

APPENDIX G6
COMMENTS AND RESPONSES REPORT

ENVIRONMENTAL AUTHORISATION AMENDMENTS FOR THE GRID CONNECTION INFRASTRUCTURE FOR THE NAMAS WIND FARM

(DFFE Reference Number.: 14/12/16/3/3/1/2032/AM2)

COMMENTS AND RESPONSES REPORT

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The amendment application process and availability of the Motivation Report was announced to all registered Interested and Affected Parties (I&APs) on the project database on Monday, 24 May 2021 inviting them to submit any comments / queries that they might have on the content of the Motivation Report and the requested amendments.

The Motivation Report has been made available for a 30-day review and comment period from **Monday, 24 May 2021** until **Thursday, 24 June 2021**. All written comments received during the public consultation process undertaken have been included within this Comments and Responses Report (C&RR).

The C&RR is included as **Appendix C5** of the final Motivation Report.

LIST OF ABBREVIATIONS / ACRONYMS

C&RR	Comments and Reponses Report	I&APs	Interested and Affected Parties
DFFE	Department of Forestry, Fisheries, and the Environment	MTS	Main Transmission Substation
DWS	Department of Water and Sanitation	OoS	Organs of State
EA	Environmental Authorisation	PPP	Public Participation Process
EAP	Environmental Assessment Partitioner	SAHRA	South African Heritage Resources Agency
EIA	Environmental Impact Assessment	SARAO	South African Radio Astronomy Observatory
EMPr	Environmental Management Programme Report		

1. COMMENTS SUBMITTED DURING THE REVIEW PERIOD OF THE MOTIVATION REPORT

1.1. Organs of State

No.	Comment	Raised by	Response
1.	<p>Final Comment</p> <p>The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final Motivational Report and EMPr:</p> <ul style="list-style-type: none"> • 38(4)a — The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed amendment; • 38(4)b — The recommendations of the specialist and the recommendations contained within the draft Motivational Report are supported. • The conditions provided in the previously issued Final Comment are still valid and must be adhered to; • As the project area overlaps with an area recently assessed in SAHRIS Case ID 16475 (https://sahris.sahra.org.za/cases/komas-wind-energy-facility), it is recommended that Palaeontological monitoring of all excavations be conducted and a monitoring report to be submitted once the construction phase has been completed; • 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 APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) 	<p>Natasha Higgitt SAHRA</p> <p>Letter: 24 June 2021</p>	<p>It is noted that SAHRA has not objection to the proposed amendment, no further action required.</p> <p>It is noted that specialist recommendations contained in the motivational report are supported by SAHRA. No further actions required.</p> <p>Previous Final Comments will be adhered to.</p> <p>Comment noted by the Applicant. A Paleontological monitoring report will be submitted after construction is completed.</p> <p>If any heritage resources are found the Chance Finds Procedure will be adhered to and the SAHRA AMP Unit will be altered.</p>

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	<p>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;</p> <ul style="list-style-type: none"> • 38(4)c(ii) — If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), 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 with regards to 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 Motivational Report and EMPr must be submitted to SAHRA for record purposes; • The decision regarding the EA Amendment Application must be communicated to SAHRA and uploaded to the SAHRIS Case application. 		<p></p> <p>If any human burials are found the SAHRA BGG Unit will be altered.</p> <p>Comment regarding NHRA offences noted. No further action required</p> <p>Comment regarding specialist appointed noted. No further action required.</p> <p>The Final Motivation Report has been submitted to SAHRA.</p> <p>The decision on the EA will be communicated to SAHRA.</p>
2.	<p>SARAO has undertaken an impact assessment and based on the information provided it was determined that the project represents a low risk of interference to the SKA radio telescope with a compliance headroom of 79.53 dBm/Hz. As such, we do not have any objection to the development.</p>	<p>Mr Selaelo Matlhane Spectrum & Telecommunication Manager SARAO</p> <p>Letter: 23 June 2021</p>	<p>It is noted that SARAO has no objection towards the proposed development. SARAO will be informed regarding further development of the project.</p>

