

APPENDIX C9
COMMENTS AND RESPONSES REPORT

ELECTRICAL GRID INFRASTRUCTURE FOR THE GREAT KAROO CLUSTER OF RENEWABLE ENERGY FACILITIES, NORTHERN AND WESTERN CAPE PROVINCES

(DFFE Ref. No.: 14/12/16/3/3/1/2554)

COMMENTS AND RESPONSES REPORT

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The Basic Assessment (BA) Process for the Electrical Grid Infrastructure (EGI) for the Great Karoo Renewable Energy Cluster was announced together with the Great Karoo Cluster of Renewable Energy Facilities located near Richmond, Northern Cape Province and near Beaufort West, Western Cape Province (Gamma Transmission Substation) on **Thursday, 21 October 2021**. The Background Information Document was distributed together with a notification letter which served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments / queries that they might have on the proposed developments.

The BA Report was made available for a 30-day review and comment period from **Friday, 20 May 2022** until **Monday, 20 June 2022**, and all written comments received have been included in the table below and in **Appendix C7** of the final BA Report.

The C&RR is included as a separate document to the Final BA Report as **Appendix C9**.

LIST OF ABBREVIATIONS / ACRONYMS

APM	Archaeology, Palaeontology and Meteorites	FGM	Focus Group Meeting
BAR	Basic Assessment Report	I&AP	Interested and Affected Party
EA	Environmental Authorisation	NHRA	National Heritage Resources Agency
EAP	Environmental Assessment Practitioner	PV	Photovoltaic
EMPr	Environmental Management Programme	SAHRA	South African Heritage Resources Agency

1. COMMENTS RECEIVED DURING THE COMMENCEMENT OF THE 30-DAY REVIEW AND COMMENT PERIOD OF THE BASIC ASSESSEMENT REPORT

1.1. Organs of State

No.	Comment	Raised by	Response
1.	<p><u>This letter serves to inform you that the following information must be included to the final BAR:</u></p> <p>a) Specific Comments</p> <p>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.</p> <p>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.</p> <p>iii. With regards to the generic Environmental Management Programmes (EMPr) for the substation and powerline, Part B Section 2 and Part C is</p>	<p>Herman Alberts Case Officer DFFE</p> <p>Letter: 08 June 2022</p>	<p>The project description, including infrastructure proposed to be included within an authorisation issued for the project, is included in Chapter 2 and Chapter 8, Section 8.6 of the final BA Report. The application for Environmental Authorisation (EA) has been revised to include infrastructure proposed to be included with an authorisation issued for the project and is submitted with the final BA Report.</p> <p>The outcomes of the DFFE web-based screening tool report are included in the final BA Report under Chapter 5, Section 5.4, Table 5.5. The only specialist assessments for which no specific assessment protocols have been prescribed are the visual and social impact assessments. Site sensitivity verification as part of the visual impact assessment was undertaken through an on-site inspection of the grid connection corridor and substation development footprint. The on-site inspection identified sensitive visual receptors within 0 – 3km from the grid corridor and substation. The sensitive receptors identified from a visual perspective are also applicable from a social perspective. The site sensitivity verification as part of the social impact assessment was also undertaken through an on-site inspection and consultations with the directly affected and adjacent landowners.</p> <p>Part B, Section 2 of the generic EMPr for the substation and power line has been adequately completed – the contact details of the applicant and the details and expertise of the</p>

