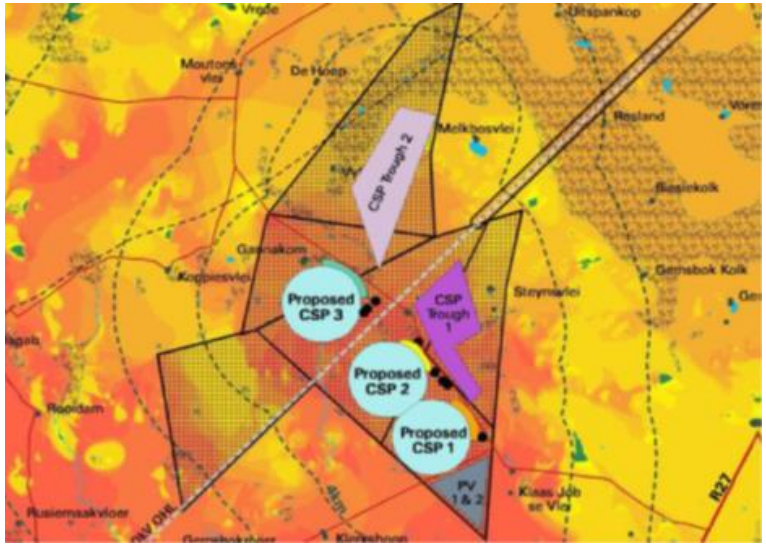
SOLARRESERVE KOTULO TSATSI ENERGY CONCENTRATED SOLAR (CSP) 1 FACILITY, NEAR KENHARDT, NORTHERN CAPE PROVINCE COMMENTS RECEIVED ON THE FINAL EIA REPORT FOLLOWING 21 DAY REVIEW PERIOD AND SUBMISSION TO DEA AND LATE COMMENTS		
NO.	**COMMENT/ISSUE RECIEVED**	**RESPONSE TO ISSUES RAISED**
1. ACKNOWLEDGMENT RECEIVED FROM NC DENC DATED 03 MAY 2016		
1.1	The Department confirms having received the Final EIA Report for environmental authorisation of the above mentioned project on 28th April 2016. As required in terms of the Environmental Impact Assessment Regulations. The application has been assigned the reference number NC/NAT/ZFM/KAI!/KEN4/2015. Kindly quote this reference number in any future correspondence in respect of the application. Please note that the responsible officer is going to be Mr. Ordain Riba and can be contacted at 060 991 4817.	Acknowledgment from the commenting authority is noted. No further comments on the application for authorisation have been received directly from DENC.
2. COMMENTS RECEIVED FROM THE DEPARTMENT OF WATER AND SANITATION DATED 04 MAY 2016		
2.1	The Department of Water & Sanitation (DWS) hereby acknowledges receipt of your draft environmental impact assessment report for the construction of the solar reserve Kotulo Tsatsi concentrated solar 1, Northern Cape Province on 13/11/2015. According to the EIA report the water for proposed project construction and operational will be sourced from Kai Garib Local Municipality, please provide the Department of Water and Sanitation with written confirmation from the municipality indicating the agreed volumes and the duration of the water supply. Also note that should the proposed development cross any dry rivers or water tributaries the department should be notified and relevant authorisation should be applied for. Please indicate if there will be any waste water that will be generated by the proposed project and how will the waste water be disposed.	It is confirmed that the CSP project will require 150 000m^3 per annum of water during the construction phase (duration approximately 36 months) and 250 000m^3 per annum of water during the operational phase (a minimum of 20 years). The confirmation from the Kai !Garib Local Municipality for the provision of water to meet these requirements during both the construction and operational phases has been provided (refer to Appendix C) and has been submitted to the DWS for their record. A water use license application will be submitted by the applicant once the project receives preferred bidder status from the Department of Energy. The relevant water use activities will be applied for as required.

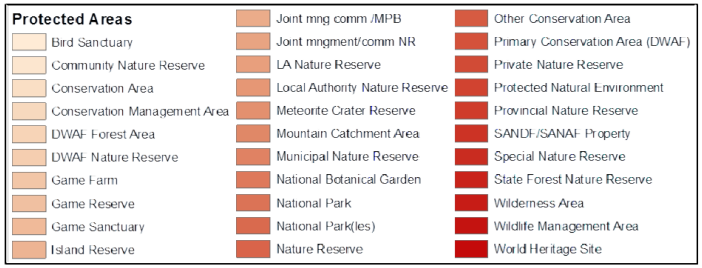
	The water user/ developer is expected to assess all the potential water uses [associated with the development] as defined under section 21 of the National Water Act, 1998 [Act 36 of 1998]. All identified water uses will need to be authorized in terms of section 40 of the National Water Act unless such a water use is permissible under section 22 of the Act. Please note that quaternary drainage region D73D is excluded from General Authorisations for taking of water from a [ground] water resource [as extended under Notice 837 in the Government Gazette of 23 September 2010]. Kindly note that energy developments / projects are not part of small industrial users and as such cannot be entitled to the water use allowance set aside for small industrial users as determined by the General Authorisation. Activities that might have an impact on water resources such as (i) storm water management (ii) waste management (iii) sanitation (iv) sedimentation and erosion (where it is not defined as a water use) (v) storage of hazardous substances, should be manged and mitigated as stated in the EMP of the Proposed Project. The Department will be content with the inclusion of these proposed management and mitigation measures in the environmental management plan for the project. Kindly note that any deviations to these measures should be communicated to DWS in writing. Due to the high number of renewable energy projects that are taking part in the Department of Energy [DOE] bidding process, the Department [DWS] has resolved to only processing applications for water use authorisations received from developers who have attained preferred bidder status. Developers who wish to submit applications for water use authorisations may however proceed to do so, with the understanding that their applications will be processed as soon as we have confirmation of their status with the	

	DOE. Attached to this letter is annexure 1 that details information, which must be submitted as part of the application for water use authorisation. As part of the requirements for the DOE proposals, the Department [DWS] will issue non-binding letters to water users / bidders as required under clauses 2.4.4.1.2 and 2.4.4.1.3 of Part B: Qualification Criteria of Tender Number DOE/001/2011/2012. The information required by the Department in order to issue the non-binding letters is contained on the attached annexure 2 [notes on the confirmation to be provided by DWS on water availability on request from bidders in the REFIT programme].	
3. COMMENTS RECEIVED FROM PHS CONSULTING ON BEHALF OF LEOPONT 340 PROPERTIES (LEOPONT) (LANDOWNER – MR. J.W BASSON), DATED 18 MAY 2016		
3.1	PHS Consulting act on behalf of Mr Basson of Leopont 340 Proprietary Limited t/a Dagab Boerdery called Leopont for the purpose of this objection. Leopont does not support the development, construction and operation of commercial solar thermal electricity generating facility and associated infrastructure, referred to as the Solarreserve Kotulo Tsatsi Concentrated Solar Plant (CSP 1) at the said location. Our grounds for objection dated 12 December 2015 were addressed in the comments and response report (C&R Report) and it form the basis of further objection to the development. We are of the opinion that the responses formulated to our comments do not address our concerns and therefore we attach our 12 December 2015 objection to this letter for DEA to consideration in the decision.	The comments submitted provide no reason for the CSP1 facility to not be supported at the said location, which is on Portion 3 of the farm Styns Vley 280.
3.2 Objections to the Final EIA Report		
A	The EAP responded in the C&R Report that the site alternative assessment ended with a development footprint of a 6000 ha from an initial 55 000 ha study area, indicating that it is not the applicant's intention to develop the entire 55 000 ha area. Please	Figure 1 as per the PHS Consulting's comments shows an area of approximately 20 700 ha, which sits within the greater 55 000ha development area under the control of the developer. The FEIR explains clearly that the broader study area includes seven (7) farm portions that

