

# THE PROPOSED AMENDMENTS FOR THE SANNASPOS PV SOLAR ENERGY FACILITY.

Free State Province, South Africa

Social Impact Assessment Statement

August 2023



**Prepared for:**

Sannaspos Solar PV Project (Pty) Ltd  
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## REPORT DETAILS

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<b>Title</b>	:	Proposed Amendments for the Sannaspos Solar PV Energy Facility Social Statement
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<b>Report Revision</b>	:	Revision 1
<b>Date</b>	:	August 2023

**When used as a reference this report should be cited as:** Savannah Environmental's (2023) Social Impact Assessment Statement for the proposed Sannaspos Solar PV project, Free State Province.

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## **SPECIALIST DECLARATION OF INTEREST**

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I, Cornelius Holtzhausen, declare that –

- » I act as the independent specialist in this application.
- » I will perform the work relating to the application objectively, even if this results in views and findings that are not favourable to the applicant.
- » I declare that there are no circumstances that may compromise my objectivity in performing such work.
- » I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity.
- » I will comply with the Act, Regulations, and all other applicable legislation.
- » I have no, and will not engage in, conflicting interests in the undertaking of the activity.
- » I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing – any decision to be taken with respect to the application by the competent authority, and – the objectivity of any report, plan, or document to be prepared by myself for submission to the competent authority.
- » All the particulars furnished by me in this form are true and correct.
- » I realise that a false declaration is an offence in terms of Regulation 48 and is punishable in terms of section 24F of the Act.

Cornelius Holtzhausen

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Name

July 2023

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Date



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Signature

## EXECUTIVE SUMMARY

### Background

Sannaspos Solar PV (Pty) Ltd received an Environmental Authorisation for the proposed Sannaspos PV Plant Phase 1 and associated infrastructure, located on Portion 0 of Farm 1808 Besemkop and Portion 0 of Farm 2962 Lejwe, within the Mangaung Metropolitan Municipality, Free State Province in May 2013 (DFFE Reference No.: 14/12/16/3/3/2/360/1). The proposed facility will have a contracted capacity of 75MW (90MW installed capacity) and will include the following infrastructure:

- » PV arrays and inverters
- » Cabling between project components, laid underground as far as possible
- » An on-site 132kV Independent Power Producer (IPP) substation to facilitate the grid connection
- » Internal access roads.
- » Guardhouse
- » Laydown, Campsite, and assembly area.
- » Office and Control Centre.

Sannaspos Solar PV Project (Pty) Ltd is proposing to amend the Environmental Authorisation (EA) by extending the EA validity by an additional two (2) years. Extension of the validity of the EA will ensure that the EA remains valid for the undertaking of the authorised activities. The project is a preferred bidder project under Round 5 of the Renewable Energy IPP Procurement Programme (REIPPPP) and construction is planned to commence in the near future following Financial and Commercial Close.

Savannah Environmental has been appointed as the Registered Environmental Assessment Practitioner (EAP) to prepare the Application. The EA Amendment will be completed in terms of Regulation 30(1)(a) of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, including additional specialist studies and public participation required by the National Department of Forestry, Fisheries and the Environment (DFFE). This document serves as inputs for an amendment process in terms of the social impacts identified in the original report for the EA in 2012 undertaken by Savannah Environmental (Pty) Ltd.

### Updated socio-economic context.

Based on the available secondary data sources, the demographics in the area are similar to the early 2010s, and the same can be said about the baseline economic data, service delivery access, and other facets of society. While there have been a few more solar developments in the area, the cumulative effect of these tends to have a positive impact on the environment and the social status of the area.

### Implications of the proposed amendments on previously identified impacts, including mitigation & enhancement measures

The amendment as stated above is simply to adjust the Environmental Authorisation period and has little material bearing on the project or its function or footprint. The amendment is unlikely to add additional social impacts to what is currently understood in the area. An amendment would likely give the developer more time to implement and follow through on the construction and operation of the solar facility.

### Cumulative impacts

The proposed Sannaspos Solar PV project, together with existing and proposed renewable developments, will assist in enabling efficient and effective expansion of key infrastructure to satisfy local and national grid requirements. The implementation of this project would therefore assist/ strengthen the electricity network of the South African National Grid, meeting the growing demand for electricity in the area and improving service quality and reliability. Reliable, i.e., uninterrupted, supply of electricity to the country is one of the prerequisites for development and economic growth as businesses.

Having a number of these kinds of developments in the area would likely mean an increase in the visual impact and sense of place. The other sites are rather spread out, however, so the extent of the impact would be mitigated.

### **Concluding remarks**

The specialist assessed the proposed amendments and confirmed that there is no significant change to the affected social environment or the scope and nature of the proposed project. Therefore, from a socio-economic perspective, there is no reason why the proposed amendment should not be authorised.

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## ACRONYMS

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DFFE	Department of Forestry Fisheries and the Environment
DM	District Municipality
EA	Environmental Authorisation
EIA	Environmental Impact Assessment
FSPGDS	Free State Provincial Growth and Development Strategy
GDP	Gross Domestic Product
GN	General Notice
GVA	Gross Value Added
IDP	Integrated Development Plan
IPP	Independent Power Producer
km	Kilometre
kV	Kilovolt
LM	Local Municipality
MMM	Mangaung Metropolitan Municipality
MW	Mega Watt
NEMA	National Environmental Management Act (No. 107 of 1998)
PV	Photovoltaic
RDP	Rural Development Plan
SDF	Spatial Development Framework
SIA	Social Impact Assessment
UISP	Upgrading of Informal Settlement Plan

# 1. INTRODUCTION

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Sannaspos Solar PV (Pty) Ltd received an Environmental Authorisation for the proposed Sannaspos PV Plant Phase 1 and associated infrastructure, located on Portion 0 of Farm 1808 Besemkop and Portion 0 of Farm 2962 Lejwe, within the Mangaung Metropolitan Municipality, Free State Province in May 2013 (DFFE Reference No.: 14/12/16/3/3/2/360/1). The proposed facility will have a contracted capacity of 75MW (90MW installed capacity) and will include the following infrastructure:

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Savannah Environmental has been appointed as the Registered Environmental Assessment Practitioner (EAP) to prepare the Application. The EA Amendment will be completed in terms of Regulation 29 Amendments to be applied for in terms of Part 1, of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, including additional specialist studies and public participation required by the National Department of Forestry, Fisheries and the Environment (DFFE). This document serves as inputs for an amendment process in terms of the social impacts identified in the original report for the EA in 2012 undertaken by Savannah Environmental (Pty) Ltd.

The Sannaspos photovoltaic (PV) project is located in the Free State Province, the map below (**Figure 1-1**) shows the proposed location of the development. The proposed facility will have a contracted capacity of 75MW (90MW installed capacity) and will include the following infrastructure:

- » PV arrays and inverters
- » Cabling between project components, laid underground as far as possible
- » An on-site 132kV Independent Power Producer (IPP) substation to facilitate the grid connection
- » Internal access roads.
- » Guardhouse
- » Laydown, Campsite, and assembly area.
- » Office and Control centre.

