

Appendix D.3

MURA 3 SOLAR PV FACILITY COMMENTS



Govender, Megan

From: Ephron Maradwa <EMaradwa@dffe.gov.za>
Sent: Tuesday, 14 March 2023 14:02
To: Govender, Megan
Cc: Constance Musemburi; EIAAdmin; Salome Mambane; Jay-Jay Mpelane
Subject: 14/12/16/3/3/2/2324

Dear Megan

14/12/16/3/3/2/2324

ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION AND DRAFT SCOPING REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A SCOPING ASSESSMENT PROCESS FOR THE PROPOSED MURA 3 SOLAR PHOTOVOLTAIC FACILITY (UP TO 320 MW) BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE AND NORTHERN CAPE PROVINCES.

The Department confirms having received the Application form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 03 March 2023. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.

Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Kindly quote the abovementioned reference number in any future correspondence in respect of the application.

EIA Applications

Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to EIAAdmin@dffe.gov.za.

You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email.



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia,· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2324

Enquiries: Mr Wayne Hector

Telephone: (012) 399 9410 **E-mail:** WHector@dfffe.gov.za

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
Building 1, Golder House
Maxwell Office Park, Magwa Crescent West
Waterfall City
MIDRAND
1685

Cell Number: (011) 361 1392
Email Address: Ashlea.strong@wsp.com

PER MAIL / E-MAIL

Dear Ms Strong.

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF UP TO 320 MW MURA 3 SOLAR PHOTOVOLTAIC FACILITY BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE PROVINCE AND NORTHERN CAPE PROVINCES.

The Application for Environmental Authorisation and Draft Scoping Report (SR) dated March 2023 and received by the Department on 03 March 2023, refer.

This letter serves to inform you that the following information must be included to the final SR:

1. **Application form:**

- The applicant represented by Mr Lance Blaine, did not sign the application form. Please note that a signed application form must be submitted.
- Kindly clarify the reason why this Department is the Competent Authority (CA) in terms of Section 24C of NEMA. State clearly if the applicant intends to bid the project in terms of the Integrated Resource Plan (IRP) and the Renewable Independent Power Producer Programme (REIPPP).
- Please note that the Minister is the competent authority for applications for facilities or infrastructure, that will form part of the Integrated Resource Plan (IRP) Programmes for technologies whose procurement processes have been determined under the Electricity Regulation Act, 2006 and / or the Electricity Regulations on New Generation Capacity. If the applicant will not, or does not intend to, participate in any of the IRP programmes, the competent authority will be the MEC responsible for environmental affairs in the respective province. Be advised that this information must be clearly presented in Section 1 –Competent Authority in the application form.
- Reflecting the above, the reasons provided in Section 1 of the application form for this Department being the Competent Authority in terms of S24C of NEMA are incomplete. This must be rectified and expanded on in the application form as well as the report. Please refer to GN 779.

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- Please ensure that the application form is fully completed and correct. The SG codes, all farm names, and the EAP's contact details are correct.
- Please include the GPS coordinates for the onsite substation and the battery energy storage system (BESS) facility.

2. Listed Activities

- It is noted that the proposed solar facility does not fall within any renewable energy development zones. Although the application form indicates that part of the project is within the Electricity Grid Infrastructure (EGI) as per GN 113, therefore this application will be considered as a normal EIA application.
- Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.
- You are required to confirm whether systematic biodiversity plans or bioregional plans are adopted by the competent authority. There are certain activities in Listing Notice 3 that requires that Bioregional Plans to be adopted.
- It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property possibly falls within geographically designated areas in terms of Listing Notice 3 Activities. Written comments must be obtained from the relevant authorities (or proof of consultation if no comments were received) and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided. Please also ensure that the potential impacts on the affected Critical Biodiversity Areas and Ecological Support Areas are fully assessed in the final Environmental Impact Assessment Report (EIAR).
- If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.dffe.gov.za/documents/forms>.

3. Layout & Sensitivity Maps

- Please provide a layout map which indicates the following:
 - The proposed location of the PV array and associated infrastructure of the proposed up to 320MW Mura 3 Solar Photovoltaic Facility
 - The proposed grid infrastructure connecting the PV facility to the existing substation, overlain by the sensitivity map;
 - All supporting onsite infrastructure e.g., roads (existing and proposed); fence, office buildings, and etc.
 - The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
 - Buffer areas; and
 - All "no-go" areas.
- The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure, as well as the neighbouring PV Solar Clusters.
- Google maps will not be accepted for decision-making purposes.

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4. **Public Participation Process**

- Please ensure that all issues raised, and comments received on the draft SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: BCAdmin@dffe.gov.za, the provincial authority and the local municipality) in respect of the proposed activity are adequately addressed in the final SR. Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.
- The Public Participation Process must be conducted in terms of the approved public participation plan and Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended. Take note of the timeframes required for adequate public participation.
- A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments (pre and post submission of the draft SR) for this development. The C&R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.

5. **Specialist Assessments to be conducted in the EIA Phase**

- Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of PV arrays, and all other associated infrastructures that they have assessed and are recommending for authorisations.
- The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
- You are further required to ensure that all required specialist studies are recommended and assessed for the proposed up to 320MW Mura 3 Solar Photovoltaic Facility.
- It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols. Please note further that the protocols require the specialists' to be registered with SACNASP in their respective field.
- Please include a table in the report, summarising the specialist studies required by the Department's Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols.

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6. Cumulative Assessment to be conducted in the EIA Phase

Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:

- Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
- Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
- A cumulative impact environmental statement on whether the proposed development must proceed.

7. Environmental Management Programme

The EMPr must include the following:

- It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the Generic Environmental Management Programme, **must** be used and submitted with the final report over and above the EMPr for the facility. This means that a generic EMPR must be included for the substation. In total, 2 EMPrs should accompany the final report.
- Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.

General

You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:

"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a SR which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority".

You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of SRs in accordance with Appendix 2 and Regulation 21(1) of the NEMA EIA Regulations 2014, as amended.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

wh

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



Ms Milicent Solomons
Acting Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Letter signed by: Mr Wayne Hector
Designation: Deputy Director: Priority Infrastructure Projects
Date: 29/03/23

cc:	Lance Blaine	Mura 4 (Pty) Ltd	Email: surina@red-cap.co.za
	Ashley Mitchell	Beaufort West Local Municipality	Email: buildingcontrol@beaufortwestmun.co.za
	MJ Penxa	Beaufort West Local Municipality	Email: jacksonp@beaufortwestmun.co.za

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20672

Date: Friday March 31, 2023
Page No: 1

Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mura 3 (Pty) Ltd

Mura 3 Solar Photovoltaic Facility (up to 320 MW) between Loxton and Beaufort West in the Western Cape and Northern Cape Provinces

WSP has been appointed by Mura 3 (Pty) Ltd to undertake an Environmental Authorisation Application for a proposed Solar Photovoltaic Facility, near Loxton, Northern Cape Province.

A Draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include solar panels, substations, Battery Energy Storage System (BESS), offices, operational and maintenance buildings, warehouse/workshop, ablution facilities, converter/invertor stations, underground cabling, internal roads, fencing, storm water management infrastructure, and site camps.

Almond, J. E. 2022. Combined Desktop & Field-Based Palaeontological Heritage Study: Proposed Mura PV Solar Facilities between Loxton and Beaufort West, Beaufort West Local Municipality (Central Karoo District Municipality), Western Cape and Ubuntu Local Municipality (Pixley Ka Sema District Municipality), Northern Cape

The report combines the results for five development applications. Only the results pertaining to Mura PV 3 will be discussed below.

The proposed development is underlain by the Teekloof Formation. A total of 12 fossil sites were recorded within the proposed development area. These include reworked bone fragments, remains of small tetrapods, reedy plant stem casts and invertebrate trace fossils of Grade IIIC heritage significance, and robust tetrapod remains and sizeable ridged bone fragment of Grade IIIB significance (sampled/collected).

No recorded fossil sites of unique scientific or conservation value are likely to be directly impacted by the proposed renewable energy and electrical infrastructure developments and no further palaeontological studies or mitigation is proposed here with regard to these sites. A Chance Fossil Finds Protocol is recommended to be implemented.

Our Ref:



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Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20672

Date: Friday March 31, 2023
Page No: 2

Orton, J. 2022. Heritage Impact Assessment: Proposed Mura 1-4 PV Facilities, Beaufort West Magisterial District, Western Cape and Victoria West Magisterial District, Northern Cape

The report combines the results for five development applications. Only the results pertaining to Mura PV 3 will be discussed below.

A total of two heritage resources were identified within the Mura PV 3 development area. These include a stone-walled house ruin of medium significance and a mound of rocks of very low heritage significance.

Recommendations provided in the report include the following:

- A Fossil Chance Finds Procedure (as supplied in the palaeontological specialist study) must be included in the project EMPr;
- The site at waypoint 1402 should be avoided if possible with a 50 m buffer or else revisited to record it in detail as well as determining whether any sampling would be required;
- Any realignment of the DR02317 within 400 m of waypoint 2000 must be checked in the field and approved by an archaeologist;
- No stones may be removed from any archaeological site;
- The road construction camp location must be approved by an archaeologist and subjected to a site inspection if deemed necessary; and
- If any archaeological material or human burials are uncovered during the course of development, work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

Interim Comment

SAHRA requests clarity regarding the permit used for the collection of fossil material in the Northern Cape Province. Further comments will be issued upon receipt of the requested clarity and the draft EIA inclusive of appendices.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Our Ref:



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Department of Arts and Culture

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Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20672

Date: Friday March 31, 2023
Page No: 3

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

ADMIN:
Direct URL to case: <https://sahris.sahra.org.za/node/612928>
(DFFE, Ref:)

Govender, Megan

From: Thea Jordan <Thea.Jordan@westerncape.gov.za>
Sent: Tuesday, 11 April 2023 13:06
To: Govender, Megan; Strong, Ashlea; JMpelane@environment.gov.za; EIAAdmin
Cc: Adri La Meyer
Subject: COMMENTS ON THE DSR FOR THE PROPOSED DEVELOPMENT OF THE 320MW MURA 3 SOLAR PV FACILITY, BEAUFORT WEST AND UBUNTU LOCAL MUNICIPALITIES
Attachments: 2023 April 11 - PROPOSED DEVELOPMENT OF THE 320MW MURA 3 SOLAR PV FACILITY, BEAUFORT WEST AND UBUNTU LOCAL MUNICIPALITIES.pdf

Dear EAP,

Your request for comment refers.

Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan
Pr. Pl. (A/1237/2002)
Director: Development Facilitation
Department of Environmental Affairs and Development Planning
Western Cape Government

11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 4093
Email: Thea.Jordan@westerncape.gov.za
Website: www.westerncape.gov.za/eadp



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From: Govender, Megan <Megan.Govender@wsp.com>
Sent: Monday, March 6, 2023 14:51
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>
Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST: DRAFT ENVIRONMENTAL REPORTS REVIEW

Dear Commenting Authority,

Notice is given in terms of Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) for submission of an application for environmental authorisation (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).

Red Cap Energy is proposing to develop four solar facilities, namely Mura 1, Mura 2, Mura 3, and Mura 4, and an associated grid connection, collectively known as the Mura PV Development between Loxton and Beaufort West in the Beaufort West Local Municipality and Ubuntu Local Municipality and the Central Karoo District Municipality and Pixley ka Seme District Municipality in the Western Cape and Northern Cape Provinces. The proposed Mura PV Development is located in close proximity to the approved Nuweveld Wind Farm Development. The proposed authorisations include the following Basic Assessment (BA) and Scoping and Environmental Impact Reporting (S&EIR) processes:

- Mura 1 Solar PV Facility: BA Process
- Mura 2 Solar PV Facility: S&EIR Process
- Mura 3 Solar PV Facility: S&EIR Process
- Mura 4 Solar PV Facility: S&EIR Process
- Mura EGI Corridor: BA Process

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the independent Environmental Assessment Practitioner (EAP) by Red Cap Energy (Pty) Ltd, to manage the respective BA and S&EIR processes. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the process.

DRAFT BASIC ASSESSMENT AND DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Environmental Basic Assessment and Scoping Reports will be made available from WSP on request and/or at the venues below for review and comment for 30 days from 06 March 2023 to 06 April 2023.

Area	Venue	Street Address
Beaufort West	Beaufort West Public Library	Corner of Bird Street and Church Street
	Klein Karoo Agri	80 Donkin Street
Loxton	Loxton Library	Margaretha Prinsloo Street, Loxton
WSP Website	https://www.wsp.com/en-ZA/services/public-documents	
Datafree Website	https://wsp-engage.com/	

The report has also been made available at the link below easy access:

One Drive Link	<input type="checkbox"/> _Mura Solar PV Development For Public Review
One Drive Instruction	<ul style="list-style-type: none"> • Please note that you will receive a separate email with the link to the one drive. This link will then request a verification number which will automatically be sent to your email address – if it doesn't seem to come through please check your "spam" folder

A presentation on the summary of the proposed development has been collated. The presentation has been made available on the WSP website, Datafree website and One Drive Link.

PowerPoint Instruction	<ul style="list-style-type: none"> • To view and listen to the project summary presentation, please open the PowerPoint Presentation and click on the speaker icon on the left on each slide to listen to the accompanying commentary
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WSP contact details are:

Name: Megan Govender

Tel: 011 361 1410
Fax: 011 361 1381
E-mail: Megan.Govender@wsp.com
Address: PO Box 98867, Sloane Park, 2152

We look forward to your participation in this process.

Kind Regards,



Megan Govender
Senior Consultant

T +27 011 361 1300

Redacted as per POPIA requirements



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Building 1, Golder House, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
2191 South Africa

wsp.com

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WSP Group Africa (Pty) Ltd, Registered Office: Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand, Gauteng, 1685, South Africa
Registered Number: 1999/008928/07 South Africa

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References:

18/2/3/2023-2024 (Development Facilitation)

19/2/5/3/C3/2/WL0035/23 (Waste Management)

19/3/2/4/C3/1/DDF0131/22 (Pollution and Chemicals Management)

Attention: Ms Megan Govender

WSP Group Africa (Pty) Ltd
P.O. Box 98867
Sloane Park
JOHANNESBURG
2151

Megan.Govender@wsp.com

Dear Madam

COMMENTS ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF THE 320MW MURA 3 SOLAR PHOTOVOLTAIC FACILITY AND ASSOCIATED INFRASTRUCTURE AND STRUCTURES (INCLUDING, *INTER ALIA*, A BATTERY ENERGY STORAGE SYSTEM AND SUBSTATION, 2 ON-SITE SOLAR FARM SUBSTATIONS, ACCESS ROADS, SITE CAMPS, CABLING, BUILDINGS, ETC.) ON FARM LEEUWKLOOF NO. 43, REMAINDER OF FARM ABRAMS KRAAL NO. 206, PORTION 4 AND THE REMAINDER OF PORTION 3 OF FARM DUIKER KRANSE NO. 45, FARM SNEEUWKRAAL NO. 46, AND AANGRENSEND FARM ABRAMSKRAAL NO. 11, BEAUFORT WEST AND UBUNTU LOCAL MUNICIPALITIES, WESTERN AND NORTHERN CAPE PROVINCES

1. The email correspondence of 06 March 2023, informing interested and affected parties of the release of Draft Scoping Report ("DSR") for comments, the email received on the same day, providing an additional link to download the DSR and appendices, and the Department's email of 05 April 2023, informing the environmental assessment practitioner ("EAP") that the Department is unable to meet the deadline of 06 April 2023, refer.
2. The Department extends its appreciation to the EAP for extending the deadline for comments on the DSR. Please find consolidated comments from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated March 2023 that was available for download from various online platforms provided by the EAP.

3. Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.Lameyer@westerncape.gov.za; Tel.: (021) 483 2887):
- 3.1. This Directorate requires clarity on the extent of the development footprint and that of the proposed site (indicated as Farm Leeuwkloof No. 43, Remainder of Farm Abrams Kraal No. 206, Portion 4 and the Remainder of Portion 3 of Farm Duiker Kranse No. 45, Farm Sneeuwkraal No. 46, and Aangrensend Farm Abramskraal No. 11). The DSR interchangeably refers to the total project area as 436 ha and 395 ha. On page 26 of the DSR it is indicated that *“The proposed Mura 3 Facility will be developed within a project area of approximately 395 hectares (ha), excluding the access road corridor”*, whereas on page 37 it is indicated that *“The total project area is 436 ha”* and that *“The total development envelope for project installation is approximately 395 ha”*. Assuming that the proposed 320MW solar field will be constructed on 395 ha; the proposed battery energy storage system (“BESS”) and BESS substation will be developed on ~ 4 ha; internal gravel access roads will have a development footprint of 36 ha; and up to two 2.2 ha site camps / laydown areas (i.e., 4.4 ha in total) will be developed, then more than 439 ha is required for the proposed solar photovoltaic (“PV”) facility and associated structures and infrastructure. The development footprint of the associated buildings (offices, ablution facilities, operational and maintenance centre, etc.) and the two on-site solar substations were not indicated. Please ensure that the Final Scoping Report (“FSR”) and the forthcoming Draft EIA Report clearly describe the size of the proposed site, the development footprint, and the individual components of the proposed solar PV development.
- 3.2. Further to the above, section 4.1.1 of the DSR deals with the site selection process. It is noted that the original five potential Mura PV development areas were further reduced to two areas (Areas 2 and 5) that were considered suitable for the Mura 1, 2, 3 and 4 solar PV developments. Area 5 consist of two sites of 395 ha and 425 ha, respectively. The 395-ha area corresponds with the project area for the proposed Mura 3 solar PV facility. It is again reiterated that the 395 ha appears to only be sufficient for the proposed solar field, based on the information provided in the DSR. The FSR and the Draft EIA Report must indicate the size of the development footprint against the size of the proposed site.
- 3.3. It is noted that Activities 12, 14 and 23 of Listing Notice (“LN”) 3 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) EIA Regulations, 2014 (as amended) are applied for. Please be advised that no systematic biodiversity plans or bioregional plans for the Western Cape Province have been adopted by this Department. As such, Activity 12.i.ii, Activity 14(ii)(a) and (c) i.i.(ff) and Activity 23(ii)(a) i.i.(ff) of LN 3 of the NEMA EIA Regulations, 2014 (as amended) are not applicable to the application for environmental authorisation.
- 3.4. Appendix F and Table 2-1 of the DSR list the specialist studies identified by the Screening Tool, that should be undertaken in the environmental impact reporting (“EIR”) phase. The EAP has provided motivation for undertaking or not undertaking the recommended Screening Tool specialist studies, as well as the undertaking of additional specialist studies not identified by the Screening Tool. Section 2.2.1 of the DSR notes that *“An RFI Study will not be undertaken... As this theme has been identified as high, a compliance statement will be prepared by the EAP and included in the EIA Report.”* Please note that the Screening Tool indicated a medium (and not high) sensitivity for the Radio Frequency Interference (“RFI”) theme. The Plan of Study for EIA (Section 10.5) lists the specialist studies that have been commissioned for the EIR phase, which are aligned to section 2.2.1 of the DSR. The Plan of Study

for EIA does not include the undertaking of an RFI Assessment. Please thus indicate whether an RFI Compliance Statement will be undertaken by the EAP in the EIR phase. If so, the Plan of Study for EIA must be amended to include the RFI Compliance Statement.

- 3.5. The Plan of Study for EIA must be amended to include an Archaeological Impact Assessment as part of the Cultural Heritage Impact Assessment.
- 3.6. Please ensure that the specialist assessments include a cumulative assessment of the same renewable energy projects within a 30km radius of the proposed site. It is noted that the Terrestrial Biodiversity Compliance Statement compiled by 3Foxes Biodiversity Solutions dated November 2022 refers to the *"The three Nuweveld WEFs west of the site have been authorised and there is also the Hoogland 1 and Hoogland 2 WEFs which have not yet been authorised and lie adjacent and to the north and west of the Nuweveld site"*. Please note that the Hoogland 1 and 2 wind energy facilities ("WEFs") have received environmental authorisations. The Socio-Economic Impact Assessment Report compiled by Independent Economic Researchers dated January 2023 refers to the *"Assessment of cumulative impacts considered Mura 1, 2, 3 and 4 SEFs; Hoogland 1, 2, 3 and 4 WEFs; Nuweveld North, East and West WEFs, Taaibos WEFs, Soutrivier WEFs, as well as the Mura, Hoogland, Nuweveld and Gamma Grid Corridors."* Other scoping phase specialist assessments also include reference to the Taaibos and Soutrivier WEFs. If within a 30km radius of the proposed site, these WEFs must be included in all the specialist assessments and referenced in the FSR and Draft EIA Report.
- 3.7. The Traffic Impact Assessment ("TIA") compiled by Athol Schwarz dated 30 November 2022 indicates that access to the proposed site is via the OP 08881 and an existing private road from the DR 02317. It is further noted that a site visit of the area was undertaken by the traffic engineer in September 2019. The TIA notes that *"OP 08881 is 36.9 km long, starting at the DR 02317 before ending at the farm Slangfontein. This road will be used to access Mura 3 and Mura 4. This road was not included in the site inspection. Thus, the author cannot comment on the condition or the viability of using this route."* It is crucial that this limitation/ gap in knowledge be determined during the EIR phase to confirm that OP 08881 is acceptable for traffic to and from the proposed site. Comments from the relevant road's authority on the condition or viability of the road would be acceptable.
- 3.8. Please include reference to the Western Cape Noise Control Regulations promulgated in Provincial Notice 200/2013 of 20 June 2013 in the section dealing with provincial and municipal legal and regulatory framework in the Draft EIA Report.
4. Directorate: Waste Management – Mr Hassan Parker (Email: Hassan.Parker@westerncape.gov.za; Tel.: (021) 483 6877):
 - 4.1. It is recommended that the following aspects, among others, be taken into consideration in terms of waste management for the proposed development:
 - 4.1.1. Implementation of a solid waste management hierarchy – taking the most environmentally friendly steps to avoid resorting to illegal dumping or disposing of waste to landfill that can be diverted.
 - 4.1.2. Measures, as far as possible, for the recycling and/or recovering of materials from the solar PV infrastructure in the event of partial or complete replacement when reaching "end-of-life" or undergoing replacement or maintenance repairs.

- 4.2. This Directorate awaits the Draft EIA Report, EIR specialist studies and Environmental Management Programme ("EMPr") to provide additional comment.
5. Directorate: Pollution and Chemicals Management – Ms Shehaam Brinkhuis (Email: Shehaam.Brinkhuis@westerncape.gov.za; Tel.: (021) 483 8309):
- 5.1. This Directorate has no comments on the DSR and Plan of Study for EIA and awaits the Draft EIA Report (and accompanying EMPr) to provide comment on potential pollution impacts and mitigation measures.

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

Thea Jordan Digitally signed by Thea Jordan
Date: 2023.04.11 13:04:38 +02'00'

pp **HEAD OF DEPARTMENT**
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Letter signed by:

Thea Jordan

Director: Development Facilitation

Date: 11 April 2023

CC: Mr Jay-Jay Mpelane (DFFE)

Email: JMpelane@environment.gov.za

Comments on Mura 3 Solar Photovoltaic Facility (Draft Scoping Report)

Name of IA&P:	Anthony Jefferson		
Matter: (Title of Legislation)	NEMA EIA Regulations, 2014 (as amended) and Listing Notices of 2017		
Contact details:			
Email:	Redacted as per POPIA requirements		
Telephone:			
Submitted To:	Megan.Govender@wsp.com (WSP Group Africa (Pty) Ltd.)		

