

Power Line for the Sonvanger Photovoltaic Solar Power Plant: Comments and Response Report

Comments received during the 30-day review and comment period of the Basic Assessment Report (02 August - 02 September 2021)

Organisation	Person	Issue or comment raised (see Appendix C5 & C6)	Addressing or incorporation of issue or comment
Mvelaphande Trading (representing Telkom)	Chris Schutte	<p>In an email dated 02 August 2021, the following feedback was received from the Mr. Schutte in response to the project:</p> <p>Hereby do we acknowledge your proposed project.</p> <p>For future reference please quote OTUN0421-21.</p>	<p>The response received in terms of the acknowledgement of the project is noted, as well as the reference number which has been allocated to the project.</p>
Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Directorate	Shalot Sekonko	<p>In an email dated 03 August 2021, the following feedback was received from the DFFE: Biodiversity Directorate in response to the Notification of the availability of the BA Report for the project:</p> <p>DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the Notification of the Basic Assessment Report: Power line for the Sonvanger PV Solar Power Plant near Theunissen, Free State Province. Kindly note that the project has been allocated to Ms Rabothata (both copied on this email) and myself.</p> <p>Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries will be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for the attention of Mr Seoka Lekota.</p>	<p>The feedback from the Biodiversity Directorate is acknowledged, as well as the process of the Directorate for the submission of Public Participation Documents.</p>

<p>Mvelaphande Trading (representing Telkom)</p>	<p>Chris Schutte</p>	<p>In an email dated 19 August 2021, the following feedback was received from the Mr. Schutte in response to the project:</p> <p>With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved by our Client (Openserve) in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.</p> <p>Our Client (Openserve)'s existing infrastructure is affected by this proposal and the route is marked in BLUE 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 is not on the sketch please stop and contact us immediately to arrange a site meeting. In the event that our cables are exposed and damaged/stolen by a third party the damages will be repaired at the customer's account. 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.</p> <p>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 relocation will be for your account in terms of section 25 of the Electronic Communications Act.</p> <p>Mr Wynand Du Plessis must be contacted at telephone number 081 362 2186. Two (2) weeks prior to commencement of</p>	<p>Ms. Lisa Opperman from Environamics responded via email on 20 August 2021 acknowledging the comments and requirements raised. It was also confirmed that the information and requirements raised in the correspondence have been submitted to the developer for their records and implementation.</p> <p>The following responses are provided to the comments raised in the correspondence:</p> <p>The approval of the proposed project is noted.</p> <p>It is noted that the development of the proposed power line will affect the existing infrastructure of Openserve. The requirements set out in the comments for work near die infrastructure is noted and will be adhered to during the construction phase. The developer also acknowledges these requirements.</p> <p>The requirements that have to be met on the completion of the project is noted, including requirements and financial implications for the relocation or alteration of existing infrastructure of Openserve, as per the legislation.</p> <p>Mr Wynand Du Plessis will be contacted as required prior to the commencement of</p>
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		proposed work. It's important that all services are shown on site before construction starts.	construction, and all services will be indicated on site are required.
Department of Forestry, Fisheries and the Environment (DFFE)	Ms. Winnie Tebogo Mabena	The Application for Environmental Authorisation and Draft Basic Assessment Report (BAR) dated August 2021 and received by the Department on 02 August 2021 and the acknowledgement thereof dated 04 August 2021, refer. <u>This letter serves to inform you that the following information must be included to the final BAR:</u>	The comments submitted by the Department of Forestry, Fisheries and the Environment on the draft BAR are noted. Responses to the comments and requirements raised by the Department are provided below.
		<p>a) <u>Listed Activities</u></p> <ul style="list-style-type: none"> • Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed. • If the activities applied for in the application form differ from those mentioned in the final BAR, 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.environment.gov.za/documents/forms. • It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed 	<ul style="list-style-type: none"> • It is confirmed that all relevant listed activities (including consideration of the amendments gazetted in GNR 517 of 11 June 2021) triggered by the proposed development have been applied for in the amended Application for Environmental Authorisation and included in the revised BA Report available for review and comments. A detailed description related to the project is provided for each listed activity applied for, as included in the amended Application for Environmental Authorisation and revised BA Report. • An amended Application for Environmental Authorisation has been submitted to the DFFE with the revised BA Report. The correct Application form has been used. • The relevant commenting authorities have been notified of the Basic Assessment process from the onset of the project and

