

APPENDIX E4
COMMENTS RECEIVED





M C Martins
C/O 58 Boersma Street
Universitas
Bloemfontein
9301

Enquiries: [Mothobi Martins](#)
Telephone: 0827376286

E-mail: MartiMC2@telkom.co.za

Date: 15/08/23

Our reference: OBLT0546-23

Your reference: **SE 3623 SANNASPOS SOLAR PV FACILITY.**

Savannah Environmental
First Floor
Block 2
5 Woodlands Drive
Office Park
Cnr Woodlands Drive & Western Service Road
Woodmead
2191

SANNASPOS SOLAR PV FACILITY AND ASSOCIATED GRID CONNECTION - SE 3623
SANNASPOS SOLAR PV FACILITY.

With reference to your letter dated 08/08 /2023.

With reference to your above-mentioned application, I hereby inform you that our Client (OPENSERVE) approves the proposed work indicated on your drawings in terms Section 29 of the Electronic Communications Act 36 of 2005 as amended.

Any changes/deviations from the original planning during or prior to construction must immediately be communicated to this office.

Our Client (OPENSERVE)'s infrastructure is affected by this proposal and the routes are marked in GREEN on attached sketch as accurately as possible. **We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that are not on the sketch please stop and contact us immediately to arrange a site meeting. Please make use of pilot holes in order not to damage our infrastructure.** Therefore, any damages occurred during construction of work will be repaired at the customer's account. Consequently, the following conditions apply:

Aerial Plant - At points of crossing, the overhead power lines should cross above the communications lines in accordance with and clearances stipulated in the Occupational Health and safety Act no 85 of 1993, Machinery regulations 20 – Crossings, and Electrical Machinery Regulations 15 – Clearance of Power Lines. If the specifications could not be met, all deviation costs will be for the applicant's account. We also refer to section 25 of Electronic Communication Act 36 of 2005.

At points of crossing, the overhead power line should cross over the overhead communication lines with a minimum vertical separation of **0.8** meters.

Suitable protection as laid down in section 5 of the Code of Practice should be provided at all important crossings.

The crossing of supply lines or overhead service mains directly above or adjacent to communication poles must be avoided if possible. If not clearance of **3** meters must be provided.

In order to minimize noise induction into the telecommunication systems, the angle of crossing between the overhead power line and all communication lines, should be as near to a right angle as possible – the following deviation from the right angle being permitted at:

- Power voltage of 48 kV and higher - 30 degrees
- Power voltage of lower than 48 kV - 45 degrees
-SWER must be as near as 90 degrees as possible

Approved on condition that, should it later be found necessary to deviate the existing communication line due to existing noise interference or any other reason whatsoever, the cost of such remedial action shall be repayable.

Paragraph 2.4.1 of the Code of Practice stipulates the minimum acceptable horizontal separation between power and the communication lines and where this cannot be met, the design of the power line is also stipulated. This could apply between the attached plans and these requirements should strictly be adhered to.

Calculations have shown that an earth fault on the high voltage Power lines will induce excessive low frequency induction into the Communication lines. As a result of this, the cost to deviate / alter the communication lines to prevent this induction will be for the power provider.

Relocations of our Client (OPENSERVE) plant will be done at customer's request and will be a repayable project.

Please notify the office within 21 working days from date of this letter of acceptance and if any alternative proposal is available of if a recoverable work should commence, the liaison officer is **Aletta Gabaitumele** at tel. no. **0825216813**.

As important cables are affected, **Mr Leonard Thikeson must be contacted at 051 435 70991 / 081 459 5420, (2) two weeks' prior of commencement on construction work. It would be appreciated if this office can be notified within 30 days on completion of construction work.** Confirmation is required on completion of construction as per agreed requirements.

On completion of this project please certify that all requirements as stipulated in this letter have been met. Please note that should any of our Client (OPENSERVE) infrastructure has to be relocated or altered as a result of your activities the cost for such alterations or relocations will be for your account in terms of section 25 of the Electronic Communications Act.

This approval is valid for 6 months only, after which re-application must be made if the work has not been completed.

Should our Client (OPENSERVE) infrastructure be damaged while work is undertaken, kindly call the Toll-free number **0800203951** immediately

All of our Client (OPENSERVE) rights remain reserved.

Mr Leonard Thikeson must be contacted at 051 435 70991 / 081 459 5420, Two weeks before any commencement of proposed work.