COMMENTS:

Comment	Suggestion
<p>Project Infrastructure:</p> <p>The DSR omitted to include at least one comprehensive site layout plan illustrating all proposed onsite and off-site infrastructures.</p>	<p>It is suggested an updated SR or the EIR to include such a layout plan at an appropriate scale.</p>
<p>Project Infrastructure:</p> <p>Section 3.4.1, indicates that solar Modules will be located on either single axis tracking structures or fixed tilt mounting structures or similar.</p>	<p>It is suggested that an updated SR or the EIR indicate the exact mounting structure technology that will be used to mount the solar PV modules. This is to ensure transparency from the outset to prevent possible 11th hour substandard technology for the Central Karoo.</p>
<p>Project Infrastructure:</p> <p>Section 3.4.3, states that "The BESS will be Lithium-ion or similar solid-state technology."</p>	<p>It is suggested that an updated SR alternatively the EIR indicate the exact BESS technology. This is to ensure transparency of potential health & safety risk and to prevent 11th hour substandard technology be dumped upon the Central Karoo.</p>
<p>PV & MOUNTING SYSTEM:</p> <p>Considering the CKDM is the poorest region in the Western Cape Province and its communities are the most vulnerable in</p>	

<p>the province; but its electricity rates are higher than many if not all areas within the Cape Metro. Further, section 3.2.1, states that this Mura 3 Solar PV Facility is a large-scale system supplying power into the commercial electricity grid and not to local users. Hence, how will this proposed project impact the CKDM communities passively in a direct manner with significant reduced electricity prices? If, any direct positive impact of reduced power prices at community level, what will the expected timeline be from the time of operation?</p> <p>Section 3.2.1, only made reference to sunlight as a source whilst excluding geothermal as a potential source. Hence the two considered mounting systems is limited to single axis tracking and fixed axis mounting structures.</p>	<p>Suggestion...the municipality be subsidised by Eskom to allow it to reduce its electricity prices to communities whilst still being able to make a marginal income profit.</p> <p>It is suggested that the economic viability of geothermal heat/ power be investigated. If, it is viable, then an additional mounting technology be considered such as bifacial axis mounting structures be considered. It is assumed that the last mentioned structure would be cost effective oppose to the current two considered mounting structures.</p>
<p>Section 3.3, omitted to consider potential geothermal heat radiation that can be a viable energy source during non-sunshine days/evening periods.</p>	<p>It is suggested the following sentences be changed as follows, " Since solar and wind technology depend largely on whether the sun is shining or the wind is blowing, respectively, these technologies are more efficient when these sources are available."</p>
<p>Section 3.3.2, only indicates that, "The battery facilities...will not have any</p>	<p>It is suggested that the EMPr indicates</p>

<p>additional office/operation/maintenance infrastructure as those of the substation.</p>	<p>specific scheduled mechanical safety maintenance operations that should be conducted in terms of all applicable SA Health & Safety requirements i.e. the OSHAct and Mechanical and Ventilation Regulations; and other applicable regulatory tools as cited under section 3.3.3, of the DSR.</p>
<p>Location Map: Section 3.1, page 26-32 read together with section 4.1, read together with Appendix E (Maps). These sections basically addressed only the GPS co-ordinates; alternative sites particulars are scattered around in figures with no scales at times; and no credible topographical map but more of a kind of thematic map has been provided.</p>	<p>It is suggested that the following being addressed in an updated scoping report or the EIA report:</p> <p>Provide a colour location map at a larger scale of at least 1:50 000. The scale must be indicated on the map. The map must indicate the following:</p> <ul style="list-style-type: none"> • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend to represent physical/natural landscapes, water features, vegetation features, constructed/cultural/man-made landscape, and transport and administration features on the map. Towns cited under section 6.3.5 should be depicted on the map.; • the prevailing wind direction (during November to April and during May to October); • Date map was printed; and • the already provided GPS Hartbeesthoek 94/WG584 co-ordinate system information.
<p>Site Plan:</p>	

Section 3.1, read together with section 4.1, read together with Appendix E (Maps) should provide an amended Site Plan for the preferred Mura Solar 3 project as well as each alternatives considered. These site plans should conform to the following:

Detailed site plan(s) must be prepared for each alternative site or alternative activity and provided in an updated SR or EIAR/EIR. The site plan must contain or conform to the following:

- The detailed site plan must be at a scale preferably at a scale of 1:500 or at an appropriate scale. The scale must be indicated on the plan.
- The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan.
- The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be indicated on the site plan.
- The position of each element of the application as well as any other structures on the site must be indicated on the site plan.
- Services, including electricity supply cables (indicate above or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the development must be indicated on the site plan. Servitudes indicating the purpose of the servitude must be indicated on the site plan. Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to):
 - Watercourses/Rivers/Wetlands (including non-perennial features).
 - Flood lines (i.e. 1:10 year, 1:50 year, and 1:100 year where applicable;
 - Ridges.
 - Cultural and historical features.
 - Areas with indigenous vegetation (even

	<p>if it is degraded or infested with alien species).</p> <ul style="list-style-type: none"> •Whenever the slope of the site exceeds 1:10, then a contour map of the site must be submitted.
<p>Schematic Process/Project Drawing</p>	<p>It is suggested a holistic schematic process drawing (project layout) of the entire solar Mura 3 project be provided. This drawing should include all the different stages with its main technology/infrastructure in a input-process-output manner.</p>
<p>Photographs:</p> <p>Section 2.4 read together with section 2.7, states that descriptions of environmental attributes were by means of combination of desktop reviews i.e. aerial imagery and site investigations done between March and October 2022, to identify sensitive features on site. It further states that "...the latest available aerial imagery for the site."</p>	<p>However a number of important information has been left out and need to be provided in an updated SR or during the EIA phase document as follows:</p> <ol style="list-style-type: none"> 1. Colour photographs of the site and its surroundings (taken of the site and from the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan; 2. Recent aerial photograph or at least dates of those aerial photographs (attach as an Appendix). The Appendix should be supplemented with additional dated onsite-photographs taken of relevant features during your stated field trips as cited under section 7.2 of the DSR. Kindly note, the aforementioned requirements must be duplicated for all alternative sites.
	<p>It is suggested a larger A3 size map as an Appendix be provided under section 6.1.3 (geology).</p>

<p>Land use character of surrounding area</p> <p>Section 6.3.5.1 read together with section 6.3.4.3 failed to adequately describe the current land uses on the proposed project site and its immediate surrounding areas. The aforementioned sections also failed to adequately describe the prominent features that occur in the immediate surrounds from the proposed project area.</p>	<p>Hence it is suggested either an updated scoping report or the EIA provides a proper description of the current land uses and/or prominent features that occur within +/- 500m radius of the proposed project area and neighbouring properties if these are located beyond 500m of the site from all directions. Further, a description of any potential impacts the proposed project may pose on the highlighted land uses or features.</p>
<p>Socio-Economic:</p>	<p>It is suggested that the Mitigation and Management Measures under section 6.3.5 relating to regional employment and contracts be included in an updated scoping report or be addressed within the EIA as follows: specifications/requirements/targets:</p> <ul style="list-style-type: none"> • 100% unskilled workers must be local; • 90% semi-skilled workers from local; and • 70% skilled workers must be from local/indigent. • That the concept "local/indigent" shall mean having been born in the CKDM and having lived in the CKDM area for at least more than 10 years and having attended at least either and/or a primary or high school in the CKDM area irrespective whether the candidate is currently residing in the CKDM area or not. If not born in the CKDM area than at least one parent born in the region

	<p>but both parents must have lived in the area for more than 20 years;</p> <ul style="list-style-type: none"> • That a CKDM professionals body shall be consulted for particulars of local/indigent professionals to be considered for skilled jobs and/or be willing to undergo rapid skills upgrading to occupy skilled jobs; • That CKDM Professionals Body shall have representation in all committees/forums established under this proposed project; • That local sub-contractors who did not gain from tenders in the past locally will receive preferential treatment in terms of the equity principle and a skills transfer programme be adopted by the main contractors; • That sub-contractors who previously gained tenders locally equally compete with external contractors to be main contractors; • That the income/wealth status of sub-contractors and skilled workers for all Black contenders / candidates will also be included in the specifications in addition to the standard "black" requirement under the BBBEE and EEA redress umbrella to ensure wealth does not circulate consistently amongst a few individuals.
<p>Section 3.6 " NEED AND DESIRABILITY" have very little to zero direct and possibly indirect relevance to the Central Karoo District Municipal Area. Yes it is a common fact that the district is in dire need of urgent economic development.</p>	

<p>Section 3.6, states that South Africa is the seventh highest coal producer in the world, with approximately 77% of the country's electricity generated from coal.</p> <p>Section 3.6, states also that the SA's large dependence on coal and its use also resulted in a variety of negative impacts on the environment, including the contribution to climate change. SA is also the highest emitter of GHGs in Africa; attributed to the country's energy-intensive economy that largely relies on coal-based electricity generation.</p>	<p>It is suggested a comparable spreadsheet of the aforementioned seven countries and energy mix usages be provided.</p> <p>It is suggested a western cape regional spreadsheet show casing coal dependence amongst WC district and metro municipalities. Also to include comparative WC district municipalities and metro municipality drivers and associated environmental impacts (GHG emissions, Climate Change, Health Impacts, etc.) as a result of direct/indirect coal usages. Also to include comparative data to showcase the status of energy-intensive economies that relies on coal-based electricity generation amongst the WC district municipalities and metro municipality.</p>
<p>Section 3.6 NEED AND DESIRABILITY also omits to include a dedicated subsection of WESTERN CAPE PERSPECTIVE and REGIONAL PERSPECTIVE</p> <ul style="list-style-type: none"> • which would have outlined the energy mix in response to the growing electricity demand and the promotion of clean sources of energy within the CKDM in comparison to the province; • it would have outlined the reduction and elimination of poverty in the CKDM is more dire oppose to other regions within the province; • it would also have outlined that power shortages are most probably 	<p>Hence it is strongly suggested that mention be made about the poorest socio-economic status of the region in comparison to the rest of the province. Further it is strongly suggested that factual comparative analysed data and an objective interpretation of electricity prices communities and businesses are subjected to amongst the districts and one metro municipality in the western cape be provided.</p> <p>Further it is strongly suggested the case study of the Frankfort Municipality and Surrounding Towns Pilot/Case Study that uses four (4) Solar Energy Farms operated</p>

<p>the worse in the CKDM oppose to other regions in the province, esp the metro;</p> <ul style="list-style-type: none"> • it would have outlined the socio-economic benefits available to the local communities and businesses in the CKDM area from this proposed project; and • that the project will And this premise will promote the reaching one of the National Development Plan's aims which is to reduce and eliminate poverty in South Africa by 2030 (see section 3.6.2, page 40 of the dBAR). 	<p>by Rural Maintenance (a private IPPP) that benefits specifically the local communities and businesses be used and cited.</p> <p>This is to empower people of the Central Karoo to negotiate with all IPPP'S and Eskom in the region for electricity price reductions of up to 30% (considering the region might have more than four solar and wind energy farms) and many more other benefits. Benefits to the local communities and businesses of Frankford gains from that pilot study are as follows:</p> <ul style="list-style-type: none"> • Electricity demand from the Eskom grid are reduced whilst the local communities and business still have access to electricity; • The local community and businesses saves a reduced electricity cost of 15% pricing to what they would have paid to Eskom. • Water and Sanitation Facilities operates 24/7 due to electricity flow, even though it is loadshedding; • Cable theft reduced because the local grid remained alive; • Small Power Users like residence and business are exposed to power outages in smaller durations as per their requests; • The Large Power Users are exposed to power outages of a longer duration as per their request; • Low voltages has been reduced resulting in local communities using their equipment more optimally; and • In the event of loadshedding,
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	<p>locals receives more reliable weekly schedules of specific reduced periods of loadshedding.</p>
<p>Alternatives (Location):</p> <p>Section 4.1.1 only referenced that areas were assessed from a technical perspective by considering slope, aspect, undulation, and access, and more detailed environmental perspective. Resulting in the consideration of high level solar design. No consideration was given to geothermal heat reflection capacity from the landscape such as geological structures and soil characteristics. This could have resulted in the consideration of alternative technologies such as the addition of bi-facial panels and the reconsideration of methods of elevating those bi-facial panels. Hence it is suggested the Amended dBAR or FBAR include descriptions, maps and geothermal heat radiation capacities during non-sunshining days/periods.</p>	<p>It is suggested the scoping report be updated or the EIA address all current land uses in the proposed project region, including depicting within the topographical map and a separate thematic map layers of potential future economic development resources such as geological minerals and gas.</p>
<p>Alternatives (Technology):</p>	<p>It is suggested section 4.2.1 provide a detailed consideration of bi-facial solar panels in relation to both sun radiation/heat and geothermal heat.</p>
<p>Alternatives (Operational):</p> <p>Section 4, made no provision for the consideration of Operational Aspect Alternatives. A detailed objective review and assessment of the suggested factors for consideration will equip the people of the</p>	<p>Hence it is strongly suggested that the updated scoping report or the EIA provide a detailed consideration of this aspect by considering the following factors:</p> <ul style="list-style-type: none"> • Comments made in this Letter of Comments under the section that

<p>Central Karoo as to whether their genuine socio-economic upliftment is equally a priority as the rest of the province, but not limited to it.</p>	<p>dealt with the Frankfort Solar Energy Pilot Study;</p> <ul style="list-style-type: none">• Operational and technology aspects used in the aforementioned pilot study;• Electricity costs savings Frankfort Pilot Study local community, businesses and agriculture gained as a result of not having used the Eskom grid; and incorporate objective information of other current and/or proposed/intent renewable energy projects the western cape government recently announced to take all provincial municipalities off the Eskom national grid.
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emailed

Signature



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2324

Enquiries: Mr Wayne Hector

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Maxwell Office Park
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MIDRAND
1685

Cell Number: (011) 361-1392
Email Address: Ashlea.strong@wsp.com

PER E-MAIL / MAIL

Dear Ms Strong

ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF UP TO 320 MW MURA 3 SOLAR PHOTOVOLTAIC FACILITY BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE PROVINCE AND NORTHERN CAPE PROVINCES.

The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment (PoSEIA) dated April 2023 and received by the Department on 18 April 2023, refer.

The Department has evaluated the submitted final SR and the PoSEIA dated April 2023 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

The FSR is hereby **accepted** by the Department in terms of Regulation 22(1)(a) of the EIA Regulations, 2014, as amended.

You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the Plan of Study for Environmental Impact Assessment as required in terms of the EIA Regulations, 2014, as amended.

Please ensure that the following information forms part of the next report:

1. Listed Activities

- a) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.
- b) Please continue to ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project

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description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.

- c) The listed activities represented in the EIAR and the application form must be the same and correct.
- d) The EIAR must assess the correct sub listed activity for each listed activity applied for.

2. **Public Participation**

- a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR.
- b) Please ensure that all issues raised and comments received during the circulation of the draft SR and draft EIAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are addressed in the final EIAR. Proof of correspondence with the various stakeholders must be included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- c) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to I&AP’s comments.
- d) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
- e) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.
- f) The EAP is requested to contact the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAR.

3. **Alternatives**

The EAP is required to provide clear assessment for each identified alternative and further provide clear motivation and reasons as to why the **preferred** alternative **proves** to be the preferred compared to other alternatives.

These alternatives includes:

- Location / Site Alternatives.
- Technology Alternatives.
- Design and Layout Alternatives.
- BESS technology alternatives.
- No-go alternative.

4. **The layout map must indicate the following:**

All supporting onsite infrastructure such as follows:

- All supporting onsite infrastructure that will support the proposed 320MW photovoltaic solar facility e.g., roads (existing and proposed, fencing, BESS area, etc.).
- Connection routes (including pylon positions) to the distribution/transmission network; and
- All existing infrastructure on the site, including neighbouring villages (if any), etc.
- The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
- Buffer areas; and
- All “no-go” areas.

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5. **Specialist assessments**

Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of Substation, and all other associated infrastructures that they have assessed and are recommending for authorisation.

- a) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- b) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas. Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
- c) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
- d) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.
- e) The screening tool output:
 - The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.
 - It is the **responsibility** of the **EAP** to confirm the list of specialist assessments and to motivate in the assessment report, the reason for not including any of the identified specialist studies including the provision of photographic evidence of the site situation. The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached.
- f) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.
- g) Please include a table that shows the proposed studies and the relevant specialists carrying out the study. In addition, a summary should be included of the specialist's recommendations in terms of the alternatives that are preferred based on the findings of their study.

General

Details of the future plans for the site and infrastructure after decommissioning in 20-30 years and the possibility of upgrading the proposed infrastructure to more advanced technologies must be indicated.

Should a Water Use License be required, proof of application for a license needs to be submitted.

A construction and operational phase EMP that includes mitigation and monitoring measures must be submitted with the final EIAR.

The comments issued by this Department on 29 March 2023, during the draft scoping report are still valid and must be all addressed throughout the EIA process.

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Should you use coordinates, please ensure that it is in the format as prescribed in the 2014 EIA NEMA Regulations, as amended.

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, with regard to the time period allowed for complying with the requirements of the Regulations.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.

Yours faithfully



Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries & the Environment
Signed by: Mr Wayne Hector
Designation: Deputy Director: Priority Infrastructure Projects
Date: 12/05/2023

cc:	Lance Blaine	Mura 3 (Pty) Ltd	Email: anthony@atlanticep.com
	Gavin Benjamin	DEA&DP	Email: gavin.benjamin@westerncape.gov.za
	Elsabe Swart	DENC	Email: elsabeswart.denc@gmail.com
	Ashley Mitchell	Beaufort West Local Municipality	Email: buildingcontrol@beaufortwestmun.co.za

Annexure 1

Format for Comments and Response Trail Report:

Date of comment, format of comment name of organisation/I&AP	Comment	Response from EAP/Applicant/Specialist
27/01/2016 Email Department of Environment, Forestry and Fisheries: Priority Infrastructure Projects (John Doe)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted) The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form

Govender, Megan

From: Ephron Maradwa <EMaradwa@dffe.gov.za>
Sent: Tuesday, 14 March 2023 14:02
To: Govender, Megan
Cc: Constance Musemburi; EIAAdmin; Salome Mambane; Jay-Jay Mpelane
Subject: 14/12/16/3/3/2/2324

Dear Megan

14/12/16/3/3/2/2324

ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION AND DRAFT SCOPING REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A SCOPING ASSESSMENT PROCESS FOR THE PROPOSED MURA 3 SOLAR PHOTOVOLTAIC FACILITY (UP TO 320 MW) BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE AND NORTHERN CAPE PROVINCES.

The Department confirms having received the Application form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 03 March 2023. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.

Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Kindly quote the abovementioned reference number in any future correspondence in respect of the application.

EIA Applications

Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to EIAAdmin@dffe.gov.za.

You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email.



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia,· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2324

Enquiries: Mr Wayne Hector

Telephone: (012) 399 9410 **E-mail:** WHector@dffe.gov.za

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
Building 1, Golder House
Maxwell Office Park, Magwa Crescent West
Waterfall City
MIDRAND
1685

Cell Number: (011) 361 1392
Email Address: Ashlea.strong@wsp.com

PER MAIL / E-MAIL

Dear Ms Strong.

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF UP TO 320 MW MURA 3 SOLAR PHOTOVOLTAIC FACILITY BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE PROVINCE AND NORTHERN CAPE PROVINCES.

The Application for Environmental Authorisation and Draft Scoping Report (SR) dated March 2023 and received by the Department on 03 March 2023, refer.

This letter serves to inform you that the following information must be included to the final SR:

1. Application form:

- The applicant represented by Mr Lance Blaine, did not sign the application form. Please note that a signed application form must be submitted.
- Kindly clarify the reason why this Department is the Competent Authority (CA) in terms of Section 24C of NEMA. State clearly if the applicant intends to bid the project in terms of the Integrated Resource Plan (IRP) and the Renewable Independent Power Producer Programme (REIPPP).
- Please note that the Minister is the competent authority for applications for facilities or infrastructure, that will form part of the Integrated Resource Plan (IRP) Programmes for technologies whose procurement processes have been determined under the Electricity Regulation Act, 2006 and / or the Electricity Regulations on New Generation Capacity. If the applicant will not, or does not intend to, participate in any of the IRP programmes, the competent authority will be the MEC responsible for environmental affairs in the respective province. Be advised that this information must be clearly presented in Section 1 –Competent Authority in the application form.
- Reflecting the above, the reasons provided in Section 1 of the application form for this Department being the Competent Authority in terms of S24C of NEMA are incomplete. This must be rectified and expanded on in the application form as well as the report. Please refer to GN 779.

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- Please ensure that the application form is fully completed and correct. The SG codes, all farm names, and the EAP's contact details are correct.
- Please include the GPS coordinates for the onsite substation and the battery energy storage system (BESS) facility.

2. Listed Activities

- It is noted that the proposed solar facility does not fall within any renewable energy development zones. Although the application form indicates that part of the project is within the Electricity Grid Infrastructure (EGI) as per GN 113, therefore this application will be considered as a normal EIA application.
- Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.
- You are required to confirm whether systematic biodiversity plans or bioregional plans are adopted by the competent authority. There are certain activities in Listing Notice 3 that requires that Bioregional Plans to be adopted.
- It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property possibly falls within geographically designated areas in terms of Listing Notice 3 Activities. Written comments must be obtained from the relevant authorities (or proof of consultation if no comments were received) and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided. Please also ensure that the potential impacts on the affected Critical Biodiversity Areas and Ecological Support Areas are fully assessed in the final Environmental Impact Assessment Report (EIAR).
- If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.dffe.gov.za/documents/forms>.

3. Layout & Sensitivity Maps

- Please provide a layout map which indicates the following:
 - The proposed location of the PV array and associated infrastructure of the proposed up to 320MW Mura 3 Solar Photovoltaic Facility
 - The proposed grid infrastructure connecting the PV facility to the existing substation, overlain by the sensitivity map;
 - All supporting onsite infrastructure e.g., roads (existing and proposed); fence, office buildings, and etc.
 - The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
 - Buffer areas; and
 - All "no-go" areas.
- The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure, as well as the neighbouring PV Solar Clusters.
- Google maps will not be accepted for decision-making purposes.

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4. **Public Participation Process**

- Please ensure that all issues raised, and comments received on the draft SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: BCAdmin@dffe.gov.za, the provincial authority and the local municipality) in respect of the proposed activity are adequately addressed in the final SR. Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.
- The Public Participation Process must be conducted in terms of the approved public participation plan and Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended. Take note of the timeframes required for adequate public participation.
- A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments (pre and post submission of the draft SR) for this development. The C&R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.

5. **Specialist Assessments to be conducted in the EIA Phase**

- Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of PV arrays, and all other associated infrastructures that they have assessed and are recommending for authorisations.
- The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
- You are further required to ensure that all required specialist studies are recommended and assessed for the proposed up to 320MW Mura 3 Solar Photovoltaic Facility.
- It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols. Please note further that the protocols require the specialists' to be registered with SACNASP in their respective field.
- Please include a table in the report, summarising the specialist studies required by the Department's Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols.

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6. Cumulative Assessment to be conducted in the EIA Phase

Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:

- Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
- Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
- A cumulative impact environmental statement on whether the proposed development must proceed.

7. Environmental Management Programme

The EMPr must include the following:

- It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the Generic Environmental Management Programme, **must** be used and submitted with the final report over and above the EMPr for the facility. This means that a generic EMPR must be included for the substation. In total, 2 EMPrs should accompany the final report.
- Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.

General

You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:

“If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a SR which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”.

You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of SRs in accordance with Appendix 2 and Regulation 21(1) of the NEMA EIA Regulations 2014, as amended.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

wh

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



Ms Milicent Solomons
Acting Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Letter signed by: Mr Wayne Hector
Designation: Deputy Director: Priority Infrastructure Projects
Date: 29/03/23

cc:	Lance Blaine	Mura 4 (Pty) Ltd	Email: surina@red-cap.co.za
	Ashley Mitchell	Beaufort West Local Municipality	Email: buildingcontrol@beaufortwestmun.co.za
	MJ Penxa	Beaufort West Local Municipality	Email: jacksonp@beaufortwestmun.co.za

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20672

Date: Friday March 31, 2023
Page No: 1

Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mura 3 (Pty) Ltd

Mura 3 Solar Photovoltaic Facility (up to 320 MW) between Loxton and Beaufort West in the Western Cape and Northern Cape Provinces

WSP has been appointed by Mura 3 (Pty) Ltd to undertake an Environmental Authorisation Application for a proposed Solar Photovoltaic Facility, near Loxton, Northern Cape Province.

A Draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include solar panels, substations, Battery Energy Storage System (BESS), offices, operational and maintenance buildings, warehouse/workshop, ablution facilities, converter/invertor stations, underground cabling, internal roads, fencing, storm water management infrastructure, and site camps.

Almond, J. E. 2022. Combined Desktop & Field-Based Palaeontological Heritage Study: Proposed Mura PV Solar Facilities between Loxton and Beaufort West, Beaufort West Local Municipality (Central Karoo District Municipality), Western Cape and Ubuntu Local Municipality (Pixley Ka Sema District Municipality), Northern Cape

The report combines the results for five development applications. Only the results pertaining to Mura PV 3 will be discussed below.

The proposed development is underlain by the Teekloof Formation. A total of 12 fossil sites were recorded within the proposed development area. These include reworked bone fragments, remains of small tetrapods, reedy plant stem casts and invertebrate trace fossils of Grade IIIC heritage significance, and robust tetrapod remains and sizeable ridged bone fragment of Grade IIIB significance (sampled/collected).

No recorded fossil sites of unique scientific or conservation value are likely to be directly impacted by the proposed renewable energy and electrical infrastructure developments and no further palaeontological studies or mitigation is proposed here with regard to these sites. A Chance Fossil Finds Protocol is recommended to be implemented.