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	<p>incomplete in the draft BAR. Please sign the generic EMPrs. We request that you adequately complete all applicable sections in the generic EMPrs.</p>		<p>Environmental Assessment Practitioner (EAP) are included, as well as a detailed description of the project, and a development footprint site map overlain with the identified environmental sensitivities. The declaration as provided in subsection 3 has been signed and dated by the applicant.</p> <p>Part C of the generic EMPr for the substation and power line has been adequately completed – site-specific sensitive environmental features/attributes were identified within the grid connection corridor and substation development footprint and appropriate measures to mitigate impacts on these features have been included in Part C. The impact management actions are presented in the format of the pre-approved generic EMPr template.</p>
	<p>b) Listed Activities</p> <p>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.</p>		<p>All relevant listed activities have been applied for as detailed in the application for EA submitted to the DFFE on 20 June 2022 and in Chapter 5, Section 5.2.1 of the final BA Report.</p>
	<p>ii. Please ensure that all relevant listed activities and sub-activities are correctly numbered as per the relevant listing notices.</p>		<p>All relevant listed activities and sub-activities are correctly numbered as per the relevant listing notices and have been included in the application for EA and Chapter 5, Section 5.2.1 of the final BA Report.</p>
	<p>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</p>		<p>All applicable listed activities have been identified and included in the application for EA and Chapter 5, Section 5.2.1 of the final BA Report. No activities have been removed since the version of the application submitted to the DFFE on 20 June 2022.</p>
	<p>iv. The listed activities represented in the final BAR and the application form must be the same and correct.</p>		<p>The listed activities applied for in the application form are the same of those mentioned in the final BA Report.</p>

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	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.		The application form has been amended to include infrastructure proposed to be included with an authorisation issued for the project and is submitted with the final BA Report. It should be noted however that the activities applied for have not changed or been amended since the version of the application submitted to the DFFE on 20 June 2022.
	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 .		The latest version of the EA application form, dated April 2021, has been used.
	vii. The final BAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.		The final BA Report included an assessment of impacts and mitigated measure for each of the listed activities applied (refer to Chapter 7 for the assessment of direct, indirect and cumulative impacts).
	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.		Listing Notice 3 activities are triggered as a result of the corridor overlapping with a Critical Biodiversity Area (CBA) and due to the fact that a water course (i.e., drainage features) infringes into the substation development footprint and that the overhead power line traverses watercourses (i.e., an episodic rivers and drainage features), with pylon placement occurring within 32m of these watercourses. Comments were sourced from the DFFE: Directorate Biodiversity Conservation and the biodiversity departments of the relevant provincial environmental authorities, and from the Department of Water and Sanitation (DWS) during the 30-day review and comment period of the BA Report. No written comments were received from the DWS and the biodiversity department of the relevant provincial environmental authorities; however, written comments were received DFFE: Directorate Biodiversity Conservation on 13 June 2022 and a representative from this unit a;sp attended the Key Stakeholder Workshop held on 24 May 2022 during which the provided comment on the proposed development, including the cluster of renewable

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	<p>c) Layout & Sensitivity Maps</p> <p>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.</p> <p>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:</p> <p>a) The envisioned area for the infrastructure, i.e. placing of infrastructure and all associated infrastructure should be mapped at an appropriate scale.</p> <p>b) All supporting onsite infrastructure required such as laydown areas, roads etc.</p> <p>c) All necessary details regarding all possible locations and sizes of the infrastructure.</p> <p>d) All existing infrastructure on the site, especially internal road infrastructure.</p> <p>iii. Please provide an environmental sensitivity map which indicates the following:</p> <p>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;</p> <p>b) Buffer areas; and</p> <p>c) All "no-go" areas.</p>		<p>energy facilities of which it forms part (refer to Appendix C8 of the BA Report for a copy of the meeting minutes).</p> <p>The centre and corner coordinates of the substation development footprint, as well as the start, middle and end point coordinates of the grid connection corridor are included under Chapter 1, Section 1.2, Table 1.1 of the final BA Report.</p> <p>A layout map indicating the infrastructure associated with the Great Karoo Electrical Grid Infrastructure is included as Figure 8.2, under Chapter 8, and as Appendix L to the final BA Report.</p> <p>An Environmental Sensitivity Map indicating all environmentally sensitive features associated with the grid connection corridor and substation development footprint is included as Figure 8.1 under Chapter 8, and Appendix L of the final BA Report.</p>