	consider the extent of development in figure 1 below. The CSP 1 position is clearly a pre-selected site, amongst other components (not approved yet) completing infrastructure puzzle.	total approximately 20 700 ha in extent. The entire 20 700 ha of the study area i.e. Portion 1, 2, and 3 of the Farm Styns Vley 280, Remaining Extent of Farm Melkbosch Vley 278, Portion 2 of Farm Kopjes Vley 281, Portion 1 of Farm Gemsbok Rivier 301 and Remaining Extent of Farm Gemsbok Rivier 301 was subjected to the EIA level assessment in order to: • Provide a thorough and comprehensive view of the larger study area which was included in the assessment. • Provide the option of identifying more suitable sites for development of the individual CSP Projects, should any of the areas be found to be technically or environmentally constrained. This assessment enabled the CSP1 facility, together with the CSP2 and CSP3 facilities to be appropriately located within the study area, avoiding those areas considered to be constrained or less suitable for development. The total development footprint on the project site for the CSP1 facility, including associated infrastructure is ~ 1000 ha in extent. The development footprint and the study area is not only limited to these project developments.
B	a. The fact that the EIA's for the various components are split makes a mockery of the EIA process. We still maintain that separate EIA's for the various components are defeating the objective of NEMA ito the impacts on the larger landscape, suitability ito the site context and a lack of a clear cumulative impact assessment.	a. Each CSP project was addressed individually in the EIA phase as was advised by the DEA on acceptance of the Scoping Report (refer to correspondence from DEA, dated 27 November 2014, where DEA requested the applicant to split the three CSP tower and two CSP trough projects and therefore provide five separate applications for authorisation and subsequently separate EIA Reports). b. The CSP1 EIA report considers the interconnectivity of the development components in considering the potential for cumulative impacts associated with the authorised CSP3 facility, as well as the proposed CSP2 facility. The objectives of NEMA are met through the EIA reporting.

	b. Figure 1 basically shows how the entire development engulfs the relevant farm portions even if the footprint hectares indicated by the EAP seems small. The only farm portion not developed is one on the western side. The areas in between the development components are calculated as non-development, but due to the integrated nature of figure 1 the impacts will be much wider than the said 6000 ha. We are of the opinion that at least 20 000 ha will be affected inside the "Solar Reserve". The EIA did not consider the interconnectivity of development components during operations.  Figure 1: Solar Farm components	The statement that PHS Consulting is of the opinion that "at least 20 000 ha will be affected" is factually incorrect. 1. The entire area shown in the Figure 1 is 20 700 ha in extent. Therefore 20 000 ha cannot reasonably be affected by the proposed projects. 2. Each CSP facility, together with its associated infrastructure, has a development footprint of 1000 ha. 3. Therefore, the CSP3 facility (authorised), plus the CSP1 facility (subject of this EIA) and the CSP2 facility (separate application for authorisation) impact on a cumulative area of 3000 ha. This is less than 15% of the 20 700 ha area shown in the Figure 1. 4. The two CSP trough plant applications as shown in the Figure 1 have since lapsed. Chapter 8 of the FEIR addresses and considers cumulative impacts (i.e. interconnectivity of the CSP development components) during operations, and as such this comment is factually incorrect.
C	Eskom Proposed Aries-Helios 765kV Transmission Power Line and Substations Upgrade; ref (NEAS Ref: DEA/EIA/0001556/2012) (DEA Ref: 14/12/16/3/3/2/441), on the same cadastral properties is still a concern. Although the EAP claim that the CSP 3 EA is valid we'd like to stress that an Appeal against the EA was lodged and until the Minister makes a final decision, the CSP 3 can't be	Savannah Environmental as well as Kotulo Tsatsi Energy are registered as I&APs for the Eskom Aries-Helios 765kV Project and to date have worked closely with Eskom and their appointed EAP on this matter. The CSP 1 Project does not conflict with the proposed Eskom Aries-Helios 765kV power line corridor. The final corridor for the planned 765kV power

	developed. The CSP position has a bearing on the infrastructure puzzle.	line avoids the properties where the CSP3 facility is located (refer to Annexure B). The two parties have engaged through the respective EIA processes and a practical solution has been proposed and accepted by all parties. There is therefore no need for concern regarding the two projects in a larger area. There is no conflict or overlap between Eskom's proposed corridor and the SolarReserve-Kotulo Tsatsi projects. Likewise, there is no conflict between the proposed CSP1 project and the existing Eskom Aries-Helios 400kV power line, or the authorised CSP3 facility, or the proposed CSP2 facility. The infrastructure is all logically and appropriately positioned. As at 05 June 2016, the appeal referred to was dismissed by the Minister therefore the objection has no bearing on the CSP3 project.
D	The Eskom corridor application was registered before the Solar Reserve development, therefore it is essential that this EIA consider the proposal and treat all alternative transmission line corridors as constraints. I understand that there are deviations on the Eskom corridors and we could not find reference to this in the EIA. With the CSP 3 clash it will have a ripple effect on the CSP 1 position and feasibility. The various Eskom transmission line corridor positions and recent deviation were not sufficiently assessed in the EIAR.	Refer to response C above. Such development risk is for SolarReserve-Kotulo Tsatsi to assess on the viability of its Projects. There is no conflict between Eskom's proposed corridor and any of the Kotulo Tsatsi projects. It was therefore not relevant for the EIAs undertaken for any of the Kotulo Tsatsi CSP projects to consider/avoid the corridor (or any deviations). The statement is therefore factually incorrect. The following is relevant to note: 1. The final corridor for the planned 765kV power line, as provided to the EAP by Eskom, avoids the properties where the CSP 3, CSP 2 and CSP1 facilities are located (refer to Annexure B). 2. Eskom Transmission and Kotulo Tsatsi Energy have engaged through the respective EIA processes and a practical solution has been proposed. 3. The Final EIA report for the Eskom Aries-Helios 765kV project was available for review by I&APs for a 21 day period (8 to 29 July 2016), and is being submitted to DEA for consideration. This is as per correspondence received from Eskom's EAP (Mokgope Consulting).

