

MOEDING SOLAR PV FACILITY, NORTH WEST PROVINCE

DEA Ref No: 14/12/16/3/3/1/1987

COMMENTS AND RESPONSES REPORT

TABLE OF CONTENTS

1. WRITTEN COMMENTS RECEIVED BY ORGANS OF STATE: BASIC ASSESSMENT NOTIFICATION PERIOD	1
2. WRITTEN COMMENTS RECEIVED BY INTERESTED AND AFFECTED PARTIES: BASIC ASSESSMENT NOTIFICATION PERIOD	1
3. WRITTEN COMMENTS RECEIVED BY ORGANS OF STATE: BASIC ASSESSMENT REPORT REVIEW PERIOD.....	3
4. WRITTEN SUBMISSIONS FROM I&APS: BASIC ASSESSMENT REPORT REVIEW PERIOD	18
5. GENERAL SUBMISSIONS	20

The Moeding Solar Photovoltaic (PV) Facility's Basic Assessment process was announced on the Monday, 30 July 2018. All written comments received since the announcement of the Basic Assessment process have been included in this Comments and Responses Report (C&RR).

The C&RR includes all written comments received on the Basic Assessment Report (BAR) which was made for a 30-day review and comment period from **Wednesday, 16 January 2019** to **Monday, 18 February 2019**.

Comments received are captured in the C&RR are **verbatim** (as received per e-mail / letter).

NOTE:

In terms Regulation 44(1) of the EIA Regulations of December 2014 (as amended on 07 April 2017), please note that the comments raised and responses provided at the various Focus Group Meetings held during the announcement phase of the Basic Assessment process have not been captured in this C&RR. The notes of the meetings are attached as **Appendix C7**.

List of Abbreviations / Acronyms

APM	Archaeology, Palaeontology and Meteorites	BA	Basic Assessment
BAR	Basic Assessment Report	BID	Background Information Document
C&RR	Comments and Responses Report	DAFF	Department of Agriculture, Forestry and Fisheries
DEA	Department of Environmental Affairs	DoE	Department of Energy
DPWR	Department: Public Works and Roads (North West Provincial Government)	DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner	EMPr	Environmental Management Programme
HMP	Heritage Monitoring Project	I&AP	Interested and Affected Party
NHRA	National Heritage Resources Act	NWPHRA	North West Provincial Heritage Resources Authority
SAHRA	South African Heritage Resources Agency	TFR	Transnet Freight Rail
TOPS	Threatened or Protected Species		

1. WRITTEN COMMENTS RECEIVED BY ORGANS OF STATE: BASIC ASSESSMENT NOTIFICATION PERIOD

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>This serves as a notice of receipt and confirms that your application has been captured in our electronic AgriLand tracking and management system. It is strongly recommended that you use the on-line AgriLand application facility in future.</p> <p>Detail of your application as captured: Type: REZONING Your Reference number: Property Description: ROSENDAL NO. 673,PTN 4 Dated: AUGUST 2018 Please use the following reference number in all enquiries: AgriLand reference number: 2018_08_0024 Enquiries can be made to the above post, fax or e-mail address.</p>	<p>NV Maumela On behalf of: Director: Land use and Soil Management DAFF</p> <p>Letter: 08-08-2018</p>	<p>The BAR was made available to the DAFF for review and comment on 18 January 2019 for the regulated 30-days review and comment period. The comment period ended on 18 February 2019. Attempts were made to elicit comments from the DAFF (refer to Appendix C4). No other / further comments were received during the BAR's review and comment period.</p>

2. WRITTEN COMMENTS RECEIVED BY INTERESTED AND AFFECTED PARTIES: BASIC ASSESSMENT NOTIFICATION PERIOD

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>I would like to know what Surveying inputs will be needed on this project. I run an Engineering Survey Company.</p>	<p>Tumelo Letele Email: 03-08-2018</p>	<p>It can be confirmed that no surveying work is required at this stage in the process (BA process). The e-mail has been forwarded to the Applicant for information purposes.</p>
2.	<p>The letter, send on your behalf by Savannah Environmental, on 11 January 2019 refers.</p> <p>Vodacom (Pty) Ltd has no objection to the proposed solar PV facility, situated on Portion 1 on the farm Champions Kloof 731, Portion 4 and the remaining extent of Portion 3 of the farm Waterloo 730, situated approximately 8km south of Vryburg in the North West Cape Province.</p>	<p>Hennie Barnard Property Manager Vodacom Central Region</p> <p>Letter: 11-01-2019</p>	<p>The content of Vodacom's letter was acknowledged and submitted to the Applicant for attention.</p>