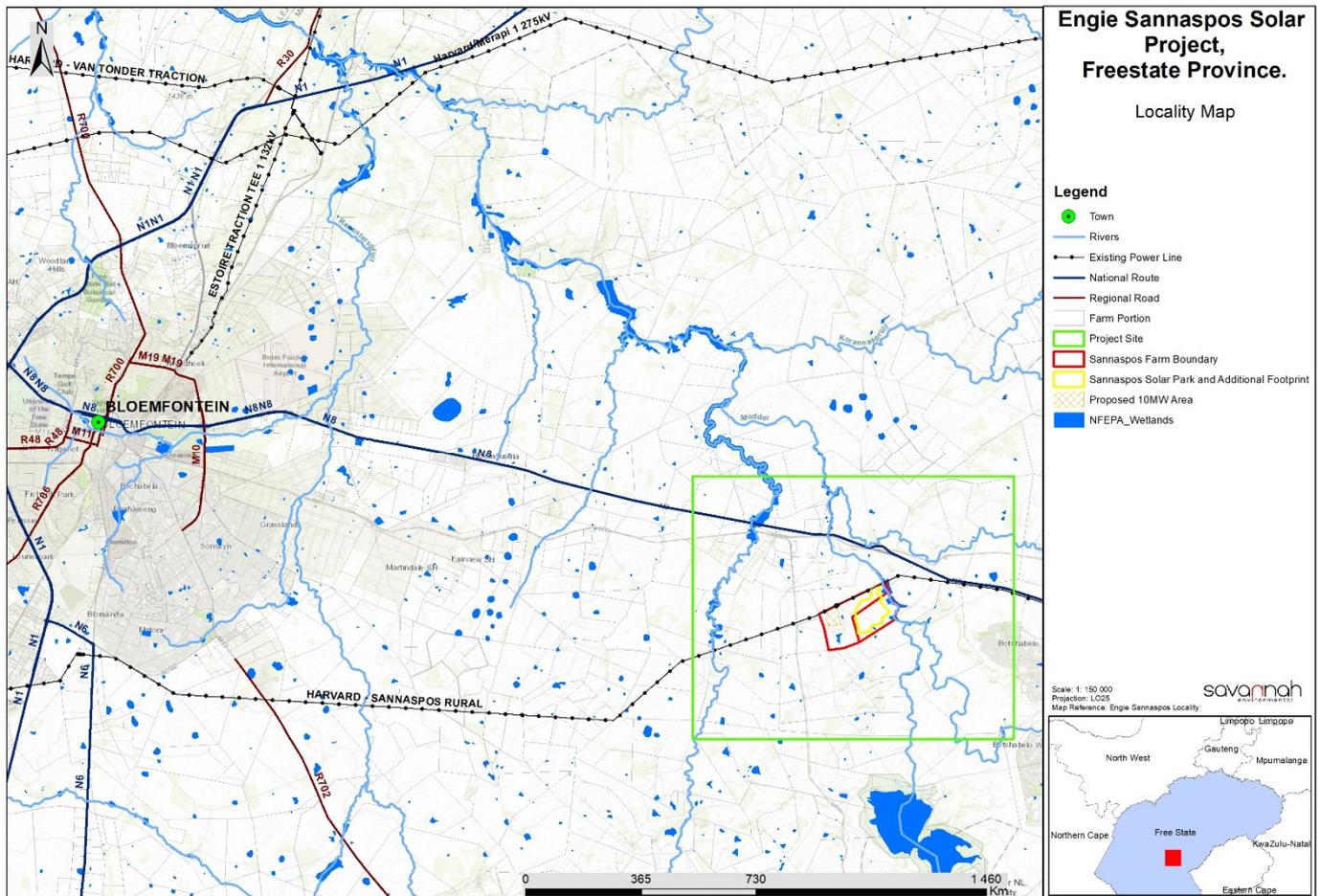


Figure 1-1: Sannospos Solar PV Energy Facility Location

## 2. AMENDMENT APPROACH

In line with the Environmental Impact Statement (EIA) Regulations of 2014 as well as the new National Environmental Management Act, 107 of 1998 (NEMA) General Notice (GN) 320 regulations, this report needs to:

- » Confirm the status of the environment compared to that at the time of the original assessment to make a statement as to whether the environment has changed since the original assessment. Since the original report was completed in 2012, and again in 2022, an updated socio-economic profile has therefore been provided.
- » Provide an indication as to whether the impact rating as provided in the initial assessment remains valid and if mitigation measures provided are still applicable or if new ones need to be included.
- » An indication if any new assessments/guidelines which were not included as part of the initial assessment must be taken into consideration and addressed in the report.
- » A description and assessment of any changes to the environment that has occurred since the initial EA was issued.
- » A description and an assessment of the surrounding environment in relation to new developments or changes in land use which might impact the project:
  - Within a 30km radius
  - Cumulative impacts

### 3. UPDATED SOCIO-ECONOMIC OVERVIEW

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The purpose of this section is to provide an update on the previously presented socio-economic context of the Free State Province and Mangaung Metropolitan Municipality (MMM). This section provides insight into the relative size and structure of the local economy. Various demographic and economic indicators will be discussed and analysed to assess potential impacts that are bearing on the surrounding areas under study. The data available at the time of the original study is compared to the latest available data to identify any specific indicator changes that could have an impact on the socio-economic conditions of the study area. The original EA was accompanied by a Social Impact Assessment (SIA) in October 2012, prepared by Tony Barbour and Daniel Rogatschnig. This report will make use of the original Social Impact assessment where possible and update the socio-economic data to the most recent information.

#### 3.1. Economic Profile

As the 2012 SIA indicated, the population in the MMM had increased from 645 440 in 2001 to 752 906 in 2007 (Stats SA, 2007), a combined growth rate of 16.6 % over the previous 6 years. It translated to a growth rate of just more than 3% per annum and a projected population of ~ 900 000 people as of 2011. During the same time, the number of households increased from 188 876 to 202 762 in the corresponding years (Stats SA, 2007). The increase in the population and the number of households has been attributed to the migration of people to the area seeking better livelihood opportunities from other towns in the Free State Province, other provinces, and the neighbouring country of Lesotho. The rapid growth in population size placed pressure on the MMM to provide adequate services and prevent backlogs from developing. The challenge was exacerbated by the large number of indigent families who have migrated to the area and their inability to pay for services.

In terms of population distribution, the population was heavily skewed towards Bloemfontein. This was to be expected given the high-level levels of inequalities between the Bloemfontein and the other two major settlements of Botshabelo and Thaba Nchu. Approximately 94% of the total population of the MMM at the time was urban, while only 6% were rural.

More recent data as reflected in the MMM Integrated Development Plan (IDP) and Spatial Development Framework (SDF) show that the MMM recorded a Gross Value Added (GVA) value amounting to R 85,5 billion in 2018 which represents about 40,5% of the Free State Provincial GVA (R 218,7 billion) and 2% of the National GVA (R 4,341,3 billion). The economic growth rate of the MMM has been declining since 2012 when it was around 4,2%, compared to the 0,9% recorded in 2018. The primary sector contributes a mere 3% to the economy of the MMM while the secondary sector represents 12% of the GVA. The tertiary sector dominates the MMM's economy by contributing about 85% of the GVA. Community services (33%) and Finance (21%) are the largest contributors followed by Trade (17%) and Transport (13%). Manufacturing (6%) is the largest contributor in the Secondary Sector while Agriculture contributes about 2% and Mining only 1% to the Mangaung GVA.

#### 3.2. Employment Profile

As the 2012 SIA indicated, the creation of employment opportunities amongst semi and unskilled persons remained a challenge in the area. As a result, unemployment figures were unacceptably high at 30%. The IDP indicated that poverty levels in the MMM were very high with more than 50% of the residents earning less than R1000 per month (Stats SA, 2007). Township dwellers (Botshabelo, Thaba-Nchu and Mangaung township residents) were disproportionately affected.

More recent data shows that the MMM holds an estimated 270,389 workers (job opportunities) of which about 13,051 (5%) are in the Primary Sector, 36,511 (14%) in the Secondary Sector and 220,826 (82%) in the Tertiary Sector. Community Services (29%) and Trade (22%) are the largest contributors to employment, followed by Finance (14%) and Households (12%). Construction (7%) and Manufacturing (6%) are the largest contributors in the Secondary Sector while Agriculture contributes about 3% of all job opportunities in the Metropolitan area. The estimated unemployment rate (2018) stands at approximately 27,1% which is about 1,8 percentage points higher than the 25,3% recorded in 2011. The MMM's unemployment rate is in line with the national average but slightly less than the average for Free State Province.

Further, approximately 61% of all households in the MMM earn less than R 3,500 per month (which is the threshold for government-subsidized housing). It is important to note the fact that the average monthly household income in Mangaung/Bloemfontein (R 10,921) is about three times higher than the average household income of Botshabelo-Thaba Nchu (R 3,509).

This would indicate that while progress has been made, unemployment remains unacceptably high. It also shows that the townships are still disproportionately affected as reflected by the disparity in monthly household income between Mangaung/Bloemfontein and that of Botshabelo-Thaba Nchu.