		<p>development within the respective geographical areas must be provided.</p>	<p>received notification of the availability of the draft BA Report for review and comment. Furthermore, these authorities are also registered on the project database (Appendix C3 of the revised BA Report). Written comments on the draft BA Report were received from the DFFE Biodiversity Directorate and are included and responded to as part of this Comments and Responses Report (the original comment is included in Appendix C5 of the revised BA Report). Figure 6 of the revised report provides an illustration of the relevant geographical areas relevant to the proposed project.</p>
		<p>b) <u>Layout & Sensitivity Maps</u></p> <ul style="list-style-type: none"> • Please provide a layout map which indicates the following: <ul style="list-style-type: none"> a) The proposed powerline corridor or servitude with all supporting associated infrastructure for the development and please illustrate the connection of the new Sonvanger Photovoltaic Solar Power Plant powerline to the existing Oryx-Joel 132kV power line located at the Beatrix Mine (Sibanye Stillwater). b) The proposed grid infrastructure overlain by the sensitivity map in relation to the authorised Sonvanger Photovoltaic Solar Power Plant. c) All supporting onsite infrastructure e.g. roads (existing and proposed) and a 132kV substation (1ha in extent). 	<ul style="list-style-type: none"> • The layout map included as Figure 6 (1) and Figure 6(2) of the revised BA Report has been updated accordingly to include all the requirements provided by the Department in this regard.

		<p>d) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines, existing power lines, vegetation, critical biodiversity areas, etc. that will be affected.</p> <p>e) Buffer areas; and, all “no-go” areas. Please note that the Department considers a ‘no-go’ area, as an area where no development or any infrastructure is allowed; therefore, no development or associated infrastructure is allowed in the ‘no-go’ areas.</p> <p>f) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring developments and all existing infrastructure that will be affected by the proposed project.</p> <p>g) Google maps will not be accepted.</p>	
		<p>c) <u>Alternatives</u></p> <ul style="list-style-type: none"> • Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content: <ul style="list-style-type: none"> a) details of all the alternatives considered; b) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs; c) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them; 	<ul style="list-style-type: none"> • Section 5.1 of the revised BA Report provides the details and feedback of all alternatives considered for the proposed development, which includes the no-go alternative, location alternatives, design and layout alternatives and technology alternatives. Where no reasonable or feasible alternatives are available this has been motivated for. In ensuring that the best practicable environmental option is selected, existing disturbances within the landscape have been considered, as well as the shortest possible route to the grid connection point to reduce impact. The route which the grid connection corridor follows provides an

		<ul style="list-style-type: none"> d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; e) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts— f) (aa) can be reversed; g) (bb) may cause irreplaceable loss of resources; and h) (cc) can be avoided, managed or mitigated; i) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives; j) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; k) the possible mitigation measures that could be applied and level of residual risk; l) the outcome of the site selection matrix; m) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and 	<p>opportunity for the consolidation of linear disturbance and infrastructure within the landscape based on the presence of the R30 regional road which is parallel to the assessed route. No reasons in terms of limited financial constraints have been included in the consideration of alternatives.</p> <ul style="list-style-type: none"> • The following responses provides feedback of where the requirements of Appendix 1(3)(1)(h) have been met in the revised BA Report: <ul style="list-style-type: none"> a) The details of the alternatives considered in Section 5.1. b) The details of the public participation process are included in Section 5.2. Copies of supporting documents and proof are included in Appendix C. c) All issues and comments raised during the 30-day review and comment period of the draft BA Report are included and responded to in this Comments and Responses Report (Appendix C4). d) The environmental attributes (including the social aspects) associated with the grid connection corridor are included in Section 5.3. e) The impacts and risks associated with the preferred alternative are included and assessed within Section 6.1 and Section 6.2, and Appendix E.
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		<p>n) a concluding statement indicating the preferred alternatives, including preferred location of the activity.</p> <ul style="list-style-type: none"> • Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1. 	<p>f) Refer to the response provided under point e) above.</p> <p>g) Refer to the response provided under point e) above.</p> <p>h) Refer to the response provided under point e) above.</p> <p>i) The methodology used in the environmental assessment is included in Section 6.4.</p> <p>j) The positive and negative impacts associated with the preferred alternative are included and assessed within Section 6.1 and Section 6.2, and Appendix E.</p> <p>k) The recommended mitigation measures are included and assessed within Section 6.1 and Section 6.2, and Appendix E. The measures are also included in Appendix F1 and Appendix F2.</p> <p>l) The outcome of the site selection matrix is included in Section 5.4.</p> <p>m) Where no reasonable or feasible alternatives are available this has been motivated for in Section 5.1.</p> <p>n) A concluding statement indicating the preferred alternative is included as Section 5.5.</p>
		<p>e) <u>Specialist Assessments</u></p> <ul style="list-style-type: none"> • Specialist studies to be conducted must provide a detailed description of their methodology, as well as all 	<ul style="list-style-type: none"> • The specialist studies included as part of the revised BA Report (Appendix D), provides the details of the methodology used for the