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	<p>iv. The above layout map must be overlain with the sensitivity map and a cumulative map which shows existing infrastructure.</p>		<p>A combined Layout and Environmental Sensitivity Map indicating all environmentally sensitive features and the proposed infrastructure is included as Figure 8.1 under Chapter 8, and Appendix L.</p>
	<p>v. Google maps will not be accepted.</p>		<p>The layout, sensitivity and combined layout and sensitivity maps were prepared using ArcGIS.</p>
	<p>d) Alternatives</p> <p>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:</p> <p>a) details of all the alternatives considered;</p> <p>b) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</p> <p>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;</p> <p>d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p>		<p>An overview of the various alternatives (i.e., property/location alternatives, design and layout alternatives, activity alternatives, technology alternatives and the 'do-nothing' alternative) considered for the Great Karoo Electrical Grid Infrastructure is included in Chapter 2 of the BA Report. The 'do-nothing' alternative is assessed in detail in Chapter 7, Section 7.11 of the BA Report.</p> <p>Details of the public participation process undertaken in terms of Regulation 41 of the EIA Regulations, 2014, as amended, are included in Chapter 5, under Section 5.3 of the BA Report. Copies of the supporting documents and inputs are attached as Appendix C to the BA Report.</p> <p>The issues raised by interested and affected parties are attached as Appendix C7 to the BA Report and included in this Comments and Responses Report which will be appended to the final BA Report as Appendix C9.</p> <p>Details of the environmental attributes associated with the site where the grid connection infrastructure is proposed are provided in Chapter 6 of the BA Report.</p>
	<p>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 -</p> <p>(aa) can be reversed;</p>		<p>An assessment of the impacts and risks associated with the development of the proposed grid infrastructure is provided in Chapter 7 of the BA Report.</p>

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	(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;		The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the proposed development is included in Chapter 5, under Section 5.5.
	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;		Positive and negative impacts that the proposed development will have on the environment and community are listed and assessed in Chapter 7 of the BA Report.
	h) the possible mitigation measures that could be applied and level of residual risk;		The possible mitigation measures that could be applied, as well as the level of residual risk are included in Chapter 7 of the BA Report.
	i) the outcome of the site selection matrix;		The outcome of the site selection is included in Chapter 2 of the BA Report.
	j) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and		Where no alternatives were investigated, motivation for not considering such is included in Chapter 2 of the BA Report.
	k) a concluding statement indicating the preferred alternatives, including preferred location of the activity.		An overview of the various alternatives (i.e., property/location alternatives, design and layout alternatives, activity alternatives, technology alternatives and the 'do-nothing' alternative) considered for the Great Karoo Electrical Grid Infrastructure, including a concluding statement indicating the preferred alternatives, is included in Chapter 2 of the BA Report.
	ii. Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.		An overview of the various alternatives (i.e., property/location alternatives, design and layout alternatives, activity alternatives, technology alternatives and the 'do-nothing' alternative) considered for the Great Karoo Electrical Grid

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	<p>e) Specialist Declaration of Interest</p> <p>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).</p> <p>f) Specialist Assessments</p> <p>i. The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>e) All specialist studies must be final, and provide detailed/practical mitigation measures for the</p>		<p>Infrastructure is included in Chapter 2 of the BA Report. The 'do-nothing' alternative is assessed in detail in Chapter 7, Section 7.11 of the BA Report.</p> <p>Signed and commissioned specialist declarations 7rganization for each specialist study conducted are contained in Appendix K of the BA Report.</p> <p>The specialists were provided with the same terms of reference as follows:</p> <p>a) The specialists were provided with the same detailed description of the substation development footprint, grid connection corridor, and all other associated infrastructure which has been assessed in the various studies. The specialist studies compiled in support of this project provide detailed descriptions of the different methodologies followed (refer to Appendix D - J).</p> <p>b) All specialist studies include a detailed description of all limitation to the studies (refer to Appendix D – J).</p> <p>c) The Department's definition of 'no go' areas is noted. This is the same approach taken by the EAP and specialists.</p> <p>d) The specialist's definition of 'no go' areas does not differ from that of the Department. Please note all no-go zones and buffers as determined by specialists are clearly indicated and will be adhered to by the developer.</p> <p>e) All specialist studies are final and provide detailed/practical mitigation measures and recommendations (refer to Appendix D -J). None of the studies recommend further studies to be completed post EA.</p>

