

APPENDIX C9:  
Public Participation Plan

## PUBLIC PARTICIPATION PLAN

### KOTULO TSATSI SOLAR DEVELOPMENT CONSISTING OF KOTULO TSATSI ENERGY PV1, KOTULO TSATSI ENERGY PV3 AND KOTULO TSATSI ENERGY PV4 SOLAR PV FACILITIES, NORTHERN CAPE

OCTOBER 2020

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The restrictions enforced in terms of Government Gazette 43096 which placed the country in a national state of disaster limiting the movement of people to curb the spread of the COVID-19 virus has placed some limitations on the commencement and continuation of the public consultation as part of an EIA and BA process. Considering these limitations, the following consultation process has been designed and will be implemented, on approval by the DEFF, to cater for the conducting of the public participation process which includes I&APs, the competent authority, directly impacted landowners/occupiers, adjacent landowners/occupiers, relevant Organs of State departments, Municipalities, ward councillors and other key stakeholders.

#### **Project Details:**

The development of three separate solar photovoltaic (PV) facilities of up to 200MW and associated infrastructure is proposed by Kotulo Tsatsi Energy (Pty) Ltd on a site located approximately 70km south-west of the town of Kenhardt in the Northern Cape Province. The three solar PV facilities are to be known as Kotulo Tsatsi Energy PV1, Kotulo Tsatsi Energy PV3 and Kotulo Tsatsi Energy PV4.

The solar PV facilities are located on portions of Portion 2 of Farm Kopjes Vley 281, Portion 2 of Farm Styns Vley 280 and Portion 3 of Farm Styns Vley 280. The solar PV facilities will be connected to the grid via the previously authorised grid connection solution, which consists of a collector substation and a power line to the Eskom Aries Substation located north-east of the site.

Each solar PV facility will be constructed as a separate stand-alone project. The details for the respective projects are as follows:

<b>Project Name:</b>	<b>Affected property:</b>	<b>Contracted Capacity:</b>
Kotulo Tsatsi Energy PV1	Portion 3 of Farm Styns Vley 280	200MW
Kotulo Tsatsi Energy PV3	Portion 2 of Farm Styns Vley 280	200MW
Kotulo Tsatsi Energy PV4	Portion 2 of Farm Kopjes Vley 281, Portion 2 of Farm Styns Vley 280	200MW

It is the Developer's intention to bid each solar PV facility under the Department of Energy's (DoE) Renewable Energy Independent Power Producer Procurement (REIPPP) Programme. The power generated from each solar PV facility will be sold to Eskom and fed into the national electricity grid through the authorised grid connection to Aries Substation. The development of the facilities and grid connection infrastructure will also assist with achieving the energy mix as set out in the Integrated Resources Plan (IRP).

**Public Participation Plan:**

Due to the proximity of the solar PV facilities to one another, the public participation processes for the EIA processes will be undertaken concurrently, providing the public with an opportunity to comment on all projects simultaneously. The public participation (PP) process will be undertaken in accordance with the requirements of Regulations 39 to 44 of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, (GNR 326). The aim of the public participation process is primarily to ensure that:

- » information containing all relevant facts in respect of the proposed projects is made available to potential stakeholders and I&APs;
- » participation by I&APs is facilitated in such a manner that all potential stakeholders and I&APs are provided with a reasonable opportunity to comment on the proposed projects; and
- » comments received from potential stakeholders and I&APs are recorded and incorporated into the EIA process.

The traditional means and opportunities available for the undertaking of public participation will still be covered and implemented as part of this plan considering the current limitations. Alternative means of undertaking consultation have been designed and will be implemented by Savannah Environmental to ensure that I&APs are afforded sufficient opportunity to raise comments on the projects through an interactive web-based platform readily available and accessible to any person indicating interest in the project, and enables the public participation process to be undertaken in line with Regulations 41 to 44 of the EIA Regulations, 2014, as amended.

