

Jo-Anne Thomas

From: Herman Alberts <HALBERTS@dffe.gov.za>
Sent: Monday, 14 November 2022 08:06
To: Jo-Anne Thomas
Cc: Muhammad Essop; Ephron Maradwa
Subject: Re: 2022-11-0006

Dear Jo-Anne

Please note that a meeting is not required. You may continue as per your project schedule .

From: Jo-Anne Thomas <joanne@savannahsa.com>
Sent: Tuesday, November 8, 2022 12:43 PM
To: Herman Alberts <HALBERTS@dffe.gov.za>
Cc: Muhammad Essop <MESSOP@dffe.gov.za>; Coenrad Agenbach <CAGENBACH@dffe.gov.za>; EIA Applications <EIAApplications@dffe.gov.za>
Subject: RE: 2022-11-0006

Dear Herman,

Can you please confirm if you are the correct case officer for this application as I note the below is addressed to Bathandwa. Please can you advise whether you require a meeting for this application. We would like to commence our public participation on 11 November if possible.

Kind regards
Jo-Anne

Jo-Anne Thomas

Director | Savannah Environmental (Pty) Ltd
Tel: +27 (0)11 656 3237 | Fax: +27 (0)86 684 0547 | Cell: +27 (0)82 775 5628
[SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015](#)

From: EIA Applications <EIAApplications@dffe.gov.za>
Sent: Friday, 04 November 2022 10:59
To: Herman Alberts <HALBERTS@dffe.gov.za>
Cc: Muhammad Essop <MESSOP@dffe.gov.za>; Coenrad Agenbach <CAGENBACH@dffe.gov.za>; Jo-Anne Thomas <joanne@savannahsa.com>
Subject: 2022-11-0006
Importance: High

Dear Bathandwa.

Please note that you have been allocated an application:

Type of Application: Pre-Application Meeting Request;
Reference Number: 2022-11-0006;
Date Received: 03/11/2022;
Action Required: Decide on meeting request.

Kindly let Ephron know which date the meeting is to be held, if it will be set

EIA Applications
Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to ElAdmin@dffe.gov.za.

You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email.

From: Jo-Anne Thomas <joanne@savannahsa.com>
Sent: Thursday, 03 November 2022 13:19
To: EIA Applications <EIAApplications@dffe.gov.za>
Subject: Pre-application request - Merino Wind Farm
Importance: High

Good day,

Kindly find attached the pre-application request form and supporting files for the proposed Merino Wind Farm and associated infrastructure, Northern Cape. As indicated in the pre-application request, a pre-application meeting is not specifically required, and the purpose of the application is for the Department to consider the details of the project.

Please confirm receipt of the request.

Kindly advise should you require any further information.

Kind regards
Jo-Anne



Jo-Anne Thomas
Director

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

e: joanne@savannahsa.com
c: +27 (0) 82 775 5628

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

Processing of personal Information / POPIA compliance

We respect your privacy and acknowledge that this e-mail will contain Personal Information, which may belong to you, others and/or to your organization and which we will process. The processing of your personal information by Savannah Environmental may be included in reports submitted to governmental departments or on our public platforms, which processing will be done in accordance with our processing notice housed on our website - <https://savannahsa.com/privacy-policy-privacy-policy-page/>. By sending and/or receiving this message, you hereby consent to the lawful processing of personal information for the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act No 4 of 2013).

This email has been scanned for viruses and malware, and automatically archived by **Mimecast SA (Pty) Ltd**, and is believed to be clean.

DFFE CORRESPONDENCE FROM INITIAL EIA PROCESS

Rendani Rasivhetshele

From: Herman Alberts <HALberts@environment.gov.za>
Sent: Wednesday, September 15, 2021 11:54 AM
To: Jo-Anne Thomas
Cc: Muhammad Essop; Coenrad Agenbach; Rendani Rasivhetshele; Mmakoena Mmola
Subject: RE: 2021-09-0001 APPROVAL OF THE PP PLAN FOR THE PROPOSED DEVELOPMENT OF A CLUSTER OF RENEWABLE ENERGY FACILITIES (GREAT KAROO RENEWABLE ENERGY) NEAR RICHMOND, NORTHERN CAPE PROVINCE

Dear Ms Thomas

The Public Participation (PP) Plan for the proposed development of a cluster of renewable energy facilities (Great KAROO Renewable Energy) near Richmond, Northern Cape Province, received by this Department on 02 September 2021, refers.