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20672

Date: Friday March 31, 2023
Page No: 2

Orton, J. 2022. Heritage Impact Assessment: Proposed Mura 1-4 PV Facilities, Beaufort West Magisterial District, Western Cape and Victoria West Magisterial District, Northern Cape

The report combines the results for five development applications. Only the results pertaining to Mura PV 3 will be discussed below.

A total of two heritage resources were identified within the Mura PV 3 development area. These include a stone-walled house ruin of medium significance and a mound of rocks of very low heritage significance.

Recommendations provided in the report include the following:

- A Fossil Chance Finds Procedure (as supplied in the palaeontological specialist study) must be included in the project EMPr;
- The site at waypoint 1402 should be avoided if possible with a 50 m buffer or else revisited to record it in detail as well as determining whether any sampling would be required;
- Any realignment of the DR02317 within 400 m of waypoint 2000 must be checked in the field and approved by an archaeologist;
- No stones may be removed from any archaeological site;
- The road construction camp location must be approved by an archaeologist and subjected to a site inspection if deemed necessary; and
- If any archaeological material or human burials are uncovered during the course of development, work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

Interim Comment

SAHRA requests clarity regarding the permit used for the collection of fossil material in the Northern Cape Province. Further comments will be issued upon receipt of the requested clarity and the draft EIA inclusive of appendices.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20672

Date: Friday March 31, 2023
Page No: 3

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

ADMIN:
Direct URL to case: <https://sahris.sahra.org.za/node/612928>
(DFFE, Ref:)

Govender, Megan

From: Thea Jordan <Thea.Jordan@westerncape.gov.za>
Sent: Tuesday, 11 April 2023 13:06
To: Govender, Megan; Strong, Ashlea; JMpelane@environment.gov.za; EIAAdmin
Cc: Adri La Meyer
Subject: COMMENTS ON THE DSR FOR THE PROPOSED DEVELOPMENT OF THE 320MW MURA 3 SOLAR PV FACILITY, BEAUFORT WEST AND UBUNTU LOCAL MUNICIPALITIES
Attachments: 2023 April 11 - PROPOSED DEVELOPMENT OF THE 320MW MURA 3 SOLAR PV FACILITY, BEAUFORT WEST AND UBUNTU LOCAL MUNICIPALITIES.pdf

Dear EAP,

Your request for comment refers.

Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan
Pr. Pl. (A/1237/2002)
Director: Development Facilitation
Department of Environmental Affairs and Development Planning
Western Cape Government

11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 4093
Email: Thea.Jordan@westerncape.gov.za
Website: www.westerncape.gov.za/eadp



Be 110% Green. Read from the screen.

Due to COVID-19 restrictions, we are still operating on a "work-from-home" basis. Should you not be able to contact the numbers above, please call +27 (0)21 483 4091 between 07:30-16:00.

From: Govender, Megan <Megan.Govender@wsp.com>
Sent: Monday, March 6, 2023 14:51
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>
Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST: DRAFT ENVIRONMENTAL REPORTS REVIEW

Dear Commenting Authority,

Notice is given in terms of Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) for submission of an application for environmental authorisation (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).

Red Cap Energy is proposing to develop four solar facilities, namely Mura 1, Mura 2, Mura 3, and Mura 4, and an associated grid connection, collectively known as the Mura PV Development between Loxton and Beaufort West in the Beaufort West Local Municipality and Ubuntu Local Municipality and the Central Karoo District Municipality and Pixley ka Seme District Municipality in the Western Cape and Northern Cape Provinces. The proposed Mura PV Development is located in close proximity to the approved Nuweveld Wind Farm Development. The proposed authorisations include the following Basic Assessment (BA) and Scoping and Environmental Impact Reporting (S&EIR) processes:

- Mura 1 Solar PV Facility: BA Process
- Mura 2 Solar PV Facility: S&EIR Process
- Mura 3 Solar PV Facility: S&EIR Process
- Mura 4 Solar PV Facility: S&EIR Process
- Mura EGI Corridor: BA Process

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the independent Environmental Assessment Practitioner (EAP) by Red Cap Energy (Pty) Ltd, to manage the respective BA and S&EIR processes. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the process.

DRAFT BASIC ASSESSMENT AND DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Environmental Basic Assessment and Scoping Reports will be made available from WSP on request and/or at the venues below for review and comment for 30 days from 06 March 2023 to 06 April 2023.

Area	Venue	Street Address
Beaufort West	Beaufort West Public Library	Corner of Bird Street and Church Street
	Klein Karoo Agri	80 Donkin Street
Loxton	Loxton Library	Margaretha Prinsloo Street, Loxton
WSP Website	https://www.wsp.com/en-ZA/services/public-documents	
Datafree Website	https://wsp-engage.com/	

The report has also been made available at the link below easy access:

One Drive Link	<input type="checkbox"/> _Mura Solar PV Development For Public Review
One Drive Instruction	<ul style="list-style-type: none"> • Please note that you will receive a separate email with the link to the one drive. This link will then request a verification number which will automatically be sent to your email address – if it doesn't seem to come through please check your "spam" folder

A presentation on the summary of the proposed development has been collated. The presentation has been made available on the WSP website, Datafree website and One Drive Link.

PowerPoint Instruction	<ul style="list-style-type: none"> • To view and listen to the project summary presentation, please open the PowerPoint Presentation and click on the speaker icon on the left on each slide to listen to the accompanying commentary
-------------------------------	--

WSP contact details are:

Name: Megan Govender

Tel: 011 361 1410
Fax: 011 361 1381
E-mail: Megan.Govender@wsp.com
Address: PO Box 98867, Sloane Park, 2152

We look forward to your participation in this process.

Kind Regards,



Megan Govender
Senior Consultant

T +27 011 361 1300
M +27 083 228 5288



WSP in Africa
Building 1, Golder House, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
2191 South Africa

wsp.com

WSP is a proud Level 1 B-BBEE contributor and is internationally certified for ISO 9001, 14001 & 45001

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WSP Group Africa (Pty) Ltd, Registered Office: Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand, Gauteng, 1685, South Africa
Registered Number: 1999/008928/07 South Africa

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References:

18/2/3/2023-2024 (Development Facilitation)

19/2/5/3/C3/2/WL0035/23 (Waste Management)

19/3/2/4/C3/1/DDF0131/22 (Pollution and Chemicals Management)

Attention: Ms Megan Govender

WSP Group Africa (Pty) Ltd
P.O. Box 98867
Sloane Park
JOHANNESBURG
2151

Megan.Govender@wsp.com

Dear Madam

COMMENTS ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF THE 320MW MURA 3 SOLAR PHOTOVOLTAIC FACILITY AND ASSOCIATED INFRASTRUCTURE AND STRUCTURES (INCLUDING, *INTER ALIA*, A BATTERY ENERGY STORAGE SYSTEM AND SUBSTATION, 2 ON-SITE SOLAR FARM SUBSTATIONS, ACCESS ROADS, SITE CAMPS, CABLING, BUILDINGS, ETC.) ON FARM LEEUWKLOOF NO. 43, REMAINDER OF FARM ABRAMS KRAAL NO. 206, PORTION 4 AND THE REMAINDER OF PORTION 3 OF FARM DUIKER KRANSE NO. 45, FARM SNEEUWKRAAL NO. 46, AND AANGRENSEND FARM ABRAMSKRAAL NO. 11, BEAUFORT WEST AND UBUNTU LOCAL MUNICIPALITIES, WESTERN AND NORTHERN CAPE PROVINCES

1. The email correspondence of 06 March 2023, informing interested and affected parties of the release of Draft Scoping Report ("DSR") for comments, the email received on the same day, providing an additional link to download the DSR and appendices, and the Department's email of 05 April 2023, informing the environmental assessment practitioner ("EAP") that the Department is unable to meet the deadline of 06 April 2023, refer.
2. The Department extends its appreciation to the EAP for extending the deadline for comments on the DSR. Please find consolidated comments from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated March 2023 that was available for download from various online platforms provided by the EAP.

3. Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.Lameyer@westerncape.gov.za; Tel.: (021) 483 2887):
- 3.1. This Directorate requires clarity on the extent of the development footprint and that of the proposed site (indicated as Farm Leeuwkloof No. 43, Remainder of Farm Abrams Kraal No. 206, Portion 4 and the Remainder of Portion 3 of Farm Duiker Kranse No. 45, Farm Sneeuwkraal No. 46, and Aangrensend Farm Abramskraal No. 11). The DSR interchangeably refers to the total project area as 436 ha and 395 ha. On page 26 of the DSR it is indicated that *“The proposed Mura 3 Facility will be developed within a project area of approximately 395 hectares (ha), excluding the access road corridor”*, whereas on page 37 it is indicated that *“The total project area is 436 ha”* and that *“The total development envelope for project installation is approximately 395 ha”*. Assuming that the proposed 320MW solar field will be constructed on 395 ha; the proposed battery energy storage system (“BESS”) and BESS substation will be developed on ~ 4 ha; internal gravel access roads will have a development footprint of 36 ha; and up to two 2.2 ha site camps / laydown areas (i.e., 4.4 ha in total) will be developed, then more than 439 ha is required for the proposed solar photovoltaic (“PV”) facility and associated structures and infrastructure. The development footprint of the associated buildings (offices, ablution facilities, operational and maintenance centre, etc.) and the two on-site solar substations were not indicated. Please ensure that the Final Scoping Report (“FSR”) and the forthcoming Draft EIA Report clearly describe the size of the proposed site, the development footprint, and the individual components of the proposed solar PV development.
- 3.2. Further to the above, section 4.1.1 of the DSR deals with the site selection process. It is noted that the original five potential Mura PV development areas were further reduced to two areas (Areas 2 and 5) that were considered suitable for the Mura 1, 2, 3 and 4 solar PV developments. Area 5 consist of two sites of 395 ha and 425 ha, respectively. The 395-ha area corresponds with the project area for the proposed Mura 3 solar PV facility. It is again reiterated that the 395 ha appears to only be sufficient for the proposed solar field, based on the information provided in the DSR. The FSR and the Draft EIA Report must indicate the size of the development footprint against the size of the proposed site.
- 3.3. It is noted that Activities 12, 14 and 23 of Listing Notice (“LN”) 3 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) EIA Regulations, 2014 (as amended) are applied for. Please be advised that no systematic biodiversity plans or bioregional plans for the Western Cape Province have been adopted by this Department. As such, Activity 12.i.ii, Activity 14(ii)(a) and (c) i.i.(ff) and Activity 23(ii)(a) i.i.(ff) of LN 3 of the NEMA EIA Regulations, 2014 (as amended) are not applicable to the application for environmental authorisation.
- 3.4. Appendix F and Table 2-1 of the DSR list the specialist studies identified by the Screening Tool, that should be undertaken in the environmental impact reporting (“EIR”) phase. The EAP has provided motivation for undertaking or not undertaking the recommended Screening Tool specialist studies, as well as the undertaking of additional specialist studies not identified by the Screening Tool. Section 2.2.1 of the DSR notes that *“An RFI Study will not be undertaken... As this theme has been identified as high, a compliance statement will be prepared by the EAP and included in the EIA Report.”* Please note that the Screening Tool indicated a medium (and not high) sensitivity for the Radio Frequency Interference (“RFI”) theme. The Plan of Study for EIA (Section 10.5) lists the specialist studies that have been commissioned for the EIR phase, which are aligned to section 2.2.1 of the DSR. The Plan of Study

for EIA does not include the undertaking of an RFI Assessment. Please thus indicate whether an RFI Compliance Statement will be undertaken by the EAP in the EIR phase. If so, the Plan of Study for EIA must be amended to include the RFI Compliance Statement.

- 3.5. The Plan of Study for EIA must be amended to include an Archaeological Impact Assessment as part of the Cultural Heritage Impact Assessment.
- 3.6. Please ensure that the specialist assessments include a cumulative assessment of the same renewable energy projects within a 30km radius of the proposed site. It is noted that the Terrestrial Biodiversity Compliance Statement compiled by 3Foxes Biodiversity Solutions dated November 2022 refers to the *"The three Nuweveld WEFs west of the site have been authorised and there is also the Hoogland 1 and Hoogland 2 WEFs which have not yet been authorised and lie adjacent and to the north and west of the Nuweveld site"*. Please note that the Hoogland 1 and 2 wind energy facilities ("WEFs") have received environmental authorisations. The Socio-Economic Impact Assessment Report compiled by Independent Economic Researchers dated January 2023 refers to the *"Assessment of cumulative impacts considered Mura 1, 2, 3 and 4 SEFs; Hoogland 1, 2, 3 and 4 WEFs; Nuweveld North, East and West WEFs, Taaibos WEFs, Soutrivier WEFs, as well as the Mura, Hoogland, Nuweveld and Gamma Grid Corridors."* Other scoping phase specialist assessments also include reference to the Taaibos and Soutrivier WEFs. If within a 30km radius of the proposed site, these WEFs must be included in all the specialist assessments and referenced in the FSR and Draft EIA Report.
- 3.7. The Traffic Impact Assessment ("TIA") compiled by Athol Schwarz dated 30 November 2022 indicates that access to the proposed site is via the OP 08881 and an existing private road from the DR 02317. It is further noted that a site visit of the area was undertaken by the traffic engineer in September 2019. The TIA notes that *"OP 08881 is 36.9 km long, starting at the DR 02317 before ending at the farm Slangfontein. This road will be used to access Mura 3 and Mura 4. This road was not included in the site inspection. Thus, the author cannot comment on the condition or the viability of using this route."* It is crucial that this limitation/ gap in knowledge be determined during the EIR phase to confirm that OP 08881 is acceptable for traffic to and from the proposed site. Comments from the relevant road's authority on the condition or viability of the road would be acceptable.
- 3.8. Please include reference to the Western Cape Noise Control Regulations promulgated in Provincial Notice 200/2013 of 20 June 2013 in the section dealing with provincial and municipal legal and regulatory framework in the Draft EIA Report.
4. Directorate: Waste Management – Mr Hassan Parker (Email: Hassan.Parker@westerncape.gov.za; Tel.: (021) 483 6877):
 - 4.1. It is recommended that the following aspects, among others, be taken into consideration in terms of waste management for the proposed development:
 - 4.1.1. Implementation of a solid waste management hierarchy – taking the most environmentally friendly steps to avoid resorting to illegal dumping or disposing of waste to landfill that can be diverted.
 - 4.1.2. Measures, as far as possible, for the recycling and/or recovering of materials from the solar PV infrastructure in the event of partial or complete replacement when reaching "end-of-life" or undergoing replacement or maintenance repairs.

- 4.2. This Directorate awaits the Draft EIA Report, EIR specialist studies and Environmental Management Programme ("EMPr") to provide additional comment.
5. Directorate: Pollution and Chemicals Management – Ms Shehaam Brinkhuis (Email: Shehaam.Brinkhuis@westerncape.gov.za; Tel.: (021) 483 8309):
- 5.1. This Directorate has no comments on the DSR and Plan of Study for EIA and awaits the Draft EIA Report (and accompanying EMPr) to provide comment on potential pollution impacts and mitigation measures.

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

Thea Jordan Digitally signed by Thea Jordan
Date: 2023.04.11 13:04:38 +02'00'

pp **HEAD OF DEPARTMENT**
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Letter signed by:

Thea Jordan

Director: Development Facilitation

Date: 11 April 2023

CC: Mr Jay-Jay Mpelane (DFFE)

Email: JMpelane@environment.gov.za

Comments on Mura 3 Solar Photovoltaic Facility (Draft Scoping Report)

Name of IA&P:	Anthony Jefferson		
Matter: (Title of Legislation)	NEMA EIA Regulations, 2014 (as amended) and Listing Notices of 2017		
Contact details:			
Email:	Jeffathon@gmail.com		
Telephone:	0768663669		
Submitted To:	Megan.Govender@wsp.com (WSP Group Africa (Pty) Ltd.)		

COMMENTS:

Comment	Suggestion
<p>Project Infrastructure:</p> <p>The DSR omitted to include at least one comprehensive site layout plan illustrating all proposed onsite and off-site infrastructures.</p>	<p>It is suggested an updated SR or the EIR to include such a layout plan at an appropriate scale.</p>
<p>Project Infrastructure:</p> <p>Section 3.4.1, indicates that solar Modules will be located on either single axis tracking structures or fixed tilt mounting structures or similar.</p>	<p>It is suggested that an updated SR or the EIR indicate the exact mounting structure technology that will be used to mount the solar PV modules. This is to ensure transparency from the outset to prevent possible 11th hour substandard technology for the Central Karoo.</p>
<p>Project Infrastructure:</p> <p>Section 3.4.3, states that "The BESS will be Lithium-ion or similar solid-state technology."</p>	<p>It is suggested that an updated SR alternatively the EIR indicate the exact BESS technology. This is to ensure transparency of potential health & safety risk and to prevent 11th hour substandard technology be dumped upon the Central Karoo.</p>
<p>PV & MOUNTING SYSTEM:</p> <p>Considering the CKDM is the poorest region in the Western Cape Province and its communities are the most vulnerable in</p>	

<p>the province; but its electricity rates are higher than many if not all areas within the Cape Metro. Further, section 3.2.1, states that this Mura 3 Solar PV Facility is a large-scale system supplying power into the commercial electricity grid and not to local users. Hence, how will this proposed project impact the CKDM communities passively in a direct manner with significant reduced electricity prices? If, any direct positive impact of reduced power prices at community level, what will the expected timeline be from the time of operation?</p> <p>Section 3.2.1, only made reference to sunlight as a source whilst excluding geothermal as a potential source. Hence the two considered mounting systems is limited to single axis tracking and fixed axis mounting structures.</p>	<p>Suggestion...the municipality be subsidised by Eskom to allow it to reduce its electricity prices to communities whilst still being able to make a marginal income profit.</p> <p>It is suggested that the economic viability of geothermal heat/ power be investigated. If, it is viable, then an additional mounting technology be considered such as bifacial axis mounting structures be considered. It is assumed that the last mentioned structure would be cost effective oppose to the current two considered mounting structures.</p>
<p>Section 3.3, omitted to consider potential geothermal heat radiation that can be a viable energy source during non-sunshine days/evening periods.</p>	<p>It is suggested the following sentences be changed as follows, " Since solar and wind technology depend largely on whether the sun is shining or the wind is blowing, respectively, these technologies are more efficient when these sources are available."</p>
<p>Section 3.3.2, only indicates that, "The battery facilities...will not have any</p>	<p>It is suggested that the EMPr indicates</p>

<p>additional office/operation/maintenance infrastructure as those of the substation.</p>	<p>specific scheduled mechanical safety maintenance operations that should be conducted in terms of all applicable SA Health & Safety requirements i.e. the OSHAct and Mechanical and Ventilation Regulations; and other applicable regulatory tools as cited under section 3.3.3, of the DSR.</p>
<p>Location Map: Section 3.1, page 26-32 read together with section 4.1, read together with Appendix E (Maps). These sections basically addressed only the GPS co-ordinates; alternative sites particulars are scattered around in figures with no scales at times; and no credible topographical map but more of a kind of thematic map has been provided.</p>	<p>It is suggested that the following being addressed in an updated scoping report or the EIA report:</p> <p>Provide a colour location map at a larger scale of at least 1:50 000. The scale must be indicated on the map. The map must indicate the following:</p> <ul style="list-style-type: none"> • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend to represent physical/natural landscapes, water features, vegetation features, constructed/cultural/man-made landscape, and transport and administration features on the map. Towns cited under section 6.3.5 should be depicted on the map.; • the prevailing wind direction (during November to April and during May to October); • Date map was printed; and • the already provided GPS Hartbeesthoek 94/WG584 co-ordinate system information.
<p>Site Plan:</p>	

Section 3.1, read together with section 4.1, read together with Appendix E (Maps) should provide an amended Site Plan for the preferred Mura Solar 3 project as well as each alternatives considered. These site plans should conform to the following:

Detailed site plan(s) must be prepared for each alternative site or alternative activity and provided in an updated SR or EIAR/EIR. The site plan must contain or conform to the following:

- The detailed site plan must be at a scale preferably at a scale of 1:500 or at an appropriate scale. The scale must be indicated on the plan.
- The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan.
- The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be indicated on the site plan.
- The position of each element of the application as well as any other structures on the site must be indicated on the site plan.
- Services, including electricity supply cables (indicate above or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the development must be indicated on the site plan. Servitudes indicating the purpose of the servitude must be indicated on the site plan. Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to):
 - Watercourses/Rivers/Wetlands (including non-perennial features).
 - Flood lines (*i.e.* 1:10 year, 1:50 year, and 1:100 year where applicable;
 - Ridges.
 - Cultural and historical features.
 - Areas with indigenous vegetation (even

	<p>if it is degraded or infested with alien species).</p> <ul style="list-style-type: none"> •Whenever the slope of the site exceeds 1:10, then a contour map of the site must be submitted.
<p>Schematic Process/Project Drawing</p>	<p>It is suggested a holistic schematic process drawing (project layout) of the entire solar Mura 3 project be provided. This drawing should include all the different stages with its main technology/infrastructure in a input-process-output manner.</p>
<p>Photographs:</p> <p>Section 2.4 read together with section 2.7, states that descriptions of environmental attributes were by means of combination of desktop reviews i.e. aerial imagery and site investigations done between March and October 2022, to identify sensitive features on site. It further states that "...the latest available aerial imagery for the site."</p>	<p>However a number of important information has been leftout and need to be provided in an updated SR or during the EIA phase document as follows:</p> <ol style="list-style-type: none"> 1. Colour photographs of the site and its surroundings (taken of the site and from the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan; 2. Recent aerial photograph or at least dates of those aerial photographs (attach as an Appendix). The Appendix should be supplemented with additional dated onsite-photographs taken of relevant features during your stated field trips as cited under section 7.2 of the DSR. Kindly note, the aforementioned requirements must be duplicated for all alternative sites.
	<p>It is suggested a larger A3 size map as an Appendix be provided under section 6.1.3 (geology).</p>

<p>Land use character of surrounding area</p> <p>Section 6.3.5.1 read together with section 6.3.4.3 failed to adequately describe the current land uses on the proposed project site and its immediate surrounding areas. The aforementioned sections also failed to adequately describe the prominent features that occur in the immediate surrounds from the proposed project area.</p>	<p>Hence it is suggested either an updated scoping report or the EIA provides a proper description of the current land uses and/or prominent features that occur within +/- 500m radius of the proposed project area and neighbouring properties if these are located beyond 500m of the site from all directions. Further, a description of any potential impacts the proposed project may pose on the highlighted land uses or features.</p>
<p>Socio-Economic:</p>	<p>It is suggested that the Mitigation and Management Measures under section 6.3.5 relating to regional employment and contracts be included in an updated scoping report or be addressed within the EIA as follows: specifications/requirements/targets:</p> <ul style="list-style-type: none"> • 100% unskilled workers must be local; • 90% semi-skilled workers from local; and • 70% skilled workers must be from local/indigent. • That the concept "local/indigent" shall mean having been born in the CKDM and having lived in the CKDM area for at least more than 10 years and having attended at least either and/or a primary or high school in the CKDM area irrespective whether the candidate is currently residing in the CKDM area or not. If not born in the CKDM area than at least one parent born in the region

	<p>but both parents must have lived in the area for more than 20 years;</p> <ul style="list-style-type: none"> • That a CKDM professionals body shall be consulted for particulars of local/indigent professionals to be considered for skilled jobs and/or be willing to undergo rapid skills upgrading to occupy skilled jobs; • That CKDM Professionals Body shall have representation in all committees/forums established under this proposed project; • That local sub-contractors who did not gain from tenders in the past locally will receive preferential treatment in terms of the equity principle and a skills transfer programme be adopted by the main contractors; • That sub-contractors who previously gained tenders locally equally compete with external contractors to be main contractors; • That the income/wealth status of sub-contractors and skilled workers for all Black contenders / candidates will also be included in the specifications in addition to the standard "black" requirement under the BBBEE and EEA redress umbrella to ensure wealth does not circulate consistently amongst a few individuals.
<p>Section 3.6 " NEED AND DESIRABILITY" have very little to zero direct and possibly indirect relevance to the Central Karoo District Municipal Area. Yes it is a common fact that the district is in dire need of urgent economic development.</p>	