This online stakeholder engagement platform allows the EAP to visually present details regarding the projects and our consultation documentation, including project maps and plans, presentations and posters regarding the projects, as well as reports available for review. The use of online tools enables stakeholders and I&APs to explore the project-specific content in their own time and allows them to participate in a meaningful way in the consultation process. The online platform allows for instant feedback and comments to be submitted, in so doing saving time for the stakeholder and also giving the assurance that their comments have been submitted for inclusion

in the project reporting. The online stakeholder engagement platform considers the limitations applied by the Disaster Management Act Regulations prohibiting the gathering of people, as well as limitations which certain I&APs may have in terms of access to computers and internet as well as access to public spaces not open for operation or which have restricted access.

The benefits of the online stakeholder engagement platform include:

- Ability to create a dedicated project-specific online platform to enable easy access to project-related information.
- Ability to reach a wider audience, allowing more widespread consultation for major infrastructure projects.
- Allowing stakeholders and I&APs the opportunity to engage on a project without leaving their office or home.
- Enabling stakeholders and I&APs to register their interest in a project (for inclusion on the project database), and automatically gaining access to comprehensive project documentation.
- Enabling the EAP to maintain a complete database of I&APs through maintaining a record of persons accessing the online stakeholder consultation platform.
- Enabling the EAP and stakeholders/I&APs to meet virtually.
- Provides a resilient solution to a public consultation process.

Where I&APs do not have the applicable facilities i.e. access to internet connection, mobile phones, or computers, provision has been made to include these I&APs in the consultation process by consulting with the Ward Councillor, the ward committee members, community representatives and local community forum members. Direct in-person consultation will only take place in limited numbers and where sanitary conditions can be maintained at all times.

The schematic illustration below provides an overview of the tools that are available to I&APs and stakeholders to access project information and interact with the public participation team to obtain project information and resolve any queries that may arise, and to meet the requirements for public participation.

<p>i. Stakeholder identification and register of I&amp;APs</p>	<ul style="list-style-type: none"> <li>• Register as an I&amp;AP on the online platform via completion of a form and provision of contact information, by responding to an advert, or sending a 'please call me' which will be responded to</li> <li>• State interest in the project</li> <li>• Receive all project related information via email</li> </ul>
<p>ii. Advertisements and notifications</p>	<ul style="list-style-type: none"> <li>• Advertisements, site notices and/or radio live reads and notifications provide information and details on where to access project information</li> <li>• Notifications regarding the EIA processes and availability of project reports for public review to be sent via email, post or SMS notifications</li> </ul>
<p>iii. Public Involvement and consultation</p>	<ul style="list-style-type: none"> <li>• Distribution of a BID providing details on the project and how I&amp;APs can become involved in the process</li> <li>• Submission of comments or queries via the online platform to the PP team</li> <li>• Virtual presentations (both English and Afrikaans) available via the online platform</li> <li>• Availability of project information via the online platform</li> <li>• An opportunity for I&amp;APs and stakeholders to request virtual meetings with the project team.</li> <li>• Direct in-person consultation will only take place in limited numbers and where sanitary conditions can be maintained at all times.</li> </ul>
<p>iv. Comment on the Scoping and EIA Reports</p>	<ul style="list-style-type: none"> <li>• Availability of the project reports via the online platform for 30-day comment period</li> <li>• Submission of comments via the online platform, email or post to the PP team</li> <li>• Comments recorded and responded to, as part of the process</li> </ul>
<p>v. Identification and recording of comments</p>	<ul style="list-style-type: none"> <li>• Comments and Responses Report, including all comments received, and included within the final Report for decision-making</li> </ul>

The PP plan, as set out in the table below, has been drafted for the above-mentioned projects to ensure that reasonable opportunity is provided to I&APs and that all administrative actions are reasonable. Proof of all notifications will be included in the public participation appendix included in the Scoping and EIA reports.

The PP plan is submitted to the Department of Environment, Forestry and Fisheries for discussion and agreement before the PP process is undertaken for the proposed projects.

