

APPENDIX C7:  
Comments Received



# 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:** 14/12/16/3/3/1/2554

**Enquiries:** Herman Alberts

**Telephone:** (012) 399 9371 **E-mail:** HALberts@dfffe.gov.za

Ms Jo-Anne Thomas  
Savannah Environmental (Pty) Ltd  
PO Box 148  
**SUNNINGHILL**  
2191

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

## **PER EMAIL**

Dear Ms Thomas

### **COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED GREAT KAROO ELECTRICAL GRID INFRASTRUCTURE, NORTHERN CAPE AND WESTERN CAPE PROVINCES**

The draft Basic Assessment Report (BAR) dated May 2022 and received by this Department on 20 May 2022, refers.

This letter serves to inform you that the following information must be included to the final BAR:

#### **(a) Specific Comments**

- (i) Please provide a concise, but complete, summary and bullet list of the project description and associated infrastructure (or project scope) to be included in the decision (or as it should appear in the decision), should a positive Environmental Authorisation be granted. This must include a list of all development components and associated infrastructure.
- (ii) The BAR must clearly provide a detailed section which addresses the site sensitivity verification requirements where a specialist assessment is required but no specific assessment protocol has been prescribed, as well as the site sensitivity verification and minimum report content requirements for all specialist assessments undertaken, which was included in the screening tool report.
- (iii) With regards to the generic Environmental Management Programmes (EMPr) for the substation and powerline, Part B Section 2 and Part C is incomplete in the draft BAR. Please sign the generic EMPrs. We request that you adequately complete all applicable sections in the generic EMPrs.

#### **(b) Listed Activities**

- (i) 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.
- (ii) Please ensure that all relevant listed activities and sub-activities are correctly numbered as per the relevant listing notices.

*JCA*

- (iii) The EAP must clearly identify and provide a final list of all applicable listed activities. If any activities are to be removed, motivation for their removal must be included in the final BAR.
- (iv) The listed activities represented in the final BAR and the application form must be the same and correct.
- (v) If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted.
- (vi) 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>.
- (vii) The final BAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.
- (viii) 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 development within the respective geographical areas must be provided.

### **(c) Layout & Sensitivity Maps**

- (i) The final BAR must provide 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.
- (ii) A copy of the final layout map must be submitted with the final BAR. 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:
  - a) The envisioned area for the infrastructure, i.e. placing of infrastructure and all associated infrastructure should be mapped at an appropriate scale.
  - b) All supporting onsite infrastructure required such as laydown areas, roads etc.
  - c) All necessary details regarding all possible locations and sizes of the infrastructure.
  - d) All existing infrastructure on the site, especially internal road infrastructure.
- (iii) Please provide an environmental sensitivity map which indicates the following:
  - a) The location of sensitive environmental features on site, e.g. CBAs, protected areas, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;
  - b) Buffer areas; and
  - c) All "no-go" areas.
- (iv) The above layout map must be overlain with the sensitivity map and a cumulative map which shows existing infrastructure.
- (v) Google maps will not be accepted.

### **(d) Alternatives**

- (i) Please note that you are required to provide a full description of the process followed to reach the proposed amended preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content:
  - 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;
  - 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 -
    - (aa) can be reversed;
    - (bb) may cause irreplaceable loss of resources; and
    - (cc) can be avoided, managed or mitigated;
  - f) 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;
  - g) 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;
  - h) the possible mitigation measures that could be applied and level of residual risk;
  - i) the outcome of the site selection matrix;
  - j) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and
  - k) a concluding statement indicating the preferred alternatives, including preferred location of the activity.
- (ii) Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.

**(e) Specialist Declaration of Interest**

- (i) Specialist Declaration of Interest forms must be attached to the final BAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Department's website (please use the Department's template).

**(f) Specialist Assessments**

- (i) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:
  - a) 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.
  - b) 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.
  - c) 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.
  - d) 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 if applicable.
  - e) **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.**
  - f) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
  - g) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.
- (ii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting in 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.**

- (iii) 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.