Based on the information provided this Department decided to **approve** the PP Plan for the proposed project.

You may proceed with the PP process in accordance with tasks contemplated in the PP plan. Should you wish to deviate from the submitted PP Plan, the amended PP Plan must be submitted to the Department for approval prior commencement of the PP Process.

Please note that submission of a PP Plan and approval thereof do not negate your responsibility to comply with the requirements for public participation in terms of Chapter 6 of the EIA Regulations 2014, as amended.

From: Jo-Anne Thomas <joanne@savannahsa.com>
Sent: Wednesday, 15 September 2021 11:16
To: EIA Applications <EIAApplications@environment.gov.za>; Herman Alberts <HALberts@environment.gov.za>
Cc: Muhammad Essop <MEssop@environment.gov.za>; Coenrad Agenbach <Cagenbach@environment.gov.za>; Rendani Rasivhetshele <rendani@savannahsa.com>; Mmakoena Mmola <Mmakoena@savannahsa.com>
Subject: RE: 2021-09-0001

Dear Herman,

Please can you revert on the below. As stated in the application form, we do not require a meeting but do need approval of the PP Plan. Please advise if you require a meeting and a suitable date.

Kind regards
Jo-Anne

Jo-Anne Thomas
Director | Savannah Environmental (Pty) Ltd
Tel: +27 (0)11 656 3237 | Fax: +27 (0)86 684 0547 | Cell: +27 (0)82 775 5628
[SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015](#)

From: EIA Applications <EIAApplications@environment.gov.za>
Sent: Monday, 06 September 2021 13:14
To: Herman Alberts <HALberts@environment.gov.za>
Cc: Muhammad Essop <MEssop@environment.gov.za>; Coenrad Agenbach <Cagenbach@environment.gov.za>; Jo-Anne

Thomas <joanne@savannahsa.com>

Subject: 2021-09-0001

Importance: High

Dear Herman.

Please note that you have been allocated an application:

Type of Application: Pre-Application Meeting Request;

Reference Number: 2021-09-0001;

Date Received: 02/09/2021;

Action Required: Decide on meeting request.

Kindly let Ephron know which date the meeting is to be held, if it will be set.

*EAP/Applicant: please use this reference number when submitting the application for EA/amendment application (page 1 of the application form), as well as attach the approved PP Plan if the application requires a PP process.

EIA Applications

Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to EIAAdmin@environment.gov.za.

You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email.

From: Jo-Anne Thomas [<mailto:joanne@savannahsa.com>]

Sent: Thursday, September 2, 2021 7:23 PM

To: EIA Applications <EIAApplications@environment.gov.za>

Cc: Mmakoena Mmola <Mmakoena@savannahsa.com>; Rendani Rasivhetshela <rendani@savannahsa.com>

Subject: Great Karoo Renewable Energy Facilities - Request for Pre-Application Meeting

Importance: High

Good evening,

Please find attached pre-application meeting request for the proposed Great Karoo Renewable Energy Facilities. Please contact me with any queries in this regard.

Kind regards

Jo-Anne



Jo-Anne Thomas
Director

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

e: joanne@savannahsa.com
c: +27 (0) 82 775 5628

Processing of personal information / POPIA compliance

We respect your privacy and acknowledge that this e-mail will contain Personal Information, which may belong to you, others and/or to your organization and which we will process. The processing of your personal information by Savannah Environmental may be included in reports submitted to governmental departments or on our public platforms, which processing will be done in accordance with our processing notice housed on our website - <https://savannahsa.com/privacy-policy-privacy-policy-page/>. By sending and/or receiving this message, you hereby expressly give us consent to process the Personal Information contained herein which processing will be done in accordance with POPIA Act 4 of 2013.

This email has been scanned for viruses and malware, and automatically archived by **Mimecast SA (Pty) Ltd**, and is believed to be clean.