E	The CSP is regarded as renewable energy source and the REDZ principle clearly uses criteria for site selection for RE. The REDZ areas have therefore been pre-screened eliminating conservation worthy no-go zones. It is a major red flag if development is proposed outside this zone irrespective of the REDZ status. Independent scientists were involved in REDZ work and by ignoring these recommendations the EAP is setting a dangerous president and clear disregard for good environmental practice.	The statement that REDZ areas have been pre-screened eliminating conservation worthy no-go zones is not factually correct. The REDZ SEA process considered protected areas, and the Focus Areas which have resulted from this SEA are, in several instances, not free of areas which could be considered to be conservation-worthy. Regardless, following the process and considering the criteria considered in the SEA process for exclusion (as listed in the image below, from the CSIR's SEA process), none of these as listed below as exclusion areas coincide with the SolarReserve-Kotulo Tsatsi site:  There is no Critical Biodiversity Area (CBA) on the site. An ESA, or Ecological Support Area, was not considered an exclusionary item in the REDZ process, nor by NC DENC in terms of their spatial planning. There is no dangerous precedent being set. In terms of the documentation released by the CSIR, 2015, the following should be noted, as this clearly states what the DEA's position is regarding the REDZ, and that the need for development outside of the proposed Focus Areas should not be disregarded or discounted. The following is a direct quote: "The REDZs will give effect to provisions in the Infrastructure Development Act (Act 23 of 2014) and the Spatial Planning and Land Use Management

		Act (SPLUMA) (Act 16 of 2013) that allow for the streamlining of infrastructure development in geographical areas associated with SIPs. Through these provisions the PICC and local municipalities will be mandated to ensure that wind and solar PV development in REDZs is given priority in planning, approval and implementation processes. The REDZs also provide priority areas for investment into the electricity grid. Currently one of the greatest challenges to renewable energy development in South Africa is the saturation of existing grid infrastructure and the difficulties in expanding the grid. Proactive investment in grid infrastructure is thus likely to be the most important factor determining the success of REDZs. Although it is intended for the SEA to facilitate proactive grid investment in REDZs, such investment should not be limited to these areas. Suitable wind and solar PV development should still be promoted across the country and any proposed development must be evaluated on its own merit." Areas falling outside of REDZ are not intended to be excluded from development of renewable energy projects. The purpose of the REDZ is to streamline applications falling within them. The study area of the proposed project has under no circumstances been ruled out for development.
F	Wrt the Strategic Environmental Assessment for Wind and Solar Photovoltaic Energy in South Africa (CSIR, 2015) the EAP shows disregard for good quality research and guidelines. The EAP try and make out a case that CSP is completely different than PV, therefore not covered by the various strategic studies. The bottom line is that CSP is regarded as renewable solar energy that require the same resources and infrastructure than Wind and PV, therefore the CSIR documentation need to be recognised.	Through their participation as part of the REDZ SEA Expert Reference Group, the EAP is fully knowledgeable of the REDZ and the rationale behind the identification of the Focus Areas. As such, the EAP is also fully knowledgeable of the DEA's direct decision to only include wind and solar photovoltaic technologies in the determination of focus areas. Solar PV and CSP technology are completely different technologies and function completely differently. Sections 4.1.7 and 4.2 of the FEIR provide a detailed description of CSP technology. The identification of Focus Areas resulting from the Strategic Environmental Assessment for Wind and Solar Photovoltaic Energy in South Africa (CSIR, 2015) was done only after the site was identified by

		the Applicant and after the application for authorisation for the CSP1 Project was lodged. The SEA does not include CSP technology nor is the SEA mandated in NEMA to be used as a baseline for any infrastructure projects in South Africa.
G	The SEA process considered both negative and positive mapping to identify RE development areas. Positive key factors including transmission loss, local municipalities with high social need and high potential for development, priority areas for renewable energy manufacturing and import activities, and existing transmission infrastructure were considered. This also applies to CSP's. Negative mapping entail environmental and technical constraints to eliminate areas with highly sensitive features consisting of environmental features (e.g. protected areas and areas of known bird and bat sensitivity), existing and future planned land uses (e.g. agriculture), existing infrastructure (e.g. electricity grid), existing national plans (e.g. Square Kilometre Array electro-magnetic telescope project). This also applies to CSP's. The idea was to identify large clusters of land with the lowest environmental sensitivity, overlaid with the highest development potential areas per province. The priority development areas were then identified. Specialist scoping level pre-assessments were then undertaken in the REDZ for agriculture, landscape, heritage, terrestrial and aquatic biodiversity, birds, bats, and socio-economic sensitivities. Below is a map (figure 2) extracted from the CSRI & DEA SEA, the red star is the approximate location of the approved CSP 3. It is clearly outside of high development potential areas and within an exclusion area. The grey exclusions in this case relate to SKA reserve area, sensitive wetland drainage patterns and ecological corridors.	The extracted map is for high development potential areas for PV and wind only. This does <u>not</u> apply to CSP technology, nor has this been gazetted to be used as a baseline for renewable energy infrastructure development in terms of the NEMA or any other infrastructure development legislation. PHS Consulting's inference that this applies to CSP is fundamentally flawed, however, the following should be noted: - Only the dark grey areas are flagged as exclusion areas, and relate to SKA satellite stations. There is no direct overlap with the Kotulo Tsatsi site and the exclusion areas shown, or SKA sites. In terms of the documentation released by the CSIR, 2015, the following should be noted regarding the DEA's position is concerning the REDZ, and that the need for detailed assessment at a project level, even within a Focus Area, would be required. The following is a direct quote: CSIR, 2015: "Scoping level pre-assessments of the biophysical and social environments have been undertaken as part of the SEA to produce sensitivity maps for the proposed REDZs. The sensitivity maps are based on the best available data, but are not sufficiently detailed to support project level decision making in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998). The maps instead identify potential sensitivities to inform environmental assessment at a project level. Environmental Authorisation in terms of NEMA will be based on the outcomes of a project level environmental assessment and not the outputs of this SEA study." The REDZ nodes are not gazetted and areas falling outside of REDZ are not intended to be excluded from development of renewable energy projects.

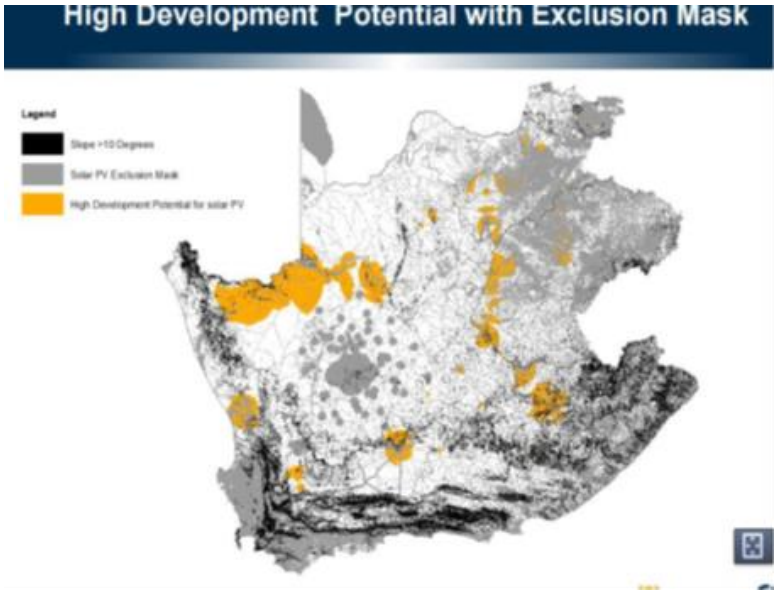


Figure 2: Source - SEA www.csir.co.za & DEA

The purpose of the REDZ is to streamline applications falling within them. The study area of the proposed project has thus not been ruled out for development. In addition, it must again be noted that the REDZ proposed to be gazetted are for Solar PV and Wind technology projects only.

A large area (20 700 ha) was subjected to scoping level assessments (for agriculture, landscape, heritage, terrestrial and aquatic biodiversity, birds, ecology, and socio-economic sensitivities) which identified no-go areas and lead to the proposed 1000 ha being chosen.