#### **(g) Undertaking of an Oath**

- (i) Please ensure that the final BAR includes an undertaking under oath or affirmation by the EAP.
- (ii) Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include:  
*“an undertaking under oath or affirmation by the EAP in relation to:*  
a) *the correctness of the information provided in the reports;*  
b) *the inclusion of comments and inputs from stakeholders and I&APs;*  
c) *the inclusion of inputs and recommendations from the specialist reports where relevant; and*  
d) *any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties”.*

#### **(h) Details and Expertise of the EAP**

- (i) You are required to include the details and expertise of the EAP in the BAR, including a curriculum vitae, in order to comply with the requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations, 2014, as amended.

#### **(i) Public Participation Process**

- (i) Comments must be obtained from this Department’s Biodiversity Conservation Directorate at BCAdmin@environment.gov.za.
- (ii) The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 and 44 of the EIA Regulations 2014, as amended.
- (iii) Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others that have jurisdiction in respect of the proposed activity are adequately addressed and included in the final BAR.
- (iv) Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final BAR.
- (v) 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. In terms of Regulation 41(2)(b) of the EIA Regulations, 2014, as amended, please provide proof of written notice for the availability of the BAR for comment.
- (vi) All issues raised and comments received during the circulation of the draft BAR from I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final BAR, including comments from this Department, and must be incorporated into a Comments and Response Report (CRR).
- (vii) The CRR report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter.
- (viii) 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 an I&AP’s comments.

- (ix) Minutes and attendance registers (where applicable) of any physical/virtual meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the final BAR.

**(j) Environmental Impact Statement**

- (i) You are reminded that an environmental impact statement must be included in the final BAR, therefore you are kindly requested to include an environmental impact statement which contains –
  - a) a summary of the key findings of the environmental impact assessment;
  - b) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and
  - c) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.

**(k) Environmental Management Programme**

- (i) It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programme, contemplated in Regulations 19(4) must be used and submitted with the final report over and above the EMPr for the facility.
- (ii) There needs to be an EMPr for the facility, the onsite substation as well as the power line, for whichever alternative is chosen.
- (iii) Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.
- (iv) Please be informed that the following content must be incorporated within the EMPr/s as indicated in Appendix 4 of the EIA Regulations 2014, as amended:
  - a) Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including a curriculum vitae.
  - b) A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.
  - c) A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including –
    - (aa) Planning and design;
    - (bb) Pre-construction activities;
    - (cc) Construction activities;
    - (dd) Rehabilitation of the environment after construction and where applicable post closure; and
    - (ee) Where relevant, operation activities.
  - d) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) of Appendix 4 of the EIA Regulations 2014, as amended, will be achieved, and must, where applicable, include actions to –
  - e) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;
  - f) Comply with any prescribed environmental management standards or practices;
  - g) Comply with any applicable provisions of the Act regarding closure, where applicable; and
  - h) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.

- i) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- j) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- k) An indication of the persons who will be responsible for the implementation of the impact management actions.
- l) The time periods within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.
- m) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- n) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.

## **(l) General**

- (i) The EAP must provide details of the specific locations in the BAR, and not provide vague locations of the proposed developments. All associated infrastructure must be clearly indicated in the final BAR and its associated layout plans.
- (ii) When submitting the BAR and future documents kindly name each of the documents and attachments according to the information it contains. E.g., instead of only naming it Appendix A, it must be Appendix A: Maps, Appendix B: EAP Declaration etc.
- (iii) The EAP must provide an outline of where in the final BAR each of this Department's comments are addressed. This must be a separate document and must be submitted as an appendix to the final BAR.
- (iv) 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.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *"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 any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, 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"*.

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(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: *"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 documents contemplated in subregulation 1(a) 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 documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days."*

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.