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	<p>preferred alternative and recommendations, and must not recommend further studies to be completed post EA.</p> <p>f) Should a specialist recommend specific mitigation measures, these must be clearly indicated.</p> <p>g) 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.</p>		<p>f) All recommended mitigation measures provided by the specialists are clearly indicated in the final BA Report (refer to Chapter 7).</p> <p>g) No contradicting recommendations were provided by the specialist.</p>
	<p>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</p>		<p>The specialist studies have been conducted in accordance with Government Notice No. 320 of 20 March 2020 (i.e., "the protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e., protocols for terrestrial plant and animal species).</p>
	<p>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.</p>		<p>Signed and commissioned specialist declarations, including the scientific organisation registration/member number, and status of registration/membership for each specialist are contained as Appendix K of the BA Report.</p>
	<p>g) Undertaking of an Oath</p> <p>i. Please ensure that the final BAR includes an undertaking under oath or affirmation by the EAP.</p> <p>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:</p>		<p>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, is attached to this final BA Report as Appendix P.</p>

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	<p><i>"an undertaking under oath or affirmation by the EAP in relation to:</i></p> <ul style="list-style-type: none"> <i>a) the correctness of the information provided in the reports;</i> <i>b) the inclusion of comments and inputs from stakeholders and I&APs;</i> <i>c) the inclusion of inputs and recommendations from the specialist reports where relevant; and</i> <i>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".</i> 		
	<p>h) Details and Expertise of the EAP</p> <ul style="list-style-type: none"> 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. 		<p>The details and expertise of the EAP are included in Chapter 1, Section 1.3. The CVs of the EIA Consulting Team are included in Appendix A of the BA Report.</p>
	<p>i) Public Participation Process</p> <ul style="list-style-type: none"> i. Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@environment.gov.za. 		<p>Comments from the Department's Biodiversity Conservation Directorate were provided on 15 June 2022 and is included in Appendix C7 of the final BA Report.</p>
	<ul style="list-style-type: none"> 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. 		<p>The Public Participation Process has been conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended (GNR 326), as well as in accordance with the approved Public Participation Plan (Appendix C1) as follows:</p> <ul style="list-style-type: none"> • Project database: <ul style="list-style-type: none"> ○ A register of I&APs has been compiled and is included as Appendix C2 to the final BA Report. • BA & Public Participation process announcements: <ul style="list-style-type: none"> ○ The Background Information Document (BID), accompanied by a cover letter inviting I&APs to register on the project database, was distributed via

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			<p>email to identified I&Aps and relevant Organs of TSATE (OoS) on 21 October 2021 (refer to Appendices C4, C5 & C6 of the final BA Report.)</p> <ul style="list-style-type: none"> o An advertisement was placed in The Echo Newspaper on Thursday, 23 September 2021 (refer to Appendix C3 of the final BA Report). o Site notices announcing the BA process were placed at visible points the along the proposed corridor in accordance with the requirements of the EIA Regulations on 28-30 September 2021 (refer to Appendix C3 of the final BA Report). o Process notices were placed at various public places in Richmond (refer to Appendix C3 of the final BA Report). <ul style="list-style-type: none"> • BA Report available for review and comment: <ul style="list-style-type: none"> o Registered I&APs were notified of the availability of the BA Report for a 30-day review and comment period via e-mail on 13 May 2022 (refer to Appendix C6 of the final BA Report). o Commenting authorities, municipal councillors and local and district municipalities which have jurisdiction in the area were requested to submit written comments on the BA Report via email on 13 May 2022 (refer to Appendix C5 of the final BA Report). o Advertisements were placed in <ul style="list-style-type: none"> o The Echo/Midland News on 13 May 2022 announcing the availability of the BA Report review and comment period as 20 May 2022 until 20 June 2022 (refer to Appendix C3 of the final BA Report). o Live read (radio) on Radio Sonder Grense (RSG) 100-104 FM announcing the availability of the BA Report for a 30-day review and comment period was aired on Saturday, 04 June 2022. Due to unavailability of