<p>Section 3.6, states that South Africa is the seventh highest coal producer in the world, with approximately 77% of the country's electricity generated from coal.</p> <p>Section 3.6, states also that the SA's large dependence on coal and its use also resulted in a variety of negative impacts on the environment, including the contribution to climate change. SA is also the highest emitter of GHGs in Africa; attributed to the country's energy-intensive economy that largely relies on coal-based electricity generation.</p>	<p>It is suggested a comparable spreadsheet of the aforementioned seven countries and energy mix usages be provided.</p> <p>It is suggested a western cape regional spreadsheet show casing coal dependence amongst WC district and metro municipalities. Also to include comparative WC district municipalities and metro municipality drivers and associated environmental impacts (GHG emissions, Climate Change, Health Impacts, etc.) as a result of direct/indirect coal usages. Also to include comparative data to showcase the status of energy-intensive economies that relies on coal-based electricity generation amongst the WC district municipalities and metro municipality.</p>
<p>Section 3.6 NEED AND DESIRABILITY also omits to include a dedicated subsection of WESTERN CAPE PERSPECTIVE and REGIONAL PERSPECTIVE</p> <ul style="list-style-type: none"> • which would have outlined the energy mix in response to the growing electricity demand and the promotion of clean sources of energy within the CKDM in comparison to the province; • it would have outlined the reduction and elimination of poverty in the CKDM is more dire oppose to other regions within the province; • it would also have outlined that power shortages are most probably 	<p>Hence it is strongly suggested that mention be made about the poorest socio-economic status of the region in comparison to the rest of the province. Further it is strongly suggested that factual comparative analysed data and an objective interpretation of electricity prices communities and businesses are subjected to amongst the districts and one metro municipality in the western cape be provided.</p> <p>Further it is strongly suggested the case study of the Frankfort Municipality and Surrounding Towns Pilot/Case Study that uses four (4) Solar Energy Farms operated</p>

<p>the worse in the CKDM oppose to other regions in the province, esp the metro;</p> <ul style="list-style-type: none"> • it would have outlined the socio-economic benefits available to the local communities and businesses in the CKDM area from this proposed project; and • that the project will And this premise will promote the reaching one of the National Development Plan's aims which is to reduce and eliminate poverty in South Africa by 2030 (see section 3.6.2, page 40 of the dBAR). 	<p>by Rural Maintenance (a private IPPP) that benefits specifically the local communities and businesses be used and cited.</p> <p>This is to empower people of the Central Karoo to negotiate with all IPPP'S and Eskom in the region for electricity price reductions of up to 30% (considering the region might have more than four solar and wind energy farms) and many more other benefits. Benefits to the local communities and businesses of Frankford gains from that pilot study are as follows:</p> <ul style="list-style-type: none"> • Electricity demand from the Eskom grid are reduced whilst the local communities and business still have access to electricity; • The local community and businesses saves a reduced electricity cost of 15% pricing to what they would have paid to Eskom. • Water and Sanitation Facilities operates 24/7 due to electricity flow, even though it is loadshedding; • Cable theft reduced because the local grid remained alive; • Small Power Users like residence and business are exposed to power outages in smaller durations as per their requests; • The Large Power Users are exposed to power outages of a longer duration as per their request; • Low voltages has been reduced resulting in local communities using their equipment more optimally; and • In the event of loadshedding,
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	<p>locals receives more reliable weekly schedules of specific reduced periods of loadshedding.</p>
<p>Alternatives (Location):</p> <p>Section 4.1.1 only referenced that areas were assessed from a technical perspective by considering slope, aspect, undulation, and access, and more detailed environmental perspective. Resulting in the consideration of high level solar design. No consideration was given to geothermal heat reflection capacity from the landscape such as geological structures and soil characteristics. This could have resulted in the consideration of alternative technologies such as the addition of bi-facial panels and the reconsideration of methods of elevating those bi-facial panels. Hence it is suggested the Amended dBAR or FBAR include descriptions, maps and geothermal heat radiation capacities during non-sunshining days/periods.</p>	<p>It is suggested the scoping report be updated or the EIA address all current land uses in the proposed project region, including depicting within the topographical map and a separate thematic map layers of potential future economic development resources such as geological minerals and gas.</p>
<p>Alternatives (Technology):</p>	<p>It is suggested section 4.2.1 provide a detailed consideration of bi-facial solar panels in relation to both sun radiation/heat and geothermal heat.</p>
<p>Alternatives (Operational):</p> <p>Section 4, made no provision for the consideration of Operational Aspect Alternatives.</p> <p>A detailed objective review and assessment of the suggested factors for consideration will equip the people of the</p>	<p>Hence it is strongly suggested that the updated scoping report or the EIA provide a detailed consideration of this aspect by considering the following factors:</p> <ul style="list-style-type: none"> • Comments made in this Letter of Comments under the section that

<p>Central Karoo as to whether their genuine socio-economic upliftment is equally a priority as the rest of the province, but not limited to it.</p>	<p>dealt with the Frankfort Solar Energy Pilot Study;</p> <ul style="list-style-type: none">• Operational and technology aspects used in the aforementioned pilot study;• Electricity costs savings Frankfort Pilot Study local community, businesses and agriculture gained as a result of not having used the Eskom grid; and incorporate objective information of other current and/or proposed/intent renewable energy projects the western cape government recently announced to take all provincial municipalities off the Eskom national grid.
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emailed

Signature



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2324

Enquiries: Mr Wayne Hector

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PER E-MAIL / MAIL

Dear Ms Strong

ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF UP TO 320 MW MURA 3 SOLAR PHOTOVOLTAIC FACILITY BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE PROVINCE AND NORTHERN CAPE PROVINCES.

The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment (PoSEIA) dated April 2023 and received by the Department on 18 April 2023, refer.

The Department has evaluated the submitted final SR and the PoSEIA dated April 2023 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

The FSR is hereby **accepted** by the Department in terms of Regulation 22(1)(a) of the EIA Regulations, 2014, as amended.

You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the Plan of Study for Environmental Impact Assessment as required in terms of the EIA Regulations, 2014, as amended.

Please ensure that the following information forms part of the next report:

1. Listed Activities

- a) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.
- b) Please continue to ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project

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description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.

- c) The listed activities represented in the EIAR and the application form must be the same and correct.
- d) The EIAR must assess the correct sub listed activity for each listed activity applied for.

2. **Public Participation**

- a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR.
- b) Please ensure that all issues raised and comments received during the circulation of the draft SR and draft EIAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are addressed in the final EIAR. Proof of correspondence with the various stakeholders must be included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- c) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to I&AP’s comments.
- d) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
- e) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.
- f) The EAP is requested to contact the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAR.

3. **Alternatives**

The EAP is required to provide clear assessment for each identified alternative and further provide clear motivation and reasons as to why the **preferred** alternative **proves** to be the preferred compared to other alternatives.

These alternatives includes:

- Location / Site Alternatives.
- Technology Alternatives.
- Design and Layout Alternatives.
- BESS technology alternatives.
- No-go alternative.

4. **The layout map must indicate the following:**

All supporting onsite infrastructure such as follows:

- All supporting onsite infrastructure that will support the proposed 320MW photovoltaic solar facility e.g., roads (existing and proposed, fencing, BESS area, etc.).
- Connection routes (including pylon positions) to the distribution/transmission network; and
- All existing infrastructure on the site, including neighbouring villages (if any), etc.
- The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
- Buffer areas; and
- All “no-go” areas.

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5. **Specialist assessments**

Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of Substation, and all other associated infrastructures that they have assessed and are recommending for authorisation.

- a) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- b) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas. Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
- c) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
- d) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.
- e) The screening tool output:
 - The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.
 - It is the **responsibility** of the **EAP** to confirm the list of specialist assessments and to motivate in the assessment report, the reason for not including any of the identified specialist studies including the provision of photographic evidence of the site situation. The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached.
- f) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
- g) Please include a table that shows the proposed studies and the relevant specialists carrying out the study. In addition, a summary should be included of the specialist's recommendations in terms of the alternatives that are preferred based on the findings of their study.

General

Details of the future plans for the site and infrastructure after decommissioning in 20-30 years and the possibility of upgrading the proposed infrastructure to more advanced technologies must be indicated.

Should a Water Use License be required, proof of application for a license needs to be submitted.

A construction and operational phase EMP that includes mitigation and monitoring measures must be submitted with the final EIAR.

The comments issued by this Department on 29 March 2023, during the draft scoping report are still valid and must be all addressed throughout the EIA process.

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Should you use coordinates, please ensure that it is in the format as prescribed in the 2014 EIA NEMA Regulations, as amended.

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, with regard to the time period allowed for complying with the requirements of the Regulations.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.

Yours faithfully



Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries & the Environment
Signed by: Mr Wayne Hector
Designation: Deputy Director: Priority Infrastructure Projects
Date: 12/05/2023

cc:	Lance Blaine	Mura 3 (Pty) Ltd	Email: anthony@atlanticep.com
	Gavin Benjamin	DEA&DP	Email: gavin.benjamin@westerncape.gov.za
	Elsabe Swart	DENC	Email: elsabeswart.denc@gmail.com
	Ashley Mitchell	Beaufort West Local Municipality	Email: buildingcontrol@beaufortwestmun.co.za

Annexure 1

Format for Comments and Response Trail Report:

Date of comment, format of comment name of organisation/I&AP	Comment	Response from EAP/Applicant/Specialist
27/01/2016 Email Department of Environment, Forestry and Fisheries: Priority Infrastructure Projects (John Doe)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted) The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form



OUR REFERENCE : 20/9/2/3/1/083
YOUR REFERENCE : 41103930
ENQUIRIES : Cor van der Walt/Kyle Solomons

WSP

Email: Megan.Govender@wsp.com

Att: Megan Govender

DRAFT BASIC ASSESSMENT REPORT

PROPOSED CONSTRUCTION OF THE MURA 3 SOLAR PHOTOVOLTAIC FACILITY:

DIVISION BEAUFORT WEST

FARM LEEUWFLOOF NO 43

FARM BULTFONTEIN NO 13

FARM SNEEUWKRAAL NO 46

FARM AANGRENSEND ABRAMSKRAAL NO 11

REMAINDER OF FARM ABRAM KRANSE NO 45

PORTION 4 OF THE FARM DUIKER KRANSE NO 45

REMAINDER OF PORTION 3 OF THE FARM DUIKER KRANSE NO 45

Your application dated March 2023 has reference.

Mura 3 (Pty) Ltd proposes the construction and operation of a 320 MW solar photovoltaic energy facility. The proposed development will have a foot print of approximately 436ha for the solar facility and associated infrastructure.

The Western Cape Department of Agriculture: Land Use Management (WCDoA: LUM) has reviewed the report and has no objection to the proposed application on condition that the proposed mitigation measures mentioned in the EMPr are implemented to prevent erosion and manage storm water during the construction and operational phases.

In order to accommodate the proposed application must be made to the WCDoA: LUM as well as the Beaufort West municipality for a change in land use, the required registering of a servitude for access roads, entrance routes and power lines as well as to register a lease agreement.

Please note:

- That this is comment to the relevant deciding authorities in terms of the National Environmental Management Act no.107 of 1998.
- That this is comment to the relevant deciding authorities in terms of the Subdivision of Agricultural Land Act 70 of 1970.
- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.
- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely



Mr. CJ van der Walt

LANDUSE MANAGER: LANDUSE MANAGEMENT

2023-05-12

Copies:

Department of Environmental Affairs & Development Planning

Private Bag X6509

GEORGE

6530

Beaufort West Municipality

Private Bag 582

BEAUFORT WEST

6970

Govender, Megan

From: Ephron Maradwa <EMaradwa@dffe.gov.za>
Sent: Tuesday, 04 July 2023 14:07
To: Govender, Megan
Cc: Constance Musemburi; Salome Mambane; EIAAdmin
Subject: 14/12/16/3/3/2/2324

Dear Megan.

14/12/16/3/3/2/2324

ACKNOWLEDGEMENT OF RECEIPT OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A SCOPING ASSESSMENT PROCESS FOR THE PROPOSED MURA 3 SOLAR PHOTOVOLTAIC FACILITY (UP TO 320 MW) BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE AND NORTHERN CAPE PROVINCES.

The Department confirms having received the Draft Environmental Impact Assessment Report for the abovementioned project on 30 June 2023. You have submitted these documents to comply with the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that *“Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but must be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority.”*

Further note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7) of these Regulations.

You are hereby reminded of Section 24F of the National Environmental Management Act 1998 (Act No. 107 of 1998), as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Kindly quote the abovementioned reference number in any future correspondence in respect of the application.

EIA Applications

Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to EIAAdmin@environment.gov.za.

You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email.



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA 0001 · Environment House 473 Steve Biko Road, Arcadia, · PRETORIA

DFFE Reference: 14/12/16/3/3/2/2324

Enquiries: Ms Constance Musemburi

Telephone: (012) 399 9416 **E-mail:** CMusemburi@dff.gov.za

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
Building 1, Golder House
Maxwell Office Park
Magwa Crescent West
Waterfall City
MIDRAND
1685

Tel Number: (011) 361 1392
Email Address: Ashlea.strong@wsp.com

PER MAIL / E-MAIL

Dear Ms Strong

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF UP TO 320 MW MURA 3 SOLAR PHOTOVOLTAIC FACILITY BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE PROVINCE AND NORTHERN CAPE PROVINCES.

The Application form for Environmental Authorisation and draft Environmental Impact Assessment Report (EIAR) received by the Department on 03 July 2023, refer.

This letter serves to inform you that the following information must be included in the final EIAR:

1. Application Form

- a) If the activities applied for in the application form differ from those mentioned in the final EIAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.dffe.gov.za/documents/forms>
- b) The final EIAR must also provide the technical details for the proposed facility in table format as well as their description and/or dimensions.
- c) Please include a list of the proposed infrastructure for the proposed development.
- d) The final EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.
- e) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.
- f) The listed activities represented in the EIAR and the application form must be the same and correct.
- g) The EAP is required to provide clear assessment for each identified alternative and further provide clear motivation and reasons as to why the preferred alternative proves to be the preferred compared to other alternatives.

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- h) Ensure that the SG codes, farm names and numbers are correct and consistent throughout the reports and application form.

2. Alternatives

A development envelope has been determined and assessed by specialists and this area would avoid no-go areas identified by the specialists. Please provide further information regarding this to demonstrate how the layout was derived. Note that a finalized layout must be presented in the final EIR.

3. Public Participation Process

- a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the final EIAR. This includes but is not limited to the relevant Provincial Departments, Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation.
- b) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format. All comments from I&APs must be responded to adequately. A response such as “noted” is not regarded as an adequate response to I&AP’s comments.
- c) Comments from each submission must be responded to individually. The dates in which comments were received must be recorded in the C&R. Your responses to the issues raised by the Department must be included in the comments and response (C&R) report, in a tabular format. Ensure that comments are organised chronologically.
- d) The final EIAR must comply with all conditions of the acceptance of the scoping report (SR) and the Plan of Study for Environmental Impact Assessment (PoSEIA). The final EIAR must address all comments received on the SR and the draft EIAR, including this letter.
- e) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the NEMA EIA Regulations, 2014, as amended.

4. Cumulative Assessment

- a) Should there be any other similar projects within a 20km to 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:
- Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
 - Detailed process flow and proof must be provided, to indicate how the specialist’s recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
 - A cumulative impact environmental statement on whether the proposed development must proceed or not.

5. The layout map must indicate the following:

- a) The envisioned area for the development of a Solar Photovoltaic (PV) Facility (**Mura 3**). (i.e.), location and all associated infrastructure including BESS, should be mapped at an appropriate scale.
- Solar Farm Substations area (e.g., two on-site solar substations adjacent to Eskom switching stations that will connect to the approved Nuweveld Collector Substation.
 - Building Infrastructure (e.g., Offices; Operational and maintenance (O&M)/ control centre; Warehouse/workshop; Ablution facilities; and Converter/inverter stations).

- Other Infrastructure located within the solar area footprint (e.g., Internal underground cables, Internal gravel roads; Fencing around the PV Facility; Panel maintenance and cleaning area, Storm water management system; Site camps, and temporary construction laydown area).
 - BESS and BESS substation (e.g., substation yard).
 - All existing infrastructure on the site, especially internal road infrastructure, as indicated above.
- b) Please provide an environmental sensitivity map, if possible, which indicates the following:
- The location of sensitive environmental features on site, e.g., CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;
 - Buffer areas; and All “no-go” areas.
- c) Please include a cadastre map which shows the affected farm portions from Table 4-1 in relation to Mura 3 PV.

6. Specialist assessments

- a) Specialist Declaration of Interest forms must be attached to the final EIAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Department’s website (please use the Department’s template).
- b) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
- c) Please ensure that, all required specialist studies for the project are recommended and conducted. Finding and recommendations of the specialist studies must incorporate with final report and the EMPr for decision making. As initial recommended in the scoping acceptance.
- d) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.
- e) Recommendations provided by specialist reports must be considered and used to inform the preferred layout alternative.

7. Environmental Management Programme

The EMPr must also include the following:

- All recommendations and mitigation measures recorded in the EIAR and the specialist studies conducted.
- An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.
- Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.
- An alien/invasive plant management report; plant rescue and protection report; and re-vegetation and habitat rehabilitation report.
- In addition to the above, the EMPr for the facility must comply with Appendix 4 of the NEMA EIA Regulations, 2014, as amended.
- It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, **must** be used and submitted with the final report over and above the EMPr for the facility. This means that a generic EMPr must be included for the substation and the powerline (only if applicable).
- A generic EMPr for the 132kV substation has been compiled and submitted, however, the declaration is not dated (Appendix E of Appendix I).

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- Please include clarity whether the generic EMPr for the substation (Appendix E of Appendix I) includes all the proposed substation infrastructure i.e. the two substations for the PV facility and the 1 substation for the BESS. Include the substations in the maps of the generic EMPr.
- Furthermore, it is unclear as to why a generic EMPr for a powerline has been included since the grid application for overhead powerlines will be a separate application (Appendix E of Appendix I - EMPr).

General

Ensure that a preferred technology is provided for the BESS.

The EIAR must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities. Coordinates must be provided in the format as specified in the 2014 NEMA EIA Regulations, as amended. Kindly provide property information in a separate appendix and include farm names, portions and numbers; coordinates of main infrastructure etc.

Please note that, all correspondences issued by this Department for this project are still valid and must be adhered to.

You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority -*

(a) an environmental impact assessment report inclusive of any specialist reports, and an EMPr, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”

Should there be significant changes or new information that has been added to the EIAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the reports, and an EMPr, will be submitted within 156 days of acceptance of the scoping report by the competent authority, or where regulation 21(2) applies, within 156 days of receipt of application by the competent authority, as significant changes have been made or significant new information has been added to the environmental impact assessment report or EMPr, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised environmental impact assessment report or EMPr will be subjected to another public participation process of at least 30 days”.*

Should you fail to meet any of the timeframes stipulated in Regulation 23 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

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You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely.



Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries & the Environment
Signed by: Mr Wayne Hector
Designation: Deputy Director: Prioritised Infrastructure Projects
Date: 25/04/2023

cc:	Lance Blaine	Mura 3 (Pty) Ltd	redacted as per POPIA requirements
	Gavin Benjamin	DEA&DP	
	Ashley Mitchell	Beaufort West Local Municipality	
	MJ Penxa	Beaufort West Local Municipality	

Govender, Megan

From: Govender, Megan
Sent: Wednesday, 23 August 2023 07:52
To: Elsabe Swart; Strong, Ashlea
Subject: RE: Re Proposed development of Mura PV3, ref 14/12/16/3/3/2/2324

Good Morning Elsabe

Thank you for the comment. We had not received the comment prior to this. We will include the comment in the Final EIA and respond accordingly.

Kind Regards,



Megan Govender
Senior Consultant

T +27 011 361 1300

redacted as per POPIA requirements

From: Elsabe Swart redacted as per POPIA requirements

Sent: Tuesday, August 22, 2023 2:04 PM

To: Govender, Megan <Megan.Govender@wsp.com>; Strong, Ashlea <Ashlea.Strong@wsp.com>

Subject: Re Proposed development of Mura PV3, ref 14/12/16/3/3/2/2324

Dear Megan

We have not received an acknowledgement of receipt on our comments for this development. Could you please include the attached comments and recommendations to your consultation and note the content of the attached. Your due consideration of the attached would be greatly appreciated.

Thank you

--

Regards
Elsabè

redacted as per POPIA requirements

E SWART
SCIENTIFIC MANAGER GR B: ENVIRONMENTAL RESEARCH AND DEVELOPMENT
Pr.Sci.Nat.

Department of Agriculture, Environmental Affairs, Rural Development and Land Reform
Private Bag X6102
Kimberley
8300

Permit office, Kimberley: - dencpermits@gmail.com / 053 807 7300/ 081 463 4839 Permit forms:
<https://docs.google.com/document/d/1YEmVt4YHNfljnodXqmwTa3O10ilka3fs7PRk0GiZXXs/pub>
<http://daerl.ncpg.gov.za/intranet>

redacted as per POPIA requirements



Environmental Research

90 Long Street, Kimberley, Northern Cape, South Africa, 8300, Tel: (053) 807 7300

E-mail: nuys.denc@gmail.com, web: www.agrinc.gov.za

Date:	12 May 2023	File:	
To:	Megan.Govender@wsp.com , Ashlea.Strong@wsp.com	From:	N Uys
Subject: RE: MURA 3 SOLAR PHOTOVOLTAIC FACILITY FINAL ENVIRONMENTAL SCOPING REPORT, DFFE REFERENCE NUMBER: 14/12/16/3/3/2/2324			

Megan Govender

WSP in Africa

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T +27 011 361 1300

M +27 083 228 5288

Megan.Govender@wsp.com

**RE: MURA 3 SOLAR PHOTOVOLTAIC FACILITY FINAL ENVIRONMENTAL SCOPING (FSR) REPORT, DFFE
REFERENCE NUMBER: 14/12/16/3/3/2/2324**

Your Final Scoping Report dated April 2023 has reference.

1. The Red Cap Energy (Pty) Ltd Mura PV 3 for 320 MW solar PV is the only Mura PV development project that is located inside the Northern Cape Province. The proposed locality for the Mura PV 3 does not fall inside a CBA nor in any Protected Expansion Areas.
2. Thank you for including all the Mura development footprints (1 - 4) as part of the cumulative assessment. It should be noted that the Ecological Specialist report did not include all the cumulative projects towards the north as mentioned in the FSR report.
3. Please take cognizance that rehabilitation in arid areas is very slow and the risk of erosion high.
4. It is recommended that vegetation clearance be minimized and done in phases to mitigate for dust pollution, erosion, and risk of alien and invasive vegetation infestation.
5. The reason for the medium sensitivity for the footprint was not defined in the Terrestrial Biodiversity Compliance Statement. However, following the precautionary principle it is recommended that the solar PV footprint be avoided.
6. The following recommendation made by the Avifauna specialist should be incorporated into the EMPR and should be updated to make the recommendation time-bound, for example that incidents must be reported to ornithologist within the same financial year quarter and that specific recommendations made must be implemented by the next quarter as to ensure that faulty structures can be swiftly rectified. – *“The risk of electrocution of large birds in the substations should be managed reactively. If any such electrocutions are recorded once operational this should be reported to an ornithologist for suitable case specific mitigation measures.”*



7. The department has received reports on the death of tortoises via electric fence electrocutions. It is recommended that for the fencing, that at least a 20cm gap is left between the lowest electrified strand and ground level (pers. comm. with EWT).
8. One of the proposed mitigation actions in the Animal Compliance Statement mentioned is that a contribution should be made towards Riverine Rabbit conservation initiatives. Based on the defined impacts and information in the report, the recommendation is not justified as the specialist indicated that the Mura PV 3 development does not fall within, nor impact on riverine rabbit habitat. A robust biodiversity monitoring can rather be incorporated under the EMPR for the lifetime of the project that will help mitigate future PV developments' impacts in the area.
9. Fauna and flora permits will be needed from the department prior to project commencement for handling/ removing/ relocating/ destroying all specially protected and protected flora and fauna. Estimated numbers for species that need to be removed must be provided for permit approval.
10. Alien and invasive species management must be done throughout the lifetime of the projects. Please take note that cacti species such as *Opuntia* spp cannot be dumped at general waste sites without prior treatment (drying/ chemical). Please liaise with Dr Thabiso Mokotjomela, 073 324 6118, mokotjomela@sanbi.org.za, on the management and disposal of cacti.
11. I.t.o. the terrestrial biodiversity please mitigate and make provision in the EMPR for the following:
 - a. Please take note that tortoise populations are affected by the following:
 - i. electrocutions with electric fences.
 - ii. predations by crows – (relates to waste management).
 - b. Monitoring of the following is recommended to determine the:
 - i. The heat island effect (local warming, impacts on reptiles etc.).
 - ii. Lake effect on insects (e.g. reports received that insects have been laying eggs on panels instead of pans).
 - iii. Insect mortalities (security lights at these sites at night attract insects).
 - iv. Bat impacts (bats are attracted to by the security lights).
12. In the EMPR, please make provision for the correct disposal and possible recycling of PV panels during construction, operational and closure phases. There have been cases in the past where broken panels arrived at the construction sites that were illegally disposed of in a borrow pit.
13. The department has received the following complaints regarding some solar PV developments due to increased traffic around these projects:
 - a. Increase in roadkill along roads. The animals are not adapted to the increase in the number of vehicles along these rural roads and they cannot move away from vehicles fast enough due to the high speeds that vehicles are travelling at. In some instance the animals can't move away due to the type of fencing along roads that block the animals inside the road reserve e.g., tortoises.
 - b. The department has also received complaints regarding the dust pollution in areas with gravel roads.
 - c. Farmers have also complained that their grazing have been impact as their animals cannot graze due to dusts deposited on the vegetation adjacent to these roads.