'Please consider the environment before you print this email' The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

Disclaimer

This message and any attachments transmitted with it are intended solely for the addressee(s) and may be legally privileged and/or confidential. If you have received this message in error please destroy it and notify the sender. Any unauthorized usage, disclosure, alteration or dissemination is prohibited. The Department of Forestry, Fisheries and the Environment no responsibility for any loss whether it be direct, indirect or consequential, arising from information made available and actions resulting there from. The views and opinions expressed in this e-mail message may not necessarily be those of Management. The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

Disclaimer

This message and any attachments transmitted with it are intended solely for the addressee(s) and may be legally privileged and/or confidential. If you have received this message in error please destroy it and notify the sender. Any unauthorized usage, disclosure, alteration or dissemination is prohibited. The Department of Forestry, Fisheries and the Environment no responsibility for any loss whether it be direct, indirect or consequential, arising from information made available and actions resulting there from. The views and opinions expressed in this e-mail message may not necessarily be those of Management. The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.



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: 14/12/16/3/3/2/2114

Enquiries: Mr Herman Alberts

Telephone: (012) 399 9371 **E-mail:** HAlberts@dffe.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 E-MAIL

Dear Ms Thomas

ACCEPTANCE OF THE SCOPING REPORT FOR THE PROPOSED DEVELOPMENT OF THE MERINO WIND FARM IN THE NORTHERN CAPE PROVINCE

The final Scoping Report (SR) and the Plan of Study for Environmental Impact Assessment dated January 2022 and received by the Department on 13 January 2022, refer.

The Department has evaluated the submitted final SR and the Plan of Study for Environmental Impact Assessment dated January 2022 and is satisfied that the documents comply with the minimum requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

The final SR is hereby accepted by the Department in terms of Regulation 22(1)(a) of the EIA Regulations, 2014, as amended.

You may proceed with the environmental impact assessment process in accordance with the tasks contemplated in the Plan of Study for Environmental Impact Assessment as required in terms of the EIA Regulations, 2014, as amended.

In addition, the following amendments and additional information are required for the EIAr:

(a) Listed Activities

- (i) Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description.
- (ii) Ensure that all relevant listed activities and sub-activities are correctly numbered as per the relevant listing notices.
- (iii) If the activities applied for in the application form differ from those mentioned in the draft EIAr, an amended application form must be submitted.
- (iv) 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>.

JCA

- (v) The EIAr must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.

(b) Public Participation

- (i) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr. This includes but is not limited to Northern Cape: DAEARDLR, the provincial Department of Agriculture, SANRAL, the Ubuntu Local Municipality, the Pixley Ka Seme District Municipality, the Department of Human Settlements, Water and Sanitation, the South African Heritage Resources Agency (SAHRA), the Endangered Wildlife Trust (EWT), BirdLife SA, the Department of Mineral Resources and Energy, the Department of Rural Development and Land Reform, and the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation.
- (ii) Please ensure that all issues raised and comments received during the circulation of the draft SR and draft EIAr from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAr.
- (iii) Proof of correspondence with the various stakeholders must be included in the final EIAr. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- (iv) A Comments and Response trail report (C&R) must be submitted with the final EIAr. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter. 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 I&AP’s comments.
- (v) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.
- (vi) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended and the Public Participation Plan (PPP).

(c) Alternatives

- (i) Please provide a description of each of the preferred alternative type and provide detailed motivation on why it is preferred.
- (ii) The EAP must ensure that all relevant alternatives and/or alternative combinations are adequately assessed in the EIAr.

(d) Layout & Sensitivity Maps

- (i) The EIAr 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) All preferred turbine positions must be clearly numbered. The turbine position numbers must be consistently used in all maps to be included in the final EIAr.
- (iii) The final EIAr must provide the technical details of the proposed facility in a table format as well as their description and/or dimensions.
- (iv) A copy of the final layout map must be submitted with the final EIAr. 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 wind energy facility, i.e. placing of wind turbines and all associated infrastructure should be mapped at an appropriate scale.

- b) All supporting onsite infrastructure such as laydown area, guard house, control room, and buildings, including accommodation etc.
- c) All necessary details regarding all possible locations and sizes of the proposed BESS, the main substation and internal power lines.
- d) All existing infrastructure on the site, especially internal road infrastructure.
- (v) 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.
- (vi) The above layout map must be overlain with the sensitivity map and a cumulative map which shows neighbouring energy developments and existing grid infrastructure.

(e) Specialist assessments

- (i) The final BAR and all the attached specialist studies must indicate and adequately assess a consistent number of turbines.
- (ii) 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 authorisation.
 - 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 Department’s 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) **Bird and Bat specialist studies must have support from Birdlife South Africa and SABAA and adhere to the latest guidelines in this regard.**
 - g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
 - h) 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 expertise advice.
- (iii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. **Please note that specialist assessments must be conducted in accordance with these protocols.**
- (iv) 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.