**Public Participation Plan: Discussion of approach and methodology to meet the requirements of the Regulations**

Regulation	Approach & Methodology to meet requirements
<p>Regulation 40(1), Regulation 40(3) &amp; Regulation 43 – provide all potential or registered interested and affected parties, including the competent authority, <b>access to project related information</b>, access to the Scoping, EIA and Basic Assessment reports which will be made available for a period of at least 30 days to <b>submit comments on draft reports</b> prior to submission of final reports for decision-making.</p>	<p><u>Notification of Scoping and Environmental Impact Assessment (EIA) processes to be undertaken for application for Environmental Authorisation (EA) to be distributed using the following means:</u></p> <ul style="list-style-type: none"> <li>• E-mail</li> <li>• Dedicated project page on the Savannah Environmental online stakeholder engagement platform</li> <li>• Post</li> <li>• Process notices placed at locations that are accessible to I&amp;APs</li> <li>• Advertisement in the printed media.</li> </ul> <p><u>Notification of availability of reports and period for review using the following means:</u></p> <ul style="list-style-type: none"> <li>• Newspaper advert, including details of where the report can be accessed and details of the Savannah Environmental website.</li> <li>• Radio adverts (live read) on a local radio station.</li> <li>• Notification letter (to be sent via email, fax or post) to registered I&amp;APs.</li> <li>• Notifications to communities via Ward Councillor, ward committee members, identified and confirmed community representatives, and local community forum members.</li> <li>• SMS and/or WhatsApp notifications where no other means are available.</li> </ul> <p><u>Availability of reports for review:</u></p> <ul style="list-style-type: none"> <li>• Reports available on the Savannah Environmental website for download.</li> <li>• Electronic copies can be made available to parties via a secure Dropbox link that will be emailed upon request for the documentation.</li> <li>• CDs to be posted, if requested.</li> <li>• Hard copy reports to be available only where appropriate sanitary conditions can be maintained.</li> <li>• Report will be submitted to DEFF using the DEFF online portal.</li> </ul>

Regulation	Approach & Methodology to meet requirements
	<ul style="list-style-type: none"> <li>• Report will be submitted to Organs of State and commenting authorities via an agreed electronic platform (such as on CD, or via a secure Dropbox link).</li> </ul> <p><u>Submission of comments to EAP:</u></p> <ul style="list-style-type: none"> <li>• Comments will be able to be submitted directly to the EAP using the Savannah Environmental online stakeholder engagement platform. A customised reply form is available on this webpage.</li> <li>• The online platform allows for instant feedback and comments to be submitted, in so doing saving time for the stakeholder and also giving the assurance that their comments have been submitted for inclusion in the project reporting.</li> <li>• Written comments can also be submitted via email, post or fax.</li> <li>• Any comments provided telephonically or via instant message will be transcribed and recorded as formal comments.</li> </ul> <p><u>Alternative mechanisms for consultation where the primary methodology and required resources are not available to I&amp;APs:</u></p> <ul style="list-style-type: none"> <li>• Post.</li> <li>• Placement of site notices on all affected properties.</li> <li>• Advertisement in printed media (local newspaper).</li> <li>• Radio adverts (local radio).</li> <li>• Consultation and communication through the ward councillor, ward committee members and confirmed community representatives and local community forum members.</li> <li>• SMS or WhatsApp notification.</li> <li>• CDs to be posted, if requested (and where a computer is available).</li> <li>• Hard copy report where sanitary conditions can be maintained.</li> </ul>
Regulation 40(2) - Provide access to all project information that has the potential to influence any	<p><u>Provision of project information and consultation via various means including:</u></p> <ul style="list-style-type: none"> <li>• Telephonic consultation.</li> </ul>