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 sincerely



**Ms Milicent Solomons**

**Acting Chief Director: Integrated Environmental Authorisations**

**Department of Forestry, Fisheries and the Environment**

**Signed by: Mr Coenrad Agenbach**

**Designation: Deputy Director: Priority Infrastructure Projects**

**Date: 08 June 2022**

cc:	Gerhard Gerber	WC DEADP	Email: Gerhard.Gerber@westerncape.gov.za
	Romaya Dorasamy	Great Karoo Renewable Energy (Pty) Ltd	Email: romaya@greatkaroo.energy
	Tobias Hobbach	Great Karoo Renewable Energy (Pty) Ltd	Email: tobias@greatkaroo.energy
	Bryan Fisher	NC DAEARD	Email: Bfisher@ncpg.gov.za
	Kosie Haarhoff	Beaufort West Local Municipality	Email: kosieh@beaufortwestmun.co.za



**Annexure 1**

Format for Comments and Response Trail Report:

Date of comment, format of comment name of organisation/I&AP	Comment	Response from EAP/Applicant/Specialist
14/05/2021 Email Department of Forestry, Fisheries and the Environment: Priority Infrastructure Projects (John Soap)	Please record C&R trail report in this format  Please update the contact details of the provincial environmental authority	EAP: ( <del>Noted</del> )The C&R trail report has been updated into the desired format, see Appendix K  EAP: Details of provincial authority have been updated, see page 16 of the Application form

# Proposed Grid Connection for the Great Karoo Renewable Energy Facility development near Richmond in the Northern Cape

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
www.sahra.org.za

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: nhiggitt@sahra.org.za  
CaseID: 18652

Date: Wednesday June 15, 2022  
Page No: 1

## Final Comment

**In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Savannah Environmental (Pty) Ltd

PO Box 148  
Sunninghill  
2157

**Great Karoo Renewable Energy (Pty) Ltd is proposing the development of 2 x wind energy facilities, 3 x solar energy facilities and 5 x grid connections on sites near Richmond, Northern Cape. The cluster of projects is known as Great Karoo Renewable Energy (GKRE). As the projects fall outside of a REDZ, a full Scoping & EIA process would be required for the facilities and BA processes for the associated grid connections. Project details are as follows: Project Name Technology Capacity Affected farm names Angora Wind Energy Facility Wind (140MW) on Rem. 85 Rondavel, 86 Annex Rondavel and Rem. 84 Vogelstruisfontein Merino Wind Energy Facility Wind (140MW) on Land Rem. 85 Rondavel, 86 Annex Rondavel and Rem. 84 Vogelstruisfontein Grid connection infrastructure associated with each of the above-mentioned projects will include a 132kV onsite substation and 132kV overhead power line.**

Savannah Environmental (Pty) Ltd has been appointed by Great Karoo Renewable Energy (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed development of the Great Karoo Electrical Grid infrastructure near Richmond, in the Northern Cape and Western Cape Province.

A draft Basic Assessment report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed activities include the construction of a 132kV central collector substation (19.95 ha) and a 132kV double circuit power line (37.5 km long and 1 km wide), with permanent access roads along the length of the powerline.

CTS Heritage has been appointed to provide heritage specialist input into the EA process as per section 24(4)b(iii) of the NEMA and section 38(3) and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Lavin, J. 2022. Heritage Impact Assessment in terms of Section 38(8) of the NHRA for the Proposed Grid Connection Infrastructure for the Great Karoo Wind Energy Facility development near Richmond in the*



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### *Northern Cape.*

The HIA has incorporated the results of three heritage sub-specialist studies and contains the following recommendations:

- The Chance Fossil Finds Procedure must be implemented for the duration of construction activities
- A Chance Finds Procedure is recommended to be implemented.