The point which has not been raised by PHS Consulting is that the SolarReserve-Kotulo Tsatsi site is situated within a focus area (central corridor) of the Electricity Grid Infrastructure Strategic Environmental Assessment (SEA) currently being concluded by Eskom. In efforts to expand and strengthen the national grid, Eskom has identified five 100km-wide corridors where its future transmission lines will link power-generating capacity with substations, transformers and electricity users. This is based on long-term forecasts of future supply and demand requirements. The SEA identified the best possible routes for power lines within these corridors. This is one of many grid strengthening and expansion projects currently implemented and/or proposed by Eskom in the vicinity of the Proposed Project area (CSP 1 Development footprint). These include the proposed Aries-Helios 765kV Transmission Power Line Project (DEA Ref. 14/12/16/3/3/2/441) and the authorised 400/50kV Eskom Substation between the Aries and Helios Substation on the Farm Moutonsvlei 1615 (DEA Ref. 12/12/20/1167).

Section 4.1 of the FEIR provides detail on the need and desirability of the proposed Project, which includes consideration of the following:

- Hantam Local Municipality Integrated Development Plan
- Kai !Garib Local Municipality Integrated Development Plan
- Eskom's Strategic Environmental Assessment (SEA) for identification of suitable grid infrastructure routing corridors

		• The Need for the CSP Project from a National Perspective • Selection of site and investigation of alternative and least sensitive sites • Receptiveness of the CSP1 study area to the Development
H	We requested that the public and authorities need to see a comprehensive overlay of all the constraints in the greater Namaqua District area as per SEA, NEMF & SKA Reserve, but this was rejected by the EAP. Areas not included in sensitive areas should be regarded as potential sites and therefore included in the EIA. This needs to be presented at the 2016 public and authorities meeting. This was not done in the EIA neither was a final public meeting or focus group meeting arranged since our request in December 2015. Because of the magnitude of this proposal we suggest that DEA reject the Final EIA Report and request EAP to engage with the public directly.	In the letter dated 10 December 2015 PHS Consulting requested that a public meeting be convened in early 2016 so that "*the public need to understand if this development are acceptable ito regional planning guidelines*". The purpose of this public participation process was to provide I&APs with access to all information regarding the project and present the project's potential environmental impacts and ways in which environmental impacts can be mitigated or managed. The public participation process cannot be used to debate the appropriateness of the project in terms of "regional planning guidelines". A focus group meeting was never requested by PHS Consulting. Furthermore, it should be noted that the Applicant attempted to arrange a direct meeting with Mr JW Basson at his offices in Cape Town in the first quarter of 2016. The request for this meeting was denied. Information regarding the project, including a motivation on the project's need and desirability and the project's potential environmental impacts and mitigation and management measures were presented to stakeholders in detail during the Scoping and EIA phases of the project. The manner in which this information was presented to stakeholders is detailed below. Stakeholders including impacted and adjacent landowners and tenants, authorities, organs of state departments, state owned companies and members of the public were consulted with during the Scoping and EIA phases of the Project. Opportunities for engagement and consultation were first provided in the Scoping Phase which commenced in August 2014 through a series of focus group meetings held with authorities and organs of state departments, including the Kai !Garib Local Municipality,

		Department of Agriculture, Forestry and Fisheries, Department of Water and Sanitation, and the Northern Cape Department of Environment and Nature Conservation. A landowner's focus group meeting was also convened during this period. All impacted and adjacent landowners were invited to attend this meeting. The EIA process and potential environmental impacts pertaining to each of the proposed CSP and PV projects proposed by SolarReserve and Kotulo Tsatsi Energy were presented at the meeting. The landowners were well represented by their tenants and farm managers, who were mandated by the respective landowners to receive information on and provide input on the projects. A public meeting was also held during the Scoping phase. A second round of public participation meetings was convened during the EIA phase. Details pertaining to the CSP1 project were presented to stakeholders during this round of public participation meetings. Opportunities for further stakeholder engagement and consultation were provided through focus group meetings with authorities and organs of state departments, landowners and members of the public. The landowners were again well represented at a landowner's focus group meeting. Authorities, organs of state departments, landowners, tenants and farm managers who represented the landowners at the meetings as well as members of the public were well informed of the EIA process, the project in general and the potential environmental impacts identified. Stakeholders did not raise any pertinent objections against the project at these meetings. All issues which were raised were considered within the EIA Report for CSP1. Further opportunities for stakeholder consultation were provided during the public review period of the DEIAr for CSP1. Stakeholders were invited to submit written comment on the draft and final EIRs. All I&APs were sufficiently informed of the CSP1 project. A meeting with key stakeholders, the commenting and competent authorities, was held on-site on 09 September 2015. At this meeting,

		authorities were given the opportunity to raise and discuss issues relating to the ESA as per the NEMF, the relevance of offsets, the proximity of the SKA Reserve and any other pertinent issues. Since the PPP was undertaken in accordance with Regulations 54 – 57 of GN R. 543 (refer to Section 2.3 of the EIAR), and that all the relevant stakeholders were widely consulted during the entire EIA process and considering the fact that no objections were raised by I&APs during focus group and public meetings and the extended public participation process held during the EIA process, the EAP concluded no further public meetings were deemed necessary for this project. All concerns, opinions and notes raised by PHS Consulting have been adequately addressed throughout this PPP, and as such the EAP reaffirms its need not to have held an additional Public Meeting. It must also be stated that undertaking an SEA is not a requirement. The relevant assessment criteria used for this EIA involved a site specific assessment. The assessment criteria were approved by DEA in their Acceptance of Scoping therefore the assessment criteria were supported by DEA. Criteria used during site selection is discussed in detail in Section 5 of the FEIR.
I	We would also urge DEA to communicate directly with the SKA Head of Strategy and the Department of Science and Technology regarding all the renewable energy developments inside the SKA reserve area. It is imperative for the future of the SKA	All comments from Dr. Adrian Tiplady - SKA Head of Strategy, which have been received for this project have been included in the FEIR.
J	As I&AP we at least expected the EIA to have a contextual overview of how the development complies with planning policies, guide plans etc. Clearly the EAP is not interested because there are serious clashed between these documents and what is proposed. We urge DEA to reject the EIAR and request a better analysis of planning, conservation policies in relation the site selection.	PHS Consulting did not make it clear on what planning policies and guidelines are referred to. However, Chapter 3 of the FEIR provides a legal and strategic context of policies, legislation and plans which affect energy planning in South Africa, and specifically in the Northern Cape Province. As an I&AP, this opportunity for a contextual overview has been provided through the

		reporting. The statement that this has not been provided is factually incorrect. The applicability of the following was considered in the EIAr: National Policies: » The Constitution Act 108 of 1996 » National Environmental Management Act 107 of 1998 (NEMA) » National Energy Act (2008) » National Development Plan 2030 » National Climate Change Response Green Paper (DEA, 2010) » White Paper on Energy Policy of the Republic of South Africa (1998) » White Paper on Renewable Energy of the Republic of South Africa (2003) » National Integrated Resource Plan South Africa (2010-2030) » Strategic Infrastructure Projects (SIPs) Provincial Policies: » Northern Cape Provincial Development and Resource Management Plan / Provincial Spatial Development Framework (PSDF) (2012) » Northern Cape Provincial Growth and Development Strategy (NCPGDS) (2011) » Northern Cape Provincial Local Economic Development Strategy (LED) (2009) Local and District Policies: » Namakwa District Municipality Environmental Management Framework (EMF) and Strategic Environmental Management Plan (SEMP) (2011) » Namakwa District Municipality Integrated Development Plan (2013-2014/2012-2016) » Namakwa District Municipality Local Economic Development Strategy (LED) (2009) » Siyanda (ZF Mgcawu) District Municipality Growth and Development Strategy (2007) » Siyanda (ZF Mgcawu) District Municipality Integrated Development plan (IDP) (2013-2014)