		<p>other associated infrastructures that they have assessed and are recommending for the authorisation.</p> <ul style="list-style-type: none"> • 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 expert advice. • 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. • 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. • As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist. 	<p>study, as well as the details of all infrastructure considered and assessed.</p> <ul style="list-style-type: none"> • The specialist studies (Appendix D of the revised BA Report) provide the details of any limitations and gaps associated with the studies. All studies have been conducted in the correct season and no gaps in this regard are noted. It can be confirmed that the revised BA Report includes the final Avifauna Impact Assessment, inclusive of fieldwork, (Appendix D3) which has been made available for review and comment to all registered I&APs. The EAP notified the DFFE of the applicability of Regulation 19(1)(b) on 09 September 2021, which was acknowledged by the Department on 16 September 2021. • No contradicting recommendations have been specified by the appointed specialists. Therefore, this comment is not applicable. • All specialist studies included in Appendix D are final and recommends detailed/practical mitigation measures. No further studies are recommended. • The specialist studies (Appendix D of the revised BA Report) which require to be undertaken in terms of the Protocols have complied with this requirement. • The Specialist Declaration of Interest forms for all specialists appointed for the project
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			<p>are included in Appendix D of the revised BA Report. The relevant details pertaining to the specialist registrations are included in the respective Specialist Declaration of Interest forms.</p>
		<p>f) <u>Cumulative Assessment</u></p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> a) 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. b) 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. c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development. d) A cumulative impact environmental statement on whether the proposed development must proceed. 	<ul style="list-style-type: none"> • Similar projects within a 30km radius from the project are present to the north (Section 7.4.1 of the revised BA Report). The entire Section 7 of the revised BA Report considers the cumulative impacts associated with the development. The requirements of the Department are met in this section as per the points below: <ul style="list-style-type: none"> a) The identified cumulative impacts associated with the development are defined and discussed in Sections 7.5 and 7.6 of the revised BA Report. This includes an indication of the significance ratings. b) The process flow is included as Figure 7.1 of the revised BA Report. c) The cumulative impact significance is considered within Section 4.2 (Section 4: Need and Desirability). Refer to the last point of discussion under this section for the required information. d) Section 7.7 of the revised BA Report provides a conclusion regarding the cumulative impacts, as well as a overall

