

18 August 2021

Attention: Ragna Redelstorff
South African Heritage Resources Agency
111 Harrington Street
Cape Town

10MW HARMONY ELAND SOLAR ENERGY FACILITY AND ITS ASSOCIATED INFRASTRUCTURE WITHIN THE REMAINING EXTENT OF FARM RIETPAN 17, THE REMAINING EXTENT OF THE FARM TOCHGEKREGEN 99, FARM MIJANNIE 162 AND FARM FREGUL 443, WITHIN THE MATJHABENG LOCAL MUNICIPALITY, FREE STATE PROVINCE

REQUEST TO UPDATE PROPERTY DESCRIPTION IN FINAL COMMENT FOR ELAND PV

Dear Ragna,

Savannah Environmental (Pty) Ltd was appointed by Eland Photovoltaic (Pty) Ltd to provide support and assistance in meeting the permitting requirements for financial close for the above-mentioned project, which included, amongst other tasks, revising the Environmental Management Programme (EMPr) to include the conditions of the Environmental Authorisation (EA) and findings of the heritage walkdown of the final development footprint (i.e., the solar PV area, power line, access route and substation). Following compilation of the revised EMPr and heritage walkdown report, the case for this project was resubmitted to SAHRA for final comment, which was subsequently issued on 29 June 2021.

Following receipt of the final comment, it was noted that the property description in the final comment does not reflect the correct property names and as a result, a request to update the property description to include the Farm Fregul 443 and Farm Mijannie 162 in the final comment was sent to you on 02 July 2021, following which you indicated that formal documentation indicating that the Farm Fregul 443 and Mijannie 162 were assessed as part of the Basic Assessment (BA) process is required before this request can be processed.

As you may recall from THE last correspondence I sent you on 30 July 2021, I indicated that Farm Mijannie 162 was not included in the final Basic Assessment Report and the original EA issued for the project as it was established at a later stage (i.e., post 2015) through consolidation of Portion 5 of the Farm Rietpan 17, Portion 3 of Farm 66 and Portion 2 of Wesselia 101. Kindly refer to **Appendix A** for a copy of the property report obtained from Windeed.

It is noted that the final Basic Assessment Report and original EA make no mention of Farm Fregul 443. The reason for this is that in the initial assessment undertaken in 2015, it was envisaged that the power line would run through the Remaining Extent of Farm Rietpan 17 and tie into the Blinkpoort Shaft Substation.

An amendment to the overhead power line co-ordinates was undertaken in 2021 to ensure that the power line route connects to Freguls Five Substation, as opposed to the initially authorised Blinkpoort Shaft Substation. As a result of this amendment, the power line route now traverses both the Remaining Extent of Rietpan 17 and Fregul 443. Since the power line will have a maximum capacity of 33kV and the pylons will not encroach within 32m of any water course, it does not trigger a listed activity in terms of the EIA Regulations promulgated under NEMA, and as a result, Fregul 443 is not included in the list of affected properties within the amended EA. Kindly refer to the attached amendment letter (**Appendix B**). It is important to note, however, that Fregul 443 was assessed as part of the heritage walkdown of the final power line route.

Further to the above, the attached approved layout (**Appendix C**) included in the approved EMPr clearly depicts that the power line traverses Fregul 443. I have also attached the EMPr approval letter as **Appendix D**.

Given the above, we would like to request that the final comment letter be updated to include Fregul 443 and Mijannie 162 in the first and second paragraph speaking to the description of the project.

I trust you will find the above in good order. Should you have any questions in this regard, please do not hesitate to contact me.

Yours sincerely

Mmakoena Mmola
Savannah Environmental
Environmental Consultant
(mmakoena@savannahsa.com)

APPENDIX A:
Mijannie 162 Property Report

APPENDIX B:

EA Amendment Letter (DFFE: 14/12/16/3/3/1/1471/AM2)

**APPENDIX C:
Approved Layout**

**APPENDIX D:
EMPr APPROVAL LETTER**