### 3.3. Demographic Profile

In 2001 the population of the Free State was ~ 2.7 (Census 2001), an increase over the 2.64 million in 1996. The population grew at a rate of 0.6% between 1996 and 2001, which was lower than the national population growth rate of ~2% per annum for the same period. This had been attributed to a number of factors, including the declining contribution of the agricultural and the mining sectors. The impact of HIV/AIDS had also been identified as a contributing factor. The Free State Provincial Growth and Development Strategy (FSPGDS) indicated that the province's population is expected to stabilise at about 2.89 million people by 2010. In terms of the age breakdown, the largest percentage of children was found in the communal areas where 34.9% of the population were children. The lowest percentage is found in larger urban areas, where 25.6% of the population were children. The percentage of children increased from the larger urban areas (25.6%) to regional towns (27.3%), to medium-sized towns (30.8%), to small towns (32.8%), and to communal areas (34.9%). The cities had the highest percentage of youths (39.3%), while the commercial farms, communal areas, and small towns had the lowest percentage. This pattern reflects the lack of employment in the rural areas and the associated small rural towns and the tendency for the youth to migrate to the bigger urban centres to search for work. The highest percentage of elderly people were to be found in the small towns (8.4%), regional towns (8.1%), and the communal areas (7.8%).

The provinces gender statistics also reflected the tendency for males, especially younger males, to relocate in search of work. In this case the migration of males to the Free State in search of work on the mines has decreased. This was reflected by the increase in the percentage of females between 1996 and 2001. In 1996, 50.7% of the province's population was female. This increased to 52.1% in 2001. The FSPGDS notes that the main reason for the increase in the percentage of females is the decline of the mining industry and, therefore, a decline in the number of male migrant workers. The tendency for males to migrate to the cities from the urban areas in search of work is also reflected in the gender statistics. Cities (51.8%), followed by regional towns (52.6%), medium-sized and small towns (52.7%) have the lowest percentage of females compared to rural areas (53.8%) during this time. Commercial farms had the lowest percentage of females (48.9%).

The spatial patterns indicate that ~70% of the province's population was 70% urban, compared with the national percentage of just over 50%. The urban areas grew at 2.2% between 1991 and 2001. This growth placed increased pressure on the ability of municipalities to provide basic services. The towns that have experience rapid growth between 1991 include Bloemfontein and Sasolburg. The annual growth rate of Bloemfontein has been more than 3 % per annum between 1991 and 2001. The urban areas grew by 2.8 % per annum between 1991 and 1996 and by 1.5% per annum between 1996 and 2001. In real terms, this represents a growth of nearly 400 000 people between 1991 and 2001. Over the same period, rural areas experienced a population decline of 3.4 % per annum between 1991 and 1996 and an even larger decrease of 3.7% between 1996 and 2001. In this regard, the number of people residing on commercial farms has declined considerably over the past 15 years. In 1991, more than 630 000 (24.3% of the province's population) people resided on commercial farms. By 2001, this had declined to about 14.7% of the province's population.

The population of the Free State Province increased at a rate of 0,6% per annum from 2,745 million in 2011 to 2,834 million by 2016. The total population increment during this period is 89,123 people which translates to an annual increment of about 17,825 people in the province. The MMM represents approximately 28% of the provincial population. During the period 2011 to 2019, the Mangaung population increased from 775,028 to 878,834 – an increment of about 104,749 people which translates to around 13,000 people per annum. This population growth rate (1,6% per annum) is significantly higher than that of the Free State Province.

The population represents an estimated 285,385 households at an average household size of 3,1 people per household. About 65% of all households reside in Mangaung/Bloemfontein; 31% in Botshabelo-Thaba Nchu, 3% in the other small towns and 2% in the farm areas. The household increment during the period 2011 to 2019 is approximately 4,4750 which translates to approximately 5,594 households per annum. Further, about 76% of all dwelling units are formal houses while informal dwellings (backyard and informal settlements) represent about 11% of all housing stock in the municipality. In Mangaung/Bloemfontein this figure is higher at about 14% and even higher (16%) in Botshabelo/Thaba Nchu and 18% in the other small towns. Around 63% of the housing stock is fully owned and paid off; about 11% is rented; and about 8% is occupied rent-free (especially in the rural areas).

The male:female ratio in the MMM is about 48:52. The age group 0-14 represents 30% of the population in 2016 compared to 28% in 2011, and the age group 15-29 years represents about 28% in 2016. This implies that about 58% of the population is younger than 30 years.

### **3.4. Education**

As the 2012 SIA indicates the percentage of people five years and older in the Free State in 2001 who had not completed primary school and who, as a result, are classified as functionally illiterate was 43.4%. The national figure was 45.7%. Only 14.6% of people five years and older had completed Grade 12 or higher in 2001. The District Municipality (DM) with the lowest education levels was the Xhariep DM (52.5% functionally illiterate), followed by the Thabo Mofutsanyane DM (46.8%). The Motheo DM (now the MMM) had the lowest number of people over the age of five who were functionally illiterate (39%). The education levels in the Province were low and would impact the ability to promote economic growth.

The more recent data however showed a much improved situation. Those who had no schooling stood at 5.2% in 2016 which is higher than the 2011 amount of 4.3% (of people aged 20 and above). Those who completed matric also improved with 29.1% having done so in 2011, and 32.8% in 2016. Those with access to higher education remained stable over the same period at 13.1% (2011) and 13.3% (2016). The increase in levels of education would mean that there the pool of skilled workers would have grown since the initial SIA was conducted.

### **3.5. Security and Service Delivery**

As the 2012 SIA indicates, due to its relatively high state of development, Bloemfontein inevitably attracted more migrants, especially in the township of Mangaung. This resulted in a growing backlog of services. The backlogs for water stood at 8.7%; 6.9% for sanitation; 15% for roads and 26% for stormwater in 2009 (IDP, 2010/2011)). The influx of migrants to the town has also resulted in rapid growth in informal settlements due to the shortage of housing. There are an estimated 45 informal settlements in Mangaung (IDP, 2010/2011).

As indicated in the 2021/2022 IDP for MMM, there are about forty-seven known informal settlements and those that do not have access to refuse removal it is due to a lack of access roads and lack of resources to be able to collect waste. Forty-two informal settlements compared to the previous financial year of 35 informal settlements receive a waste collection service. Road conditions are generally poor across most of the areas with 90% of the bituminous road surfacing needing urgent attention to prevent moisture ingress and extend the life of the underlying pavements. Rehabilitation backlogs are also substantial with less than 35% of the pavements in very poor condition.

As far as sanitation is concerned, an estimated 84% of households have access to sanitation facilities above Rural Development Programme (RDP) standard (VIP toilet and higher). An additional 10% have pit toilets without ventilation and 6% have bucket toilets/no facilities. The backlogs in this regard are most prominent in the rural areas, Botshabelo and Thaba-Nchu. Around 3.1% have no access to electricity, 82.4% are getting refuse disposal from a local authority, private company, or other community members, and 95.9% of people are getting water from a regional or local services provider. Of those, 52% of people have piped water inside their yards, 39% have piped water inside their houses, and 4% have water gets access to water on a community stand.

### 3.6. Site Details

The site details as per the 2012 SIA indicated that Phase 2 (10MW) and Phase 1 (75MW) of the proposed Sannaspos Solar project are both located on Portion 0 of Farm 1808 Besemkop and Portion 0 of Farm 2962 Lejwe, which falls within the MMM. The updated layout (2021) of the Sannaspos PV project is illustrated in **Figure 3-1**. The site and surrounding area can be described as a typical Free State rural, farming landscape that is relatively flat with sparse natural vegetation cover.

A broader area of approximately 600 ha was being considered on the site within which the facilities were to be constructed. The broader site is bounded in the south and east by low ridges and in the west by the un-surfaced S417 secondary road. The site slopes towards the Modder River in the east, which forms the eastern boundary of the site. The Rustfontein Dam, and the associated Rustfontein Dam Nature Reserve, is located on and adjacent to the Modder River, ~7.7 km south of the southern boundary of the site. The site is bounded in the north by an Eskom power line and the Sannaspos Substation and in the west by the S417 secondary dirt road.