		» Hantam Local Municipality Integrated Development Plan (IDP) (2013-2014) » Kai !Garib Local Municipality Integrated Development Plan (IDP) (2013-2014) Solar Energy Policies: » Solar Energy Technology Roadmap (2013) In addition, Section 4.1 of the FEIR provides detail on the need and desirability of the proposed Project. This includes consideration of, inter alia, the: • Hantam Local Municipality Integrated Development Plan • Kai !Garib Local Municipality Integrated Development Plan • Eskom's Strategic Environmental Assessment (SEA) for identification of suitable grid infrastructure routing corridors • The Need for the CSP Project from a National Perspective
K	If transmission loss can't be clarified in the EIA we are still of the opinion that feasibility from a REIPPP point of view is questionable. A mere reference to the capital investment value does not mean a project is feasible. Many renewable energy development projects are pure speculation and financed by European based companies that favours the exchange rate. Please reject the EIAR and request the EAP to clarify the role transmission lost play with in this specific case.	The developer uses prudent and professional development methodologies in determining the location of their projects. Each project is subjected to a detailed technical and financial feasibility assessment before the site is chosen. Transmission loss is a commercial and technical component and is not an environmental concern. The grid connection solutions that was proposed and considered in the reporting are practical and in line with other renewable energy projects located within the Northern Cape and in line with Eskom's network upgrade and strengthening programmes. As such the EAP recommends that the DEA discard this comment made by the I&AP.
L	It's not clear which of the two water pipeline routes are preferred, but it remain absurd to pipe water for 70 km from Kenhardt. The EIA report refers to the supplementing with groundwater, but the specialist report noted the following concerns. This is not encouraging in an area that has scares water resources. The WULA	PHS Consulting has provided no independent technical or substantiating reports to justify this comment. Section 9.14 of the EIAr states that raw water is proposed to be conveyed via pipeline from the Kenhardt Reservoir to the Project Site from the

	application that needs to be conducted will have to be concluded before the EA is issued in order to ensure that these impacts don't occur. See comment below -	starting point at the Kenhardt Reservoir. From an environmental perspective either route alternative is acceptable. The Kai !Garib Local Municipality have indicated that there is sufficient water available to supply the project during construction and operation (refer to Appendix C of the EIAr). To put the extract taken from the Surface and Groundwater Specialist study into context, the specialist is referring to the potential impacts to ground and surface water during the operational phase. The specialist is providing a description of the potential impacts that may arise as a result of the Operation phase. The specialist report also provides mitigation measures for impacts specified and furthermore the specialist report does not exclude abstraction of water from groundwater. To correct PHS Consulting, a Water Use Licence Application cannot and will not be granted until a project receives an Environmental Authorisation. In fact, the WULA will not be accepted for consideration by DWS until an EA is issued for a project and that project is nominated as a Preferred Bidder as part of the REIPPP Programme under the DoE. As per the structure of the FEIAr the developer has all water supply options available for development and use.

	9.5.2. Operational phase • The operational vehicle movement would result in the generation of dust which impacts negatively on surface water; • The man camp development would promote the collection of rainwater in roofs and gutters, increasing the water volume above the natural hydrological yield due to a high runoff coefficient; • The failure of sewage treatment works will impact negatively on the chemical and microbiological characteristics of the receiving surface water resources. The proposed development will result in higher sewage volume generations; • Long term pumping of groundwater to supply the plant operations will result in dewatering of the underlying aquifers if the abstraction rate is not managed properly, leading to a loss of surface water and groundwater connectivity. A long term decline in the groundwater level could result in reduced baseflow to surface water; • Accidental leakages from the tower systems occur during the circulation of the HTF in the parts not shielded by insulation (central receiver). In this instance the pressurised fluid would be sprayed outside over a large area, due to the height of the tower; • Molten salts as an HTF pollute less, are non-flammable and have lower vapour pressures. Leaking molten salts will solidify and can be cleaned by scooping with a shovel, therefore a not a potential threat to the underlying aquifers; and • Sewer lines may be situated deep underground below the biologically active portion of the soil; the sewage can enter the groundwater directly. Sewer leaks can occur from tree root invasion, soil slippage, loss of foundation and flooding.	
M	The EAP in response to our comments make out a case why the site is suitable. Below we counter why the suitability is superficial and pre-selected: » This type of topography is typical of Northern ape and could be found within the REDZ areas as well. » The ESKOM corridor require an upgrade and its till in EIA process and the Solar Reserve plan (figure 1) has various clashes with the proposed corridors.	Detailed responses are provided to comments A, E F and L. We note that these are all repetitive comments raised by PHS Consulting. In addition, the following is relevant regarding the comment: » The terrain, as well as the vegetation types and associations are largely uniform across large tracts of the Northern Cape. The area is considered highly suitable for a development of this nature.

	» There are many good access roads in the Northern Cape within the REDZ areas. » The preferred water pipeline route is not clear and the supplementation with groundwater is vague plus the impacts identified by specialist are a major concern for farmers in this arid area. » The area is a growing game farm area associated with eco-tourism and hunting tourism. The scale of this development will ruin the chances of these micro enterprises that will help sustain the farms, unlike this major project that does not benefit the community but only the developer. » The climatic condition of the area makes it extremely sensitive. Groundwater impacts are eminent without further WULA assessments taking place.	» There is no clash between current or planned land uses in this area. All relevant parties have been consulted and there are no outstanding issues of concern. » Site access: the site can be readily accessed via an existing gravel access road branching off of the R27 between Kenhardt and Brandvlei, with only minor improvements to the turnoff onto the access road from the R27 required. » Water supply considerations: Water supply will be via an existing supply from the Gariep River to Kenhardt town as agreed to by the Kai !Garib Municipality. A water supply pipeline between the Kenhardt Reservoir and the Project Site is proposed to be constructed within the servitude of existing roads, thereby limiting further transformation of land. » Loss of current land use: There is no cultivated agricultural land in the study area or directly adjacent to it, which could be impacted upon by the proposed development. The Project Site is not optimal for agricultural land use activities restricted by the arid climate and shallow soils, limiting the overall agricultural potential of the site to very low, and rendering a low carrying capacity for livestock. » Climatic conditions: Climatic conditions determine the economic viability of a solar energy facility as it is directly dependent on the annual direct solar irradiation values for a particular area. The Northern Cape receives the highest average daily direct normal and global horizontal irradiation in South Africa which indicates that the regional location of the Project is appropriate to a solar energy facility. Factors contributing to the location of the Project include the relatively high number of daylight hours and the low number of rainy days experienced in this region. A Direct Normal Irradiation (DNI)[1] of more than 2440 kWh/m²/year is relevant for the area in which the site is located. » Socio-economic: The project would create employment opportunities for local people. A socio-economic and community needs assessment

[1] GHI is the total amount of shortwave radiation received from above by a surface horizontal to the ground. The value of particular interest to CSP installations is the Direct Normal Irradiance (DNI) as mirrors track the suns movements throughout the day.