The Heritage reports that were incorporated into the HIA includes the following:

*Almond, J. A. 2022. Combined Project Area for the Great Karoo Renewable Energy Cluster (Angora Wind Farm, Merino Wind Farm, Nku, Moriri & Kwana Solar PV Facilities) near Richmond, Pixley Ka-Seme District, Northern Cape Province and Associated Grid Connections to The Gamma MTS near Hutchinson*

The proposed development area is underlain by bedrocks of the Late Permian Teekloof Formation. A total of four palaeontological resources were identified within the proposed development footprint which include a Grade IIIC rated resources such as scatter of baked white bone fragments of small-bodied tetrapod (Site 896), a possible skull fragment of a small tetrapod (Site 914), probable rhizoliths (Site 917), with one Grade IIIB resource (probable small tetrapod skull with possible baked gypsum roses; Site 918). A 20 m buffer zone is recommended around site 918. The anticipated impact significance of the proposed development is likely to be very low.

*Lavin, J and Wiltshire, N. 2022. Archaeological Specialist Study In terms of Section 38(8) of the NHRA for a Proposed Great Karoo Renewable Energy Facility development near Richmond in the Northern Cape*

Heritage resources were identified within the proposed grid development footprint, all of which were rated as non-conservation worthy resources which include Stone Age lithics and farming infrastructure.

*Winter, S and Wilson, W. 2021. Cultural Landscape Assessment for the Proposed Development of the Great Karoo Renewable Energy Facility near Richmond in the Northern Cape.*

The current cultural landscape located in the Central Plateau of the Great Karoo with the N1 road as a dominant feature and artery is defined as a farming landscape focused on water availability with layers of historical colonial settlement and frontier movement, and more modern farming methods, game-farming,

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Enquiries: Natasha Higgitt  
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CaseID: 18652

Date: Wednesday June 15, 2022  
Page No: 3

nature tourism, and event-based economy, and now the renewable energy industry.

## Final Comment

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 BAR and EMPr:

- 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. Further additional specific conditions are provided for the development as follows:
- If is not possible to avoid palaeontological site 918, a permit in terms of section 35 of the NHRA must be applied from SAHRA to mitigate the site prior to the construction phase;
- 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) 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/Nggabutho Madida 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 of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- 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 and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

Should you have any further queries, please contact the designated official using the case number quoted

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CaseID: 18652

Date: Wednesday June 15, 2022  
Page No: 4

above in the case header.

Yours faithfully

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

## ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/597916>

## Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

**Reference:** 18/2/3/2022-2023

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**Attention:** Ms Nicolene Venter

Savannah Environmental (Pty) Ltd  
P.O. Box 148  
SUNNINGHILL  
2157

By e-mail: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)

Dear Madam

**COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED GREAT KAROO ELECTRICAL GRID INFRASTRUCTURE PROJECT, NORTHERN CAPE AND WESTERN CAPE PROVINCES**

1. The e-mail correspondence of 14 May 2022 notifying stakeholders of the availability of the Draft Basic Assessment Report ("BAR") and inviting them to attend a virtual stakeholder workshop, the Department's acknowledgement of receipt of the notification sent via e-mail on 16 May 2022, the Focus Group Meeting ("FGM") held on 24 May 2022 with officials from the Western Cape and Northern Cape Provincial Departments responsible for environmental affairs, and the presentation of the FGM received via e-mail on 24 May 2022, refer.
2. The Department acknowledges the thorough manner how public consultation has been managed to date, including the provision of a virtual authorities' FGM and stakeholder workshop. Thank you for the opportunity to comment on the Draft BAR dated May 2022 that was available for download from the website of the environmental assessment practitioner.
3. The electrical grid infrastructure project entails the development of a 132kV central collector substation and a 132kV double circuit overhead powerline on a site located approximately 35km south-west of Richmond within Ubuntu Local Municipality in the Northern Cape Province. Approximately 2km of the overhead powerline/ grid corridor falls within Beaufort West Local Municipality in the Western Cape Province. The entire extent of the development area falls within the Central Corridor of the Strategic Transmission Corridors. The development of the 132kV central collector substation and 132kV powerline is required to enable connection for the Great Karoo Cluster of renewable energy facilities (comprising of three 100MW solar photovoltaic ("PV") energy facilities and two 140MW wind farms) to the national grid for the evacuation of the generated electricity. All the solar PV energy facilities and wind farms are proposed within the boundaries of the Northern Cape.