The capital of the Free State Province, Bloemfontein, is located ~25 km west of the site. Botshabelo is the closest settlement to the proposed development site and is located ~9 km east of the site and south of the N8. Botshabelo is located ~55km to the east of and was the single largest township development in the Free State. However, it was highly underdeveloped and lacked the most basic services. As a result, the majority of its residents relied on the City of Bloemfontein for employment and other economic activities. It was estimated that more than 17 000 people who resided in Botshabelo and Thaba Nchu commuted to Bloemfontein daily (in 2012). Thaba Nchu is located ~12km further east of Botshabelo, north of the N8, and used to be part of the former Bophuthatswana homeland. The N8, which links Bloemfontein to the west and Maseru, to the east, is located ~3.5 km north of the northern boundary of the site. Access to the site is from the N8 via the S417 secondary road. The S417 is traversed by a railway line which runs parallel to the N8. A railway crossing is located near the intersection between the N8 and the S417 secondary road.

In terms of social receptors, very few homestead or labourers' cottages were located in or close to the proposed development layout sites. The most notable of those found were on Sanna's Post, which is located ~800m east of the proposed location of Phase 1 (10MW), and on Rust-en-Vrede, which is located ~1km north of the proposed location of Phase 1 (10MW). In terms of surrounding land uses, the dominant activity was



## 4. PREVIOUSLY IDENTIFIED IMPACTS

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The EIA and SIA released in 2012 as part of the original EA granted in 2013, identified, assessed, and suggested the mitigation/enhancement of the following Socio-Economic Impacts. This report makes use of an abridged description of the 2012 SIA report, as the full report is still available.

### 4.1. Social Impacts And Mitigations Identified During The Construction Phase

#### Potential positive impacts

- » Creation of employment and business opportunities and opportunities for skills development and on-site training

#### Potential negative impacts

- » Impacts associated with the presence of construction workers on site
- » Increased risk of stock theft, poaching and damage to farm infrastructure associated with presence of construction workers on the site
- » Increased risk of veld fires associated with construction-related activities
- » Threat to safety and security of farmers associated with the presence of construction workers on site
- » Impact of heavy vehicles, including damage to roads, safety, noise and dust
- » Potential loss of grazing land associated with construction-related activities.

### 4.2. Creation Of Employment And Business Opportunities And Opportunity For Skills Development And On-Site Training

An abridged version of the 2012 SIA report suggested the following. Given the proximity of the site to Bloemfontein and the associated townships of Botshabelo and Thaba Nchu, the majority of the low and semi-skilled employment opportunities are likely to benefit members from the local community. The majority of the beneficiaries are also likely to be historically disadvantaged members of the community. The potential opportunities for the local service sector would be linked to accommodation, catering, cleaning, transport and security, etc. associated with the construction workers on the site. The majority of non-local construction workers are likely to be accommodated in the Bloemfontein This will create opportunities for local hotels, B&Bs, guest farms and people who want to rent out their houses.

The majority of benefits are likely to accrue to personnel employed by the relevant contractors. In the absence of specific commitments from the developer to employ local contractors the potential for meaningful skills development and training for members from the local communities are likely to be limited. The hospitality industry in Bloemfontein is also likely to benefit from the provision of accommodation and meals for professionals (engineers, quantity surveyors, project managers, product representatives etc.) and other (non-construction) personnel involved in the project. Experience from other large construction projects indicates that the potential opportunities are not limited to on-site construction workers but also to consultants and product representatives associated with the project.

#### Previously Recommended Assessment of No-Go Option

There is no impact as it maintains the current status quo. The potential employment and economic benefits associated with the proposed solar park would therefore be forgone. The potential opportunity costs in terms of capital expenditure, employment, skills development, and opportunities for local business are therefore regarded as negative.

#### Previously Recommended Enhancement Measures

In order to enhance local employment and business opportunities associated with the construction phase the following measures should be implemented:

#### Employment

- » Where reasonable and practical, Engie Southern Africa should appoint local contractors and implement a 'locals first' policy, especially for semi and low-skilled job categories. However, due to the low skills levels in the area, the majority of skilled posts are likely to be filled by people from outside the area.
- » Where feasible, efforts should be made to employ local contractors that are compliant with Black Economic Empowerment (BEE) criteria;
- » Before the construction phase commences Engie Southern Africa should meet with representatives from the MMM to establish the existence of a skills database for the area. If such as database exists it should be made available to the contractors appointed for the construction phase.
- » The local authorities, community representatives, and organisations on the interested and affected party database should be informed of the final decision regarding the project and the potential job opportunities for locals and the employment procedures that Engie Southern Africa intends to follow for the construction phase of the project. Where feasible, training and skills development programmes for locals should be initiated prior to the initiation of the construction phase.
- » The recruitment selection process should seek to promote gender equality and the employment of women wherever possible.

### **Business**

- » Engie Southern Africa should seek to develop a database of local companies, specifically BEE companies, which qualify as potential service providers (e.g. construction companies, catering companies, waste collection companies, security companies etc.) prior to the commencement of the tender process for construction contractors. These companies should be notified of the tender process and invited to bid for project-related work.
- » Where possible, Engie Southern Africa should assist local BEE companies to complete and submit the required tender forms and associated information.
- » The MMM, in conjunction with the local Chamber of Commerce and representatives from the local hospitality industry, should identify strategies aimed at maximising the potential benefits associated with the project.

Note that while preference for local employees and companies was recommended, it is recognised that a competitive tender process may not guarantee the employment of local labour for the construction phase.

### **4.3. Impacts Associated With The Presence Of Construction Workers On Site**

Previous recommendations noted that the presence of construction workers posed a potential risk to family structures and social networks in the area. In addition, there were a number of potentially vulnerable farming activities, such as livestock farming. The potential threat to farming activities is discussed below. While the presence of construction workers does not in itself constitute a social impact, the manner in which construction workers conduct themselves can impact on the local community. In this regard, the most significant negative impact is associated with the disruption of existing family structures and social networks.

#### **Assessment of No-Go Option**

There was no impact previously identified as the no-go option would maintained the current status quo. The potential positive impacts on the local economy associated with the additional spending by construction workers in the local economy will also be lost.

#### **Recommended mitigation measures.**

- » The potential risks associated with construction workers can be mitigated. The aspects that should be covered include:

- » Where possible, Engie Southern Africa should make it a requirement for contractors to implement a 'locals first' policy for construction jobs, specifically semi and low-skilled job categories. This will reduce the potential impact that this category of worker could have on local family and social networks;
- » Engie Southern Africa should consider the need to establish a Monitoring Forum (MF) for the construction phase which should be established before the construction phase commences and should include key stakeholders, including representatives from the local community, local councillors, farmers, and the contractor. The role of the MF would be to monitor the construction phase and the implementation of the recommended mitigation measures. The MF should also be briefed on the potential risks to the local community associated with construction workers;
- » Engie Southern Africa and the contractor should, in consultation with representatives from the MF, develop a Code of conduct for the construction phase. The code should identify what types of behaviour and activities by construction workers are not permitted. Construction workers that breach the code of good conduct should be dismissed. All dismissals must comply with the South African labour legislation;
- » Engie Southern Africa and the contractor should implement an HIV/AIDS awareness programme for all construction workers at the outset of the construction phase;
- » The movement of construction workers on and off the site should be closely managed and monitored by the contractors. In this regard the contractors should be responsible for making the necessary arrangements for transporting workers to and from site on a daily basis;
- » The contractor should make the necessary arrangements for allowing workers from outside the area to return home over weekends and or on a regular basis during the 12 month construction phase. This would reduce the risk posed by construction workers to local family structures and social networks;
- » It is recommended that no construction workers, with the exception of security personnel, should be permitted to stay overnight on the site. This will make it possible to manage the potential impacts effectively.

#### **4.4. Increased Risk Of Stock Theft, Poaching And Damage To Farm Infrastructure Associated With Presence Of Construction Workers On The Site**

The presence of construction workers on the site increases the potential risk of stock theft and poaching. The movement of construction workers on and off the site also poses a potential threat to farm infrastructure, such as fences and gates, which may be damaged. Stock and game losses may also result from gates being left open and/or fences being damaged.

##### **Assessment of No-Go Option**

There was no impact identified as the no-go option was considered to maintain the current status quo.