- d. It should also be noted that the department have received complaints regarding the drying up of boreholes adjacent to these projects. Water saving strategies should be considered for the construction of infrastructure, cleaning of panels, dust control, etc. No underground water should be used for the development of this facility nor for its operation.

Yours sincerely



N UYS

PRODUCTION SCIENTIST GRADE A: BOTANIST



E. SWART

SCIENTIFIC MANAGER GR B: RESEARCH



References:

18/2/3/2023-2024 (Development Facilitation)

19/2/5/3/C3/2/WL0035/23 (Waste Management)

19/3/2/4/C3/1/DDF0131/22 (Pollution and Chemicals Management)

Attention: Ms Megan Govender

WSP Group Africa (Pty) Ltd
P.O. Box 98867
Sloane Park
JOHANNESBURG
2151

Megan.Govender@wsp.com

Dear Madam

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF THE 320MW MURA 3 SOLAR PHOTOVOLTAIC FACILITY AND ASSOCIATED INFRASTRUCTURE AND STRUCTURES ON FARM LEEUWKLOOF NO. 43, REMAINDER OF FARM ABRAMS KRAAL NO. 206, PORTION 4, REMAINING EXTENT OF PORTION 3, AND THE REMAINDER OF FARM DUIKER KRANSE NO. 45, FARM SNEEUWKRAAL NO. 46, AND AANGRENSEND FARM ABRAMSKRAAL NO. 11, BEAUFORT WEST AND UBUNTU LOCAL MUNICIPALITIES, WESTERN AND NORTHERN CAPE PROVINCES (DFFE REF: 14/12/16/3/3/2/2324)

1. The Draft Scoping Report ("DSR") dated March 2023, the Department's comments thereto dated 11 April 2023, and the email notification of 03 July 2023 regarding the availability of the Draft Environmental Impact Assessment ("EIA") Report for comments, refer.
2. Thank you for your willingness to extend the deadline for comments on the Draft EIA Report. Please find consolidated comments from various directorates within the Department on the Draft EIA Report dated July 2023 that was available for download from various online platforms.

3. Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.Lameyer@westerncape.gov.za; Tel.: (021) 483 2887):
 - 3.1. This Directorate is satisfied that its comments on the DSR have been adequately addressed and responded to in the Comments and Responses Report, Draft EIA Report, and Traffic Impact Assessment compiled by Athol Schwarz dated 07 May 2023.
 - 3.2. The Animal Species Compliance Statement compiled by 3Foxes Biodiversity Solutions dated November 2022 noted that the proposed development site has a low sensitivity for both the Karoo Dwarf Tortoise and the Riverine Rabbit based on habitat mapping, active searching, and camera trapping across the site. This Directorate supports the recommendation of the faunal specialist, which has been incorporated into the Environmental Management Programme ("EMPr"), that the developer will contribute towards Riverine Rabbit monitoring or conservation initiatives being undertaken in the area.
 - 3.3. This Directorate has no further comments on the Draft EIA Report.
4. Directorate: Waste Management – Mr Hassan Parker (Email: Hassan.Parker@westerncape.gov.za; Tel.: (021) 483 6877):
 - 4.1. Although the Draft EIA Report and EMPr include waste management measures to be implemented in terms of the waste management hierarchy, specific approaches in addressing potential solar photovoltaic ("PV") waste (as previously raised by this Directorate in its comments on the DSR) are unclear – in comparison, the measures provided in the case of battery waste disposal are apparent.
 - 4.2. The mitigation measures and specialists' recommendations, as proposed in the Draft EIA Report and EMPr should be implemented and adhered to.
5. Directorate: Pollution and Chemicals Management – Ms Shehaam Brinkhuis (Email: Shehaam.Brinkhuis@westerncape.gov.za; Tel.: (021) 483 8309):
 - 5.1. In line with the recommendations of the Aquatic Biodiversity and Species Specialist Assessment compiled by BlueScience (Pty) Ltd dated April 2023 (Appendix H4), surface installations such as solar PV arrays, substations, battery storage facilities and construction camps, must be located outside of the designated buffer areas, most notably, the sensitive watercourses and their buffers.
 - 5.2. It is supported, that as far as possible, construction near sensitive aquatic features be undertaken during the dry season, with the installation of sediment traps downstream.
 - 5.3. The utilisation of cleaning chemicals on solar panels poses a risk of contamination and pollution to water resources. Care should be taken to implement mitigation measures to reduce this. It is recommended that all cleaning products used within the site should be environmentally friendly and biodegradable, as per section 9.13 of the Draft EIA Report. It is noted that a panel cleaning and maintenance area is proposed. Drainage in this area must be carefully planned, and contaminated water captured for appropriate disposal to a registered waste facility, and not discharged into the

environment, stormwater channels or any water resources nearby. It is preferable that the cleaning and maintenance area is hard surfaced with appropriate collection channels and a drainage system installed.

- 5.4. The following recommendations are provided with respect to the proposed battery energy storage system to prevent and manage potential contamination of water resources, including groundwater, emanating from the site during the construction and operational phases:
 - 5.4.1. Compilation and adherence to a procedure for the safe handling of battery cells.
 - 5.4.2. Lithium-ion batteries must have battery management systems (containment, automatic alarms and shut-off systems) to monitor and protect cells from overcharging or damaging conditions.
 - 5.4.3. Compilation of an emergency response plan for implementation in the event of a spill or leakage.
 - 5.4.4. Provision of spill kits on-site for clean-up of spills and leaks.
 - 5.4.5. Immediate clean-up of spills and disposal of contaminated absorbents and materials or soil at a licensed hazardous waste disposal facility.
 - 5.4.6. Recording and reporting of all electrolyte spills or leaks so that appropriate clean-up measures can be implemented. A copy of these records must be made available to authorities on request throughout the project lifecycle.
 - 5.4.7. Frequent and appropriate disposal of both general and hazardous waste to prevent pollution of soil and groundwater.
 - 5.4.8. On-site battery maintenance should only be undertaken on impermeable surfaces with secondary containment measures. Any resulting hazardous substances must be disposed of appropriately at a registered facility with retention of chain of custody documentation.
 - 5.4.9. Provision of suitable emergency and safety signage on-site, and demarcation of any areas which may pose a safety risk (including hazardous substances). Emergency numbers for the local police, fire department, Eskom and Beaufort West Municipality must be placed in a prominent, clearly visible area on-site.
- 5.5. Reference is made to the storage of diesel in aboveground tanks within concrete bunds. Additional information is required on this aspect, including but not limited to, the following: What is the approximate total volume of fuel to be stored on site? How many aboveground tanks are proposed? Where is their location within the site? Please include the specifications of the bund(s). What mitigation measures are proposed to prevent and manage impacts related to fuel losses?
- 5.6. Generalised descriptions have been provided of "other infrastructure" and service infrastructure for the proposals. With specific reference to the offices, site camps, workshop, warehouse and control centre, how will effluent, liquid waste and sewage be handled and disposed of? A description has been included of Beaufort West Municipality's current services; however, it is not clear how the service infrastructure required on-site links to municipal services. Please clarify and provide confirmation thereof. Should conservancy tanks be proposed, please specify and include confirmation of sludge disposal method and frequency. In the event an on-site package plant/wastewater treatment works is proposed, please clarify the preferred technology and treated effluent disposal method. Please note that this Directorate does not support the installation of septic tanks.

- 5.7. It is requested that the EMPr be amended to include reference to section 30 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") pertaining to the control of incidents. Please note that the statement included under section 8.1 of the EMPr, relating to an Emergency Response Plan, is insufficient. In the event of a significant spill or leak of hazardous substances (e.g., petrol, diesel, etc.) used during the proposed activities, such an incident(s) must be reported to the relevant authorities, including this Department's Directorate: Pollution and Chemicals Management, in accordance with section 30 of the NEMA, 1998.
- 5.8. The Geohydrological Assessment compiled by GEOSS dated 31 January 2023 (Appendix H13) details recommendations for the proposed development, which are supported. However, these recommendations include specifications around water supply. Similarly, the Aquatic Biodiversity and Species Specialist Assessment also includes recommendations with respect to a "viable water supply" for the site and use of water within the existing water allocation of the property, unless application has been made for new boreholes. It is noted that the aspect of water supply has not been specifically addressed in the Draft EIA Report. Please clarify water supply for the proposals, in addition to the approximate volume required. It is requested that the necessary approvals from the relevant authority(ies) (depending on whether groundwater or municipal supply) is provided with the Final EIA Report to demonstrate the required approval for abstraction or supply is in place, or that application is underway.
- 5.9. The Geohydrological Assessment also includes the following recommendation, which is strongly supported and should be implemented in accordance with the specialist's specifications: *"Monitoring of groundwater (abstraction volumes, quality and water levels) will be required, this should ideally be implemented one year prior to the start of construction if the project timeframes permit."*
- 5.10. Further to the above, it is noted that according to the Draft EIA Report, *"the DWS will make the final decision on water uses that are applicable to the project through a pre-application meeting after which a Water Use Authorisation Application (WUA) as determined by the risk assessment will be undertaken in compliance with procedural regulations published by the DWS within General Notice 267 (GN267)."* Given that the application is in the environmental impact reporting phase, has a decision been made and advice obtained from the Department of Water and Sanitation on the applicability of section 21 of the National Water Act, 1998 (Act No. 36 of 1998)?
6. The applicant is reminded of its *"general duty of care towards the environment"* as prescribed in section 28 of the NEMA, 1998 which states that *"Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment."*

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

Thea Jordan Digitally signed by Thea Jordan
Date: 2023.08.04 11:49:22 +02'00'

pp **HEAD OF DEPARTMENT**
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Letter signed by:

Thea Jordan

Director: Development Facilitation

Date: 4 August 2023

[INBOX](#) [SENT MESSAGES](#) [ALL MESSAGES](#) [READ MESSAGE](#)Between you and [natasha.higgitt](#)[natasha.higgitt](#) Jul 31 [Delete](#)

Good afternoon,

I note the submission of two new heritage reports to the heritage report file, however, please can you highlight the differences between these reports? It is not clear. Additionally, please provide the requested clarity regarding the collected fossil material as noted in the Interim Comment.

Kind regards,
Natasha Higgitt

CaseReference:

[Mura 3 Solar Photovoltaic Facility \(up to 320 MW\)](#)

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Good Day Natasha,

There were a few minor changes in terms of the project description and grammar. In terms of the interim comment, a response was included in the Stakeholder Engagement Report (Appendix D), which states:

"Fossil material collected from the Abrahamskraal Formation / lower Teekloof Formation (Poortjie Member) during the initial site visit to the Mura solar project area near Loxton (July 2022) has already been evaluated by Professor Bruce Rubidge of Wits University who has a Fossil Collection Permit and whose research team is currently involved with a long-standing research project on the fossil record of this stratigraphic interval in the Main Karoo Basin. Specimens considered to be of palaeontological research value by Professor Rubidge are curated, together with stratigraphic / locality data, in the collections of the Evolutionary Studies Institute, Johannesburg. A couple of additional specimens from Locs. 408 and 083 from the second site visit in September 2022 have yet to be evaluated by Professor Rubidge."

If you would like to discuss anything further please let me know.

Kind Regards,
Megan Govender

[Add message to tracker:](#)

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20672

Date: Monday August 07, 2023
Page No: 1

Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mura 3 (Pty) Ltd

Mura 3 Solar Photovoltaic Facility (up to 320 MW) between Loxton and Beaufort West in the Western Cape and Northern Cape Provinces

WSP has been appointed by Mura 3 (Pty) Ltd to undertake an Environmental Authorisation Application for a proposed Solar Photovoltaic Facility, near Loxton, Northern Cape Province.

A Draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include solar panels, substations, Battery Energy Storage System (BESS), offices, operational and maintenance buildings, warehouse/workshop, ablution facilities, converter/invertor stations, underground cabling, internal roads, fencing, storm water management infrastructure, and site camps.

Almond, J. E. 2022. Combined Desktop & Field-Based Palaeontological Heritage Study: Proposed Mura PV Solar Facilities between Loxton and Beaufort West, Beaufort West Local Municipality (Central Karoo District Municipality), Western Cape and Ubuntu Local Municipality (Pixley Ka Sema District Municipality), Northern Cape

The report combines the results for five development applications. Only the results pertaining to Mura PV 3 will be discussed below.

The proposed development is underlain by the Teekloof Formation. A total of 12 fossil sites were recorded within the proposed development area. These include reworked bone fragments, remains of small tetrapods, reedy plant stem casts and invertebrate trace fossils of Grade IIIC heritage significance, and robust tetrapod remains and sizeable ridged bone fragment of Grade IIIB significance (sampled/collected).

No recorded fossil sites of unique scientific or conservation value are likely to be directly impacted by the proposed renewable energy and electrical infrastructure developments and no further palaeontological studies or mitigation is proposed here with regard to these sites. A Chance Fossil Finds Protocol is recommended to be implemented.

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Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20672

Date: Monday August 07, 2023
Page No: 2

Orton, J. 2022. Heritage Impact Assessment: Proposed Mura 1-4 PV Facilities, Beaufort West Magisterial District, Western Cape and Victoria West Magisterial District, Northern Cape

The report combines the results for five development applications. Only the results pertaining to Mura PV 3 will be discussed below.

A total of two heritage resources were identified within the Mura PV 3 development area. These include a stone-walled house ruin of medium significance and a mound of rocks of very low heritage significance.

Recommendations provided in the report include the following:

- A Fossil Chance Finds Procedure (as supplied in the palaeontological specialist study) must be included in the project EMPr;
- The site at waypoint 1402 should be avoided if possible with a 50 m buffer or else revisited to record it in detail as well as determining whether any sampling would be required;
- Any realignment of the DR02317 within 400 m of waypoint 2000 must be checked in the field and approved by an archaeologist;
- No stones may be removed from any archaeological site;
- The road construction camp location must be approved by an archaeologist and subjected to a site inspection if deemed necessary; and
- If any archaeological material or human burials are uncovered during the course of development, work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

In an Interim Comment issued on the 31/03/2023, SAHRA requested clarity regarding the permit used for the collection of fossil material in the Northern Cape Province. Since the issuing of the Interim Comment, the draft EIA and Comments and Response Report have been submitted for review (04/07/2023).

Final Comment

The following comments are made as a requirement in terms of section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final EIA and EMPr:

- 38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed

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Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20672

Date: Monday August 07, 2023
Page No: 3

development;

- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
- A report detailing the results of the realignment of the DR02317 and the construction camp inspection must be submitted to SAHRA for comment. No work may commence in these areas in this regard;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA DAU (Natasha Higgitt 021 202 8660 / nhiggitt@sahra.org.za) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA DAU (Natasha Higgitt 021 202 8660 / nhiggitt@sahra.org.za) must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
 - The Final EIA must be submitted to the SAHRIS application for record purposes;
 - The decision regarding the EA application must be submitted to the SAHRIS application for record purposes.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20672

Date: Monday August 07, 2023
Page No: 4

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/612928>
(DFFE, Ref: 4/12/16/3/3/2/2324)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

Appendix D.4

MURA 4 SOLAR PV FACILITY COMMENTS



Govender, Megan

From: Salome Mambane <SMAMBANE@dffe.gov.za>
Sent: Monday, 06 March 2023 12:30
To: Strong, Ashlea
Cc: Azrah Essop; EIAAdmin; Ephron Maradwa
Subject: 14/12/16/3/3/2/2325

Dear Ashlea

14/12/16/3/3/2/2325

ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION AND DRAFT SCOPING REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A SCOPING ASSESSMENT PROCESS FOR THE PROPOSED MURA 4 SOLAR PHOTOVOLTAIC FACILITY (UP TO 360 MW) BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE AND NORTHERN CAPE PROVINCES

The Department confirms having received the Application form and Draft Scoping Report for Environmental Authorisation for the abovementioned project on 03 March 2023. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 3 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 21 of the EIA Regulations, 2014 as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.

Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Kindly quote the abovementioned reference number in any future correspondence in respect of the application.

EIA Applications

Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to EIAAdmin@dffe.gov.za.

You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email

Kind Regards,
Salome Mambane
Integrated Environmental Authorisations:
Priority Infrastructure Developments
Tel: 012 399 9385
Cell: 063 684 5431
Email: SMambane@dffe.gov.za



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia,· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2325

Enquiries: Ms Azrah Essop

Telephone: (012) 399 8529 **E-mail:** AEssop@dfffe.gov.za

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
Building 1, Golder House
Maxwell Office Park
Magwa Crescent West
Waterfall City
MIDRAND
1685

Cell Number: (011) 361 1392
Email Address: Ashlea.strong@wsp.com

PER MAIL / E-MAIL

Dear Ms Strong.

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED MURA 4 SOLAR PHOTOVOLTAIC FACILITY (UP TO 360 MW) BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE PROVINCE.

The Application for Environmental Authorisation and Draft Scoping Report (SR) dated March 2023 and received by the Department on 03 March 2023, refer.

This letter serves to inform you that the following information must be included to the final SR:

1. Application form:

- Kindly clarify the reason why this Department is the Competent Authority (CA) in terms of Section 24C of NEMA. State clearly if the applicant intends to bid the project in terms of the Integrated Resource Plan (IRP) and the Renewable Independent Power Producer Programme (REIPPP).
- Please note that the Minister is the competent authority for applications for facilities or infrastructure, that will form part of the Integrated Resource Plan (IRP) Programmes for technologies whose procurement processes have been determined under the Electricity Regulation Act, 2006 and / or the Electricity Regulations on New Generation Capacity. If the applicant will not, or does not intend to, participate in any of the IRP programmes, the competent authority will be the MEC responsible for environmental affairs in the respective province. Be advised that this information must be clearly presented in Section 1 –Competent Authority in the application form.
- Reflecting the above, the reasons provided in Section 1 of the application form for this Department being the Competent Authority in terms of S24C of NEMA are incomplete. This must be rectified and expanded on in the application form as well as the report. Please refer to GN 779.
- Ensure that the SG codes, all farm names, and numbers and the EAP's contact details are correct.

wh

- Include the GPS coordinates for the onsite substation and the battery energy storage system (BESS) facility.
- Ensure that the declaration of the applicant is signed.

2. Listed Activities

- It is noted that the proposed solar facility does not fall within any renewable energy development zones. Although the application form indicates that part of the project is within the Electricity Grid Infrastructure (EGI) as per GN 113, therefore this application will be considered as a normal EIA application.
- Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.
- You are required to confirm whether systematic biodiversity plans or bioregional plans are adopted by the competent authority. There are certain activities in Listing Notice 3 that requires that Bioregional Plans to be adopted.
- It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property possibly falls within geographically designated areas in terms of Listing Notice 3 Activities. Written comments must be obtained from the relevant authorities (or proof of consultation if no comments were received) and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided. Please also ensure that the potential impacts on the affected Critical Biodiversity Areas and Ecological Support Areas are fully assessed in the final Environmental Impact Assessment Report (EIAR).
- If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.dffe.gov.za/documents/forms>.

3. Layout & Sensitivity Maps

- Please provide a layout map which indicates the following:
 - The proposed location of the PV array and associated infrastructure of the proposed up to 360MW Mura 4 Solar Photovoltaic Facility
 - The proposed grid infrastructure connecting the PV facility to the existing substation, overlain by the sensitivity map;
 - All supporting onsite infrastructure e.g., roads (existing and proposed); fence, office buildings, and etc.
 - The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
 - Buffer areas; and
 - All "no-go" areas.
- The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure, as well as the neighbouring PV Solar Clusters.
- Google maps will not be accepted for decision-making purposes.

wk

4. **Public Participation Process**

- Please ensure that all issues raised, and comments received on the draft SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: BCAdmin@dffe.gov.za, the provincial authority and the local municipality) in respect of the proposed activity are adequately addressed in the final SR. Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.
- The Public Participation Process must be conducted in terms of the approved public participation plan and Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended. Take note of the timeframes required for adequate public participation.
- A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments (pre and post submission of the draft SR) for this development. The C&R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.

5. **Specialist Assessments to be conducted in the EIA Phase**

- Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of PV arrays, and all other associated infrastructures that they have assessed and are recommending for authorisations.
- The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.
- You are further required to ensure that all required specialist studies are recommended and assessed for the proposed up to 360MW Mura 4 Solar Photovoltaic Facility.
- It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols. Please note further that the protocols require the specialists' to be registered with SACNASP in their respective field.
- Please include a table in the report, summarising the specialist studies required by the Department's Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols.

wk

6. **Cumulative Assessment to be conducted in the EIA Phase**

Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:

- Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
- Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
- A cumulative impact environmental statement on whether the proposed development must proceed.

7. **Environmental Management Programme**

The EMPr must include the following:

- It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the Generic Environmental Management Programme, must be used and submitted with the final report over and above the EMPr for the facility. This means that a generic EMPR must be included for the substation. In total, 2 EMPRs should accompany the final report.
- Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.

General

You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:

"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a SR which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority".

You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of SRs in accordance with Appendix 2 and Regulation 21(1) of the NEMA EIA Regulations 2014, as amended.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

wk

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



Ms Milicent Solomons
Acting Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Letter signed by: Mr Wayne Hector
Designation: Deputy Director: Priority Infrastructure Projects
Date: 29/03/23

cc:	Lance Blaine	Mura 4 (Pty) Ltd	Email: surina@red-cap.co.za
	Ashley Mitchell	Beaufort West Local Municipality	Email: buildingcontrol@beaufortwestmun.co.za
	MJ Penxa	Beaufort West Local Municipality	Email: jacksonp@beaufortwestmun.co.za

Govender, Megan

From: Thea Jordan <Thea.Jordan@westerncape.gov.za>
Sent: Tuesday, 11 April 2023 14:42
To: Govender, Megan; Strong, Ashlea; JMpelane@environment.gov.za; EIAAdmin
Cc: Adri La Meyer
Subject: COMMENTS ON THE DSR FOR THE PROPOSED DEVELOPMENT OF THE 360MW MURA 4 SOLAR PV FACILITY NEAR BEAUFORT WEST
Attachments: 2023 April 11 - PROPOSED DEVELOPMENT OF THE 360MW MURA 4 SOLAR PV FACILITY NEAR BEAUFORT WEST.pdf

Dear EAP,

Your request for comment refers.

Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan
Pr. Pl. (A/1237/2002)
Director: Development Facilitation
Department of Environmental Affairs and Development Planning
Western Cape Government

11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 4093
Email: Thea.Jordan@westerncape.gov.za
Website: www.westerncape.gov.za/eadp



Be 110% Green. Read from the screen.

Due to COVID-19 restrictions, we are still operating on a "work-from-home" basis.
Should you not be able to contact the numbers above, please call +27 (0)21 483 4091
between 07:30-16:00.

From: Govender, Megan <Megan.Govender@wsp.com>
Sent: Monday, March 6, 2023 14:51
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>
Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST: DRAFT ENVIRONMENTAL REPORTS REVIEW

Dear Commenting Authority,

Notice is given in terms of Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) for submission of an application for environmental authorisation (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).

Red Cap Energy is proposing to develop four solar facilities, namely Mura 1, Mura 2, Mura 3, and Mura 4, and an associated grid connection, collectively known as the Mura PV Development between Loxton and Beaufort West in the Beaufort West Local Municipality and Ubuntu Local Municipality and the Central Karoo District Municipality and Pixley ka Seme District Municipality in the Western Cape and Northern Cape Provinces. The proposed Mura PV Development is located in close proximity to the approved Nuweveld Wind Farm Development. The proposed authorisations include the following Basic Assessment (BA) and Scoping and Environmental Impact Reporting (S&EIR) processes:

- Mura 1 Solar PV Facility: BA Process
- Mura 2 Solar PV Facility: S&EIR Process
- Mura 3 Solar PV Facility: S&EIR Process
- Mura 4 Solar PV Facility: S&EIR Process
- Mura EGI Corridor: BA Process


WSP Group Africa (Pty) Ltd (WSP) has been appointed as the independent Environmental Assessment Practitioner (EAP) by Red Cap Energy (Pty) Ltd, to manage the respective BA and S&EIR processes. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the process.

DRAFT BASIC ASSESSMENT AND DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Environmental Basic Assessment and Scoping Reports will be made available from WSP on request and/or at the venues below for review and comment for 30 days from 06 March 2023 to 06 April 2023.