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3.	<p>I'm lebogang Diego sebeela from the unlimited cheetahs group in vryburg I'm just want to register my company to be tendering for security service wen your site restarted to operated so I'm just want to know what the requirements that are you going to need in that project</p>	<p>Lebogang Sebeela The Unlimited Cheetahs Group E-mail: 16-01-2019</p>	<p>The request to register the organisation on the project database has been confirmed. The I&AP database has been updated (refer to Appendix C1 of the final BA Report).</p> <p>It should be noted that Savannah Environmental is an independent environmental consultant appointed for the sole purpose of conducting the Basic Assessment process for the proposed Moeding Solar PV Facility and associated infrastructure. Savannah Environmental is therefore not affiliated with the applicant and not responsible for any form of procurement or new business on their behalf.</p> <p>The Organisation's e-mail was forwarded to the Applicant for their consideration as it will be the applicant's discretion to contact the Organisation in the future should they wish to make use of the Organisation's services at the appropriate stage of the project.</p> <p>Responding e-mail sent 16 January 2019</p>
4.	<p>I would like to confirm our discussion of 10h50 this morning and reiterate that I am not in the least interested in the solar project and do not want any company or person violating my land. Please send this message to the company responsible for the project and stress it to them that I do not want to have anything to do with their business and the selfish, self-serving contract they sent me.</p>	<p>Dr Tumelontle Thiba Landowner: Champions Kloof E-mail: 14-01-2019</p>	<p>As informed during the telephone discussion, Savannah Environmental is undertaking the Basic Assessment process for the proposed Moeding Solar PV Facility and Associated Infrastructure. The solar energy facility is proposed to be developed on the following properties:</p> <ul style="list-style-type: none"> • Portion 1 of the farm Champions Kloof 731 • Portion 4 and the Remaining Extent of Portion 3 of the farm Waterloo 730 <p>All three of these properties are owned by the Tiger Kloof Educational Institution</p>

NO.	COMMENT	RAISED BY	RESPONSE
			<p>According to the Geographical Information System (GIS) and WinDeed (Deed Search) information, your property, Remainder of the farm Champions Kloof 731, is situated south-east of the project's proposed development properties (see extract below), and as required by the Environmental Impact Assessment (EIA) Regulations, you, as an adjacent landowner were notified of the proposed development.</p> <p>It was confirmed that neither Savannah Environmental (Pty) Ltd nor Moeding Solar (Pty) Ltd issued / submitted a contract to the landowner, as the registered property owner of the above-mentioned property.</p> <p>Responding e-mail sent 15 January 2019</p>
	I will send you a copy of the contract sent to me last year.	E-mail: 15.01.2019	No contract was received to date by Savannah Environmental.

3. WRITTEN COMMENTS RECEIVED BY ORGANS OF STATE: BASIC ASSESSMENT REPORT REVIEW PERIOD

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>This office acknowledges the receipt of your documents regards to the above-mentioned on 15 January 2019 (Task T6/2019). The office responsible for this area is the Kimberley Office: Mr Abe Abrahams can be contacted at (053 830-8800).</p> <p>Comments would be forwarded in due time.</p>	<p>C Theunissen Chief Admin Clerk DWS</p> <p>Letter: 16-01-2019</p>	<p>The BA Report for public review was couriered as recommended to Mr Abe Abrahams for the DWS' review and comment. Proof of delivery is included in Appendix C4. The follow-up e-mail reminding DWS that the comment period is ending on 18 February 2019, was forwarded to Mr Mahunoyane for his attention by Mr Abraham's Office (refer to Appendix C4). No comments have been received to date.</p>
2.	<p>With reference to your above-mentioned application, I hereby confirm that the proposed work installation is approved by our Client (Openserve) in terms of Section 22 of the Electronic Communications Act No. 36 of 2005 as amended.</p>	<p>Mothobi Martins Mvelaphande Trading (Client: Openserve – Telkom SOC Ltd)</p>	<p>The development footprint of the Moeding Solar PV Facility will avoid Openserve's infrastructure. Should any changes/deviations occur prior to or during the construction</p>

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	<p>Out Client (Openserve)'s infrastructure is affected by this proposal and the route is marked in GREEN and PINK on attached sketch as accurately as possible. We did our utmost to ensure that we indicate our route as accurate as possible and should you discover any of our cables that is not on the sketch please stop and contact us immediately to arrange a site meeting. In the event that our cables are exposed and damaged/stolen by a third party the damages will be repaired at the customer's account. Please make use of pilot holes in order not too damage our infrastructure. Therefore, any damages occurred during construction of work will be repaired at the customer's account.</p> <p>On completion of this project, please certify that all requirements as stipulated in this letter have been met. Please note that should any of our Client (Openserve) infrastructure has to be relocated or altered as a result of your activities the cost for such alterations or relocation will be for your account in terms of section 25 of the Electronic Communications Act.</p> <p>Mr David Gopane must be contacted at telephone number 053 927 4041/081 401 1563, 2 (Two) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.</p> <p>Approval of the proposed route is valid for six months. If construction has not yet commenced within this period, then the file must be resubmitted for approval. Any changes / deviations from the original planning during or prior to construction must immediately be communicated to this office.</p>	<p>Letter: 22-01-2019</p>	<p>period for the Project, the applicant will communicate these changes to Mvelaphande Trading.</p> <p>The applicant furthermore takes note of the conditions provided by Mvelaphande Trading and will take these into consideration when the designs for the facility and power line are being finalised.</p>