		will be undertaken to identify the socio-economic needs of the community. The social plan will address the needs identified by the community. Ecotourism ventures are currently not common in the area between Kenhardt and Brandvlei. The Project is proposed to be situated on Portion 3 of the Farm Styns Vley 280 which was identified through the Scoping process as being best suited from an environmental perspective for a project of this nature. The larger Project area was identified by the Applicant as suited to the development of the Proposed Project due to the availability of the solar resource, proximity to a viable grid connection, support from the local municipality and willing landowner. Based on the outcomes of the Scoping evaluation, some areas within the larger study area were excluded (as potential no-go areas) and potentially more suitable areas were selected for further investigation through the EIA. Therefore, a funnel-down approach to site identification was followed in order to allow environmental sensitivity to inform the siting and preliminary layout design of the Proposed Project. This was further informed during the EIA by way of the specialist field investigations. This allowed for the larger study area to be divided into representative segments. CSP 1 is proposed to be located adjacent to two such segments, within which additional and stand-alone CSP Projects are proposed to be developed by SolarReserve South Africa and Kotulo Tsatsi Energy, with the intention that the potential environmental and social impacts be contained or consolidated to a smaller area of the larger study area. The proposed CSP 1 Project is located 6km south of the first proposed CSP Project, known as the SolarReserve Kotulo Tsatsi Concentrated Solar Plant (separated by the existing Eskom 400kV OHL Servitude/Setback line), for which an Environmental Authorisation was granted in September 2015. The development site, which showed a low impact to the environment during the scoping phase, was considered within the more detailed EIA phase which was further informed by way of the specialist field investigations. For the CSP 1 Project, based on the land capability of the

		greater farm portion, an area of approximately 2022 ha in extent was identified for specialist assessment which allowed for the identification of specific environmental sensitive areas/receptors to be avoided and/or mitigated by the 1 000 ha project development footprint. Therefore, the approach adopted during site selection allowed for the avoidance of site sensitivities (following the mitigation hierarchy) by the 1 000 ha project development footprint. Despite past disturbances such as gravel roads, farm tracks, homesteads and farming activities, the natural vegetation on the Project development site is relatively intact and only a low presence of alien invasive plant species were observed on site. Most of the proposed Project site is proposed to be situated on mixed shrublands which has an overall low conservation value and sensitivity. The overall impact on this vegetation association will therefore be of low significance. The Project development footprint does not fall within any "protected areas" or Critical Biodiversity Areas (CBAs).
N	We are still of the opinion that due to REIPPP requirements the NEMA principles are jeopardized and bended in the interest of the "Solar Rush" and meeting RE development targets. What come first, obligations ito of NEMA in the interest of the people and environment or the interest of REIPPP? If REIPPP as the case may be, then please keep to the identified solar development zones. It is in effect one development, one site and one applicant. By splitting it, the extent of the real impacts is avoided. All impacts will multiply and the I&AP especially the community in the area does not realize this. The sense of place will be changed forever. This sense of place is why game farms and private conservation initiatives and eco-tourism are expanding. This Solar Reserve development will halt these local initiatives.	The comments are repetitive and have been addressed above. The REIPPP Programme is a vehicle initiated by Government for securing electricity capacity from the private sector from renewable energy sources as determined by the Minister of Energy. The comments stated are not environmentally motivated and any concerns that the I&AP has with the REIPPP Programme has to be dealt directly with the DOE. To date no comments or opinions have been received from any game farms or eco-tourism facilities as part of the PPP. However, scenic impact was considered by an independent specialist. Page 44 of the Visual Impact Assessment states "in spite of these high residual ratings, these visual impacts are not considered by the author to be fatal flaws for this development". This opinion is based primarily on the remote location of the study area and the very low density of visual receptors within the study area. In addition, no reported objections from stakeholders within the region have been communicated by the EAP. It is therefore recommended

		that the development of the CSP 1 Project at the proposed new SolarReserve Kotulo Tsatsi Energy Solar development be supported from a visual perspective, subject to the implementation of the recommended mitigation measures. Mitigation measures recommended by the visual specialist will be implemented.
O	Developed areas closer to water, major roads, airstrip and infrastructure seems more suitable for this type of development. The SEA for solar development shows the nodes closer to town centres, therefore reducing the distance that water need to be piped.	The location for the Project has been suitably addressed in the FEIAr. As per Comment M above, the area provides a suitable location and proximity to infrastructure. The larger Northern Cape area has only benefited from infrastructure development which has covered many hundreds of kilometres. This includes roads for access, pipelines for water and power lines for energy. The benefit to society is realised when a project can afford to inject infrastructure which would otherwise not be possible in areas – as an example, the municipal pipeline from the Orange River ends at Kenhardt (this municipal pipeline is over 100km in length). Therefore, communities in the vicinity of this CSP1 site have no access to piped water, and the probability of this in the near future would be low as there are no future plans on the table to provide an extension to the supply pipeline. This Project has the potential to provide a much needed service delivery to communities, which would otherwise not be realised, i.e. the provision of piped water may be realised sooner in this area. It appears that the potential for social benefits and upliftment have been ignored by PHS Consulting. Areas for the development of CSP facilities were not considered in the DEA's SEA process to define REDZ Focus Areas. As such, the comment that the SEA for solar development shows the nodes for such development to be located closer to town centres would present a land use conflict when considering CSP projects which require more available land than a PV project. The REDZ focus areas are also not yet gazetted. Areas falling outside of REDZ are not intended to be excluded from development of renewable energy projects. The purpose of the REDZ Focus areas is to streamline

		applications falling within them. The study area of the proposed Project has not been ruled out for development through the EIA or the DEA's SEA.
P	The conservation objectives and reasons why Leopont purchased property in the area relate to the natural remote environmental context, current sense of place and proximity to quality ecological corridors and the vision to potential expand larger conservation areas. The proposed development scale is regarded as a serious visual intrusion into a natural unspoilt landscape. The visual integrity of the area will be sacrificed and changed forever. Even though there are few people living in the area it is critical for the remote unspoiled context of the area to prevail. The existence of an Ecological Support Area with a high sensitivity index and an Astronomy Reserve strengthens the conservation of this specific natural open space. The development should take place within a low sensitivity index.	A list of all the conservation areas that are gazetted has not been provided to substantiate this comment. The potential for visual impact or sense of place is discussed in detail in response to comment N. The development will not impact any formal conservation areas. The area proposed for development cannot be viewed as virgin and is subject to a degree of transformation, with infrastructure in close proximity to the site including but not limited to: - the Aries-Helios 400kV overhead power line (directly to the west of project), and - the Sishen/Saldanha railway line (a freight railway line) to the north west of project and - various grid strengthening and expansion projects proposed by Eskom in the near vicinity of the Project area. These include the proposed Aries-Helios 765kV Transmission Power Line Project (DEA Ref. 14/12/16/3/3/2/441) and the authorised 400/50kV Eskom Substation between the Aries and Helios Substation (DEA Ref. 12/12/20/1167) on the Farm Moutonsvlei 1615. Therefore, the area immediately surrounding the CSP1 Project cannot be considered to be unspoiled. As stated earlier, the development will not impact any formal conservation areas. The CSP1 Project is outside the observed ESA corridor and the fact that the site falls outside of any areas of higher ecological sensitivity is supported by NC DENC and Simon Todd, acting as an independent, external ecologist who was requested to provide an opinion on the matter.
Q	The EAP stipulated that a comprehensive PPP was followed and mentioned the various stages. We would like to point out that the majority of people present at the focus group meeting were not landowners but tenants and managers. With all due respect to those	The public participation process does not limit who attends the Public Meeting and responds to the information put out in the public domain for comments. The public participation process allows for open involvement by all interested and affected parties.