Page 1 of 2

[www.westerncape.gov.za](http://www.westerncape.gov.za)

Department of Environmental Affairs and Development Planning  
Cape Town Office: Utilitas Building, 1 Dorp Street Cape Town, 8001  
George Office: York Park Building, 93 York Street, George, 6529

The connection point into the national grid will be the existing Eskom Gamma substation, located within the Western Cape Province. Since the proposed 132kV central collector substation and approximately 35.5km of the 37.5km long 132kV double circuit overhead powerline fall mostly within the boundaries of the Northern Cape and only 2km of the powerline falls within the Western Cape, ending at the existing Gamma substation, this Department has no comments on the Draft BAR, on condition that the recommendations and mitigation measures specified by the various specialists be implemented and adhered to.

4. The applicant is reminded of its "general duty of care towards the environment" as prescribed in section 28 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment."

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

**Keshni**  
**Rughoobeer**

Digitally signed by  
Keshni Rughoobeer  
Date: 2022.06.20  
18:27:13 +02'00'

pp **HEAD OF DEPARTMENT**

**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Letter signed by:

**Keshni Rughoobeer**

Acting Director: Development Facilitation

**Date:** 20 June 2022

## Savannah Public Process

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**From:** Savannah Public Process  
**Sent:** Friday, 24 June 2022 17:31  
**To:** Faisal Fakier  
**Subject:** RE: SE3125: Great Karoo Cluster of Renewable Energy Facilities - BA Report review and comment period ending soon

Dear Faisal,

We acknowledge receipt of your Branch's comment below.

Kind regards,



t: +27 (0)11 656 3237  
f: +27 (0) 86 684 0547

**Nicolene Venter**

Public Participation and Social  
Consultant

e: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)  
c: +27 (0)60 978 8396

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**From:** Faisal Fakier <Faisal.Fakier@westerncape.gov.za>  
**Sent:** Thursday, 23 June 2022 18:14  
**To:** Savannah Public Process <publicprocess@savannahsa.com>  
**Subject:** RE: SE3125: Great Karoo Cluster of Renewable Energy Facilities - BA Report review and comment period ending soon

Hi,

The Branch has no additional comment at this stage.

Best regards

Faisal Fakier Pr. Eng.

On behalf of:

Chief Engineer: Road Use Management

Chief Directorate Road Planning, Roads Branch

Department of Transport and Public Works

Western Cape Government

3<sup>rd</sup> Floor, 9 Dorp Street, Cape Town 8001; PO Box 2603, Cape Town 8000



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Website: [www.westerncape.gov.za](http://www.westerncape.gov.za)



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**From:** Savannah Environmental Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>

**Sent:** Monday, 13 June 2022 16:22

**To:** Faisal Fakier <[Faisal.Fakier@westerncape.gov.za](mailto:Faisal.Fakier@westerncape.gov.za)>

**Subject:** SE3125: Great Karoo Cluster of Renewable Energy Facilities - BA Report review and comment period ending soon

**GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES NEAR RICHMOND, NORTHERN CAPE PROVINCE  
(DFFE Reference No.: 14/12/16/3/3/1/2554)**

Dear Stakeholder and Interested & Affected Party,

Our notification letter dated 13 May 2022 in which you, as registered Interested and Affected Party (I&AP), was informed that the Basic Assessment Report (BAR) is available for your review and comment, has reference.

This e-mail serves to inform you that the review and comment period for the BAR is ending on Monday, 20 June 2022.

The BAR is available for download from Savannah Environmental's website [click here](#)

We would like to thank those stakeholders and I&APs who submitted their written comments and urge those who had not yet done so, to please submit your written comments before or on Monday, 20 June 2022.

Please do not hesitate to contact us should you require any additional information or clarification.