(f) Cumulative Assessment

- (i) If there other similar facilities proposed within a 30km radius of the proposed development site, a cumulative impact assessment must be conducted for all identified and assessed impacts which must be refined to indicate the following:
 - a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
 - d) A cumulative impact environmental statement on whether the proposed development must proceed.

(g) Specific comments

- (i) The EAP must provide details of the specific locations in the EIAR, and not provide vague locations of the proposed developments. All associated infrastructure must be clearly indicated in the EIAR and its associated layout plans.
- (ii) The EAP must identify and provide a map which shows this development and its associated infrastructure in relation to the other proposed facilities in the area.
- (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 EIAR.
- (iv) When submitting the EIAR 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.

(h) General

- (i) The EIAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions.
- (ii) The EAP must provide landowner consent for all non-linear infrastructure proposed on the farm portions affected by the proposed project.
- (iii) A construction and operational phase EMP that includes mitigation and monitoring measures must be submitted with the final EIAR.
- (iv) The final EIAR must include a list providing a clear description of the infrastructure associated with the development.
- (v) The EAP must provide an outline of where in the final Report each of this Department's comments are addressed. This must be a separate document and must be submitted as an appendix to the EIAR.

The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amended, with regard to the time period allowed for complying with the requirements of the Regulations.

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



Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Signed by: Mr Coenrad Agenbach
Designation: Deputy Director: Priority Infrastructure Projects
Date: 27 January 2022

cc:	Romaya Dorasamy	Great Karoo Renewable Energy	Email: tobias@greatkaroo.energy
	Tobias Hobbach	Great Karoo Renewable Energy	Email: romaya@greatkaroo.energy
	Bryan Fisher	NC DAEARDLR	Email: Bfisher@ncpg.gov.za
	Debere Maphosa	Ubuntu Local Municipality	Email: maphosa.d@gmail.com

Appendix 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
27/01/2016 Email Department of Forestry, Fisheries and the Environment: Priority Infrastructure Projects (John Doe)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted) 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



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: 14/12/16/3/3/2/2114

Enquiries: Mr 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 E-MAIL

Dear Ms Thomas

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED ESTABLISHMENT OF THE MERINO WIND FARM IN THE NORTHERN CAPE PROVINCE

The Application for Environmental Authorisation and draft Scoping Report (SR) dated November 2021 and received by the Department on 12 November 2021, refer.

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

(a) 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.
- (ii) The listed activities represented in the final SR and the application form must be the same and correct.
- (iii) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted.
- (iv) 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>.

(b) Layout & Sensitivity Maps

- (i) The final SR 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) All preferred turbine positions must be clearly numbered. The turbine position numbers must be consistently used in all maps to be included in the reports.
- (iii) The final SR must provide the technical details of the proposed facility in a table format as well as their description and/or dimensions.
- (iv) Please provide a layout map which indicates the following:
 - a) The envisioned area for the wind energy facility, i.e. placing of wind turbines and all associated infrastructure;

- b) Permanent laydown area footprint;
 - c) All supporting onsite infrastructure e.g. roads (existing and proposed);
 - d) Substation(s) and/or transformer(s) sites including their entire footprint;
 - e) Connection routes (including pylon positions) to the distribution/transmission network; and
 - f) All existing infrastructure on the site.
- (v) Please provide an environmental sensitivity map which indicates the following:
- a) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
 - b) Buffer areas; and,
 - c) All “no-go” areas.
- (vi) The above layout map must be overlain with the sensitivity map and a cumulative map which shows neighbouring energy developments and existing grid infrastructure.

(c) Alternatives

- (i) Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 2 of GN R.982 of 2014 (as amended).
- (ii) Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2.

(d) Public Participation Process

- (i) Please ensure that all issues raised and comments received during the circulation of the draft SR from registered I&APs and organs of state (including this Department's Biodiversity & Conservation Section), which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR.
- (ii) Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- (iii) The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended and as per the approved PP Plan.
- (iv) A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R 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.
- (v) 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 I&APs' comments.
- (vi) The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development particularly the Western Cape Department of Western Cape Department of Environmental Affairs and Development Planning, and the District and Local Municipalities.
- (vii) 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 SR.