	present the complexity and magnitude of the proposal is surreal and difficult to grasp. Not all owners can be present at meetings or afford representation by professional people that understand the EIA process. Our involvement came at a later stage and our technical input and evaluation has pointed out many issues with the proposal. We requested for direct consultation in December 2015 but no response or invitation was made. The EAP had 5 months to arrange another focus group meeting that we would have helped arrange in order to get the relevant landowners and role players together. We urge DEA to please reject the Final EIAR until further consultation takes place.	Due process was followed in terms of the public participation process where all affected and interested parties and relevant stakeholders were informed of the project via written notices, newspaper advertisements, site notices, and stakeholder consultation and via information posted on Savannah Environmental's website - refer to Section 2.3 of the EIAR. Landowners were contacted directly and invited to participate in the EIA and public participation process. Where landowners were represented by their tenants and farm managers at the meetings held throughout the public participation process, the representatives were delegated to receive information on and provide input on the projects. Meaningful contribution and dialogue between the parties was also facilitated through written correspondence, as and when required. The public consultation process has allowed every opportunity for comments to be raised, and these have been responded to as required. PHS Consulting is commenting on this process on behalf of Mr J.W. Basson. Mr J.W. Basson is the Director of Leopont 340 Properties who owns properties in the area surrounding the broader project site. If PHS Consulting were only engaged to represent the landowner late in the process, this does not impact the public participation process. Mr Basson was identified as an adjacent landowner for the CSP3 project. Mr Basson is not an adjacent landowner to the CSP1 project site since his properties are located one farm portions away from the project. Nevertheless, Leopont 340 Properties continues to be actively engaged with and consulted as an I&AP and landowner in the broader area for the CSP1 project. The statement that "*our* involvement came at a later stage" is not correct. Mr J.W. Basson was consulted with directly at the commencement of the Scoping Phase for the project. A process notification letter and background information document announcing the EIA process and inviting stakeholders to register as I&APs on the project's database were distributed to all stakeholders identified at the beginning of the Scoping Phase in June and July 2014. The process notification letter was sent to

		Anita van Rensburg, the personal assistant to Mr Basson, in June 2014. A separate email, notifying Mr Basson of the EIA process and inviting him to register as an I&AP was also emailed to his personal email address. In July 2014 Mr Basson was invited to attend the landowners focus group meeting that had been arranged in the Scoping Phase. Savannah Environmental had followed up telephonically to ascertain whether Mr Basson would attend the focus group meeting. Anita van Rensburg informed Savannah Environmental that Mr Basson would not attend the meeting and that, Mr Simon Coldrey and Mr AJ "Bertus" van Niekerk would represent Leopont 340 Properties at this meeting. Mr AJ "Bertus" van Niekerk attended the focus group meeting held on 14 August 2016 and made a note on the attendance register that he was mandated to represent J.W. Basson. Leopont 340 Properties was therefore well represented at the focus group meeting. The queries raised by Mr Van Niekerk were answered at the meeting and documented in the meeting minutes and Scoping Phase Comments and Responses Report. Reply forms received from Mr Simon Coldrey and Mr AJ "Bertus" van Niekerk during the Scoping Phase were also responded to in the Scoping Phase Comments and Responses Report. Therefore, the EAP is confident that the interests of Leopont 340 Properties were adequately presented and considered in the Scoping Report. A second landowners focus group meeting was convened in April 2015 to present the proposed layouts and environmental impacts identified for the CSP3, CSP2, CSP1 and PV facilities. Invitations were distributed to all landowners, including Mr J.W. Basson. Anita van Rensburg acknowledged receipt of the invitation received. Savannah Environmental followed-up with Mr Basson's office to confirm whether he or any of Leopont 340 Properties' representatives would attend the meeting. Anita van Rensburg confirmed that Mr AJ "Bertus" van Niekerk would attend the meeting on behalf of Leopont 340 Properties. All queries raised by the meeting attendees, including Leopont 340 Properties' representative, were responded to at the meeting and documented in the form of meeting minutes. The issues raised were included in the EIA Phase Comments and Responses Report of the final EIAr. Written comments were received from

		Mr J.W Basson following the focus group meeting in April 2015. These comments were included and responded to in the draft CSP1 EIAr Report which was made available for public review. No objections were raised by Leopont 340 Properties' representatives at the focus group meeting held nor were any objections raised in the written comments submitted by Mr Basson himself. A letter notifying I&APs of the review period of the draft EIAr for the CSP1 project was distributed in October 2015. Mr Basson received a copy of this letter via email at the beginning of the public review period. The statement that PHS Consulting requested direct consultation in December 2015 is incorrect. In the letter dated 4 December 2015 PHS Consulting requested that a public meeting be convened in early 2016 so that "*the public need to understand if this development are acceptable ito regional planning guidelines*". The purpose of the public participation process was to provide I&APs with access to all information regarding the project and present the project's potential environmental impacts and ways in which environmental impacts can be mitigated or managed. The public participation process cannot be used to debate the appropriateness of the project in terms of "regional planning guidelines". Information regarding the project, including a motivation on the project's need and desirability and the project's potential environmental impacts and mitigation and management measures were presented to stakeholders in detail during the Scoping and EIA phases of the project. The manner in which this information was presented to stakeholders is detailed below. As it is evident that all the relevant landowners and role players were widely consulted during the EIA process and considering the fact that no objections were raised by I&APs during the focus group and public meetings held during the EIA process, no further public meetings were deemed to be required for this project. Stakeholders including impacted and adjacent landowners and tenants, authorities, organs of state departments, state owned companies and members of the public were consulted within the Scoping and EIA phases

		of the project. Opportunities for engagement and consultation were first provided in the Scoping Phase which commenced in August 2014 through a series of focus group meetings held with authorities and organs of state departments, including the Kai !Garib Local Municipality, Department of Agriculture, Forestry and Fisheries, Department of Water and Sanitation, and the Northern Cape Department of Environment and Nature Conservation. A landowner focus group meeting was also convened during this period. All impacted and adjacent landowners were invited to attend this meeting. The EIA process and potential environmental impacts pertaining to each of the proposed CSP and PV projects proposed by SolarReserve Kotulo Tsatsi Energy were presented at the meeting. The landowners were well represented by their tenants and farm managers, who were mandated by the respective landowners to receive information on and provide input on the projects. A public meeting was also held during the Scoping phase. A second round of public participation meetings was convened during the EIA phase. Details pertaining to the CSP1 project were presented to stakeholders during this round of public participation meetings. Opportunities for further stakeholder engagement and consultation were provided through focus group meetings with authorities and organs of state departments, landowners and members of the public. The landowners were again well represented at a landowners focus group meeting. Authorities, organs of state departments, landowners, tenants and farm managers who represented the landowners at the meetings as well as members of the public were well informed of the EIA process, the project in general and the potential environmental impacts identified. Stakeholders did not raise any pertinent objections against the project at these meetings. All issues which were raised were considered within the EIA Report for CSP1. Further opportunities for stakeholder consultation were provided during the public review period of the DEIAr for CSP1. Stakeholders were invited to