##### **Recommended mitigation measures**

The mitigation measures that can be considered to address the potential impact on livestock, game, and farm infrastructure include:

- » Engie Southern Africa should enter into an agreement with the affected landowner/s whereby the company will compensate for damages to farm property and disruptions to farming activities. This includes losses associated with stock theft and damage to property etc.;
- » Engie Southern Africa should investigate the option of establishing an MF (see above) that includes local farmers and develop a Code of Conduct for construction workers. Should such a MF be required it should be established prior to commencement of the construction phase. The Code of Conduct should be signed by Engie Southern Africa and the contractors before the contractors move onto the site;
- » Engie Southern Africa should hold contractors liable for compensating farmers and communities in full for any stock losses and/or damage to farm infrastructure that can be linked to construction workers. This should be contained in the Code of Conduct to be signed between Engie Southern Africa, the contractors and neighbouring landowners. The agreement should also cover losses and costs associated with fires caused by construction workers or construction-related activities (see below);

- » The EMP must outline procedures for managing and storing waste on-site, specifically plastic waste that poses a threat to livestock if ingested;
- » Contractors appointed by Engie Southern Africa should ensure that all workers are informed at the outset of the construction phase of the conditions contained on the Code of Conduct, specifically consequences of stock theft and trespassing on adjacent farms.
- » Contractors appointed by Engie Southern Africa should ensure that construction workers who are found guilty of stealing livestock, poaching and/or damaging farm infrastructure are dismissed and charged. This should be contained in the Code of Conduct. All dismissals must be in accordance with South African labour legislation;
- » The housing of construction workers on the site should be limited to security personnel.

#### **4.5. Increased Risk Of Stock Theft, Poaching And Damage To Farm Infrastructure Associated With Presence Of Construction Workers On The Site**

Previous assessment suggested that the presence of construction workers and construction-related activities on the site poses an increased risk of veld fires that in turn would pose a threat to the livestock, wildlife, and farmsteads in the area. In the process, farm infrastructure may also be damaged or destroyed and human lives threatened. The farms in the area are dependent on grazing and any loss of grazing due to a fire would therefore impact negatively on the livelihoods of the affected farmers. The potential risk of veld fires is likely to be higher during the dry, winter months. The local farmers in the area did however indicate that veld fires were not a major concern.

##### **Assessment of No-Go Option**

There was no impact identified as the no-go option was considered to maintain the current status quo.

##### **Recommended Mitigation Measures**

Previous recommendation suggested that Engie Southern Africa should enter into an agreement with the affected landowners whereby the company will compensate for damages. This includes losses associated with veld fires. In addition, the potential increased risk of veld fires can be effectively mitigated. The detailed mitigation measures are outlined in the EMP for the construction and operation phases. The aspects that should be covered include:

- » Contractor to ensure that open fires on the site for cooking or heating are not allowed except in designated areas;
- » Contractor to ensure that construction-related activities that pose a potential fire risk, such as welding, are properly managed and are confined to areas where the risk of fires has been reduced. Measures to reduce the risk of fires include clearing working areas and avoiding working in high wind conditions when the risk of fires is greater. In this regard, special care should be taken during the high risk dry, windy winter months;
- » Contractor to provide adequate firefighting equipment on-site;
- » Contractor to provide fire-fighting training to selected construction staff;
- » As per the conditions of the Code of Conduct, in the advent of a fire being caused by construction workers and or construction activities, the appointed contractors must compensate farmers for any damage caused to their farms. The contractor should also compensate the firefighting costs borne by farmers and local authorities.

#### **4.6. Impact Of Heavy Vehicles, Including Damage To Roads, Safety, Noise And Dust**

Previous recommendation suggested that the movement of heavy construction vehicles during the construction phase has the potential to damage roads and create noise, dust, and safety impacts for other road users and local communities in the area. Access to the site is via the N8, which links Bloemfontein in the west and Ladybrand and Maseru in the west. The number of heavy vehicle trips associated with the Phase 1 of the Sannospos Solar project is likely to be low due to the relatively small size of Phase 1 (75MW). The social impacts associated with the movement of construction-related traffic along the N8 are therefore likely to be low. The impact on local farm roads is also likely to be low due to the relatively low volume of heavy vehicles associated with Phase 1.

### **Assessment of No-Go Option**

There was no impact identified as the no-go option was considered to maintain the current status quo.

### **Recommended Mitigation Measures**

Previous recommendation suggested that Engie Southern Africa should enter into an agreement with the affected landowners whereby the company will compensate for damages. This includes losses associated with damage to local internal farm roads that are affected by the site. In addition, the potential impacts associated with heavy vehicles and dust can be effectively mitigated. The aspects that should be covered include:

- » The timing of the transport of components to the site should be timed to avoid peak traffic times in the morning (06h00-08h00) and the evening (17h00-18h00) so as to avoid the potential impact on workers commuting from Botshabelo and Thaba Nchu to Bloemfontein.
- » The contractor must ensure that damage caused to roads by the construction related activities, including heavy vehicles, is repaired before the completion of the construction phase. The costs associated with the repair must be borne by the contractor;
- » Dust suppression measures must be implemented for heavy vehicles such as wetting of gravel roads on a regular basis and ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers;
- » All vehicles must be road-worthy and drivers must be qualified and made aware of the potential road safety issues and need for strict speed limits.

### **4.7. Potential Loss Of Grazing Land Associated With Construction-Related Activities.**

Previous recommendation suggested that the activities associated with the construction phase have the potential to damage farmlands and result in a loss of land available for grazing. The significance of the impacts is to some extent mitigated by the fact that the farming activities on the site are confined to sheep and cattle farming as opposed to crops. In addition, it is standard practice for the affected landowner/s to enter into a lease agreement that includes monthly rentals. The loss of productive farmland would therefore be offset by such an agreement. It may also be possible for livestock and game to graze between the PV panels. The final disturbance footprint can also be reduced by careful site design and placement of components. In addition, the footprint associated with a 10MW solar facility is likely to be relatively small. The impact on farmland associated with the construction phase can therefore be mitigated by minimising the footprint of the construction-related activities and ensuring that disturbed areas are fully rehabilitated on completion of the construction phase.

### **Assessment of No-Go Option**

There was no impact identified as the no-go option was considered to maintain the current status quo.

### **Recommended mitigation measures**

The potential impacts associated with damage to and loss of farmland can be effectively mitigated. The aspects that should be covered include:

- » The footprint associated with the construction-related activities (access roads, construction platforms, workshop etc.) should be minimised;
- » An Environmental Control Officer (ECO) should be appointed to monitor the establishment phase of the construction phase;
- » All areas disturbed by construction-related activities, such as access roads on the site, construction platforms, workshop area etc., should be rehabilitated at the end of the construction phase;
- » The implementation of a rehabilitation programme should be included in the terms of reference for the contractor/s appointed. The specifications for the rehabilitation programme should be drawn up by the Environmental Consultants appointed to undertake the EIA;
- » The implementation of the Rehabilitation Programme should be monitored by the ECO.

#### **4.8. Social Impacts And Mitigations/Enhancements Identified During The Operation Phase**

##### **Potential positive impacts**

- » Creation of employment and business opportunities.
- » The operational phase will also create opportunities for skills development and training;
- » Benefits associated with the establishment of a Community Trust;
- » The establishment of renewable energy infrastructure.

##### **Potential negative impacts**

- » The visual impacts and associated impact on the sense of place;
- » Potential impact on tourism.

#### **4.9. Creation Of Employment And Business Opportunities**

Previous recommendation suggested that given the location of the proposed facility the majority of permanent staff is likely to reside in Bloemfontein, Botshabelo and Thaba Nchu. In terms of accommodation options, a percentage of the permanent employees may purchase houses in the town, while others may decide to rent. Both options would represent a positive economic benefit for the region. In addition, a percentage of the monthly wage bill earned by permanent staff would be spent in the regional and local economy, which will benefit local businesses in these towns. The benefits to the local economy will extend over the 20-year operational lifespan of the project. The local hospitality industry in Bloemfontein is also likely to benefit from the operational phase. These benefits are associated with site visits by company staff members and other professionals (engineers, technicians etc.) who are involved in the company and the project but who are not linked to the day-to-day operations.

##### **Assessment of No-Go Option**

Previous recommendation suggested that there is no impact as it maintained the current status quo. However, the potential opportunity costs in terms of the loss of employment and skills and development training would be lost which would also represent a negative impact.