(e) Specialist Assessments

- (i) Specialist Declaration of Interest forms must be attached to the final SR. The forms are available on Department's website (please use the Department's template).
- (ii) The final EIAr and all the attached specialist studies must indicate and adequately assess a consistent number of turbines.
- (iii) The EAP must ensure that the terms of reference for all the identified specialist studies 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 authorisation.
 - 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 Department's 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) **Bird and Bat specialist studies must have support from Birdlife South Africa and SABAA.**
 - g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (iv) 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 expertise advice.
- (v) Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.
- (vi) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. **Please note that specialist assessments must be conducted in accordance with these protocols.**
- (vii) 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.

(f) Cumulative Assessment

- (i) If there are any other similar facilities within a 30km radius of the proposed development site, a cumulative impact assessment must be conducted for all identified and assessed impacts which must indicate the following:
 - a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.

- d) A cumulative impact environmental statement on whether the proposed development must proceed.

(g) Specific comments

- (i) Please provide a clear indication of who the contact person for the Applicant is.
- (ii) The approved PP plan with the approval email must be submitted with the final SR and must be included as an Appendix under the Public Participation Process.

(h) General

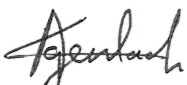
You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: *“If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has 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”*

You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

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



Mr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries and the Environment
Letter signed by: Mr Coenrad Agenbach
Designation: Director: Priority Infrastructure Projects
Date: 06 December 2021

cc:	Debere Maphosa	Ubuntu Local Municipality	E-mail: maphosa.d@gmail.com
	Bryan Fisher	NC DAEARDLR	E-mail: Bfisher@ncpg.gov.za
	Romaya Dorasamy	Great Karoo Renewable Energy (Pty) Ltd	E-mail: romaya@greatkarro.energy
	Tobias Hobbach	Great Karoo Renewable Energy (Pty) Ltd	E-mail: tobias@greatkarro.energy

Annexure 1

Format for Comments and Response Report:

Date of comment, format of comment name of organisation/I&AP,	Comment	Response from EAP/Applicant/Specialist
27/03/2021 Email Department of Forestry, Fisheries and the Environment: National Infrastructure Projects (Joe Soap)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted) 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



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 · PRETORIA

DFFE Reference: 14/12/16/3/3/2/2114

Enquiries: Mr 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 E-MAIL

Dear Ms Thomas

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF THE MERINO WIND FARM IN THE NORTHERN CAPE PROVINCE

The draft Environmental Impact Assessment Report (EIAr) dated May 2022 and received by this Department on 16 May 2022, refers.

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

(a) Specific comments

- (i) The final EIAr must ensure it includes and complies with and fulfils the requirements which enlisted the provision of regulation 3(7) of the EIA Regulations 2014 as amended. The final EIAr must clearly indicate where in the report the fulfilment of the requirement to enlist Regulation 3(7) can be found.
- (ii) Recommendations provided by specialist reports must be considered and used to inform the preferred layout alternative.
- (iii) 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.
- (iv) A list of what the proposed project entails as well as the associated infrastructure must be included in the EIAr.
- (v) The final EIAr must comply with all conditions of the acceptance of the Scoping Report (SR) and must address all comments contained in the draft SR and this letter.
- (vi) The final EIAr 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.

JCA

- (vii) The EMPr must include a provision to make the following reports available to the Department and applicable competent authority on request: alien/invasive plant management report; plant rescue and protection report; and re-vegetation and habitat rehabilitation report.
- (viii) Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.
- (ix) The EAP must provide details of the specific locations in the final EIAR, and not provide vague locations of the proposed developments. All associated infrastructure must be clearly indicated in the final EIAR and its associated layout plans.
- (x) 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 EIAR.
- (xi) The recommendations provided by the specialist reports must be considered and used to inform the preferred layout.
- (xii) With regards to the generic Environmental Management Programmes (EMPr) for the substation, Part B Section 2 and Part C is incomplete in the draft EIAR. Please sign the generic EMPs. We request that you adequately complete all applicable sections in the generic EMPs.

(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) If the activities applied for in the application form differ from those mentioned in the final EIAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.dffe.gov.za/documents/forms>.
- (iii) 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.
- (iv) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.