Yours faithfully

MA Gabaitumele
MANTWA GABAITUMELE



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: 14/12/16/3/3/2/360/2/AM2

Enquiries: Ms Trisha Pillay

Telephone: (012) 399 9406 E-mail: TPillay@dffe.gov.za

Ms Jo-Anne Thomas
Savannah Environmental (Pty) Ltd
PO Box 148
SUNNINGHILL
2157

Telephone Number: 011 656 3237
Email Address: joanne@savannahsa.com

PER EMAIL

Dear Mr Thomas

COMMENTS ON THE DRAFT AMENDMENT REPORT APPLICATION FOR THE AMENDMENT OF ENVIRONMENTAL AUTHORISATION ISSUED ON 26 JUNE 2013 FOR THE ESKOM SWITCHING STATION AND GRID CONNECTION INFRASTRUCTURE AS PART OF THE SANNASPOS PHOTOVOLTAIC (PV) SOLAR ENERGY FACILITY PHASE 1, FREE STATE PROVINCE

The Environmental Authorisation (EA) for the above-mentioned project issued on 26 June 2013, the amendments to the EA issued on 28 September 2015, 09 April 2018, 12 April 2021, 02 August 2021, 20 October 2021 and 19 January 2023 the application for amendment of the EA received by this Department on 09 June 2023, the acknowledgement letter dated 15 June 2023 and the draft amendment motivation report received by this Department on 03 August 2023, refer.

Background

On 26 June 2013 under reference: 14/12/16/3/3/2/360, SolaireDirect Southern Africa was issued an EA for the Sannaspos PV Plant Phase 1 (75MW) and associated infrastructure, located on Portion 0 of Farm 1808 Besemkop and Portion 0 of Farm 2962 Lejwe located approximately 45 km east of Bloemfontein, Mangaung Metropolitan Municipality, Free State Province. Several amendments were issued since the original EA which included change of holder contact details, extension of validity period and splitting of the EA. The latest amendment was issued on 19 January 2023 under reference: 14/12/16/3/3/2/360/2/AM1. This amendment is required to extend the validity period of the abovementioned EA beyond the ten-year validity period.

The Department has the following comments on the abovementioned amendment application:

1. Application form

- (i) It is unclear the number of years the applicant is applying to extend the validity of the EA, as on page 07 of the application form it is stipulated "The amendment therefore requests that the validity period be extended by an additional 10 years until 26 June 2025." Please include the number of years the extension is being requested for.
- (ii) Kindly include a signed declaration of applicant in the final motivation report.

- (iii) Please take note the new templates for the following documents must be used when submitting the final amendment motivation report:
- Application for amendment of Environmental Authorisation
 - Applicant declaration form for the assessments undertaken for application for authorisation;
 - Specialist declaration form for the assessments undertaken for application for authorisation; and,
 - Consent from landowner/person in control of the land, on which the activity is to be undertaken.
- These new templates can be accessed on the DFFE website:
<https://www.dffe.gov.za/documents/forms/legal>.

2. Public participation

- (i) Please ensure that comments from all relevant stakeholders are submitted to the Department with the final report.
- (ii) A Comments and Response trail report (C&R) must be submitted with the final report. The C&R report must incorporate all comments for this application in chronological order. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter. 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.
- (iii) Please ensure that all issues raised and comments received during the circulation of the draft report from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final report. Proof of correspondence with the various stakeholders must be included in the final report. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014 as amended.
- (iv) Please provide proof of the newspaper advert placement, site notice and communication with I&APs.
- (v) The final report must also indicate that this draft report has been subjected to a public participation process.

3. Specialist Letters

- (i) Please note, the gazetted protocols do not apply to applications for amendments to environmental authorisation. Please see the gazetted protocols which states that "*for protocols for the assessment and minimum report content requirements of environmental impacts for environmental themes for activities requiring environmental authorisation, as contained in the Schedule hereto.*"
- (ii) The EAP must provide a reasoned opinion or conclusion, which considers the specialists' recommendations and outcomes of their assessments and provide sufficient motivation in support of approving the amendment application.
- (iii) The EAP must include a table of comparison showing the impact table findings of the initial studies versus the current information provided in the specialist letters to demonstrate the changes (if any) to the identified impacts and provide a reasoned conclusive opinion in support or dispute of the findings.
- (iv) Kindly take note that an updated EMPr must be submitted if there are any changes and recommendations made by the specialist that were not included in the approved EMPr.

General

- (i) The final motivation report for this proposed application for amendment is due on the **15 September 2023**. Should you fail to meet this timeframe, your application will lapse and a new application for environmental authorisation will have to be applied for, should you wish to pursue the application further.
- (ii) Ensure that the requirements of the acknowledgment letter dated 15 June 2023 are fully addressed and referenced in the final report.

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 and the Environment

Signed by: Mr Muhammad Essop

Designation: Acting Director – IEA Strategic Support, Coordination and Reporting

Date: 04/09/2023

cc:	Ms Léa Giroux	Sannaspos Solar Project (Pty) Ltd	Email: lea.giroux@engie.com
	Dr M Nokwequ	Free State Department: Economic, Small Business Development, Tourism and Environmental Affairs	Email: HOD_office@destea.gov.za
	Vivian Minnaar	Mangaung Metropolitan Municipality	Email: Vivian.minnaar@mangaung.co.za