##### **Recommended Enhancement Measures**

The enhancement measures to enhance local employment and business opportunities during the construction phase, also apply to the operational phase. In addition:

- » Engie Southern Africa should implement a training and skills development programme for locals during the first 5 years of the operational phase. The aim of the programme should be to maximise the number of South Africans and locals employed during the operational phase of the project.

#### **4.10. Benefits Associated With The Establishment of A Community Trust**

Previous recommendation suggested that in terms of the Request for Proposal document prepared by the Department of Energy all bidders for operating licences for renewable energy projects must demonstrate how the proposed development will benefit the local community. This can be achieved by establishing a Community Trust which is funded by revenue generated from the sale of energy. The proponents have indicated that the Local Community Trust (the "Trust") will be established upon successful award of Preferred Bidder status. The Trust will be given a 2.5% shareholding in the Project Company. The Trust will be administered by a Board of Trustees made up of key local stakeholders. The Trustees will include persons representing the following organisations: Solar Project (the "Project Company", a local Accountant, a local Lawyer and three local Non-Government Organisations.

The objective of the Trust is to make a tangible difference to the lives of the people in the Local Community for not only the 20-year life of the project but beyond. The development priorities for the trust will be linked to the objectives and projects listed in the local IDP. The proponent believes that the comprehensive and inclusive nature of the IDP stakeholder engagement process employed by the Municipality makes it the ideal mechanism for determining the socio-economic development priorities for the Trust. The shareholders of the

Project Company believe that the proposed socio-economic development strategy has the following key advantages:

- » The Trust is independent of any political involvement;
- » Although independent of the local municipality, the trust will still be able to assist in addressing the needs of the community. Constant engagement with the municipality will ensure this occurs;
- » The Trust makes use of an existing transparent, inclusive and locally focused method of determining socio-economic priorities
- » The funding mechanism allows for an immediate flow of funds into the Trust, in turn allowing for an immediate ability to fund socio-economic projects

Community Trusts provide an opportunity to generate a steady revenue stream that is guaranteed for a 20 year period. This revenue can be used to fund development initiatives in the area and support the local community. The long term duration of the revenue stream also allows local municipalities and communities to undertake long term planning for the area. The revenue from the proposed solar park can be used to support a number of social and economic initiatives in the area, including:

- » Creation of jobs;
- » Education;
- » Support for and provision of basic services;
- » School feeding schemes;
- » Training and skills development;
- » Support for SMME's.

In addition, the establishment of a solar park is not likely to have a significant impact on the current agricultural land uses that underpin the local economic activities in the area. The loss of this relatively small area will not impact the current and future farming activities. Experience has however also shown that Community Trusts can be mismanaged. This issue will need to be addressed in order to maximise the potential benefits associated with the establishment of a Community Trust.

#### **Assessment of No-Go Option**

Previous recommendation suggested that there is no impact as it maintains the current status quo. However, the potential opportunity costs in terms of supporting the social and economic development in the area would be lost. This would also represent a negative impact.

#### **Recommended Enhancement Measures**

In order to maximise the benefits and minimise the potential for corruption and misappropriation of funds the following measures should be implemented:

- » Clear criteria for identifying and funding community projects and initiatives in the area should be identified. The criteria should be aimed at maximising the benefits for the community as a whole and not individuals within the community;
- » Strict financial management controls, including annual audits, should be instituted to manage the funds generated for the community trust from the solar park.

### **4.11. The Establishment Of Renewable Energy Infrastructure**

Previous recommendation suggested that South Africa relied on coal-powered energy to meet more than 90% of its energy needs. As a result, South Africa was one of the highest per capita producers of carbon emissions in the world and Eskom, as an energy utility, has been identified as the world's second-largest producer of carbon emissions. The establishment of a clean, renewable energy facility will therefore reduce, albeit minimally, South Africa's reliance on coal-generated energy and the generation of carbon emissions into the atmosphere.

#### **Assessment of No-Go Option**

Previous recommendation suggested that the No-Development option would represent a lost opportunity for South Africa to supplement its current energy needs with clean, renewable energy. This would represent a negative opportunity cost.

#### **Recommended mitigation measures**

The establishment of the proposed facility is a mitigation measure in itself. In order to maximise the benefits of the proposed project Engie Southern Africa should:

- » Implement a training and skills development programme for locals during the first 5 years of the operational phase. The aim of the programme should be to maximise the number of South Africans employed during the operational phase of the project;

### **4.12. The Visual Impacts And Associated Impact On The Sense Of Place**

Previous recommendation suggested that the components associated with the proposed facility will have a visual impact and, in so doing, impact on the landscape and rural sense of the place of the area. Care, therefore, needs to be taken to ensure that the development of large renewable energy projects does not impact the visual character and sense of place of the landscape.

#### **Assessment of No-Go Option**

There was no impact identified as the no-go option was considered to maintain the current status quo.

#### **Recommended mitigation measures**

The recommendations contained in the VIA should be implemented.

### **4.13. Potential Impact On Tourism**

Previous recommendation suggested that the FSPGDP identifies tourism as an important economic sector. However, based on the findings of the SIA and the VIA the proposed facility is not likely to impact the tourism sector in the area or the Province. This is due to the location of the proposed project and the area's altered sense of place. The significance of this issue is therefore rated as low negative. In some instances, the plant may also attract tourists to the area. However, the significance of this potential benefit is also rated as low positive.

#### **Assessment of No-Go Option**

The No-Development option would represent a lost opportunity to create a facility that has the potential to attract visitors to the area. This would represent a negative opportunity cost.

#### **Recommended enhancement measures**

In terms of mitigating the visual impacts, it is virtually impossible to hide the facility. The impact on the sense of place in the area cannot, therefore, be effectively mitigated. In terms of efforts to enhance the proposed benefits of tourism:

- » Engie Southern Africa should liaise with representatives from the MMM and local tourism representatives to raise awareness of the proposed facility;
- » Engie Southern Africa should investigate the option of establishing a renewable energy interpretation centre at the entrance to the site. The centre should include a viewing area where passing visitors can stop and view the site;

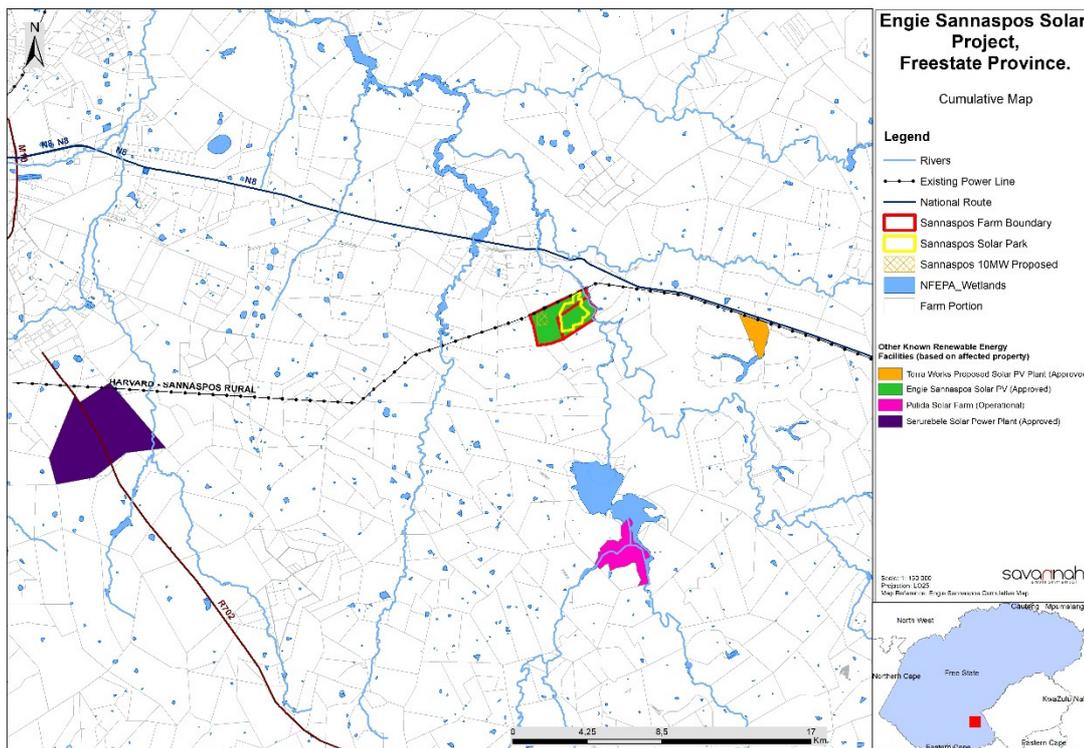
### **4.14. Cumulative Impacts**

The 2012 SIA report noted the following: Although there appear to be no guidelines for solar facilities, the Australian Wind Farm Development Guidelines (Draft, July 2010) indicate that the cumulative impact of multiple wind farm facilities is likely to become an increasingly important issue for wind farm developments in Australia. This finding is also likely to apply to solar energy plants and is also likely to be the case in South Africa.