Area	Venue	Street Address
Beaufort West	Beaufort West Public Library	Corner of Bird Street and Church Street
	Klein Karoo Agri	80 Donkin Street
Loxton	Loxton Library	Margaretha Prinsloo Street, Loxton
WSP Website	https://www.wsp.com/en-ZA/services/public-documents	
Datafree Website	https://wsp-engage.com/	

The report has also been made available at the link below easy access:

One Drive Link	 Mura Solar PV Development For Public Review
One Drive Instruction	<ul style="list-style-type: none"> • Please note that you will receive a separate email with the link to the one drive. This link will then request a verification number which will automatically be sent to your email address – if it doesn't seem to come through please check your "spam" folder

A presentation on the summary of the proposed development has been collated. The presentation has been made available on the WSP website, Datafree website and One Drive Link.

PowerPoint Instruction	<ul style="list-style-type: none"> • To view and listen to the project summary presentation, please open the PowerPoint Presentation and click on the speaker icon on the left on each slide to listen to the accompanying commentary
-------------------------------	--

WSP contact details are:

Name: Megan Govender
Tel: 011 361 1410

Fax: 011 361 1381
E-mail: Megan.Govender@wsp.com
Address: PO Box 98867, Sloane Park, 2152

We look forward to your participation in this process.

Kind Regards,



Megan Govender

Senior Consultant

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References:

18/2/3/2023-2024 (Development Facilitation)

19/2/5/3/C3/2/WL0036/23 (Waste Management)

19/3/2/4/C3/1/DDF0132/22 (Pollution and Chemicals Management)

Attention: Ms Megan Govender

WSP Group Africa (Pty) Ltd
P.O. Box 98867
Sloane Park
JOHANNESBURG
2151

Megan.Govender@wsp.com

Dear Madam

COMMENTS ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF THE 360MW MURA 4 SOLAR PHOTOVOLTAIC FACILITY AND ASSOCIATED INFRASTRUCTURE AND STRUCTURES (INCLUDING, *INTER ALIA*, A BATTERY ENERGY STORAGE SYSTEM AND SUBSTATION, 2 ON-SITE SOLAR FARM SUBSTATIONS, ACCESS ROADS, SITE CAMPS, CABLING, BUILDINGS, ETC.) ON FARM LEEUWKLOOF NO. 43, AANGRENSEND FARM ABRAMSKRAAL NO. 11, FARM SNEEUWKRAAL NO. 46, AND PORTION 4; REMAINDER OF PORTION 3; AND THE REMAINDER OF FARM DUIKER KRANSE NO. 45, BEAUFORT WEST

1. The email correspondence of 06 March 2023, informing interested and affected parties of the release of Draft Scoping Report ("DSR") for comments, the email received on the same day, providing an additional link to download the DSR and appendices, and the Department's email of 05 April 2023, informing the environmental assessment practitioner ("EAP") that the Department is unable to meet the deadline of 06 April 2023, refer.
2. The Department extends its appreciation to the EAP for extending the deadline for comments on the DSR. Please find consolidated comments from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated March 2023 that was available for download from various online platforms provided by the EAP.

3. Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.Lameyer@westerncape.gov.za; Tel.: (021) 483 2887):
- 3.1. This Directorate requires clarity on the extent of the development footprint and that of the proposed site (indicated as Farm Leeuwkloof No. 43, Aangrensend Farm Abramskraal No. 11, Farm Sneeuwkraal No. 46, and Portion 4; Remainder of Portion 3; and the Remainder of Farm Duiker Kranse No. 45). The DSR interchangeably refers to the total project area as 466 ha and 425 ha. On page 26 of the DSR it is indicated that *“The proposed Mura 4 Facility will be developed within a project area of approximately 425 hectares (ha), excluding the access road corridor”*, whereas on page 38 it is indicated that *“The total project area is 466 ha”* and that *“The total development envelope for project installation is approximately 425 ha”*. Assuming that the proposed 360MW solar field will be constructed on 425 ha; the proposed 240 MWac battery energy storage system (“BESS”) and BESS substation will be developed on ~ 4 ha; internal gravel access roads will have a development footprint of 36 ha; and up to two 2.2 ha site camps / laydown areas (i.e., 4.4 ha in total) will be developed, then more than 469 ha is required for the proposed solar photovoltaic (“PV”) facility and associated structures and infrastructure. The development footprint of the associated buildings (offices, ablution facilities, operational and maintenance centre, etc.) and the two on-site solar substations were not indicated. Please ensure that the Final Scoping Report (“FSR”) and the forthcoming Draft EIA Report clearly describe the size of the proposed site, the development footprint, and the individual components of the proposed solar PV development.
- 3.2. Further to the above, section 4.1.1 of the DSR deals with the site selection process. It is noted that the original five potential Mura PV development areas were further reduced to two areas (Areas 2 and 5) that were considered suitable for the Mura 1, 2, 3 and 4 solar PV developments. Area 5 consist of two sites of 395 ha and 425 ha, respectively. The 425-ha area corresponds with the project area for the proposed Mura 4 solar PV facility. It is again reiterated that the 425 ha appears to only be sufficient for the proposed solar field, based on the information provided in the DSR. The FSR and the Draft EIA Report must indicate the size of the development footprint against the size of the proposed site.
- 3.3. It is noted that Activities 12, 14 and 23 of Listing Notice (“LN”) 3 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) EIA Regulations, 2014 (as amended) are applied for. Please be advised that no systematic biodiversity plans or bioregional plans for the Western Cape Province have been adopted by this Department. As such, Activity 12.i.ii, Activity 14(ii)(a) and (c) i.i.(ff) and Activity 23(ii)(a) i.i.(ff) of LN 3 of the NEMA EIA Regulations, 2014 (as amended) are not applicable to the application for environmental authorisation.
- 3.4. Appendix F and Table 2-1 of the DSR list the specialist studies identified by the Screening Tool, that should be undertaken in the environmental impact reporting (“EIR”) phase. The EAP has provided motivation for undertaking or not undertaking the recommended Screening Tool specialist studies, as well as the undertaking of additional specialist studies not identified by the Screening Tool. Section 2.2.1 of the DSR notes that *“An RFI Study will not be undertaken... As this theme has been identified as high, a compliance statement will be prepared by the EAP and included in the EIA Report.”* Please note that the Screening Tool indicated a medium (and not high) sensitivity for the Radio Frequency Interference (“RFI”) theme. The Plan of Study for EIA (Section 10.5) lists the specialist studies that have been commissioned for the EIR phase, which are aligned to section 2.2.1 of the DSR. The Plan of Study

for EIA does not include the undertaking of an RFI Assessment. Please thus indicate whether an RFI Compliance Statement will be undertaken by the EAP in the EIR phase. If so, the Plan of Study for EIA must be amended to include the RFI Compliance Statement.

- 3.5. The Plan of Study for EIA must be amended to include an Archaeological Impact Assessment as part of the Cultural Heritage Impact Assessment.
 - 3.6. Please ensure that the specialist assessments include a cumulative assessment of the same renewable energy projects within a 30km radius of the proposed site. It is noted that the Terrestrial Biodiversity Compliance Statement compiled by 3Foxes Biodiversity Solutions dated November 2022 refers to the "The three Nuweveld WEFs west of the site have been authorised and there is also the Hoogland 1 and Hoogland 2 WEFs which have not yet been authorised and lie adjacent and to the north and west of the Nuweveld site". Please note that the Hoogland 1 and 2 wind energy facilities ("WEFs") have received environmental authorisations. The Socio-Economic Impact Assessment Report compiled by Independent Economic Researchers dated January 2023 refers to the "Assessment of cumulative impacts considered Mura 1, 2, 3 and 4 SEFs; Hoogland 1, 2, 3 and 4 WEFs; Nuweveld North, East and West WEFs, Taaibos WEFs, Soutrivier WEFs, as well as the Mura, Hoogland, Nuweveld and Gamma Grid Corridors." Other scoping phase specialist assessments and section 9 of the DSR also include reference to the Taaibos and Soutrivier WEFs. If within a 30km radius of the proposed site, these WEFs must be included in all the specialist assessments and referenced in the FSR and Draft EIA Report.
 - 3.7. The DSR states that "The site will be accessed via the R381, DR02317 and existing access roads". The Traffic Impact Assessment ("TIA") compiled by Athol Schwarz dated 30 November 2022 however indicates that access to the proposed site is via the OP 08881 and an existing private road from the DR 02317. Please confirm the access to the proposed site.
 - 3.8. It is further noted that a site visit of the area was undertaken by the traffic engineer in September 2019. The TIA notes that "OP 08881 is 36.9 km long, starting at the DR 02317 before ending at the farm Slangfontein. This road will be used to access Mura 3 and Mura 4. This road was not included in the site inspection. Thus, the author cannot comment on the condition or the viability of using this route." It is crucial that this limitation/ gap in knowledge be determined during the EIR phase to confirm that OP 08881 is acceptable for traffic to and from the proposed site. Comments from the relevant road's authority on the condition or viability of the road would be acceptable.
 - 3.9. Please include reference to the Western Cape Noise Control Regulations promulgated in Provincial Notice 200/2013 of 20 June 2013 in the section dealing with provincial and municipal legal and regulatory framework in the Draft EIA Report.
4. Directorate: Waste Management – Mr Vishwanath Gianpersad (Email: Vishwanath.Gianpersad@westerncape.gov.za; Tel.: (021) 483 8325):
- 4.1. It is noted that the proposed project does not constitute a waste management listed activity and hence does not require a waste management licence.

- 4.2. Waste mitigation and management measures will be detailed in the forthcoming Environmental Management Programme (“EMPr”), and this will include measures for the anticipated generation of hazardous materials/waste.
- 4.3. The EMPr must also detail measures for the management and storing of plastics, which poses a possible threat to livestock if ingested.
- 4.4. The Draft EIA Report must identify the waste disposal facility/ies where waste will be disposed of, and confirmation from the relevant Municipality/ service provider must be provided regarding its capacity to accept and dispose of solid waste generated during all phases of the proposed development. Waste should then be transported to an identified licensed waste disposal facility.
- 4.5. Sufficient waste and recycle bins such as waste containers must be placed on-site for all the waste generated from daily operations, food packaging, waste oils, and lubricants for the maintenance of tractors and heavy-duty equipment.
- 4.6. Provision must be made for the collection of waste oils and greases, generated from machinery and other equipment, by a registered contractor for transport to a licensed hazardous waste management facility.
- 4.7. The EMPr's must include reference to incidents that fall within the definition of section 30(1) (a) of the NEMA, 1998.
5. Directorate: Pollution and Chemicals Management – Ms Shehaam Brinkhuis (Email: Shehaam.Brinkhuis@westerncape.gov.za; Tel.: (021) 483 8309):
 - 5.1. This Directorate has no comments on the DSR and Plan of Study for EIA and awaits the Draft EIA Report (and accompanying EMPr) to provide comment on potential pollution impacts and mitigation measures.

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

Thea Jordan
Digitally signed by Thea Jordan
Date: 2023.04.11 14:41:14 +02'00'
pp **HEAD OF DEPARTMENT**
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Letter signed by:

Thea Jordan

Director: Development Facilitation

Date: 11 April 2023

CC: Mr Jay-Jay Mpelane (DFFE)

Email: JMpelane@environment.gov.za

Comments on Mura 4 Solar Photovoltaic Facility (Draft Scoping Report)

Name of IA&P:	Anthony Jefferson		
Matter: (Title of Legislation)	NEMA EIA Regulations, 2014 (as amended) and Listing Notices of 2017		
Contact details:			
Email:	Redacted as per POPIA requirements		
Telephone:			
Submitted To:	Megan.Govender@wsp.com (WSP Group Africa (Pty) Ltd.)		

COMMENTS:

Comment	Suggestion
<p>Project Infrastructure:</p> <p>The DSR omitted to include at least one comprehensive site layout plan illustrating all proposed onsite and off-site infrastructures.</p>	<p>It is suggested an updated SR or the EIR to include such a layout plan at an appropriate scale.</p>
<p>Project Infrastructure:</p> <p>Section 3.4.1, indicates that solar Modules will be located on either single axis tracking structures or fixed tilt mounting structures or similar.</p>	<p>It is suggested that an updated SR or the EIR indicate the exact mounting structure technology that will be used to mount the solar PV modules. This is to ensure transparency from the outset to prevent possible 11th hour substandard technology for the Central Karoo.</p>
<p>Project Infrastructure:</p> <p>Section 3.4.3, states that "The BESS will be Lithium-ion or similar solid-state technology."</p>	<p>It is suggested that an updated SR alternatively the EIR indicate the exact BESS technology. This is to ensure transparency of potential health & safety risk and to prevent 11th hour substandard technology be dumped upon the Central Karoo.</p>
<p>PV & MOUNTING SYSTEM:</p> <p>Considering the CKDM is the poorest region in the Western Cape Province and its communities are the most vulnerable in</p>	

<p>the province; but its electricity rates are higher than many if not all areas within the Cape Metro. Further, section 3.2.1, states that this Mura 4 Solar PV Facility is a large-scale system supplying power into the commercial electricity grid and not to local users. Hence, how will this proposed project impact the CKDM communities passively in a direct manner with significant reduced electricity prices? If, any direct positive impact of reduced power prices at community level, what will the expected timeline be from the time of operation?</p> <p>Section 3.2.1, only made reference to sunlight as a source whilst excluding geothermal as a potential source. Hence the two considered mounting systems is limited to single axis tracking and fixed axis mounting structures.</p>	<p>Suggestion...the municipality be subsidised by Eskom to allow it to reduce its electricity prices to communities whilst still being able to make a marginal income profit.</p> <p>It is suggested that the economic viability of geothermal heat/ power be investigated. If, it is viable, then an additional mounting technology be considered such as bifacial axis mounting structures be considered. It is assumed that the last mentioned structure would be cost effective oppose to the current two considered mounting structures.</p>
<p>Section 3.3, omitted to consider potential geothermal heat radiation that can be a viable energy source during non-sunshine days/evening periods.</p>	<p>It is suggested the following sentences be changed as follows, " Since solar and wind technology depend largely on whether the sun is shining or the wind is blowing, respectively, these technologies are more efficient when these sources are available."</p>
<p>Section 3.3.2, only indicates that, "The battery facilities...will not have any</p>	<p>It is suggested that the EMPr indicates</p>

<p>additional office/operation/maintenance infrastructure as those of the substation.</p>	<p>specific scheduled mechanical safety maintenance operations that should be conducted in terms of all applicable SA Health & Safety requirements i.e. the OSHAct and Mechanical and Ventilation Regulations; and other applicable regulatory tools as cited under section 3.3.3, of the DSR.</p>
<p>Location Map: Section 3.1, page 26-32 read together with section 4.1, read together with Appendix E (Maps). These sections basically addressed only the GPS co-ordinates; alternative sites particulars are scattered around in figures with no scales at times; and no credible topographical map but more of a kind of thematic map has been provided.</p>	<p>It is suggested that the following being addressed in an updated scoping report or the EIA report:</p> <p>Provide a colour location map at a larger scale of at least 1:50 000. The scale must be indicated on the map. The map must indicate the following:</p> <ul style="list-style-type: none"> • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend to represent physical/natural landscapes, water features, vegetation features, constructed/cultural/man-made landscape, and transport and administration features on the map. Towns cited under section 6.3.5 should be depicted on the map.; • the prevailing wind direction (during November to April and during May to October); • Date map was printed; and • the already provided GPS Hartbeesthoek 94/WG584 co-ordinate system information.
<p>Site Plan:</p>	

Section 3.1, read together with section 4.1, read together with Appendix E (Maps) should provide an amended Site Plan for the preferred Mura Solar 4 project as well as each alternatives considered. These site plans should conform to the following:

Detailed site plan(s) must be prepared for each alternative site or alternative activity and provided in an updated SR or EIAR/EIR. The site plan must contain or conform to the following:

- The detailed site plan must be at a scale preferably at a scale of 1:500 or at an appropriate scale. The scale must be indicated on the plan.
- The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan.
- The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be indicated on the site plan.
- The position of each element of the application as well as any other structures on the site must be indicated on the site plan.
- Services, including electricity supply cables (indicate above or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the development must be indicated on the site plan. Servitudes indicating the purpose of the servitude must be indicated on the site plan. Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to):
 - Watercourses/Rivers/Wetlands (including non-perennial features).
 - Flood lines (i.e. 1:10 year, 1:50 year, and 1:100 year where applicable;
 - Ridges.
 - Cultural and historical features.
 - Areas with indigenous vegetation (even

	<p>if it is degraded or infested with alien species).</p> <ul style="list-style-type: none"> •Whenever the slope of the site exceeds 1:10, then a contour map of the site must be submitted.
Schematic Process/Project Drawing	<p>It is suggested a holistic schematic process drawing (project layout) of the entire solar Mura 4 project be provided. This drawing should include all the different stages with its main technology/infrastructure in a input-process-output manner.</p>
<p>Photographs:</p> <p>Section 2.4 read together with section 2.7, states that descriptions of environmental attributes were by means of combination of desktop reviews i.e. aerial imagery and site investigations done between March and October 2022, to identify sensitive features on site. It further states that "...the latest available aerial imagery for the site."</p>	<p>However a number of important information has been leftout and need to be provided in an updated SR or during the EIA phase document as follows:</p> <ol style="list-style-type: none"> 1. Colour photographs of the site and its surroundings (taken of the site and from the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan; 2. Recent aerial photograph or at least dates of those aerial photographs (attach as an Appendix). The Appendix should be supplemented with additional dated onsite-photographs taken of relevant features during your stated field trips as cited under section 7.2 of the DSR. Kindly note, the aforementioned requirements must be duplicated for all alternative sites.
	<p>It is suggested a larger A3 size map as an Appendix be provided under section 6.1.3 (geology).</p>

<p>Land use character of surrounding area</p> <p>Section 6.3.5.1 read together with section 6.3.4.3 failed to adequately describe the current land uses on the proposed project site and its immediate surrounding areas. The aforementioned sections also failed to adequately describe the prominent features that occur in the immediate surrounds from the proposed project area.</p>	<p>Hence it is suggested either an updated scoping report or the EIA provides a proper description of the current land uses and/or prominent features that occur within +/- 500m radius of the proposed project area and neighbouring properties if these are located beyond 500m of the site from all directions. Further, a description of any potential impacts the proposed project may pose on the highlighted land uses or features.</p>
<p>Socio-Economic:</p>	<p>It is suggested that the Mitigation and Management Measures under section 6.3.5 relating to regional employment and contracts be included in an updated scoping report or be addressed within the EIA as follows: specifications/requirements/targets:</p> <ul style="list-style-type: none"> • 100% unskilled workers must be local; • 90% semi-skilled workers from local; and • 70% skilled workers must be from local/indigent. • That the concept "local/indigent" shall mean having been born in the CKDM and having lived in the CKDM area for at least more than 10 years and having attended at least either and/or a primary or high school in the CKDM area irrespective whether the candidate is currently residing in the CKDM area or not. If not born in the CKDM area than at least one parent born in the region

	<p>but both parents must have lived in the area for more than 20 years;</p> <ul style="list-style-type: none"> • That a CKDM professionals body shall be consulted for particulars of local/indigent professionals to be considered for skilled jobs and/or be willing to undergo rapid skills upgrading to occupy skilled jobs; • That CKDM Professionals Body shall have representation in all committees/forums established under this proposed project; • That local sub-contractors who did not gain from tenders in the past locally will receive preferential treatment in terms of the equity principle and a skills transfer programme be adopted by the main contractors; • That sub-contractors who previously gained tenders locally equally compete with external contractors to be main contractors; • That the income/wealth status of sub-contractors and skilled workers for all Black contenders / candidates will also be included in the specifications in addition to the standard "black" requirement under the BBBEE and EEA redress umbrella to ensure wealth does not circulate consistently amongst a few individuals.
<p>Section 3.6 " NEED AND DESIRABILITY" have very little to zero direct and possibly indirect relevance to the Central Karoo District Municipal Area. Yes it is a common fact that the district is in dire need of urgent economic development.</p>	

<p>Section 3.6, states that South Africa is the seventh highest coal producer in the world, with approximately 77% of the country's electricity generated from coal.</p> <p>Section 3.6, states also that the SA's large dependence on coal and its use also resulted in a variety of negative impacts on the environment, including the contribution to climate change. SA is also the highest emitter of GHGs in Africa; attributed to the country's energy-intensive economy that largely relies on coal-based electricity generation.</p>	<p>It is suggested a comparable spreadsheet of the aforementioned seven countries and energy mix usages be provided.</p> <p>It is suggested a western cape regional spreadsheet show casing coal dependence amongst WC district and metro municipalities. Also to include comparative WC district municipalities and metro municipality drivers and associated environmental impacts (GHG emissions, Climate Change, Health Impacts, etc.) as a result of direct/indirect coal usages. Also to include comparative data to showcase the status of energy-intensive economies that relies on coal-based electricity generation amongst the WC district municipalities and metro municipality.</p>
<p>Section 3.6 NEED AND DESIRABILITY also omits to include a dedicated subsection of WESTERN CAPE PERSPECTIVE and REGIONAL PERSPECTIVE</p> <ul style="list-style-type: none"> • which would have outlined the energy mix in response to the growing electricity demand and the promotion of clean sources of energy within the CKDM in comparison to the province; • it would have outlined the reduction and elimination of poverty in the CKDM is more dire oppose to other regions within the province; • it would also have outlined that power shortages are most probably 	<p>Hence it is strongly suggested that mention be made about the poorest socio-economic status of the region in comparison to the rest of the province. Further it is strongly suggested that factual comparative analysed data and an objective interpretation of electricity prices communities and businesses are subjected to amongst the districts and one metro municipality in the western cape be provided.</p> <p>Further it is strongly suggested the case study of the Frankfort Municipality and Surrounding Towns Pilot/Case Study that uses four (4) Solar Energy Farms operated</p>

<p>the worse in the CKDM oppose to other regions in the province, esp the metro;</p> <ul style="list-style-type: none"> • it would have outlined the socio-economic benefits available to the local communities and businesses in the CKDM area from this proposed project; and • that the project will And this premise will promote the reaching one of the National Development Plan's aims which is to reduce and eliminate poverty in South Africa by 2030 (see section 3.6.2, page 40 of the dBAR). 	<p>by Rural Maintenance (a private IPPP) that benefits specifically the local communities and businesses be used and cited.</p> <p>This is to empower people of the Central Karoo to negotiate with all IPPP'S and Eskom in the region for electricity price reductions of up to 30% (considering the region might have more than four solar and wind energy farms) and many more other benefits. Benefits to the local communities and businesses of Frankford gains from that pilot study are as follows:</p> <ul style="list-style-type: none"> • Electricity demand from the Eskom grid are reduced whilst the local communities and business still have access to electricity; • The local community and businesses saves a reduced electricity cost of 15% pricing to what they would have paid to Eskom. • Water and Sanitation Facilities operates 24/7 due to electricity flow, even though it is loadshedding; • Cable theft reduced because the local grid remained alive; • Small Power Users like residence and business are exposed to power outages in smaller durations as per their requests; • The Large Power Users are exposed to power outages of a longer duration as per their request; • Low voltages has been reduced resulting in local communities using their equipment more optimally; and • In the event of loadshedding,
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	<p>locals receives more reliable weekly schedules of specific reduced periods of loadshedding.</p>
<p>Alternatives (Location):</p> <p>Section 4.1.1 only referenced that areas were assessed from a technical perspective by considering slope, aspect, undulation, and access, and more detailed environmental perspective. Resulting in the consideration of high level solar design. No consideration was given to geothermal heat reflection capacity from the landscape such as geological structures and soil characteristics. This could have resulted in the consideration of alternative technologies such as the addition of bi-facial panels and the reconsideration of methods of elevating those bi-facial panels. Hence it is suggested the Amended dBAR or FBAR include descriptions, maps and geothermal heat radiation capacities during non-sunshining days/periods.</p>	<p>It is suggested the scoping report be updated or the EIA address all current land uses in the proposed project region, including depicting within the topographical map and a separate thematic map layers of potential future economic development resources such as geological minerals and gas.</p>
<p>Alternatives (Technology):</p>	<p>It is suggested section 4.2.1 provide a detailed consideration of bi-facial solar panels in relation to both sun radiation/heat and geothermal heat.</p>
<p>Alternatives (Operational):</p> <p>Section 4, made no provision for the consideration of Operational Aspect Alternatives. A detailed objective review and assessment of the suggested factors for consideration will equip the people of the</p>	<p>Hence it is strongly suggested that the updated scoping report or the EIA provide a detailed consideration of this aspect by considering the following factors:</p> <ul style="list-style-type: none"> • Comments made in this Letter of Comments under the section that

<p>Central Karoo as to whether their genuine socio-economic upliftment is equally a priority as the rest of the province, but not limited to it.</p>	<p>dealt with the Frankfort Solar Energy Pilot Study;</p> <ul style="list-style-type: none">• Operational and technology aspects used in the aforementioned pilot study;• Electricity costs savings Frankfort Pilot Study local community, businesses and agriculture gained as a result of not having used the Eskom grid; and incorporate objective information of other current and/or proposed/intent renewable energy projects the western cape government recently announced to take all provincial municipalities off the Eskom national grid.
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emailed

Signature

Govender, Megan

From: Stephanie Barnardt Redacted as per POPIA requirements
Sent: Friday, 14 April 2023 09:54
To: Ayanda Mdludlu; Govender, Megan
Cc: Strong, Ashlea
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST: DRAFT ENVIRONMENTAL REPORTS REVIEW

Good day Ms Govender

That is correct, the consultation for the HIA only ended 6 April and the matter was heard at the following HOMs meeting on the 11 April.

