



## forestry, fisheries & the environment

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

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**DFFE Reference:** 14/12/16/3/3/2/2068

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### **PER E-MAIL / MAIL**

Dear Ms Classen

### **ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED HALFGEWONNEN SOLAR PV FACILITIES ON PORTIONS 7, 8, 9 AND 16 OF THE FARM HALFGEWONNEN 190IS IN GOVAN MBEKI LOCAL MUNICIPALITY WITHIN GERT SIBANDE DISTRICT MUNICIPALITY, MPUMALANGA PROVINCE**

The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment dated June 2021 and received by the Department on 30 June 2021, refer.

The Department has evaluated the submitted final SR and the Plan of Study for Environmental Impact Assessment dated June 2021 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.

In addition, the following amendments and additional information are required to be incorporated in the Environmental Impact Assessment Report (EIAR):

#### **Listed Activities**

- The Department has noted on page 21 of the final SR that activity 4 of Listing Notice 2, as it relates to the installation of Battery Energy Storage System (BESS) has been applied for again, even though batteries are not regarded as facilities or infrastructure for the storage or storage and handling of a dangerous good. On page 56 of the aforesaid report, table 13, it is stated that the BESS will be preassembled. However, you have persisted to include this activity in the report. Ensure that only listed activities that are triggered by this development are applied for in the EIAR for the proposed project.

- The EIAr must provide an assessment of the impacts and mitigation measures for each of the listed activities and sub-activities applied for.
- The listed activities represented in the EIAr and the application form must be the same and correct.
- Provide the capacity of the powerlines in kilovolts as it relates to activity 11(i) of Listing Notice 1 of NEMA EIA Regulations of 2014, as amended.

### **Detail of project component**

- It is noted that the capacity of the proposed PV will be approximately 80MW. However, page 14 of the final SR indicated that the project components will be PV 1 (20MW): Module area: ~11.6 ha, PV1 (20MW): Cell area: ~10.7 ha, PV2 (60MW): Module area: ~36.8 ha and PV2 (60MW): Cell area: ~34 ha. The above mentioned MW will be more than 80MW. Please clarify?

### **Public Participation**

- Please ensure that comments from all relevant stakeholders are submitted to the Department with the final SR. This includes but not limited to the Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Planning and Conservation; Department of Mineral Resources and Energy; Department of Human Settlements, Water And Sanitation; Department of Mineral Resources and Energy; Govan Mbeki Local Municipality; Gert Sibande District Municipality; Mpumalanga Department of Agriculture, Rural development, Land and Environmental Affairs (DARDLEA); Land Claims Commission; South African Heritage Resources Agency (SAHRA); Mpumalanga Public Works, Roads & Transport; South African Civil Aviation Authority (SACAA); National Energy Regulator of South Africa (NERSA); Steve Tshwete Local Municipality; Nkangala District Municipality and Muskaligwa Local Municipality.
- 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 adequately 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.
- 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
- 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.
- The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.

### **Alternatives**

- Please provide a description of each of the alternatives and provide detailed motivation for the preferred alternative.
- You are required to identify, consider and assess the risks of Lithium ion batteries and Vanadium redox flow batteries and provide measures to mitigate those impacts. Additionally, ensure that these measures are included in the final EMPr.

### **Layout & Sensitivity Maps**

- The EIAr must provide the four corner 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.

- The EIA must provide the following:
  - Clear indication of the envisioned area for the proposed solar PV facility; i.e. location of solar PV, Battery Energy Storage System (BESS); powerlines, supporting Infrastructure: main sub-station, operation and maintenance office, weather station, internal roads, parking, offices, staff ablutions and all associated infrastructure should be mapped at an appropriate scale.
  - Clear description of all associated infrastructure. This description must include, but is not limited to the following:
    - All infrastructure;
    - All supporting onsite infrastructure.
- A copy of the final preferred route layout map. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g. roads. The layout map must indicate the following:
  - All infrastructure
  - All existing infrastructure on the site;
  - Location of access and internal roads;
  - Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible);
  - Wetlands, drainage lines, rivers, stream and water crossing of roads and cables indicating the type of bridging structures that will be used;
  - The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;
  - Buffer areas;
  - All “no-go” areas.
- An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.
- A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.

### **Specialist assessments**

- The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:
  - A detailed description of the study’s methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisations.
  - Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.
  - 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.
  - **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.**
  - Should a specialist recommend specific mitigation measures, these must be clearly indicated.
  - Regarding cumulative impacts:
    - Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
    - A detailed process flow 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.

- Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.
- The 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.
- 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.
- Additionally ensure that specialist studies where applicable, comply with GN320 and GN1150 notice of 20 March 2020 and 30 October 2020, respectively.
- The following Specialist Assessments will form part of the EIAr:

<b>Specialist Study</b>	<b>Company</b>
Soil, land use and land capability assessment	Zimpande Research Collaborative
Terrestrial Biodiversity Assessment, and Avifaunal Assessment	Scientific Terrestrial Services
Freshwater Ecological Assessment	Scientific Aquatic Services
Visual Impact Assessment	Scientific Aquatic Services
Hydrological Impact Assessment	
Heritage / Archaeological Impact Assessment	Archaeotnos

### General

- A construction and operational phase EMPr that includes mitigation and monitoring measures must be submitted with the final EIAr as well as generic EMPrs for the substation(s) and powerline.

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amended, 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 and the Environment**  
**Signed by: Ms Olivia Letlalo**  
**Designation: Deputy Director: Priority Infrastructure Projects**  
**Date: 20/07/2021**

cc:	Keobakile Sedupane	Dreamworks Haven Investments (Pty) Ltd	Email: keo@k-energy.co.za
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