The key concerns in terms of cumulative impacts are, as in the case of wind farms, also likely to be linked to visual impacts and the impact on rural, undeveloped landscapes.

The impact of solar facilities on the landscape is therefore likely to be a key issue in South Africa, specifically given South African's strong attachment to the land and the growing number of solar plant applications. With regard to the area, there do not appear to any other solar parks proposed in the immediate vicinity of the site. The potential for significant cumulative impacts is therefore likely to be low. However, the relevant environmental authorities should be aware of the potential cumulative impacts associated with the establishment of renewable energy facilities in the area when evaluating applications.

More recently, there were several renewable energy facilities approved. The ones in the vicinity of the proposed site are illustrated in **Figure 4-1**.



**Figure 4-1: Cumulative map for Sannaspos Solar project**

The following Solar facilities have been approved and operational in the area:

- Terra Works Proposed Solar PV Plant (Approved)
- Pulida Solar Farm (Operational)
- Serurebele Solar Power Plant (Approved)

The proposed Sannaspos Solar PV project, together with existing and proposed renewable developments, will assist in enabling efficient and effective expansion of key infrastructure to satisfy local and national grid requirements. The implementation of this project would therefore assist/ strengthen the electricity network of the South African National Grid, meeting the growing demand for electricity in the area and improving service quality and reliability. Reliable, i.e., uninterrupted, supply of electricity to the country is one of the prerequisites for development and economic growth as businesses.

Having a number of these kinds of developments in the area would likely mean an increase in the visual impact and sense of place. The other sites are rather spread out, however, so the extent of the impact would be mitigated.

#### 4.15. Specialist Opinion on Previously Identified Impacts

Based on the available secondary data sources, the demographics in the area are similar to the early 2010s, and the same can be said about the baseline economic data, service delivery access, and other facets of society. While there have been a few more solar developments in the area, the cumulative effect of these tend to have a positive impact on the environment and the social status of the area.

The author sees no reason to doubt or contradict the findings as laid out in the original Final Scoping and Environmental Impact Report that formed part of the EA authorised in 2013. The author concurs with the impacts and ratings as identified. The rural nature of the project meant that few of the socio-economic indicators related to the project have significantly changed since the undertaking of the original EA. Similarly, no new communities or other developments have been established close to or on the project site. As such, it is unlikely that new social impacts have arisen, similarly, no changes to the original assessment ratings are likely.

The amendment would give the developers more time to bring the project to financial closure and thus for the impacts resulting from the project to occur. The Sannaspos Solar PV project is unlikely to result in permanent damaging social impacts and has the potential to result in significant positive impacts both as a lone project and cumulatively. The project will likely result in a number of socio-economic opportunities for the region, which in turn will result in social benefits. The positive cumulative impacts include the creation of employment, skills development and training opportunities, and downstream business opportunities. The cumulative benefits to the local, and regional economy through employment and procurement of services are more considerable than that of the Sannaspos Solar PV project alone.

#### Assumptions and limitations

- It is assumed that the original information on the project and the updated information from the IDP and other sources are accurate and up to date.
- Based on the experience of the consultant there are no limitations that have a material impact on the social statement.

## 5. CONCLUSION

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To conclude, the specialist assessed the proposed amendments and confirms that there is no significant change to the affected social environment or the scope and nature of the proposed project. Therefore, from a socio-economic perspective, there is no reason why the proposed amendment should not be authorised.



**Cornelius Holtzhausen**

Public Participation and Social Consultant

Email: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)

**APPENDIX A: EXTERNAL PEER REVIEW LETTER**

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**EXTERNAL PEER REVIEW**

**SOCIAL IMPACT ASSESSMENT STATEMENT FOR  
THE PROPOSED AMENDMENTS FOR THE  
SANNASPOS SOLAR PV ENERGY FACILITY**

**REVIEW REPORT**

August 2023

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**Prepared by:**

Dr Sithandiwe Khoza  
Senior Independent Social Consultant

Pretoria, South Africa  
(Cell) 071 350 3859  
(E-Mail) sithandiwe.khoza@yahoo.com

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## INTRODUCTION

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Savannah Environmental appointed Dr Sithandiwe Khoza to undertake an independent Peer Review of the Social Impact Assessment (SIA) Statement prepared for the proposed amendments for the Sannaspos Solar PV Energy facility in the Free State Province of South Africa. This document presents the outcomes of the Peer Review of the mentioned statement.

The sub-sections below provide an overview on the terms of reference as provided by Savannah Environmental, the reviewing approach employed by the independent reviewer and independent reviewer's professional experience.

## TERMS OF REFERENCE AND APPROACH

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The terms of reference as provided by Savannah Environmental where to undertake an independent review of the SIA amendment statement for the Sannaspos Solar PV Project to ensure that the report meets the following;

- The general acceptable standards for technical report writing including the contents of the amendment document; and
- General acceptable standards for preparing SIA amendment statements.

The approach used by the independent reviewer entailed the following key aspects:

- Technical review, which entailed reviewing the following;
  - Structure and flow of the document;
  - Quality of the amendment document contents
- Approach used to prepare the SIA amendment statement

## INDEPENDENT REVIEWER PROFESSIONAL EXPERIENCE

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Dr Khoza is an independent social consultant with practical experience associated with undertaking Social Impact Assessments and associated review for quality assurance, a copy of Dr Khoza's CV has been attached as Annexure B. From 2013-2017, she has provided agricultural services to government beneficiaries in the agricultural sector with the mandate of improving food and nutrition security in rural communities. During this period, she has also conceptualized, implemented (using qualitative and quantitative research methods) and managed a number of socio-economic research projects, including Social Impact Assessments. From 2018-present, she has worked and currently works in the environmental consulting space providing social services to clients in Africa, who are in the financial, infrastructure, mining, energy and oil & gas sectors with the mandate of either obtaining environmental authorisation, obtaining investment funding from international financial institutions (*World Bank, African Development Bank and European Bank for Reconstruction & Development*) or maintaining their environmental and social license to operate as per in-country legislation and regulations, while contributing positively to the local economic development of the communities in which they operate. As such, undertaking Social Impact Assessments (SIAs) is one her core skills.

## FINDINGS OF THE PEER REVIEW

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This section presents the outcomes of the review, taking into consideration the technical and adopted approach findings.

### TECHNICAL FINDINGS

#### STRUCTURE AND CONTENTS OF THE DOCUMENT

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- **Acronyms:** Some acronyms are missing from the list, update accordingly. Acronyms should be written in full; 1<sup>st</sup> use.
- **Executive summary:** The specialist should also mention that the proposed amendments trigger Part 1 amendments, also provide context on previous authorised project.
- **NEMA Regulations:** The specialist refers to Section 30 of the EIA regulations to motivate for a Part 1 amendment, however, Section 30 details the process and consideration of the application for amendment and decision. The specialist should refer to Section 29 of the EIA regulations instead.

#### AMENDMENT STATEMENT APPROACH

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The approach adopted by the specialist is of an acceptable standard, the following is recommended for consideration;

##### **Baseline data**

The specialist has provided sufficient overview on the socio-economic profile of the study area. Although outdated sources are also used, it is assumed that this is the latest available data otherwise the specialist should consider revising the baseline to include latest data.

##### **Previously identified impacts**

The specialist refers to impacts as identified in the draft reports. The specialist should provide an overview of previously identified impacts as per the final reports (SIA/EIA/BA) which informed the granted Environmental authorisation.

Also, the specialist should remember that these are previously identified impacts, as such, the specialist should be mindful of the tense.