Regulation	Approach & Methodology to meet requirements
<p>decision regarding the application, unless protected by law, and must include <b>consultation</b> with Competent Authority, Organs of State &amp; registered I&amp;APs.</p> <p>Regulation 41(6) – Relevant <b>information available and accessible</b></p>	<ul style="list-style-type: none"> <li>• Email correspondence.</li> <li>• Correspondence sent via post.</li> <li>• SMS and/or WhatsApp.</li> <li>• The Savannah Environmental online stakeholder engagement platform will ensure that I&amp;APs are afforded sufficient opportunity to participate in the project and raise comments on the project to any person with interest in the Scoping and EIA processes for the projects. This online stakeholder engagement platform which will include the following:                         <ul style="list-style-type: none"> <li>○ A means to register on the project database and provide details of their interest in the project</li> <li>○ Background information on the project</li> <li>○ Project maps (including locality map, layout map, sensitivity map, landowner map, etc)</li> <li>○ Photos of the project site and surrounds</li> <li>○ Presentation with narration providing a summary of the project details and the findings of the Scoping and EIA reports</li> <li>○ Posters providing a summary of the findings of the Scoping Assessments and EIA Assessments.</li> <li>○ A means of submitting written comment or queries.</li> </ul> </li> <li>• An electronic copy of the Scoping and EIA Report will be available on the Savannah Environmental website (<a href="http://www.savannahsa.com">www.savannahsa.com</a>) for the convenience of online review. Access to the report via the Savannah Environmental website will be unrestricted to all I&amp;APs. I&amp;APs wanting to access the report electronically will be required to request a unique code to access the report of interest. This step and the online portal supports the EAP in maintaining a complete and accurate record and database of all parties who have interest in the project (and who choose to access the report via our online portal), in line with the requirements of the Regulations.</li> </ul>

Regulation	Approach & Methodology to meet requirements
	<ul style="list-style-type: none"> <li>• Virtual meetings using an appropriate platform agreeable to all parties (such as Zoom, Skype or Teams). The meeting will be recorded and the attendees' details captured in an attendance register. Confirmation of their attendance will also be requested by e-mail and the correspondence will be included in the report.</li> <li>• Direct in-person consultation will only take place in limited numbers and where sanitary conditions can be maintained at all times.</li> <li>• Communities will be consulted via the relevant Ward Councillor, ward committee members, community representative or local community forum members, as determined and confirmed during the consultation process.</li> </ul> <p><u>Alternative mechanisms for consultation where the primary methodology and required resources are not available to I&amp;APs:</u></p> <ul style="list-style-type: none"> <li>• Telephonic consultation.</li> <li>• Post.</li> <li>• SMS and/or WhatsApp.</li> <li>• Consultation and communication through the ward councillor, ward committee members and confirmed community representatives and local community forum members.</li> </ul>
Regulation 41(2)(a) – <b>Site notice</b>	<ul style="list-style-type: none"> <li>• Site notices will be placed at each affected property.</li> <li>• Size and content will be in accordance with Regulation 41(3) &amp; 41(4).</li> </ul>
Regulation 41(2)(b) – <b>Written notification</b> to affected and neighbouring landowners and occupiers; municipality; ward councillors; Organs of State & other parties required by the CA	<ul style="list-style-type: none"> <li>• Notification letter to be sent via email, fax or post.</li> </ul> <p><u>Alternative mechanisms for consultation where the primary methodology and required resources are not available to I&amp;APs:</u></p> <ul style="list-style-type: none"> <li>• Post.</li> <li>• SMS or WhatsApp notification.</li> </ul>
Regulation 41(2)(c) – (e) – <b>Advertisements</b>	<ul style="list-style-type: none"> <li>• Advert to be placed in a local newspaper.</li> </ul>