		submit written comment on the draft and final EIRs. All I&APs were sufficiently informed of the CSP1 project. A meeting of key stakeholders, commenting and the competent authorities was held on site on 09 September 2015. At this meeting, authorities were given the opportunity to raise and discuss issues relating to the ESA as per the NEMF, the relevance of offsets, the proximity of the SKA Reserve and any other pertinent issues. Furthermore, the Applicant attempted to arrange a direct meeting with Mr J. W. Basson at his offices in Cape Town in the first quarter of 2016. The request for this meeting was denied. The EAP is confident that the public participation process has been fully inclusive of identified interested and affected parties and has presented opportunity for engagement as required by the EIA Regulations. There is no ground for rejection on this basis.
4. COMMENTS RECEIVED FROM CARIN NEL (COMMUNITY MEMBER) DATED 09 JUNE 2016		
4.1	Please be so kind and let the community of Kenhardt, Northern Cape through this email address know when you going to start to create jobs for Kenhardt community on the energy solar park.	Job opportunities will be confirmed at a later time by the Project Company and its design, construction and operation and maintenance contractors. Generally, the Project Company and its contractors will source the skills required for the Project only once the Project has been awarded Preferred Bidder status by the DoE as part of the REIPPP Programme. The date when the Project will be awarded is still to be announced by the DoE. It should be noted that Carin Nel is being responded to as an individual community member and not a representative of the community of Kenhardt. She has been registered as an I&AP on the Project's database.
COMMENTS RECEIVED FROM KAI !GARIB MUNICIPALITY, KAKAMAS OFFICE, DATED 01 AUGUST 2016		
5.1	Agreement for Bulk Water Supply Services to the proposed SolarReserve Kotulo Tsatsi Energy Concentrating Solar Power Plant CSP 1.	It is confirmed that the CSP project will require 150 000m^3 per annum of water during the construction phase (duration approximately 36 months) and 250 000m^3 per annum of water during the operational phase (a minimum of 20 years). The confirmation from the Kai !Garib Local Municipality for the provision of water to meet these requirements during

	The Kai !Garib Local Municipality acknowledges your correspondence detailing your request to provide water to the Solar Reserve-Kotulo Tsatsi Energy Concentrated Solar Power Facility CSP 1. We understand that it is required of the applicant to provide confirmation that water is available for the proposed project as part of an application for Environmental Authorisation as well as for potential future bidding of the project under the Department of Energy REIPPP Programme. The Kai !Garib Local Municipality confirms that we have engaged with the proponent regarding the water allocation of the proposed SolarReserve Kotulo Tsatsi Energy CSP 1 project (up to 200 MW). The Kai !Garib Local Municipality confirms that we obtain water from our purification works located at Lennertsville which has a capacity of 8 500 cubic metres per day. Spare capacity at the works is calculated to be 4 500 cubic metres per day (1.6 million m^3 per annum). The proposed project will require 150 000m3 per annum of water during the construction phase (duration approximately 36 months) and 250 000m^3 per annum of water during the operational phase (duration as per the PPA with ESKOM to be signed: minimum 20 years). We herewith confirm that sufficient water will be provided to the project during both the proposed construction and operational phases.	both the construction and operational phases is acknowledged. The developer will engage further in this regard in order to formalise agreements as may be required following an award of preferred bidder status.
COMMENTS RECEIVED FROM SKA PROJECT OFFICE, DATED 09 SEPTEMBER 2016		
6.1	This letter is in response to the report, authored by ITC Services (Pty) Ltd, submitted by yourself to SKA South Africa on 5th September 2016. This report was compiled in response to a previous request made by SKA South Africa for a more detailed analysis on the potential impact of the proposed Kotulo Tsatsi CSP facility on	The developer notes that SKA South Africa agrees with the measurement and other data, and the concluding statement made in the Risk Assessment Report (submitted to SKA on the 5 September 2016) that the radio emissions of the proposed Kotulo Tsatsi CSP facility would pose a low risk of detrimental impact on the SKA radio telescope. The developer is satisfied

	the SKA. This letter should be read in conjunction with all previous written representations made by SKA South Africa to yourself concerning this proposed project. The initial high level risk assessment conducted by SKA South Africa for the above mentioned CSP facility indicated that it posed a medium to high risk of detrimental impact on the SKA. Further analysis conducted by ITC Services (Pty) Ltd concluded similarly, given the absence of detailed radio frequency measurements of the proposed facility (or of a similar type of facility). The ITC Services report provides an update on measurements conducted on a similar facility to Kotulo Tsatsi. SKA South Africa has considered this most recent report, and can summarise as follows: i. In general, the report appears to be professionally compiled. SKA South Africa has considered the contents of the report, assuming that the measurement results and analysis are accurate; ii. The report provides results from a comprehensive set of measurements on a CSP facility located in the USA, as a facility that can be considered representative of the proposed Kotulo Tsatsi CSP facility. Apart from narrowband radio communication signals, the measurements indicate a low presence of electromagnetic interference. The report further indicates that the narrowband radio communication signals, as measured and identified in the report, would not be present at the proposed Kotulo Tstatsi facility due to the nature of its design; iii. The report indicates that, when taking into consideration the following: a. the measurement data as summarised; b. ignoring the narrowband radio communication signals present in	and confirms that they are able to comply with the requirements as set out in the letter. Please refer to Appendix D6 (b) for the comments received from SKA date 09 September 2016.

	c. the cumulative impact of multiple pieces of equipment of the same type at the same site (ie. multiple heliostats, trackers etc.); d. the radio attenuation expected at the Karoo site; then the radio emissions of the proposed Kotulo Tsatsi CSP facility would pose a low risk of detrimental impact on the SKA radio telescope. On the basis of the measurement, and other, data presented in the report, SKA South Africa agrees with this statement; iv. SKA South Africa does note that multiple facilities may be located at the proposed site. It appears, however, that the safety margin provided for in the analysis would be appropriate to take into account an additional facility of the same type located in this area. This should not, however, be interpreted to mean that SKA South Africa automatically approves the construction of any other facilities in addition to this proposed project; v. Furthermore, it should be noted that the measurement data provided is data of a representative facility, and not of the Kotulo Tsatsi CSP. As a result, there is an increase in risk associated with this project – but it does not appear that this risk cannot be mitigated; vi. To ensure that any potential increase in risk of detrimental impact is identified and mitigated appropriately, SKA South Africa requires that a special condition be placed on any authorisation of this facility (should such an authorisation be granted). Such a special condition shall require that an appropriate EMC Control Plan, which identifies potential risks, mitigation measures and appropriate test and acceptance procedures during the design and construction of this facility, be provided by the developer to SKA South Africa, and must be accepted by SKA South Africa prior to construction;	

	vii. Further to the above, as the proposed facility is located within the declared Karoo Central Astronomy Advantage Area, any activities and infrastructure associated with this project would need to comply with the relevant regulations as promulgated in terms of the AGA Act. Any transmitters that are to be established, or have been established, at the site for the purposes of voice and data communication will be required to comply with the relevant AGA regulations concerning the restriction of use of the radio frequency spectrum that applies in the area concerned. This technical advice is provided by the South African SKA Project Office on the basis of the protection requirements of the SKA in South Africa, and does not constitute legal approval of the renewable energy projects in terms of the Astronomy Geographic Advantage Act, the Management Authority, and its regulations or declarations.	