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			<p>airtime, earlier notifications could not have been broadcasted (refer to Appendix C3 of the final BA Report for proof of the live read).</p> <ul style="list-style-type: none"> • Attempt to obtain comments on the BA Reports: <ul style="list-style-type: none"> ○ An e-mail to all registered I&APs and OoS as a reminder of the availability of the BA Report for review and comment was sent on 13 June 2022 (refer to Appendices C5 & C6 of the final BA Report). • Various Meetings were held during the 30-day review and comment period of the BA Report (refer to Appendix C8 of the final BA Report for the meeting notes) as follows: <ul style="list-style-type: none"> ○ A virtual FGM with District & Local Municipal Officials (Northern Cape Province and Western Cape Province) was held on 24 May 2022. ○ A virtual FGM was held with the commenting authority Northern Cape Dept of Agriculture, Environmental Affairs, Rural Development and Land Reform and the Western Cape Department of Environmental Affairs & Development Planning Officials. ○ A KSW was held on 24 May 2022 to which all OoS and Key Stakeholders from the Northern Cape and Western Cape Provinces were invited. ○ A Poster Display and Public Meeting was held in Richmond Town Hall, Richmond, on 26 May 2022. Community members and residents from Richmond was also notified of the poster display and public meeting by utilising the RICHMOND UBUNTU MATTERS WhatsApp group which consists of 60 participants. • Consultation: <ul style="list-style-type: none"> ○ Proof of consultation with I&APs and OoS throughout the BA process to date is included in Appendices C5 & C6 of the final BA Report. • Comments & Responses Report:

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			<ul style="list-style-type: none"> o All comments received from the announcement of the BA process, and those submitted during the 30-day review and comment period of the BA Report have been captured in this C&RR which is attached as a separate document to the final BA Report (refer Appendix C9).
	<p>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.</p>		<p>All comments received during the BA process and comments received during the 30-day review and comment period of the BA Report have been captured and addressed in this C&RR submitted as a separate document to the final BA Report (Appendix C9).</p>
	<p>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.</p>		<p>Copies of comments received from I&APs and OoS which have jurisdiction in respect of the proposed activity are included as Appendix C7 to the final BA Report.</p>
	<p>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.</p>		<p>Where comments have not been obtained, proof that attempts were made to obtain comments has been included in Appendix C5 and Appendix C6 of the final BA Report. Proof of correspondence with various stakeholder is also included as Appendix C5 and C6 of the final BA Report.</p>
	<p>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).</p>		<p>All comments received during the BA process and comments received during the 30-day review and comment period of the BA Report have been captured and addressed, as applicable, in this C&RR (Appendix C9) submitted with the final BA Report to the DFFE for decision-making.</p>

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	<p>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.</p>		<p>The C&RR is attached as a separate document to the final BA Report as Appendix C9 and includes all written comments received throughout the BA process, including those comments received from the DFFE.</p> <p>The format of the C&RR is similar to that of Appendix 1 as attached to the DFFE's letter.</p>
	<p>viii. Please refrain from summarizing 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 comment.</p>		<p>All comments received from I&APs are captured verbatim and have not been summarised. All comments have been responded to as applicable. No responses have been provided as "noted".</p>
	<p>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.</p>		<p>All meeting notes (virtual and face-to-face meetings) are included in Appendix C8 of the final BA Report, including the attendance registers.</p>
	<p>j) Environmental Impact Statement</p> <p>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 –</p> <ul style="list-style-type: none"> 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. 		<p>An environmental impact statement has been included in Chapter 8, Section 8.5 of the BA Report.</p>

No.	Comment	Raised by	Response
	<p>k) Environmental Management Programme</p> <p>i. It is drawn to your attention that for <u>substation and overhead electricity transmission and distribution infrastructure</u>, 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.</p> <p>ii. There needs to be an EMPr for the facility, the onsite substation as well as the power line, for whichever alternative is chosen.</p> <p>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.</p> <p>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:</p> <p>a) Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including a curriculum vitae.</p> <p>b) A <u>map</u> 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.</p> <p>c) A description of the <u>impact management outcomes</u>, including management statements,</p>		<p>The EMPrs for the substation and power line have been compiled using the generic EMPr templates (refer to Appendix N and Appendix O of the final BA Report).</p> <p>The EMPrs for the substation and power line have been compiled and attached to the BA Report (refer to Appendix N and Appendix O of the final BA Report).</p> <p>The EMPrs for the substation and power line have been compiled using the generic EMPr templates (refer to Appendix N and Appendix O of the final BA Report).</p> <p>The EMPrs for the substation and power line have been compiled and attached to the BA Report (refer to Appendix N and Appendix O of the final BA Report).</p> <p>The details of the EAP, and the expertise of the EAP, are included under Part B of the generic EMPrs for the substation and power line. The curriculum vitae of the EAP is attached as Appendix 2 to the generic EMPrs.</p> <p>A map showing the project infrastructure superimposed on the environmental sensitivities is include as Figure 1 in both the substation and power line generic EMPrs.</p> <p>The site-specific impact management outcomes are included under Part C of the generic EMPrs. Also included is a description</p>