		<p>g) <u>Public Participation Plan</u></p> <ul style="list-style-type: none"> • The following information must be submitted with the final BAR: <ul style="list-style-type: none"> a) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended; b) Copies of all comments received during the draft BAR comment period; and c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the BAR. Please note that comments received from this Department must also form part of the comment and response report. • Please ensure that all issues raised and comments received during the circulation of the BAR from registered I&APs and organs of state which have jurisdiction (including this Department’s Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR. • Proof of correspondence with the various stakeholders must be included in the final BAR. 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. 	<p>cumulative impact environmental statement.</p> <ul style="list-style-type: none"> • The following information, as requested, is included in the revised BA Report: <ul style="list-style-type: none"> a) The list of registered I&APs is included as Appendix C3 of the revised BA Report. b) Copies of all original comments received on the draft BA Report during the 30-day review and comment period is included in Appendix C4 (email correspondence) and Appendix C5 (formal written comments) of the revised BA Report. c) This comments and Responses Report (Appendix C4 of the revised BA Report) contains all comments received (including those from the DFFE) during the 30-day review period of the draft BA Report (as well as the comments received prior to the 30-day review and comment period), as well as the responses provided from the project team. • All issues raised on the draft BA Report have been addressed and considered within the revised BA Report accordingly. Further comments received during the 30-day review and comment period of the revised BA Report will be included, considered and
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			<p>addressed in the final BA Report to be submitted to the DFFE for decision-making.</p> <ul style="list-style-type: none"> • Proof of correspondence with all the various stakeholders of the project is included in Appendix C4 of the revised BA Report, including proof of the attempts made to obtain comments. The public participation process has been undertaken in line with the Regulations and the approved public participation plan.
		<p>h) <u>Generic Environmental Management Programme</u></p> <ul style="list-style-type: none"> • The proposed 132KV Sonvanger Photovoltaic Solar Power Plant powerline triggers Activity 11 of GN R.983 (as amended). The following generic EMPr must be included in the final BAR: (a) Generic EMPr for the development and expansion for overhead electricity transmission and distribution infrastructure. This generic EMPr can be downloaded from the following link https://www.environment.gov.za/documents/forms. • Part B: Section 2 of the generic EMPrs must be completed, and a copy of an originally signed EMPr must be submitted with the final BAR. • If any specific environmental sensitivities/attributes are present on the site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr template, to manage impacts, those impact management outcomes and actions must be included in section C of the generic EMPr. 	<ul style="list-style-type: none"> • The generic EMPr for the power line infrastructure and the generic EMPr for the substation infrastructure were made available during the 30-day review and comment period as part of the draft BA Report. These two EMPrs are also included in the revised BA Report as Appendix F1 and Appendix F2. • Part B: Section 2 of the two generic EMPrs (Appendix F1 and Appendix F2 of the revised BA Report have been completed). It is not possible to submit a signed EMPr to the Department with the final BA Report as the requirements of the generic EMPr template states in Section 5: Structure of the Document that Part B <i>“is to be completed by the contractor, with each completed page signed and dated by the holder of the EA prior to commencement of the activity.”</i> As

			<p>no contractor has been appointed as yet for the development as the project has not obtained preferred bidder status or Environmental authorisation, the EMPr has not been completed as per the requirements of the templates. Therefore, the signed and final EMPr can only be submitted once the Contractor has been appointed.</p> <ul style="list-style-type: none"> • Section C of the two respective generic EMPrs (Appendix F1 and F2 of the revised BA Report) has been completed to include the recommended specific impact management outcomes and impact management actions as provided by the specialists based on the site-specific findings and assessment.
		<p>Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.</p>	<ul style="list-style-type: none"> • The information required has been included under Section 8.2 of the revised BA Report.
		<p>You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: <i>“Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority - (a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which 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.”</i></p>	<ul style="list-style-type: none"> • The requirements of Regulation 19(1)(a) are noted.

		<p>Should there be significant changes or new information that has been added to the BAR 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 19(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 basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, 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 basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days”.</i></p>	<ul style="list-style-type: none"> • The requirements of Regulation 19(1)(b) are noted. It must be noted the DFFE was notified of Regulation 19(1)(b) for the project on 09 September 2021, and acknowledgement from the Department was received on 16 September 2021.
		<p>Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.</p>	<ul style="list-style-type: none"> • The prescribed timeframes of the Regulations for the Basic Assessment process are noted. It must be noted the DFFE was notified of Regulation 19(1)(b) for the project on 09 September 2021, and acknowledgement from the Department was received on 16 September 2021.
		<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</p>	<ul style="list-style-type: none"> • It is noted and acknowledged by the Applicant that no activity may commence