(c) Public Participation Process

- (i) The final EIAR must comply with all the conditions of the acceptance of the SR signed on 03 February 2022 and must address all comments contained in the final SR, the draft EIAR and this letter.
- (ii) Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@dffe.gov.za.
- (iii) 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.
- (iv) Please ensure that all issues raised and comments received during the circulation of the draft EIAR from registered Interested and Affected Parties (I&APs) and organs of state (including this Department's Biodiversity and Protected Area Sections), 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 EIAR.
- (v) 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 EIAR.
- (vi) Proof of correspondence with the various stakeholders must be included in the final EIAR. 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 EIAR for comment.

- (vii) All issues raised and comments received during the circulation of the draft EIAr from I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAr, including comments from this Department, and must be incorporated into a Comments and Response Report (CRR).
- (viii) 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.
- (ix) 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 I&AP’s comments.
- (x) 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 EIAr.

(d) Alternatives

- (i) Please provide a clear description of each of the preferred alternatives and provide a detailed assessment and motivation on why it is preferred. This must include the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community.

(e) Layout and Sensitivity Maps

- (i) The final EIAr 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 EIAr. 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) Location of turbines;
 - c) All supporting onsite infrastructure required such as laydown areas, roads etc. (existing and proposed);
 - d) Substation(s) and/or transformer(s) sites including their entire footprint;
 - e) Connection routes (including pylon positions) to the distribution/transmission network; and
 - f) All necessary details regarding all possible locations and sizes of the infrastructure.
 - g) 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 neighbouring energy developments and existing grid infrastructure.
- (v) Google maps will not be accepted.

(f) Specialist assessments

- (i) The final EIAr and all the attached specialist studies must indicate and adequately assess a consistent number of turbines.
- (ii) 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 Department's 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) **Bird and Bat specialist studies must have support from Birdlife South Africa and SABAA.**
- g) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (iii) 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.
- (iv) 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.**
- (v) 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) Cumulative Assessment

- (i) Should there be any other similar projects within a 30km radius of the proposed development site, a cumulative impact assessment for all identified and assessed impacts must be undertaken to indicate the following:
 - (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - (b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - (c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
 - (d) A cumulative impact environmental statement on whether the proposed development must proceed.

(h) Environmental Management Programme (EMPr)

- (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 the Regulations must be used and submitted with the final report over and above the EMPr for the facility.

- (ii) The EMPr must comply with Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.
- (iii) The EMPr must also include the following:
 - a) All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted.
 - b) The final site layout map.
 - c) Measures as dictated by the final site layout map and micro-siting.
 - d) An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process.
 - e) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.
 - f) An alien invasive management plan to be implemented during construction and operation. The plan must include mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and removal of alien species is undertaken.
 - g) A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.
 - h) A re-vegetation and habitat rehabilitation plan to be implemented during construction and operation. Restoration must be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.
 - i) A traffic management plan to ensure that no hazards would result from the increased traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters.
 - j) A storm water management plan to be implemented during construction and operation. The plan must ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows.
 - k) A fire management plan to be implemented during the construction.
 - l) An effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation, handling, use and storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems.
 - m) Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.

(i) Specialist Declaration of Interest

- (i) Specialist Declaration of Interest forms must be attached to the final EIAr. 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).

(j) Undertaking of an Oath

- (i) Please note that the final EIAr must have an undertaking under oath/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 3 of the NEMA EIA Regulations, 2014, as amended, which states that the EIAr must include:
- “an undertaking under oath or affirmation by the EAP in relation to:*
- (i) the correctness of the information provided in the reports;*
 - (ii) the inclusion of comments and inputs from stakeholders and I&APs;*
 - (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and*
 - (iv) 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”.*

General

Please also ensure that the final EIAr includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.

Should you fail to meet any of the timeframes stipulated in Regulation 23 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: 06 June 2022

cc:	Debere Maphosa	Ubuntu Local Municipality	E-mail: maphosa.d@gmail.com
	Bryan Fisher	NC DAEARDLR	E-mail: Bfisher@ncpg.gov.za
	Romaya Dorasamy	Great Karoo Renewable Energy (Pty) Ltd	E-mail: romaya@greatkaroo.energy
	Tobias Hobbach	Great Karoo Renewable Energy (Pty) Ltd	E-mail: tobias@greatkaroo.energy

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
27/01/2016 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: (Noted)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