No.	Comment	Raised by	Response
	<p>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 –</p> <ul style="list-style-type: none"> (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. <p>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 –</p> <ul style="list-style-type: none"> 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) 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 		<p>of the impact management actions, methods of monitoring implementation of the impact management actions, the frequency of monitoring the implementation of the impact management actions, an indication of the persons who will be responsible for the implementation of the impact management actions, and mechanism for monitoring compliance with the impact management actions.</p>

No.	Comment	Raised by	Response
	<p>contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.</p> <p>k) An indication of the persons who will be responsible for the implementation of the impact management actions.</p> <p>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.</p> <p>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.</p> <p>n) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.</p>		
	<p>l) General</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>iv. Please also ensure that the final BAR includes the period for which the Environmental Authorisation is</p>		<p>The details of the location of the proposed development, substation footprint; the start, middle and end point coordinates of the grid connection corridor, as well as the names of the affected farm properties, are provided in Chapter 1, Table 1.1 of the BA Report.</p> <p>The appendices attached to the BA Report have been named accordingly.</p> <p>An indication of where in the final BA Report each of the Department's comments are addressed is provided throughout this C&RR.</p> <p>The period for which the EA is required is indicated in Chapter 8.6 of the BA Report.</p>

No.	Comment	Raised by	Response
	<p>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>		
	<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 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".</i></p>		<p>All timeframes as per regulations Regulation 19 (1) of the NEMA EIA Regulations 2014, as amended, are adhered to.</p>
	<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(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: <i>"the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the 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."</i></p>		<p>No significant changes or new information has been introduced in the final BA Report and as such, no additional public participation is required or being undertaken.</p>

No.	Comment	Raised by	Response
	<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> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>		<p>The final BA Report is submitted within the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended.</p> <p>The applicant is aware that they may not commence with any of the listed activities prior to an EA being granted by the Department.</p>
2.	<p>The Directorate: Biodiversity Conservation has reviewed and evaluated the report.</p> <p>The final report must comply with the 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.</p> <p>Please note that the Directorate Biodiversity Conservation does not support any development within a very highly sensitive area and that will result with significant negative residual impacts after mitigation.</p> <p>In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries, should be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for the attention of Mr. Seoka Lekota.</p>	<p>Seoka Lekota Control Biodiversity Officer Grade B: Biodiversity Conservation</p> <p>DFFE</p> <p>Letter: 15 June 2022</p>	<p>The specialist studies have been conducted in accordance with Government Notice No. 320 of 20 March 2020 (i.e., "the protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e., protocols for terrestrial plant and animal species).</p> <p>One grid connection corridor has been identified for the assessment and placement of the grid connection infrastructure. The grid connection corridor is up to 1km wide and 37.5km long to allow for avoidance of environmental sensitivities, and suitable placement of the 132kV overhead power line within the corridor. The sensitive features identified through the BA process, specifically features of very high sensitivity, will be avoided by the overhead power line route and the substation development footprint.</p> <p>The final BA Report, including the Public Participation Process documents (attached as Appendix C to the BA Report) will be submitted to the Directorate: Biodiversity Conservation as requested.</p>
3.	<p>Final Comment</p> <p>The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:</p>	<p>Natasha Higgitt Heritage Officer SAHRA</p> <p>Letter: 15 June 2022</p>	<p>It is noted that the SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the development of Great Karoo EGI.</p>