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	Thank you for your correspondence, we would appreciate it if you could keep us informed with the development of the project.		
3.	<p><u>Amendments applied for</u></p> <ul style="list-style-type: none"> The environmental assessment practitioner (EAP) must ensure that the amendments applied for does not trigger any listed or specified activity as outlined in Regulation 31 of the EIA Regulations, 2014 as amended Point 1 on page 7 of the application form makes reference to the amendment of the coordinates of the substation/ switching station position. You are required to provide the authorised coordinates in relation to the proposed amended coordinates of the substation/ switching station in the amended application form to be submitted with the final amendment report. It has been noted that point 3 on page 7 of the application form refer to the amendment of the "corridor/envelop around Gromis MTS to be expanded.....", however, the final basic assessment report dated on page , 1 and 4 referred to proposed development to incorporate the "development of a collector substation (known as Rooivlei substation) and a double-circuit 132kV power line (known as Rooivlei Gromis 132 power line)" as well as associated infrastructure such as access roads and laydown areas. Further, the final BAR indicated on page 5, 20-22 (to mention few) that Gromis substation was existing when the application for grid connection (with reference 14/12/16/31311/2033) was lodged and authorised. Therefore, you are required to clarify why the amendment of the corridor for Gromis MTS has to be undertaken in this 	<p>Makhosazane Yeni Case Officer DFFE</p> <p>Letter: 07 June 2021</p>	<p>The proposed amendment to the Namas Wind Farm Grid Connection Infrastructure does not trigger any listed activity as outlined in Regulation 31 of the EIA Regulations, 2014 as amended.</p> <p>The coordinates Starting Point (Namas Wind Farm) listed in the first table on Page 7 of the application form, and page 5 of the Motivational Report, are the authorised coordinate points. The coordinates Starting Point (Rooivlei Collector Substation) listed in the first table on Page 7 of the application form, and page 5 of the Motivational Report are the proposed amended coordinates, which align with the onsite facility substation for the Wind Farm.</p> <p>The authorized grid connection corridor, as per the Basic Assessment Report dated August 2019, included the existing Gromis Substation as part of the assessed corridor.</p> <p>As part to the proposed amendment, it is requested that the authorized corridor surrounding the existing Gromis substation, as previously assessed, be enlarged in order to accommodate entry of the Rooivlei-Gromis 132kV from the north of the substation as per Eskom's requirements.</p>

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	<p>application as it was not authorised as part of the grid connection EA.</p> <p><u>Specialist studies</u></p> <ul style="list-style-type: none"> Page 4, under section 3 of the application form refer to the company name as Genesis Namas Wind (Pty) Ltd, however the cover page of Appendix A of the Ecology Addendum letter dated 23 April 2021 mentioned that "Atlantic Energy Partners is proposing to amend various component and aspects of the approved Grid Connection for the Namas Wind Energy Facility (WEF), located near Kleinsee in the Northern Cape" Based on the above, the Department is of the opinion that the said Ecology addendum letter is not relevant to the proposed amendments since the EA issued on 26 November 2019 and amendment to the EA issued on 29 January 2020 referred to the company as Genesis Namas Wind (Pty) Ltd. Please provide clarity. <p><u>Layout Plan (approved vs proposed)</u></p> <p>Please ensure that the final layout map clearly indicate the original authorised 300m corridor and the proposed changes (i.e. 600m) to the corridor, the initial authorised substation location and location of the proposed substation realignment, wind farm facility and all other associated infrastructure.</p> <p><u>EMPr</u></p> <p>You are advised to amend the EMPr to indicate how the environmental issues related to the proposed amendment of the grid connection will be managed.</p> <p><u>Public participation</u></p> <ul style="list-style-type: none"> Please ensure that all issues raised, and comments received during the circulation of the draft amendment motivation report from registered interested and affected parties (I&APs) and organs of state which have jurisdiction 		<p></p> <p>The Ecology report submitted with the Final Motivation Report (refer to Appendix A) has been updated to reflect the correct applicant name. The findings of the report remain relevant to the proposed amendment and the significance of the findings have not changed.</p> <p>A Layout Plan including the authorised and proposed layout of the grid connection infrastructure for the Namas Wind Farm is included in the Final Motivational Report (refer to Figure 2.2 & Appendix H)</p> <p>No additional mitigation measures were proposed by the specialists in the amendment letters included as part of the motivational report (refer Appendix A to F). Therefore, the EMPr does not require amendment to address any additional mitigation measures because of the proposed amendment.</p> <p>All comments received during the 30-day review and comments period have been included in Appendix G5 of the Final Motivation Report. All issues and been addressed in the Comments and Responses Report (Appendix G6 of the Final Motivation Report)</p>