##### **Previously identified mitigation/ enhancement measures**

The specialist should remember that these are previously recommended measures, as such, the specialist should be mindful of the tense.

##### **Conclusion**

The approach adopted by the specialist is of an acceptable standard, it is however recommended that the specialist should action the recommendations made by the independent reviewer.

## **ANNEXURE B: REVIEWERS CV**

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Dr Sithandiwe Khoza  
**Senior Independent Social Consultant**  
**Pretoria South Africa**  
**(Cell) 071 350 3859**  
**(E-Mail) sithandiwe.khoza@yahoo.com**

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### **Background**

Dr Khoza is an independent social consultant with practical experience associated with undertaking Social Impact Assessments and associated review for quality assurance. From 2013-2027, she has provided agricultural services to government beneficiaries in the agricultural sector with the mandate of improving food and nutrition security in rural communities. During this period, she has also conceptualized, implemented (using qualitative and quantitative research methods) and managed a number of socio-economic research projects, including Social Impact Assessments. From 2018-present, she has worked and currently works in the environmental consulting space providing social services to clients in Africa, who are in the financial, infrastructure, mining, energy and oil & gas sectors with the mandate of either obtaining environmental authorisation, obtaining investment funding from international financial institutions (*World Bank, African Development Bank and European Bank for Reconstruction & Development*) or maintaining their environmental and social license to operate as per in-country legislation and regulations, while contributing positively to the local economic development of the communities in which they operate. As such, undertaking Social Impact Assessments (SIAs) is one her core skills.

### **EDUCATION**

Higher education:

- PhD (Research), UKZN, 2018
- MA (Research), UKZN, 2015
- PGDip (Research), UKZN, 2014
- BSS Geography and Environmental Management, UKZN, 2013

Certificates:

- Sustainability Reporting with GRI standards 2021 update, 2023
- ESG (Environmental, Social and Governance), Corporate Finance Institute, 2021
- Certificate of Merit (Research methods), UKZN, 2015

### **EMPLOYMENT RECORD**

2022-Present: Senior Independent Consultant

2022- Present: Zutari Pty Ltd, Senior Social Consultant

2020-2022: Senior Independent Consultant

2018-2020: Golder Associates Pty Ltd, Social Consultant

2018-2018: Digby Wells Environmental Pty Ltd, Social Consultant

2015-2017: Agricultural Research Council, Researcher

2013-2015: CEDARA FET college of agriculture of the KwaZulu-Natal department of Agriculture and Environmental Affairs, socio-economic development specialist

### **COUNTRY EXPERIENCE**

South Africa, Democratic Republic of Congo, Angola, Ghana, Mozambique, Kenya, and Sierra Leone.

# **EXTERNAL PEER REVIEW**

## **SOCIAL IMPACT ASSESSMENT STATEMENT FOR THE PROPOSED AMENDMENTS FOR THE SANNASPOS SOLAR PV ENERGY FACILITY**

### **REVIEW REPORT**

**August 2023**

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#### **Prepared by:**

Dr Sithandiwe Khoza  
Senior Independent Social Consultant

Pretoria, South Africa  
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(E-Mail) sithandiwe.khoza@yahoo.com

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The approach used by the independent reviewer entailed the following key aspects:

- Technical review, which entailed reviewing the following;
  - Structure and flow of the document;
  - Quality of the amendment document contents
- Approach used to prepare the SIA amendment statement

### **Independent Reviewer Professional experience**

Dr Khoza is an independent social consultant with practical experience associated with undertaking Social Impact Assessments and associated review for quality assurance, a copy of Dr Khoza's CV has been attached as Annexure B. From 2013-2017, she has provided agricultural services to government beneficiaries in the agricultural sector with the mandate of improving food and nutrition security in rural communities. During this period, she has also conceptualized, implemented (using qualitative and quantitative research methods) and managed a number of socio-economic research projects, including Social Impact Assessments. From 2018-present, she has worked and currently works in the environmental consulting space providing social services to clients in Africa, who are in the financial, infrastructure, mining, energy and oil & gas sectors with the mandate of either obtaining environmental authorisation, obtaining investment funding from international financial institutions (*World Bank, African*

*Development Bank and European Bank for Reconstruction & Development*) or maintaining their environmental and social license to operate as per in-country legislation and regulations, while contributing positively to the local economic development of the communities in which they operate. As such, undertaking Social Impact Assessments (SIAs) is one her core skills.

## Findings of the peer review

This section presents the outcomes of the review, taking into consideration the technical and adopted approach findings.

### Technical findings

#### Structure and contents of the document

- **Acronyms:** Some acronyms are missing from the list, update accordingly. Acronyms should be written in full; 1<sup>st</sup> use.
- **Executive summary:** The specialist should also mention that the proposed amendments trigger Part 1 amendments, also provide context on previous authorised project.
- **NEMA Regulations:** The specialist refers to Section 30 of the EIA regulations to motivate for a Part 1 amendment, however, Section 30 details the process and consideration of the application for amendment and decision. The specialist should refer to Section 29 of the EIA regulations instead.

### Amendment statement approach

The approach adopted by the specialist is of an acceptable standard, the following is recommended for consideration;

#### Baseline data

The specialist has provided sufficient overview on the socio-economic profile of the study area. Although outdated sources are also used, it is assumed that this is the latest available data otherwise the specialist should consider revising the baseline to include latest data.

#### Previously identified impacts

The specialist refers to impacts as identified in the draft reports. The specialist should provide an overview of previously identified impacts as per the final reports (SIA/EIA/BA) which informed the granted Environmental authorisation.

Also, the specialist should remember that these are previously identified impacts, as such, the specialist should be mindful of the tense.

**Previously identified mitigation/ enhancement measures**

The specialist should remember that these are previously recommended measures, as such, the specialist should be mindful of the tense.

***Conclusion***

The approach adopted by the specialist is of an acceptable standard, it is however recommended that the specialist should action the recommendations made by the independent reviewer.

## **Annexure B: Dr Sithandiwe Khoza's CV**

Dr Sithandiwe Khoza  
**Senior Independent Social Consultant**  
**Pretoria South Africa**  
**(Cell) 071 350 3859**  
**(E-Mail) sithandiwe.khoza@yahoo.com**

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### **Background**

Dr Khoza is an independent social consultant with practical experience associated with undertaking Social Impact Assessments and associated review for quality assurance. From 2013-2027, she has provided agricultural services to government beneficiaries in the agricultural sector with the mandate of improving food and nutrition security in rural communities. During this period, she has also conceptualized, implemented (using qualitative and quantitative research methods) and managed a number of socio-economic research projects, including Social Impact Assessments. From 2018-present, she has worked and currently works in the environmental consulting space providing social services to clients in Africa, who are in the financial, infrastructure, mining, energy and oil & gas sectors with the mandate of either obtaining environmental authorisation, obtaining investment funding from international financial institutions (*World Bank, African Development Bank and European Bank for Reconstruction & Development*) or maintaining their environmental and social license to operate as per in-country legislation and regulations, while contributing positively to the local economic development of the communities in which they operate. As such, undertaking Social Impact Assessments (SIAs) is one her core skills.

### **EDUCATION**

Higher education:

- PhD (Research), UKZN, 2018
- MA (Research), UKZN, 2015
- PGDip (Research), UKZN, 2014
- BSS Geography and Environmental Management, UKZN, 2013

Certificates:

- Sustainability Reporting with GRI standards 2021 update, 2023
- ESG (Environmental, Social and Governance), Corporate Finance Institute, 2021
- Certificate of Merit (Research methods), UKZN, 2015

### **EMPLOYMENT RECORD**

2022-Present: Senior Independent Consultant

2022- Present: Zutari Pty Ltd, Senior Social Consultant

2020-2022: Senior Independent Consultant

2018-2020: Golder Associates Pty Ltd, Social Consultant

2018-2018: Digby Wells Environmental Pty Ltd, Social Consultant

2015-2017: Agricultural Research Council, Researcher

2013-2015: CEDARA FET college of agriculture of the KwaZulu-Natal department of Agriculture and Environmental Affairs, socio-economic development specialist

### **COUNTRY EXPERIENCE**

South Africa, Democratic Republic of Congo, Angola, Ghana, Mozambique, Kenya, and Sierra Leone.