Kind regards,

[Unsubscribe this type of email](#)



t: 011 656 3237  
f: 086 684 0547

**Nicolene Venter**  
Public Process

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SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015

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## water & sanitation

Department:  
Water and Sanitation  
REPUBLIC OF SOUTH AFRICA

Northern Cape Region  
Lower Orange Water Management Area  
Private Bag X5912, Upington, 8800  
Tel: (054) 338-5800, Fax: (054) 334-0205, [www.dwa.gov.za](http://www.dwa.gov.za)

F ☒ 054 334 0205

✉ A.A Hlengani

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☎ 054 338 5800

Great Karoo Renewable Energy (Pty) Ltd  
53 Carlisle Street  
Paarden Eiland  
Cape Town  
7405

By E-mail: [Publicprocess@savannahsa.com](mailto:Publicprocess@savannahsa.com)

Attention: Mmakoena Mmola



**DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED GREAT KAROO ELECTRICAL GRID INFRASTRUCTURE LOCATED 35KM SOUTH WEST OF RICHMOND AND 80KM SOUTH EAST OF VICTORIA WEST, WITHIN UBUNTU LOCAL MUNICIPALITY OF THE PIXLEY KA SEME DISTRICT MUNICIPALITY IN THE NORTHERN CAPE PROVINCE.**

Reference is made to the above-mentioned report with the Draft Basic Assessment Report dated May 2022, submitted to Department of Water and Sanitation.

This Department has no objection to the proposed amendments of the above-mentioned application and wish to comment as follows:

1. It was noted in the Basic Assessment Report that the proposed activity will use Municipal water during the construction phase and borehole water will be utilised were possible, furthermore there is no indication of source of water during operation phase. In this regard should the applicant consider drilling boreholes section 21(a) water use of the National Water Act must be applied for.
2. The grid corridor and the footprint considered for the establishment of the central collector substation may lead to an impediment and diversion of the flow of water in the water courses (episodic rivers and drainage features) and may also alter the bed, bank, course or characteristics of the watercourse. Therefore, this activity triggers Section 21 (c) & (i) water use of the National Water Act. Furthermore, the applicant must apply for section 21 (c) & (i) water use of the National Water Act.




NATIONAL DEVELOPMENT PLAN  
Our Future - make it work

3. It is highlighted in the Basic Assessment Report that the watercourses (drainage features) infringe into the substation development footprint and the overhead power line traverses the episodic river and the drainage features. The applicant should ensure that proper management measures are in place to prevent impact the mentioned watercourses.
4. The report further indicates that the pylon placement will be occurring within 32m of these watercourses. Moreover, it is advised that the applicant must consider an alternative distance for the placement of the pylon as according to the National water Act no development should take place within 100 metres from the edge of a watercourse or the riparian habitat without consent from this Department.
5. In cases were applicant intent to construct any underground insulations (e.g., batteries), the applicant is required to provide this Department with any information regarding any underground installation. Underground installations must be done according to the applicable SABS standards in order to minimize the potential for leakage and contamination of water resources.
6. The applicant must ensure that all hazardous and domestic waste generated is disposed of at licensed landfill site. A signed copy of service agreement shall be submitted to this Department to demonstrate that indeed provision will be made to render such services.
7. Storm water must be effectively managed and channelled effectively also the details of the storm water management plan must be forwarded to the local municipality for approval.
8. The Department recommends an appointment of a qualified Environmental Control Officer who will ensure that the activity does not lead to environmental degradation especially the water resources be it surface or underground.
9. In case of leakages or spillages of hydrocarbons this department must be informed within 24 hours and immediate clean-up procedure must be conducted as stipulated in section 19 of the National Water Act; (Act 36 of 1998), any clean-up of the contaminants must be disposed of in a permitted hazardous landfill site and remediation report for the clean-up measures must be sent to the department for comments before implementation.
10. Ground Water Management and monitoring must form part of risk management plan, please ensure that appropriate borehole monitoring points are sited and used for ground water level and quality monitoring only.

Please feel free to contact this department, should there be any enquiries.

Yours sincerely,

  
.....  
**PROVINCIAL HEAD: NORTHERN CAPE OPERATIONS**  
DATE: 21/06/2022