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	<p>in respect of the proposed activity are adequately addressed in the final motivation report.</p> <ul style="list-style-type: none"> <li data-bbox="226 304 981 655">• A comments and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process (PPP) for this amendment. Please note that comments received from this Department must also form part of the comment and response report. <li data-bbox="226 655 981 943">• Proof of correspondence with the various stakeholders must be included in final amendment motivation report and must indicate that this draft motivation report has been subjected to 30 days' public participation process, stating the start and end date of the PPP, Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments, <li data-bbox="226 943 981 1332">• The PPP must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended. 		<p>All issues and comments raised during the public participation process have been captured and responded to in the Comments and Responses Report (Appendix G6 of the Final Motivation Report)</p> <p>The comments received from the DFFE have been included in Appendix G5 of the final Motivation Report and have been captured in this Comments and Responses Report and have been responded to as applicable (refer to Appendix G6 of the final Motivation Report).</p> <p>Proof of correspondence with the various stakeholders is included as Appendix G2 and Appendix G3 of the Final Motivation Report.</p> <p>Attempt to obtain comments from the registered I&APs and stakeholders is included in Appendix G3 and Appendix G4 of the final Motivation Report.</p> <p>The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended (GNR 326), as well as in accordance with the approved Public Participation Plan (included as Appendix G7 of the final Motivation Report)</p> <p>» Project database: A register of I&APs has been compiled and updated throughout the 30-day review and comment period of the Motivation Report (included as Appendix G1 of the final Motivation Report).</p>

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			<p>» Notification of Motivation Report available for review and comment:</p> <ul style="list-style-type: none"> • The notification letter in which the regulated 30-day review and comment period on the content of the Motivation Report was distributed via email to the registered I&APs and the relevant Organs of State (OoS) on 24 May 2021 (refer to Appendix G4 and Appendix G5 of the final BA Report.) * Advertisement of the availability of the Motivation Report was placed in the Gemsbok on 21 May 2021 (refer to Appendix G4 of the final Motivation Report) * Site Notices were placed on site on 15 May 2021 (refer to Appendix C3 of the final BA Report) <p>» Attempt to obtain comments on the BA Report:</p> <ul style="list-style-type: none"> * Email reminder e-mail to all registered I&APs and OoS regarding the end of the review and comment period for the BA Report was sent on 15 June 2021 (refer to Appendices C5 and C6 of the final BA Report). <p>» Meetings:</p> <ul style="list-style-type: none"> * Attempts were made to secure meeting dates with OoS and LOs (refer to Appendices C4 and C5 of the final BA Report); <p>» Consultation: Proof of consultation with I&APs and OoS throughout the BA process is included in Appendices C4 and C5 of the final BA Report.</p>
	<ul style="list-style-type: none"> • It is noted that site notices have not been included as part of the draft amendment motivation report. Please ensure that site notices are included in final amendment motivation report to be submitted to the Department. 		<p>Site Notices have been included in Appendix G4 of the Final Motivation Report.</p>

No.	Comment	Raised by	Response
	<p>General</p> <p>You are further reminded to comply with Regulation 32(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: <i>"The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority -</i></p> <p><i>(a) a report, reflecting—</i></p> <p><i>(i) an assessment of all impacts related to the proposed change;</i></p> <p><i>(ii) advantages and disadvantages associated with the proposed change; and</i></p> <p><i>(iii) measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and</i></p> <p><i>(iv) any changes to the EMP; which report-</i></p> <p><i>(aa) had been subjected to a public participation process, which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential and registered interested and affected parties, including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority, and</i></p> <p><i>(bb) reflects the incorporation of comments received, including any comments of the competent authority."</i></p>		<p>The Motivation Report has been subjected to a 30-day review period and the final Motivation Report is submitted within the prescribed timeframe of the Regulations.</p>
	<p>Should there be significant changes or new information that has been added to the motivation report or EMP which changes or information was not contained in the reports or plans consulted on during the initial PPP, you are required to</p>		<p>No significant changes or new information has been added to the Final Motivation Report following the initial public participation process.</p>