		Environmental Authorisation being granted by the Department.	prior to obtaining an Environmental Authorisation.
Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Directorate	Ms. M Rabothata / Mr. S Lekota	The following comments were received by the DFFE: Biodiversity Directorate via email on 03 September 2021.	Responses to the comments are provided in the rows below.
		Based on the information provided in the report, most of the powerline footprint falls within Ecological Support Areas (ESA1 or ESA2), although most of these areas represent cultivated land or degraded Grassland. As a result, the vegetation unit on site where the development footprint is planned is classified as having Low sensitivity due to the degraded state of the herbaceous layer.	It is noted that the Department considers that the development footprint of the proposed projects is of a low sensitivity.
		Notwithstanding the above, the following recommendations must be considered in the final report: <ul style="list-style-type: none"> • An avifaunal specialist must be consulted to conduct a detailed specialist study for the project area and monitoring of the potential impact of the power line and the findings of the impact assessment ratings as well as a clear impact statement be included in the final report. • Preconstruction walk-through of the approved development footprint must be conducted to ensure that sensitive habitats and species are avoided where possible. • Alien Invasive plant species management and Rehabilitation plans must be developed and submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion. • Permits from relevant authorities must be obtained for the removal or disturbance of any TOPs, Red Data listed or provincially protected species. 	<ul style="list-style-type: none"> • The final Avifauna Impact Assessment Report (Appendix D3 of the revised BA Report) includes a detailed study, based on field survey, as well as confirmed impact assessment ratings and an overall impact statement. • The requirement for a pre-construction walk-through of the final development footprint is noted. This requirement has been included in Section 8.1.1 of both Appendix F1 and Appendix F2 of the revised BA Report. • An Alien Invasive plant species management and Rehabilitation plan is included as Appendix F3 of the revised BA Report made available to the DFFE Biodiversity Directorate for a 30-day review and comment period. This plan will also be

		<ul style="list-style-type: none"> • Sensitive habitats in close proximity to the development footprint must be avoided or demarcated as No-Go area (i.e. Depressions/ pans and wetlands). • A detailed wetland assessment should be conducted to determine the exact edges of potential wetlands and drainage channels. 	<p>submitted with the final BA to the DFFE for decision-making.</p> <ul style="list-style-type: none"> • The need to obtain permits from the relevant authorities for the removal or disturbance of any protected species is noted. This requirement has been included in Section 8.1.1 of both Appendix F1 and Appendix F2 of the revised BA Report. • The wetland specialist has recommended that a buffer zone of 32 meters should be implemented around the drainage channels and riparian zone to prevent sediment changes to the channels. No activities or disturbance may take place within the 32m buffer. Refer to Appendix D2 of the revised BA Report. • A detailed Wetland Impact Assessment and Risk Assessment (Appendix D2 of the revised BA Report) has been undertaken as part of the BA process. The report specifically identifies the locations of wetlands and drainage features within the grid connection corridor.
		<p>In conclusion please note that all Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr Seoka Lekota.</p>	<p>The process for the submission of all Public Participation Process documents is noted and will be followed accordingly.</p>

<p>South African Heritage Resources Agency (SAHRA)</p>	<p>Sityhilelo Ngcatsha</p>	<p>In a letter dated 03 September 2021, the following final comments were provided by SAHRA on the proposed project:</p> <p>Final Comment</p> <p>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 BAR 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 development; • 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development; • 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 (Sityhilelo Ngcatsha/Phillip Hine 021 462 5402) 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 Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), 	<p>The final comments made by SAHRA are noted and have been included in the revised BA Report and EMPr(s) of the project as relevant. Refer to the responses below:</p> <ul style="list-style-type: none"> • It is noted that there are no objections to the proposed development. • It is noted that the specialist recommendations are supported and that no further conditions are provided. • The requirements for a situation where evidence is found has been included in Section 8.4 of Appendix F1 and appendix F2 of the revised BA Report. • The requirements for a situation where unmarked human burial are uncovered has been included in Section 8.4 of Appendix F1 and appendix F2 of the revised BA Report. • Section 51(1) of the NHRA is noted in terms of offences. • The conditions that apply with regards to the appointment of specialists has been included in Section 8.4 of Appendix F1 and appendix F2 of the revised BA Report. • The final BA Report will be uploaded to SAHRIS once available. • The decision on the Application for Environmental Authorisation will be uploaded to SAHRIS once available.
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		<p>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;</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> 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 BAR 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. 	
Mvelaphande Trading (representing Telkom)	Chris Schutte	<p>In a letter dated 19 August 2021, the following comments were raised by Mr. Schutte in response to the project:</p> <p>With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved by our Client (Openserve) in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.</p>	Ms. Lisa Opperman from Environamics responded via email on 20 August 2021 acknowledging the comments and requirements raised. It was also confirmed that the information and requirements raised in the