Regulation	Approach & Methodology to meet requirements
	<ul style="list-style-type: none"> <li>• Radio adverts (live reads) will be used as additional means of reaching the broader community based on the nature, extent of the projects and the demographics within the vicinity of the project location.</li> </ul>
<p>Regulation 42 – <b>Project database</b></p>	<ul style="list-style-type: none"> <li>• I&amp;APs to be identified through a process of networking and referral, obtaining information from the Savannah Environmental existing stakeholder database, liaison with potentially affected parties in the greater surrounding area and a registration process involving the completion of a reply form.</li> <li>• Organs of State, key stakeholders and affected and surrounding landowners will be identified and registered on the project database.</li> <li>• Other stakeholders will be required to formally register their interest in the project through either directly contacting the Savannah Environmental Public Participation team via email or fax or use of the Savannah Environmental website.</li> <li>• In order to access the Savannah Environmental online stakeholder engagement platform for a specific project, I&amp;APs will be required to provide their details such that they are automatically registered on the project database.</li> <li>• The register of I&amp;APs will contain the names of:                         <ul style="list-style-type: none"> <li>○ all persons who requested to be registered on the database through the use of the Savannah Environmental website, or in writing and disclosed their interest in the project;</li> <li>○ all Organs of State which hold jurisdiction in respect of the activity to which the application relates; and</li> <li>○ all persons who submitted written comments or attended virtual/in-person meetings and viewed virtual presentations on the Savannah Environmental website during the public participation process.</li> </ul> </li> <li>• The information captured on the project database will contain the names, organisation and contact details, as required.</li> </ul>

Regulation	Approach & Methodology to meet requirements
	<p><u>Alternative mechanisms for consultation where the primary methodology and required resources are not available to I&amp;APs:</u></p> <ul style="list-style-type: none"> <li>• Process of networking and referral.</li> <li>• Telephonic registration.</li> <li>• SMS and/or WhatsApp.</li> <li>• Fax or post.</li> </ul>
<p>Regulation 44 – <b>Comments</b> to be recorded</p>	<ul style="list-style-type: none"> <li>• Comments will be able to be submitted directly to the EAP using the Savannah Environmental online stakeholder engagement platform. A customised reply form is available on this webpage.</li> <li>• The Savannah Environmental online stakeholder engagement platform includes:                         <ul style="list-style-type: none"> <li>○ A means to register on the project database and provide details of their interest in the project</li> <li>○ A means of submitting written comment or queries.</li> </ul> </li> <li>• The online platform allows for instant feedback and comments to be submitted, in so doing saving time for the stakeholder and also giving the assurance that their comments have been submitted for inclusion in the project reporting.</li> <li>• Written comments can also be submitted via email, post or fax.</li> <li>• Any comments provided telephonically or via instant message will be transcribed and recorded as formal comments.</li> <li>• I&amp;APs without the applicable electronic facilities to access the Savannah Environmental website will be provided with the opportunity to submit their comments and communicate with the public participation team via SMS, WhatsApp or by sending a Please-call-me notification. These comments will be transcribed and recorded as formal comments.</li> <li>• All comments received throughout the Scoping and EIA processes will be acknowledged and captured in the comments and responses report (C&amp;RR) with a relevant response.</li> <li>• The C&amp;RR will be included in the final report submitted to the CA.</li> </ul>

Regulation	Approach & Methodology to meet requirements
	<p><u>Alternative mechanisms for consultation where the primary methodology and required resources are not available to I&amp;APs:</u></p> <ul style="list-style-type: none"> <li>• Written comments via post or fax.</li> <li>• Comment submission telephonically and instant messaging (SMS and/or WhatsApp).</li> <li>• Sending a Please-call-me notification to the Public Participation team so that contact can be made.</li> </ul>
<p>Regulation 4(2) – Notification of <b>decision</b> on application</p>	<p><u>Notification of Environmental Authorisation (EA) using the following means:</u></p> <ul style="list-style-type: none"> <li>• Notification letter with details as outlined in EA issued will be sent via email, fax or post.</li> <li>• Notification will be available on the Savannah Environmental website</li> <li>• Notifications that the EA has been issued and where to download and/or obtain a copy to communities via Ward Councillor and his/her ward committee members and identified and confirmed community representatives.</li> <li>• SMS or WhatsApp notification.</li> </ul> <p><u>Alternative mechanisms for consultation where the primary methodology and required resources are not available to I&amp;APs:</u></p> <ul style="list-style-type: none"> <li>• Post.</li> <li>• Communication through the ward councillor, ward committee members and confirmed community representatives and local community forum members.</li> <li>• SMS and/or WhatsApp.</li> </ul>