No.	Comment	Raised by	Response
	<p>comply with Regulation 32(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: "<i>the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority (b) a notification in writing that the report will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the report, which changes or information was not contained in the report consulted on during the initial public participation process contemplated in sub regulation (1)(a) and that the revised report will be subjected to another public participation process of at least 30 days</i>".</p>		
	<p>In the event where sub-regulation Regulation 32 (1)(b) above applies, the report which reflects the incorporation of comments received, including any comments of the competent authority, must be submitted to the competent authority within 140 days of receipt of the application by the competent authority.</p>		<p>Sub-regulation Regulation 32(1) does not apply as no significant changes or new information has been added to the Final Motivation Report following the initial public participation process.</p>
	<p>Should you fail to meet any of the timeframes stipulated in Regulation 32 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.</p>		<p>The submission of the Final Motivation Report complies with the prescribed timeframes of the EIA Regulations.</p>
	<p>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.</p>		<p>The Applicant acknowledges that no activity may commence prior to receipt of the Environmental Authorisation.</p>
4.	<p>Please make sure about water use authorization, position with regards to nature conservation areas/ reserves/ parks, watercourses.</p>	<p>Pieter Ackerman (PrLArch) Chief Landscape Architect South Africa Sub Directorate Instream Water Use DWS</p>	<p>The closest nature reserve (Rooiklippias Nature Reserve) is located approximately 14km west of the proposed development. The northern section of the power line corridor traverses the Buffels River, and the required water use authorisation will be obtained where necessary.</p>

No.	Comment	Raised by	Response
5.	Please send me updated KMZ files of the proposed grid corridor and substation positions.	Email: 24 May 2021 John Geeringh Senior Consultant Environmental Management Land and Rights Eskom Transmission Division Eskom Holdings SOC Ltd Email: 24 May 2021	The requested .KMZ was sent on 27 May 2021 .
6.	<p>This Department has no objection to the proposed amendments of the above-mentioned application and wish to comment as follows:</p> <ol style="list-style-type: none"> 1. The applicant must note that no activities are allowed within 100m of a water resource or within 1:100-year flood line (whichever is the greatest), if the proposed amendments fall within these criteria, the applicant need to apply for water use license to ensure that the riparian ecological status of the water resource will not be negatively impacted. 2. Please note that any development within 500m from the boundary of any wetland requires a water use licence according to National Water Act (NWA) 1998 (Act No.36 of 1998). 3. Waste needs to be collected and disposed of at a registered municipal site during and after construction, and written agreement should be provided to this department 4. Storm water must be managed in such a manner as to disperse runoff and to prevent the concentration of storm water flow. 5. No surface, ground or storm water may be polluted as a result of any activities on the site 	F Masindi Case Officer DWS Letter: 22 June 2021	<p>The Buffels River is located in the northern portion of the grid connection corridor. No other water resources have been identified within the corridor assessed for the grid connection infrastructure (Ecological Addendum Letter included in Appendix A of the final Motivation Report).</p> <p>No other water resources have been identified within the corridor assessed for the grid connection infrastructure (Ecological Addendum Letter included in Appendix A of the final Motivation Report).</p> <p>The appropriate handling and management of waste is covered in the Generic EMPs as previously submitted with the approved Basic Assessment.</p> <p>The requirement for the management of stormwater identified by the DWS is noted. This requirement is covered in the Generic EMPs as previously submitted with the approved Basic Assessment.</p> <p>The requirements for preventing pollution in relation to a watercourse are noted.</p>

No.	Comment	Raised by	Response
	6. Please note that all requirements as stipulated in the national water Act (NWA) 1998 (Act no.36 of 1998) must be adhered to.		The requirement to adhere to the requirements in the National Water Act is noted and will be adhered to.

1.2. Key Stakeholders and I&APs

No.	Comment	Raised by	Response
No comments received			