		<p>Our Client (Openserve)'s existing infrastructure is affected by this proposal and the route is marked in BLUE 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 is not on the sketch please stop and contact us immediately to arrange a site meeting. In the event that our cables are exposed and damaged/stolen by a third party the damages will be repaired at the customer's account. 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.</p> <p>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 relocation will be for your account in terms of section 25 of the Electronic Communications Act.</p> <p>Mr Wynand Du Plessis must be contacted at telephone number 081 362 2186. Two (2) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.</p> <p>Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval. Any changes /</p>	<p>correspondence have been submitted to the developer for their records and implementation.</p> <p>The following responses are provided to the comments raised in the correspondence:</p> <p>The approval of the proposed project is noted.</p> <p>It is noted that the development of the proposed power line will affect the existing infrastructure of Openserve. The requirements set out in the comments for work near die infrastructure is not and will be adhered to during the construction phase. The developer also acknowledges these requirements.</p> <p>The requirements that have to be met on the completion of the project is noted, including requirements and financial implications for the relocation or alteration of existing infrastructure of Openserve, as per the legislation.</p> <p>Mr Wynand Du Plessis will be contacted as required prior to the commencement of construction, and all services will be indicated on site are required.</p> <p>The validity of the approval is noted, as well as the process should construction commence after six months. The requirements where changes or</p>
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		<p>deviations from the original planning during or prior to construction must immediately be communicated to this office.</p> <p>Please notify this office and forward an as built plan, within 30 days of completion of construction.</p>	<p>deviations are relevant to the power line prior to construction is also noted.</p> <p>The requirement for the submission of a built plan within 30 days from completion of construction is noted.</p>
South African Radio Astronomy Observatory (SARAO)	Mr. Selaelo Matlhane	<p>In a letter dated 07 September 2021, received via email on 16 September 2021, the following comments were raised by SARAO on the draft Basic Assessment Report:</p> <p>This letter is in response to the proposed solar facility and its possible impact on the Square Kilometre Array radio telescopes.</p> <p>SARAO has undertaken a high-level impact assessment concerning the development of a single circuit power line connecting the solar facility to the national grid network. 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 surplus of 107.15 dBm/Hz. As such, we do not have any objection to the proposed project.</p>	<p>It is noted that the proposed power line poses a low risk of interference to the SKA radio telescope and that there is no objection from SARAO towards the project. No further response required.</p>

Comments received prior to the release of the Basic Assessment Report for the 30-day review and comment period

Organisation	Person	Issue or comment raised (see Appendix C5 & C6)	Addressing or incorporation of issue or comment
Department of Forestry, Fisheries and	BC Admin	In an email dated 29 July 2021, the following request was received from the DFFE: Biodiversity Directorate in response to the Notification of the EIA process for the project:	Ms. Lisa Opperman from Environamics responded via email on 29 July 2021 confirming that the DFFE Directorate: Biodiversity

the Environment (DFFE): Biodiversity Directorate		DFFE Directorate: Biodiversity conservation would like to register as the I&AP for the mentioned project. Kindly notify us as soon as the report becomes available.	Conservation is registered on the project database and will therefore receive notification of the availability of the BA Report once available for review and comment.
Eskom	John Geeringh	<p>In an email dated 29 July 2021, the following feedback was received from Eskom in response to the Notification of the EIA process for the project:</p> <p>Please send me a KMZ file of the proposed grid connection. Please find attached Eskom general requirements for works at or near Eskom infrastructure and servitudes</p>	<p>It can be confirmed that the Eskom general requirements for work at or near Eskom Servitudes and Infrastructure has been submitted to the Applicant for their consideration and implementation.</p> <p>The KMZ (Google Earth) file requested of the proposed grid connection was submitted to Mr. Geeringh via email by Ms. Lisa Opperman on 02 August 2021.</p>
Mvelaphande Trading (representing Telkom)	Chris Schutte	<p>In an email dated 29 July 2021, the following request was received from Mr. Schutte in response to the Notification of the EIA process for the project:</p> <p>We need to print the sketches and if there are infrastructure affected we need to indicate it on the sketches, please supply us with sketches in A3 and pdf format.</p>	Ms. Lisa Opperman from Environamics responded via email on 02 August 2021 and acknowledged the email. The footprint map illustrating the larger gid connection corridor, as being assessed as part of the BA process, was submitted to the party as well.