The committee endorsed and the final comment has been uploaded for signature, the final comment should be out today or Monday morning.

Apologies for the delay.

However in the meantime, please see the extract from the minutes:

**Proposed Mura Electrical Grid Infrastructure, Beaufort West Magisterial District, Western Cape, S38(8)-HIA
Case No.: 22101903AM1019E**

Final comment:

The Committee resolved to endorse the HIA prepared by ASHA Consulting dated 15 December 2022 as meeting the requirements of Section 38 (3) of the NHRA and the following recommendations on page 42;

- A Fossil Chance Finds Procedure (as supplied in the palaeontological specialist study) must be included in the project EMPr;
- Known sites should be avoided by the final layout;
- A pre-construction archaeological survey must be undertaken during the EMPr approval stage;
- No stones may be removed from any archaeological site; and
- If any archaeological material or human burials are uncovered during the course of development, work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

Proposed Mura 1-4 Pv Facilities, Beaufort West Magisterial District, Western Cape, S38(8)-HIA

Case No.: 22101902AM1019E

Final comment:

The Committee resolved to endorse the HIA prepared by ASHA Consulting dated 15 December 2022 as meeting the requirements of Section 38 (3) of the NHRA and the following recommendations on page 60;

Mura 1 (Western Cape):

It is recommended that the proposed Mura 1 PV facility should be authorised but subject to the following recommendations which should be included as conditions of authorisation:

- A Fossil Chance Finds Procedure (as supplied in the palaeontological specialist study) must be included in the project EMPr;
- No stones may be removed from any archaeological site; and
- If any archaeological material or human burials are uncovered during the course of development, work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

Mura 2 (Western Cape):

It is recommended that the proposed Mura 2 PV facility should be authorised but subject to the following recommendations which should be included as conditions of authorisation:

- A Fossil Chance Finds Procedure (as supplied in the palaeontological specialist study) must be included in the project EMPr;
 - No stones may be removed from any archaeological site; and
- ASHA Consulting (Pty) Ltd | Reg. no.: 2013/220482/07 61
- If any archaeological material or human burials are uncovered during the course of development, work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

Mura 4 (Western Cape):

It is recommended that the proposed Mura 4 PV facility should be authorised but subject to the following recommendations which should be included as conditions of authorisation:

- A Fossil Chance Finds Procedure (as supplied in the palaeontological specialist study) must be included in the project EMPr;
- The site at waypoint 1399 should be avoided if possible but this is not required (if avoided and protected then the buffer can be reduced to 25 m); and
- Any realignment of the DR02317 within 400 m of waypoint 2000 must be checked in the field and approved by an archaeologist;
- No stones may be removed from any archaeological site; and
- If any archaeological material or human burials are uncovered during the course of development, work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

Warm regards,

Kindly note: Due to volume of queries I receive I may not be able to respond to you immediately, if you have not received a reply from within ten working days, please resend your query

Any urgent Heritage Western Cape matters, please contact one of the officials:

[HWC staff contact details](#)

Stephanie-Anne Barnardt-Delport
Acting Collection Management Officer, Museological Service
Department of Cultural Affairs and Sport
Western Cape Government

3rd Floor, 48 Queen Victoria Street, Cape Town

Redacted as per POPIA requirements

Website: www.westerncape.gov.za



Be 110% Green. Read from the screen.

From: Ayanda Mdludlu [Redacted as per POPIA requirements]
Sent: Friday, April 14, 2023 9:07 AM
To: Govender, Megan <Megan.Govender@wsp.com>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; [Redacted as per POPIA requirements]
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST: DRAFT ENVIRONMENTAL REPORTS REVIEW

Good day Ms Govender,

The below mentioned cases were HIAs that were discussed in HOMs of 11 April. Ms Stephanie Barnardt who is cc'd here presented them. I believe they were endorsed, however, I will give her space to confirm.

Kind regards,
Ayanda Mdludlu
Heritage Officer

Heritage Resource Management Services
Protea Assurance Building Greenmarket Square, Cape Town (currently working remotely)
Website: www.hwc.org.za / www.westerncape.gov.za



From: Govender, Megan <Megan.Govender@wsp.com>
Sent: Tuesday, April 11, 2023 12:50 PM
To: Ayanda Mdludlu <Ayanda.Mdludlu@westerncape.gov.za>
Cc: [Redacted as per POPIA requirements]
Subject: FW: NOTICE OF THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST: DRAFT ENVIRONMENTAL REPORTS REVIEW

Good Day

I am following up on my email below. Please may you confirm if Heritage Western Cape will be sending through comments? The review period ended on Thursday 06 April 2023 but we can make an exception for Heritage Western Cape and can include comments sent before COB on 12 April 2023.

Kind Regards,



Megan Govender
Senior Consultant

T +27 011 361 1300

[Redacted as per POPIA requirements]

From: Govender, Megan
Sent: Thursday, 06 April 2023 13:32
To: ayanda.mdludlu@westerncape.gov.za
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>
Subject: RE: NOTICE OF THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST: DRAFT ENVIRONMENTAL REPORTS REVIEW

Good Day

Please note the public review period for the Proposed Mura PV Development ends today. Please may you confirm if Heritage Western Cape will be sending through comments?

Kind Regards,



Megan Govender
Senior Consultant

T +27 011 361 1300

Redacted as per POPIA requirements

From: Govender, Megan

Sent: Monday, 06 March 2023 14:51

Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>

Subject: NOTICE OF THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST: DRAFT ENVIRONMENTAL REPORTS REVIEW

Dear Commenting Authority,

Notice is given in terms of Regulation 41(2) of GNR 982 (as amended) published under section 24 and 24D of the National Environmental Management Act (No. 107 of 1998) (NEMA) for submission of an application for environmental authorisation (EA) in respect of activities identified in terms of GNR 983, GNR 984 and GNR 985 (as amended).

Red Cap Energy is proposing to develop four solar facilities, namely Mura 1, Mura 2, Mura 3, and Mura 4, and an associated grid connection, collectively known as the Mura PV Development between Loxton and Beaufort West in the Beaufort West Local Municipality and Ubuntu Local Municipality and the Central Karoo District Municipality and Pixley ka Seme District Municipality in the Western Cape and Northern Cape Provinces. The proposed Mura PV Development is located in close proximity to the approved Nuweveld Wind Farm Development. The proposed authorisations include the following Basic Assessment (BA) and Scoping and Environmental Impact Reporting (S&EIR) processes:

- Mura 1 Solar PV Facility: BA Process
- Mura 2 Solar PV Facility: S&EIR Process
- Mura 3 Solar PV Facility: S&EIR Process
- Mura 4 Solar PV Facility: S&EIR Process
- Mura EGI Corridor: BA Process

WSP Group Africa (Pty) Ltd (WSP) has been appointed as the independent Environmental Assessment Practitioner (EAP) by Red Cap Energy (Pty) Ltd, to manage the respective BA and S&EIR processes. Parties wishing to formally register as stakeholders in order to offer their comment on the Proposed Projects are requested to forward their full contact details to the EAP at the details provided below. Registered stakeholders will be forwarded all future correspondence and notified individually of additional opportunities to participate in the process.

DRAFT BASIC ASSESSMENT AND DRAFT SCOPING REPORT REVIEW PERIOD

The Draft Environmental Basic Assessment and Scoping Reports will be made available from WSP on request and/or at the venues below for review and comment for 30 days from 06 March 2023 to 06 April 2023.

Area	Venue	Street Address
Beaufort West	Beaufort West Public Library	Corner of Bird Street and Church Street
	Klein Karoo Agri	80 Donkin Street
Loxton	Loxton Library	Margaretha Prinsloo Street, Loxton
WSP Website	https://www.wsp.com/en-ZA/services/public-documents	
Datafree Website	https://wsp-engage.com/	

The report has also been made available at the link below easy access:

One Drive Link	<input type="checkbox"/> Mura Solar PV Development For Public Review
One Drive Instruction	<ul style="list-style-type: none">Please note that you will receive a separate email with the link to the one drive. This link will then request a verification number which will automatically be sent to your email address – if it doesn't seem to come through please check your "spam" folder

A presentation on the summary of the proposed development has been collated. The presentation has been made available on the WSP website, Datafree website and One Drive Link.

PowerPoint Instruction	<ul style="list-style-type: none">To view and listen to the project summary presentation, please open the PowerPoint Presentation and click on the speaker icon on the left on each slide to listen to the accompanying commentary
-------------------------------	--

WSP contact details are:

Name: Megan Govender
Tel: 011 361 1410
Fax: 011 361 1381
E-mail: Megan.Govender@wsp.com
Address: PO Box 98867, Sloane Park, 2152

We look forward to your participation in this process.

Kind Regards,



Megan Govender
Senior Consultant

T +27 011 361 1300

Redacted as per POPIA requirements



WSP in Africa
Building 1, Golder House, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
2191 South Africa

wsp.com

WSP is a proud Level 1 B-BBEE contributor and is internationally certified for ISO 9001, 14001 & 45001

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WSP Group Africa (Pty) Ltd, Registered Office: Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand, Gauteng, 1685, South Africa
Registered Number: 1999/008928/07 South Africa

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If you are not the intended recipient you may not copy or deliver this message to anyone."



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2325

Enquiries: Ms Azrah Essop

Telephone: (012) 310 8529 **E-mail:** AEssop@dffe.gov.za

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
Building 1, Golder House
Maxwell Office Park
Magwa Crescent West
Waterfall City
MIDRAND
1685

Cell Number: (011) 361-1392
Email Address: Ashlea.strong@wsp.com

PER E-MAIL / MAIL

Dear Ms Strong

ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF UP TO 360 MW MURA 4 SOLAR PHOTOVOLTAIC FACILITY BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE PROVINCE.

The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment (PoSEIA) dated April 2023 and received by the Department on 18 April 2023, refer.

The Department has evaluated the submitted final SR and the PoSEIA dated April 2023 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

The FSR is hereby **accepted** by the Department in terms of Regulation 22(1)(a) of the EIA Regulations, 2014, as amended.

You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the PoSEIA as required in terms of the EIA Regulations, 2014, as amended.

Please ensure that the following information forms part of the next report:

1. Listed Activities

- a) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.
- b) Please continue to ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.

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- c) The listed activities represented in the EIAR and the application form must be the same and correct.
- d) The EIAR must assess the correct sub listed activity for each listed activity applied for.

2. **Public Participation**

- a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR.
- b) Please ensure that all issues raised and comments received during the circulation of the draft SR and draft EIAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are addressed in the final EIAR. Proof of correspondence with the various stakeholders must be included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- c) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to I&AP’s comments.
- d) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
- e) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.
- f) The EAP is requested to contact the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAR.

3. **Alternatives**

The EAP is required to provide clear assessment for each identified alternative and further provide clear motivation and reasons as to why the **preferred** alternative **proves** to be the preferred compared to other alternatives.

These alternatives include:

- Location / Site Alternatives.
- Technology Alternatives.
- Design and Layout Alternatives.
- BESS technology alternatives.
- No-go alternative.

4. **The layout map must indicate the following:**

All supporting onsite infrastructure such as follows:

- All supporting onsite infrastructure that will support the proposed 360MW photovoltaic solar facility e.g., roads (existing and proposed, fencing, BESS area, etc.).
- Connection routes (including pylon positions) to the distribution/transmission network; and
- All existing infrastructure on the site, including neighbouring villages (if any), etc.
- The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
- Buffer areas; and
- All “no-go” areas.

wh

5. **Specialist assessments**

Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of Substation, and all other associated infrastructures that they have assessed and are recommending for authorisation.

- a) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- b) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas. Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
- c) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
- d) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.
- e) The screening tool output:
 - The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool.
 - It is the **responsibility** of the **EAP** to confirm the list of specialist assessments and to motivate in the assessment report, the reason for not including any of the identified specialist studies including the provision of photographic evidence of the site situation. The site sensitivity verification for each of the recommended studies, as per the protocols, must be compiled and attached.
- f) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
- g) Please include a table that shows the proposed studies and the relevant specialists conducting the study. In addition, a summary should be included of the specialist's recommendations in terms of the alternatives that are preferred based on the findings of their study.

General

Details of the future plans for the site and infrastructure after decommissioning in 20-30 years and the possibility of upgrading the proposed infrastructure to more advanced technologies must be indicated.

Should a Water Use License be required, proof of application for a license needs to be submitted.

A construction and operational phase EMP that includes mitigation and monitoring measures must be submitted with the final EIAR.

The comments issued by this Department on 29 March 2023, during the draft scoping report are still valid and must be all addressed throughout the EIA process.

Should you use coordinates, please ensure that it is in the format as prescribed in the 2014 EIA NEMA Regulations, as amended.

wk

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, with regard to the time period allowed for complying with the requirements of the Regulations.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.

Yours faithfully



Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries & the Environment
Signed by: Mr Wayne Hector
Designation: Deputy Director: Priority Infrastructure Projects
Date: 29/05/2023

cc:	Lance Blaine	Mura 4 (Pty) Ltd	Email: surina@red-cap.co.za
	Gavin Benjamin	DEA&DP	Email: gavin.benjamin@westerncape.gov.za
	Ashley Mitchell	Beaufort West Local Municipality	Email: buildingcontrol@beaufortwestmun.co.za

Annexure 1

Format for Comments and Response Trail Report:

Date of comment, format of comment name of organisation/I&AP	Comment	Response from EAP/Applicant/Specialist
27/01/2016 Email Department of Environment, Forestry and Fisheries: Priority Infrastructure Projects (John Doe)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted) The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form



OUR REFERENCE : 20/9/2/3/1/083
YOUR REFERENCE : 41103930
ENQUIRIES : Cor van der Walt/Kyle Solomons

WSP

Email: Megan.Govender@wsp.com

Att: Megan Govender

DRAFT BASIC ASSESSMENT REPORT
PROPOSED CONSTRUCTION OF THE MURA 4 SOLAR PHOTOVOLTAIC FACILITY:
DIVISION BEAUFORT WEST
FARM LEEUWFLOOF NO 43
FARM SNEEUWKRAAL NO 46
FARM AANGRENSEND ABRAMSKRAAL NO 11
PORTION 4 OF THE FARM DUIKER KRANSE NO 45
REMAINDER OF PORTION 3 OF THE FARM DUIKER KRANSE NO 45
REMAINDER OF THE FARM DUIKER KRANSE NO 45

Your application dated March 2023 has reference.

Mura 4 (Pty) Ltd proposes the construction and operation of a 360 MW solar photovoltaic energy facility. The proposed development will have a foot print of approximately 466ha for the solar facility and associated infrastructure.

The Western Cape Department of Agriculture: Land Use Management (WCDoA: LUM) has reviewed the report and has no objection to the proposed application on condition that the proposed mitigation measures mentioned in the EMPr are implemented to prevent erosion and manage storm water during the construction and operational phases.

In order to accommodate the proposed application must be made to the WCDoA: LUM as well as the Beaufort West municipality for a change in land use, the required registering of a servitude for access roads, entrance routes and power lines as well as to register a lease agreement.

Please note:

- That this is comment to the relevant deciding authorities in terms of the National Environmental Management Act no.107 of 1998.
- That this is comment to the relevant deciding authorities in terms of the Subdivision of Agricultural Land Act 70 of 1970.
- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.
- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely



Mr. CJ van der Walt

LANDUSE MANAGER: LANDUSE MANAGEMENT

2023-05-12

Copies:

Department of Environmental Affairs & Development Planning

Private Bag X6509

GEORGE

6530

Beaufort West Municipality

Private Bag 582

BEAUFORT WEST

6970

Govender, Megan

From: Ephron Maradwa <EMaradwa@dffe.gov.za>
Sent: Tuesday, 04 July 2023 14:09
To: Govender, Megan
Cc: Azrah Essop; Salome Mambane; EIAAdmin
Subject: 14/12/16/3/3/2/2325

Dear Megan.

14/12/16/3/3/2/2325

ACKNOWLEDGEMENT OF RECEIPT OF THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A SCOPING ASSESSMENT PROCESS FOR THE PROPOSED MURA 4 SOLAR PHOTOVOLTAIC FACILITY (UP TO 360 MW) BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE PROVINCE.

The Department confirms having received the Draft Environmental Impact Assessment Report for the abovementioned project on 30 June 2023. You have submitted these documents to comply with the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that *“Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but must be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority.”*

Further note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7) of these Regulations.

You are hereby reminded of Section 24F of the National Environmental Management Act 1998 (Act No. 107 of 1998), as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Kindly quote the abovementioned reference number in any future correspondence in respect of the application.

EIA Applications

Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to EIAAdmin@environment.gov.za.

You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email.



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia,· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2325

Enquiries: Ms Azrah Essop

Telephone: (012) 310 8529 **E-mail:** AEssop@dfffe.gov.za

Ms Ashlea Strong
WSP Group Africa (Pty) Ltd
Building 1, Golder House
Maxwell Office Park
Magwa Crescent West
Waterfall City
MIDRAND
1685

Tel Number: (011) 361 1392
Email Address: Ashlea.strong@wsp.com

PER MAIL / E-MAIL

Dear Ms Strong

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR DEVELOPMENT OF UP TO 360 MW MURA 4 SOLAR PHOTOVOLTAIC FACILITY BETWEEN LOXTON AND BEAUFORT WEST IN THE WESTERN CAPE PROVINCE.

The Application form for Environmental Authorisation and draft Environmental Impact Assessment Report (EIAR) received by the Department on 30 June 2023, refer.

This letter serves to inform you that the following information must be included in the final EIAR:

1. Application Form

- a) If the activities applied for in the application form differ from those mentioned in the final EIAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.dffe.gov.za/documents/forms>
- b) The final EIAR must also provide the technical details for the proposed facility in table format as well as their description and/or dimensions.
- c) Please include a list of the proposed infrastructure for the proposed development.
- d) The final EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.
- e) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.
- f) The listed activities represented in the EIAR and the application form must be the same and correct.
- g) The EAP is required to provide clear assessment for each identified alternative and further provide clear motivation and reasons as to why the preferred alternative proves to be the preferred compared to other alternatives.

WA

- h) Ensure that the SG codes, farm names and numbers are correct and consistent throughout the reports and application form.

2. **Alternatives**

A development envelope has been determined and assessed by specialists and this area would avoid no-go areas identified by the specialists. Please provide further information regarding this to demonstrate how the layout was derived. Note that a finalised layout must be presented in the final EIR.

3. **Public Participation Process**

- a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the final EIAR. This includes but is not limited to the relevant Provincial Departments, Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation.
- b) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format. All comments from I&APs must be responded to. A response such as “noted” is not regarded as an adequate response to I&AP’s comments.
- c) Comments from each submission must be responded to individually. The dates in which comments were received must be recorded in the C&R. Your responses to the issues raised by the Department must be included in the comments and response (C&R) report, in a tabular format. Ensure that comments are organised chronologically.
- d) The final EIAR must comply with all conditions of the acceptance of the scoping report (SR) and the Plan of Study for Environmental Impact Assessment (PoSEIA). The final EIAR must address all comments received on the SR and the draft EIAR, including this letter.
- e) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the NEMA EIA Regulations, 2014, as amended.

4. **Cumulative Assessment**

Should there be any other similar projects within a 20km to 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:

- Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
- Detailed process flow and proof must be provided, to indicate how the specialist’s recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
- A cumulative impact environmental statement on whether the proposed development must proceed or not.

5. **The layout map must indicate the following:**

- a) The envisioned area for the development of a Solar Photovoltaic (PV) Facility (**Mura 4**). (i.e.), location and all associated infrastructure including BESS, should be mapped at an appropriate scale.
- Solar Farm Substations area (e.g., two on-site solar substations adjacent to Eskom switching stations that will connect to the approved Nuweveld Collector Substation.
 - Building Infrastructure (e.g., Offices; Operational and maintenance (O&M)/ control centre; Warehouse/workshop; Ablution facilities; and Converter/inverter stations).

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- Other Infrastructure located within the solar area footprint (e.g., Internal underground cables, Internal gravel roads; Fencing around the PV Facility; Panel maintenance and cleaning area, Storm water management system; Site camps, and temporary construction laydown area).
 - BESS and BESS substation (e.g., substation yard).
 - All existing infrastructure on the site, especially internal road infrastructure, as indicated above.
- a) Please provide an environmental sensitivity map, if possible, which indicates the following:
- The location of sensitive environmental features on site, e.g., CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;
 - Buffer areas; and All “no-go” areas.
- b) Please include a cadastre map which shows the affected farm portions from Table 4-1 in relation to Mura 4 PV.

6. Specialist assessments

- a) Specialist Declaration of Interest forms must be attached to the final EIAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Department’s website (please use the Department’s template).
- b) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
- c) Please ensure that, all required specialist studies for the project are recommended and conducted. Finding and recommendations of the specialist studies must incorporate with final report and the EMPr for decision making. As initial recommended in the scoping acceptance.
- d) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
- e) Recommendations provided by specialist reports must be considered and used to inform the preferred layout alternative.

7. Environmental Management Programme

The EMPr must also include the following:

- All recommendations and mitigation measures recorded in the EIAR and the specialist studies conducted.
- An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.
- Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.
- An alien/invasive plant management report; plant rescue and protection report; and re-vegetation and habitat rehabilitation report.
- In addition to the above, the EMPr for the facility must comply with Appendix 4 of the NEMA EIA Regulations, 2014, as amended.
- It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, **must** be used and submitted with the final report over and above the EMPr for the facility. This means that a generic EMPr must be included for the substation and the powerline (only if applicable).
- A generic EMPr for the 132kV substation has been compiled and submitted, however, the declaration is not dated (Appendix E of Appendix I).

wh

- Please include clarity whether the generic EMPr for the substation (Appendix E of Appendix I) includes all the proposed substation infrastructure i.e. the two substations for the PV facility and the 1 substation for the BESS. Include the substations in the maps of the generic EMPr.
- Furthermore, it is unclear as to why a generic EMPR for a powerline has been included since the grid application for overhead powerlines will be a separate application (Appendix E of Appendix I - EMPr).

General

- Ensure that a preferred technology is provided for the BESS.
- The EIAR must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities. Coordinates must be provided in the format as specified in the 2014 NEMA Regulations, as amended. Kindly provide property information in a separate appendix and include farm names, portions and numbers; coordinates of main infrastructure etc.
- Please note that, all correspondences issued by this Department for this project are still valid and must be adhered to.

You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority -*

(a) an environmental impact assessment report inclusive of any specialist reports, and an EMPr, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”

Should there be significant changes or new information that has been added to the EIAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the reports, and an EMPr, will be submitted within 156 days of acceptance of the scoping report by the competent authority, or where regulation 21(2) applies, within 156 days of receipt of application by the competent authority, as significant changes have been made or significant new information has been added to the environmental impact assessment report or EMPr, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised environmental impact assessment report or EMPr will be subjected to another public participation process of at least 30 days”.*

Should you fail to meet any of the timeframes stipulated in Regulation 23 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

wk

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely.



Mr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries & the Environment

Signed by: Mr Wayne Hector

Designation: Deputy Director: Prioritised Infrastructure Projects

Date: 24/07/2023

cc:	Lance Blaine	Mura 4 (Pty) Ltd
	Gavin Benjamin	DEA&DP
	Ashley Mitchell	Beaufort West Local Municipality
	MJ Penxa	Beaufort West Local Municipality

redacted as per POPIA requirements



References:

18/2/3/2023-2024 (Development Facilitation)

19/2/5/3/C3/2/WL0036/23 (Waste Management)

19/3/2/4/C3/1/DDF0132/22 (Pollution and Chemicals Management)

Attention: Ms Megan Govender

WSP Group Africa (Pty) Ltd
P.O. Box 98867
Sloane Park
JOHANNESBURG
2151

Megan.Govender@wsp.com

Dear Madam

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF THE 360MW MURA 4 SOLAR PHOTOVOLTAIC FACILITY AND ASSOCIATED INFRASTRUCTURE AND STRUCTURES ON FARM LEEUWKLOOF NO. 43, AANGRENSEND FARM ABRAMSKRAAL NO. 11, FARM SNEEUWKRAAL NO. 46, AND PORTION 4; REMAINDER OF PORTION 3; AND THE REMAINDER OF FARM DUIKER KRANSE NO. 45, BEAUFORT WEST (DFFE REF: 14/12/16/3/3/2/2325)

1. The Draft Scoping Report ("DSR") dated March 2023, the Department's comments thereto dated 11 April 2023, and the email notification of 03 July 2023 regarding the availability of the Draft Environmental Impact Assessment ("EIA") Report for comments, refer.
2. Thank you for your willingness to extend the deadline for comments on the Draft EIA Report. Please find consolidated comments from various directorates within the Department on the Draft EIA Report dated July 2023 that was available for download from various online platforms.

3. Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.Lameyer@westerncape.gov.za; Tel.: (021) 483 2887):
 - 3.1. This Directorate is satisfied that its comments on the DSR have been adequately addressed and responded to in the Comments and Responses Report, Draft EIA Report, and Traffic Impact Assessment compiled by Athol Schwarz dated 07 May 2023.
 - 3.2. The Animal Species Compliance Statement compiled by 3Foxes Biodiversity Solutions dated November 2022 noted that the proposed development site has a low sensitivity for both the Karoo Dwarf Tortoise and the Riverine Rabbit based on habitat mapping, active searching, and camera trapping across the site. This Directorate supports the recommendation of the faunal specialist, which has been incorporated into the Environmental Management Programme ("EMPr"), that the developer will contribute towards Riverine Rabbit monitoring or conservation initiatives being undertaken in the area.
 - 3.3. This Directorate has no further comments on the Draft EIA Report.
4. Directorate: Waste Management – Mr Vishwanath Gianpersad (Email: Vishwanath.Gianpersad@westerncape.gov.za; Tel.: (021) 483 8325):
 - 4.1. It is noted that a decommissioning assessment will be considered as part of the decommissioning process that will be subject to a separate authorisation and impact assessment process.
 - 4.2. Waste mitigation and management measures for general and hazardous waste have been detailed in the EMPr. The EMPr includes a Waste Management Plan and a Hazardous Substances Management Plan which detail measures for the management of waste during various stages of the project.
 - 4.3. The applicant must submit confirmation from Beaufort West Municipality's solid waste management department or a registered service provider regarding their capacity to accept and dispose of general solid waste generated during all phases of the proposed development.
 - 4.4. Incidents that fall under section 30(1)(a) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") must be dealt with as required. Containment and clean-up must commence immediately, and any incidents must be reported to the relevant authorities and within the prescribed period.
5. Directorate: Pollution and Chemicals Management – Ms Shehaam Brinkhuis (Email: Shehaam.Brinkhuis@westerncape.gov.za; Tel.: (021) 483 8309):
 - 5.1. In line with the recommendations of the Aquatic Biodiversity and Species Specialist Assessment compiled by BlueScience (Pty) Ltd dated April 2023 (Appendix H4), surface installations such as solar photovoltaic arrays, substations, battery storage facilities and construction camps, must be located outside of the designated buffer areas, most notably, the sensitive watercourses and their buffers.

- 5.2. It is supported, that as far as possible, construction near sensitive aquatic features be undertaken during the dry season, with the installation of sediment traps downstream.
- 5.3. The utilisation of cleaning chemicals on solar panels poses a risk of contamination and pollution to water resources. Care should be taken to implement mitigation measures to reduce this. It is recommended that all cleaning products used within the site should be environmentally friendly and biodegradable, as per section 9.13 of the Draft EIA Report. It is noted that a panel cleaning and maintenance area is proposed. Drainage in this area must be carefully planned, and contaminated water captured for appropriate disposal to a registered waste facility, and not discharged into the environment, stormwater channels or any water resources nearby. It is preferable that the cleaning and maintenance area is hard surfaced with appropriate collection channels and a drainage system installed.
- 5.4. The following recommendations are provided with respect to the proposed battery energy storage system to prevent and manage potential contamination of water resources, including groundwater, emanating from the site during the construction and operational phases:
- 5.4.1. Compilation and adherence to a procedure for the safe handling of battery cells.
 - 5.4.2. Lithium-ion batteries must have battery management systems (containment, automatic alarms and shut-off systems) to monitor and protect cells from overcharging or damaging conditions.
 - 5.4.3. Compilation of an emergency response plan for implementation in the event of a spill or leakage.
 - 5.4.4. Provision of spill kits on-site for clean-up of spills and leaks.
 - 5.4.5. Immediate clean-up of spills and disposal of contaminated absorbents and materials or soil at a licensed hazardous waste disposal facility.
 - 5.4.6. Recording and reporting of all electrolyte spills or leaks so that appropriate clean-up measures can be implemented. A copy of these records must be made available to authorities on request throughout the project lifecycle.
 - 5.4.7. Frequent and appropriate disposal of both general and hazardous waste to prevent pollution of soil and groundwater.
 - 5.4.8. On-site battery maintenance should only be undertaken on impermeable surfaces with secondary containment measures. Any resulting hazardous substances must be disposed of appropriately at a registered facility with retention of chain of custody documentation.
 - 5.4.9. Provision of suitable emergency and safety signage on-site, and demarcation of any areas which may pose a safety risk (including hazardous substances). Emergency numbers for the local police, fire department, Eskom and Beaufort West Municipality must be placed in a prominent, clearly visible area on-site.
- 5.5. Reference is made to the storage of diesel in aboveground tanks within concrete bunds. Additional information is required on this aspect, including but not limited to, the following: What is the approximate total volume of fuel to be stored on site? How many aboveground tanks are proposed? Where is their location within the site? Please include the specifications of the bund(s). What mitigation measures are proposed to prevent and manage impacts related to fuel losses?

- 5.6. Generalised descriptions have been provided of "other infrastructure" and service infrastructure for the proposals. With specific reference to the offices, site camps, workshop, warehouse and control centre, how will effluent, liquid waste and sewage be handled and disposed of? A description has been included of Beaufort West Municipality's current services; however, it is not clear how the service infrastructure required on-site links to municipal services. Please clarify and provide confirmation thereof. Should conservancy tanks be proposed, please specify and include confirmation of sludge disposal method and frequency. In the event an on-site package plant/wastewater treatment works is proposed, please clarify the preferred technology and treated effluent disposal method. Please note that this Directorate does not support the installation of septic tanks.
- 5.7. It is requested that the EMPr be amended to include reference to section 30 of the NEMA, 1998 pertaining to the control of incidents. Please note that the statement included under section 8.1 of the EMPr, relating to an Emergency Response Plan, is insufficient. In the event of a significant spill or leak of hazardous substances (e.g., petrol, diesel, etc.) used during the proposed activities, such an incident(s) must be reported to the relevant authorities, including this Department's Directorate: Pollution and Chemicals Management, in accordance with section 30 of the NEMA, 1998.
- 5.8. The Geohydrological Assessment compiled by GEOSS dated 31 January 2023 (Appendix H13) details recommendations for the proposed development, which are supported. However, these recommendations include specifications around water supply. Similarly, the Aquatic Biodiversity and Species Specialist Assessment also includes recommendations with respect to a "viable water supply" for the site and use of water within the existing water allocation of the property, unless application has been made for new boreholes. It is noted that the aspect of water supply has not been specifically addressed in the Draft EIA Report. Please clarify water supply for the proposals, in addition to the approximate volume required. It is requested that the necessary approvals from the relevant authority(ies) (depending on whether groundwater or municipal supply) is provided with the Final EIA Report to demonstrate the required approval for abstraction or supply is in place, or that application is underway.
- 5.9. The Geohydrological Assessment also includes the following recommendation, which is strongly supported and should be implemented in accordance with the specialist's specifications: "*Monitoring of groundwater (abstraction volumes, quality and water levels) will be required, this should ideally be implemented one year prior to the start of construction if the project timeframes permit.*"
- 5.10. Further to the above, it is noted that according to the Draft EIA Report, "*the DWS will make the final decision on water uses that are applicable to the project through a pre-application meeting after which a Water Use Authorisation Application (WUA) as determined by the risk assessment will be undertaken in compliance with procedural regulations published by the DWS within General Notice 267 (GN267).*" Given that the application is in the environmental impact reporting phase, has a decision been made and advice obtained from the Department of Water and Sanitation on the applicability of section 21 of the National Water Act, 1998 (Act No. 36 of 1998)?

6. The applicant is reminded of its "general duty of care towards the environment" as prescribed in section 28 of the NEMA, 1998 which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment."

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

Thea Jordan

Digitally signed by Thea
Jordan
Date: 2023.08.04 15:13:51
+02'00'

pp **HEAD OF DEPARTMENT**

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Letter signed by:

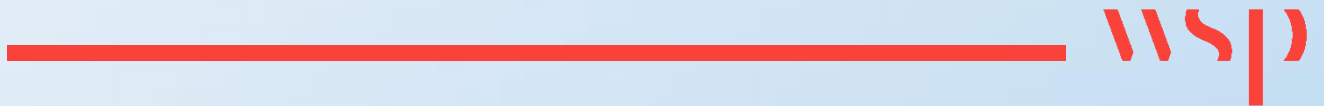
Thea Jordan

Director: Development Facilitation

Date: 4 August 2023

Appendix E

PROOF OF CORRESPONDENCE FOR **DFFE SITE VISIT**



Govender, Megan

From: Govender, Megan
Sent: Friday, 21 July 2023 08:54
To: Jay-Jay Mpelane
Cc: Whector@dfre.gov.za; Strong, Ashlea; 'Surina Laurie'; jessica@red-cap.co.za
Subject: RE: Site Visit for Mura Solar PV Development

Importance: High

Good Day Jay Jay

I tried to call you regarding the Mura site visits requested by the DFFE, as per my email below sent on 03 July 2023. Please can you let us know when you would like to undertake the site visit? The Draft EIA Reports come out of public review on 02 August 2023.

Kind Regards,



Megan Govender
Senior Consultant

T +27 011 361 1300

From: Govender, Megan
Sent: Monday, July 10, 2023 1:51 PM
To: Jay-Jay Mpelane <JMPELANE@dfre.gov.za>
Cc: Whector@dfre.gov.za; Strong, Ashlea <Ashlea.Strong@wsp.com>; 'Surina Laurie' <surina@red-cap.co.za>; jessica@red-cap.co.za
Subject: RE: Site Visit for Mura Solar PV Development

Good Day Jay-Jay

Thank you for taking my call today regarding the site visits. I will await your response after you liaise with your colleagues on their availability.

Kind Regards,



Megan Govender
Senior Consultant

T +27 011 361 1300

From: Govender, Megan
Sent: Monday, July 3, 2023 11:19 AM
To: Jay-Jay Mpelane <JMPELANE@dfre.gov.za>
Cc: 'Whector@dfre.gov.za' <Whector@dfre.gov.za>; Strong, Ashlea <Ashlea.Strong@wsp.com>; 'Surina Laurie' <surina@red-cap.co.za>; jessica@red-cap.co.za
Subject: Site Visit for Mura Solar PV Development

Good Day Jay-Jay

As per the comments received (attached) on the Final Scoping Reports for Mura 2 Solar PV (14/12/16/3/3/2/2323), Mura 3 Solar PV (14/12/16/3/3/2/2324) and Mura 4 Solar PV (14/12/16/3/3/2/2325), WSP is requested to contact

the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAr.

The Final EIAs for Mura 2, Mura 3 and Mura 4 are due to the DFFE as follows:

- Mura 2: 28 August 2023
- Mura 3: 28 August 2023
- Mura 4: 14 September 2023

Please may you provide some proposed dates for the site visit based on your availability, excluding the week of 17 July 2023 and 24 July 2023.

Kind Regards,



Megan Govender

Senior Consultant

T +27 011 361 1410



WSP in Africa

Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand
1685 South Africa

wsp.com

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WSP Group Africa (Pty) Ltd, Registered Office: Building 1, Maxwell Office Park, Magwa Crescent West, Waterfall City, Midrand, Gauteng, 1685, South Africa
Registered Number: 1999/008928/07 South Africa

Govender, Megan

From: Govender, Megan
Sent: Wednesday, 26 July 2023 13:15
To: Jay-Jay Mpelane
Cc: Strong, Ashlea
Subject: FW: REQUEST FOR SITE VISIT FOR THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST

Good Day Jay-Jay

We will be undertaking a site visit with DFFE Biodiversity on 10 August 2023 for the Mura Solar PV Development. We would like to know if you or someone from your department would like to attend the site visit as well?

Kind Regards,



Megan Govender
Senior Consultant

T +27 011 361 1300

From: Tebego Kgaphola <tkgaphola1@dffe.gov.za>
Sent: Wednesday, July 26, 2023 10:11 AM
To: Govender, Megan <Megan.Govender@wsp.com>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>
Subject: RE: REQUEST FOR SITE VISIT FOR THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST

Good day Govender.

Your availability is noted and we have decided to conduct the site visit on the 10th August 2023.

Regards,
Tebego

From: Tebego Kgaphola <tkgaphola1@dffe.gov.za>
Sent: Tuesday, July 25, 2023 8:57 AM
To: Govender, Megan <Megan.Govender@wsp.com>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>; Portia Makitla <PMakitla@dffe.gov.za>; Mashudu Mudau <MaMudau@dffe.gov.za>
Subject: REQUEST FOR SITE VISIT FOR THE PROPOSED DEVELOPMENT OF THE MURA PHOTOVOLTAIC DEVELOPMENT BETWEEN LOXTON AND BEAUFORT WEST

Good day Ashlea.

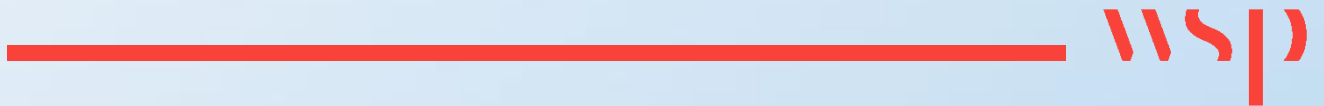
I trust you are well.

The Directorate: Biodiversity Conservation will like to conduct a site visit for the aforementioned project.

We are available within these dates: 15th and 16th of August. Kindly confirm which date will be suitable for you.

Appendix F

NON-BINDING CONFIRMATION OF THE WATER AVAILABILITY





P O BOX 7019 EAST LONDON 5200

☎ (043) 701 0248

Enquiries: L Fourie

E-mail: FourieL4@dws.gov.za

Ref: Mura1

Mura1(Pty) Ltd
Unit B2 Mainstream Centre
Main Road
Hout Bay
7806

Dear Sir/Madam

NON-BINDING CONFIRMATION OF THE WATER AVAILABILITY FOR THE PROPOSED MURA 1 SOLAR PV FACILITY- PORTION 4 OF DUIKER KRANSE 45 AND FARM LEEUW KLOOF 43: BEAUFORT WEST LOCAL MUNICIPALITY: CENTRAL KAROO DISTRICT MUNICIPALITY

The proposed solar facility, namely Mura Solar Facility 1, is located approximately 60 km north of Beaufort West within then L11D quaternary catchment of the Mzimvubu to Tsitsikamma Water Management Area. The facility will be developed on multiple properties in the Beaufort West Local Municipality, Western Cape Province.

It is estimated that about 30 000 m³ of water will be required during the construction phase which is planned for 24 months and 18 000 m³/annum during the operational phase of the project envisaged for a period of 20 years.

Available borehole development information in the area shows a positive groundwater harvest potential that would meet the estimated water requirements. However, borehole pump testing of each production borehole should be conducted to determine the sustainable yield and abstraction rate.

The L11A and L11D quaternary catchments allow for an allocable volume of 45 m³/ha/a per property (Notice No. 538; 02 September 2016). Based on the estimated water requirements, Mura Solar Facility 1 may be considered under the General Authorisation in terms of Section 39 of the National Water Act (Act 36 of 1998).

This letter on water availability only refers to the abstraction of water from groundwater resources. No activity (i.e. excavation during construction) may occur within the 1:100-year flood line of a river/drainage lines (perennial/non-perennial river) and within 500 m radius from the buffer zone of a pan or wetland without an authorisation from this Department.

A pre-consultation meeting and site inspection must be conducted with the Department of Water and Sanitation (DWS) to advise on the water uses triggered by the proposed activities which require an authorisation. These activities include the proposed abstraction of water and construction/installation of associated project infrastructure.

This letter of confirmation is non-binding and should not be construed as an authorisation to engage in any water use as defined in Section 21 of the National Water Act or that a water use license will necessarily be granted, nor does it grant exemption from the requirements of any other applicable act, ordinance, regulation, or by-law.

If you have any queries, please do not hesitate to contact this office.

Yours faithfully


PP _____
DIRECTOR: MZIMVUBU- TSITSIKAMMA PROTO CMA
DATE 3 July 2023



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

P O BOX 7019 EAST LONDON 5200

☎ (043) 701 0376

Enquiries: L Fourie

E-mail: FourieL4@dws.gov.za

Ref: Mura 2

Mura 2 (Pty) Ltd
Unit B2 Mainstream Centre
Main Road
Hout Bay
7806

Dear Sir/ Madam

NON- BINDING CONFIRMATION OF THE WATER AVAILABILITY FOR THE PROPOSED MURA 2 SOLAR PV FACILITY- PORTION 4 OF DUIKER KRANSE 45, FARM LEEUW KLOOF 43 AND THE FARM BULTFONTEIN 13: BEAUFORT WEST LOCAL MUNICIPALITY: CENTRAL KAROO DISTRICT MUNICIPALITY

The proposed solar facility, namely Mura Solar Facility 2, is located approximately 60 km north of Beaufort West within the L11D quaternary catchment of the Mzimvubu to Tsitsikamma Water Management Area. The facilities will be developed on multiple properties in the Beaufort West Local Municipality, Western Cape Province.

It is estimated that about 48 000 m³ of water will be required during the construction phase which is planned for 24 months and 28 000 m³/annum during the operational phase of the project envisaged for a period of 20 years.

Available borehole development information in the area shows a positive groundwater harvest potential that would meet the estimated water requirements. However, borehole pump testing of each production borehole should be conducted to determine the sustainable yield and abstraction rate.

The L11A and L11D quaternary catchments allow for an allocable volume of 45 m³/ha/a per property (Notice No. 538; 02 September 2016). Based on the estimated water requirements, Mura Solar Facility 2 may be considered under a Water Use Licence process in terms of Section 40 of the National Water Act (Act 36 of 1998).


This letter on water availability only refers to the abstraction of water from groundwater resources. No activity (i.e. excavation during construction) may occur within the 1:100-year flood line of a river/drainage lines (perennial/non-perennial river) and within 500 m radius from the buffer zone of a pan or wetland without an authorisation from this Department.

A pre-consultation meeting and site inspection must be conducted with the Department of Water and Sanitation (DWS) to advise on the water uses triggered by the proposed activities which require an authorisation. These activities include the proposed abstraction of water and construction/installation of associated project infrastructure.

This letter of confirmation is non-binding and should not be construed as an authorisation to engage in any water use as defined in Section 21 of the National Water Act or that a water use license will necessarily be granted, nor does it grant exemption from the requirements of any other applicable act, ordinance, regulation, or by-law.

If you have any queries, please do not hesitate to contact this office.

Yours faithfully


PP _____
DIRECTOR: MZIMVUBU- TSITSIKAMMA PROTO CMA
DATE: 3 July 2023

NON- BINDING CONFIRMATION OF THE WATER AVAILABILITY FOR THE PROPOSED MURA 2 SOLAR PV FACILITY- PORTION 4 OF DUIKER KRANSE 45, FARM LEEUW KLOOF 43 AND THE FARM BULTFONTEIN 13: BEAUFORT WEST LOCAL MUNICIPALITY: CENTRAL KAROO DISTRICT MUNICIPALITY



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

P O BOX 7019 EAST LONDON 5200

☎ (043) 701 0376

Enquiries: L Fourie

E-mail: FourieL4@dws.gov.za

Ref: Mura 3

Mura 3 (Pty) Ltd
Unit B2 Mainstream Centre
Main Road
Hout Bay
7806

Dear Sir/ Madam

NON-BINDING CONFIRMATION OF THE WATER AVAILABILITY FOR THE PROPOSED MURA 3 SOLAR PV FACILITY ON VARIOUS PROPERTIES: UBUNTU LOCAL MUNICIPALITY: PIXLEY KA SEMA DISTRICT MUNICIPALITY

The proposed solar facility, namely Mura Solar Facility 3, is located approximately 60 km north of Beaufort West within the L11A quaternary catchment of the Mzimvubu to Tsitsikamma Water Management Area. The facilities will be developed on multiple properties in the Beaufort West Local Municipality, Western Cape Province.

It is estimated that about 48 000 m³ of water will be required during the construction phase which is planned for 24 months and 28 000 m³/annum during the operational phase of the project envisaged for a period of 20 years.

Available borehole development information in the area shows a positive groundwater harvest potential that would meet the estimated water requirements. However, borehole pump testing of each production borehole should be conducted to determine the sustainable yield and abstraction rate.

The L11A quaternary catchment allow for an allocable volume of 45 m³/ha/a per property (Notice No. 538; 02 September 2016). Based on the estimated water requirements, Mura Solar Facility 3 may be considered under the Water Use Licence process in terms of Section 40 of the National Water Act (Act 36 of 1998).

This letter on water availability only refers to the abstraction of water from groundwater resources. No activity (i.e. excavation during construction) may occur within the 1:100-year flood line of a river/drainage lines (perennial/non-perennial river) and within 500 m radius from the buffer zone of a pan or wetland without an authorisation from this Department.

A pre-consultation meeting and site inspection must be conducted with the Department of Water and Sanitation (DWS) to advise on the water uses triggered by the proposed activities which require an authorisation. These activities include the proposed abstraction of water and construction/installation of associated project infrastructure.

This letter of confirmation is non-binding and should not be construed as authorisation to engage in any water use as defined in Section 21 of the National Water Act or that a water use license will necessarily be granted, nor does it grant exemption from the requirements of any other applicable act, ordinance, regulation, or by-law.

If you have any queries, please do not hesitate to contact this office.

Yours faithfully



DIRECTOR: MZIMVUBU- TSITSIKAMMA PROTO CMA
DATE 3 July 2023



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

P O BOX 7019 EAST LONDON 5200

☎ (043) 701 0376

Enquiries: L Fourie

E-mail: FourieL4@dws.gov.za

Ref: Mura 4

Mura 4(Pty) Ltd
Unit B2 Mainstream Centre
Main Road
Hout Bay
7806

Dear Sir/ Madam

NON-BINDING CONFIRMATION OF THE WATER AVAILABILITY FOR THE PROPOSED MURA 4 SOLAR PV FACILITY- VARIOUS PROPERTIES: BEAUFORT WEST LOCAL MUNICIPALITY: CENTRAL KAROO DISTRICT MUNICIPALITY

The proposed solar facility, namely Mura Solar Facility 4, is located approximately 60 km north of Beaufort West within the L11A and L11D quaternary catchments of the Mzimvubu to Tsitsikamma Water Management Area. The facilities will be developed on multiple properties in the Beaufort West Local Municipality, Western Cape Province.

It is estimated that about 48 000 m³ of water will be required during the construction phase which is planned for 24 months and 28 000 m³/annum during the operational phase of the project envisaged for a period of 20 years.

Available borehole development information in the area shows a positive groundwater harvest potential that would meet the estimated water requirements. However, borehole pump testing of each production borehole should be conducted to determine the sustainable yield and abstraction rate.

The L11A and L11D quaternary catchments allow for an allocable volume of 45 m³/ha/a per property (Gazette Notice No. 538; 02 September 2016). Based on the estimated water requirements, Mura Solar Facility 4 may be considered under the Water Use Licence process in terms of Section 40 of the National Water Act (Act 36 of 1998).

This letter on water availability only refers to the abstraction of water from groundwater resources. No activity (i.e. excavation during construction) may occur within the 1:100-year flood line of a river/drainage lines (perennial/non-perennial river) and within 500 m radius from the buffer zone of a pan or wetland without an authorisation from this Department.

A pre-consultation meeting and site inspection must be conducted with the Department of Water and Sanitation (DWS) to advise on the water uses triggered by the proposed activities which require an authorisation. These activities include the proposed abstraction of water and construction/installation of associated project infrastructure.

This letter of confirmation is non-binding and should not be construed as authorisation to engage in any water use as defined in Section 21 of the National Water Act or that a water use license will necessarily be granted, nor does it grant exemption from the requirements of any other applicable act, ordinance, regulation, or by-law.

If you have any queries, please do not hesitate to contact this office.

Yours faithfully



PP

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