No.	Comment	Raised by	Response
	<ul style="list-style-type: none"> 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development; 		
	<ul style="list-style-type: none"> 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: 		<p>It is noted that the recommendations made by the specialist in Appendix H of the BA Report are supported. The recommendations made by the heritage specialist have been included in the generic EMPs for the power line and substation which are included as Appendix N and Appendix O to the final BA Report. Further additional specific conditions are acknowledged and have been included in the generic EMPs.</p>
	<ul style="list-style-type: none"> If it 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; 		
	<ul style="list-style-type: none"> 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, 		
	<ul style="list-style-type: none"> 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 offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule; 		
	<ul style="list-style-type: none"> 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Ngqabutho 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 offence in terms of section 51(1)e of the NHRA and item 5 of the Schedule; 		
	<ul style="list-style-type: none"> 38(4)d – See section 51 of the NHRA regarding offences; 		
	<ul style="list-style-type: none"> 38(4)e – The following conditions apply with regards to the appointment of specialists: 		

No.	Comment	Raised by	Response
	<ul style="list-style-type: none"> • 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. 		<p>The recommendation made by SAHRA has been included in the generic EMPrs for the substation and power line (Appendix N and O of the final BA Report).</p> <p>Th final BA Report and generic EMPrs will be submitted to SAHRA for record purposes.</p> <p>SAHRA will be notified of the decision regarding the EA Application. The decision will also be uploaded to the SAHRIS case application.</p>
4.	<ol style="list-style-type: none"> 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 	<p>Keshni Rughoobeer PP Head of Department WC DEA&DP</p> <p>Letter: 20 June 2022</p>	<p>The Department's acknowledgement and positive comment regarding the public participation process followed is acknowledged and appreciated.</p> <p>The mitigation measures specified by the specialists have been included in the generic EMPrs for the substation and power line</p>

No.	Comment	Raised by	Response
	<p>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.</p> <p>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.</p>		<p>which are attached as Appendix N and Appendix O to the BA Report, for implementation during the construction and operation phases of the grid connection infrastructure.</p>
4.	<p>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</p>		<p>Duty of care towards the environment will be practiced through the project lifecycle. The generic EMPs for the substation and power line (attached as Appendix N and Appendix O to the BA Report) will assist in this regard.</p>

No.	Comment	Raised by	Response
	<i>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."</i>		
5.	The Branch has no additional comment at this stage.	Faisal Fakier PP Chief Engineer: Road Use Management WC Department of Transport & Public Works E-mail: 23 June 2022	The Department's response to the request for written comments was acknowledged and no further correspondence was received.
6.	<p>This Department has no objection to the proposed amendments of the above-mentioned application and wish to comment as follows:</p> <ol style="list-style-type: none"> 1. 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 where 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. 	<p>A Hlengani DWS Letter: 23 June 2022</p>	<p>Should the applicant consider drilling boreholes to acquire water required for the construction phase, section 21(a) water use of the National Water Act will be applied for as per the DWS's comment.</p> <p>In the event that the flow of water in the watercourses is affected and the bed, banks or course characteristics are altered then a water use authorisation for section 21 (c) and (i) water use of the National Water Act will be applied for as per the DWS's comment.</p>

No.	Comment	Raised by	Response
	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.		A risk assessment matrix will be prepared prior to commencement of construction activities. The matrix will also include proper management measures to prevent impacts on the episodic and drainage features present within the grid corridor and substation development footprint. These management measures will also be incorporated into the EMPr prior to construction.
	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.		The placement of pylons will be informed by the sensitivities identified with the grid connection corridor, including the watercourses.
	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.		No underground installations which may post a risk to water resources are proposed as part of this project.
	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.		This comment is noted and will be included as a condition in the generic EMPs (Appendix N and Appendix O) for implementation during the construction and operation phases.
	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.		This comment is noted and will be included as a condition in the generic EMPs (Appendix N and Appendix O) for implementation during the construction and operation phases.
	8. The Department recommends an appointment of a qualified Environmental Control Officer who will ensure that the activity does not lead to environmental degradation		This comment is noted and will be included as a condition in the generic EMPs (Appendix N and Appendix O) for implementation during the construction and operation phases.

No.	Comment	Raised by	Response
	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.		This comment is noted and will be included as a condition in the generic EMPs (Appendix N and Appendix O) for implementation during the construction and operation phases.
10.	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.		This comment is noted and will be included as a condition in the generic EMPs (Appendix N and Appendix O) for implementation during the construction and operation phases.

1.2. Key Stakeholders and Interested & Affected Parties

No.	Comment	Raised by	Response
	No comments received		