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	<p>Please notify this office and forward an as built plan, within 30 days of completion of construction.</p> <p>Mr David Gopane must be contacted at telephone number 053 927 4041/081 401 1563, 2 (Two) weeks prior to commencement of proposed work. It's important that all services are shown on site before construction starts.</p>		
3.	<p>The Directorate: Biodiversity Conservation has reviewed and evaluated the aforementioned report including its specialist's studies and the following recommendations must be implemented during the final basic assessment phase:</p> <ul style="list-style-type: none"> • A final walk through with an ecologist (search & rescue) must be conducted once final pole positions are in place, to ensure that all mitigation measures have been adequately addressed; • <i>Acacia erioloba</i> tree is protected in terms of the National Forests Act and was found to occur on site, therefore a permit to disturb, remove or relocate this species must be obtained from the relevant authorities; • All species listed in terms of the TOPs in Red Data list must be limited to the footprint of the proposed development, • Anti-collision devices such as bird flappers must be installed on all high risk sections of the powerline to forewarn birds of the risk, • All disturbed and cleared areas must be re-vegetated with indigenous perennial shrubs and grasses from the local area; and • Concurrent rehabilitation and alien vegetation control programme within all sensitive areas must be implemented. 	<p>Stanley Tshitwamulomoni Acting Director: Biodiversity Conservation DEA</p> <p>Letter: 30-01-2019</p>	<p>The recommendations made and the need for these to be considered in the final BA Report are noted.</p> <p>A final walkthrough by the ecologist once the final pylon positions are in place has been noted and included as a recommendation in the EMPr in Section 5.1, Objective 1.</p> <p>Should any <i>Acacia erioloba</i> trees be required to be disturbed, a permit from the DAFF will be obtained by the developer.</p> <p>Disturbance to Red Data species will be restricted to the development footprint only.</p> <p>During the BA process undertaken for the Moeding Solar PV Facility, it was determined that none of power line alternatives traverse highly sensitive areas from an avifauna perspective. However, should any high risk sections be identified during the walkthrough survey, anti-collision devices such as bird flappers and bird flight diverters will be installed.</p> <p>DEA Biodiversity's recommendation is noted and has been included in the EMPr in the rehabilitation management programme (refer to Appendix K).</p> <p>A Revegetation and Rehabilitation Plan as well as an Alien Plant Management Plan have been compiled for the project</p>

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	<p>The overall biodiversity objective is to minimise loss to biodiversity as possible. In order to achieve this objective the above mentioned recommendations must be adhered to.</p>		<p>and are included as Appendix C and Appendix D of the EMPr.</p> <p>The need for the minimisation of loss to biodiversity is noted. The recommendations made by DEA: Biodiversity Conservation in order to achieve the objective of minimised loss are noted and have been considered and addressed in the final BA Report as per the responses included under the points above.</p>
4.	<p>The SAHRA Archaeology, Palaeontology and Meteorites Unit has no objections to the proposed development and accepts the recommendations of the specialists. The recommendations of the specialist and the following conditions must be included in the EMPr:</p> <ul style="list-style-type: none"> • All instances in Table 3 that refer to a 20 m buffer, must be increased to a 30 m buffer; • Where monitoring is required, the monitoring must either be conducted by a qualified archaeologist or a trained Environmental Control Officer (ECO). Monitoring report must be submitted to SAHRA upon completion of the construction; 	<p>Natasha Higgitt Heritage Officer SAHRA</p> <p>Letter: 31-01-2019</p>	<p>It is noted that the SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections for the development of the Moeding Solar PV Facility and that the recommendations made by the specialist in Appendix K of the BA Report are supported. The recommendations made by the heritage specialist have been included under Objective 1 of the planning and design management programme and Objective 18 of the construction management programme in Appendix K (EMPr) of the final EIA Report. The conditions required to be included in the EMPr by SAHRA are addressed in the subsequent responses below.</p> <p>SAHRA's requirement related to the increase in the buffer area for all heritage resources listed in Table 3 in the Heritage Impact Assessment is noted. The 20m buffer has been increased to 30m as depicted in Figure 9.5 of the final BA Report. The development footprint of the Moeding Solar PV Facility and the preferred power line alternative (Alternative 2) avoids these no-go areas and therefore no optimisation of the layout is required.</p> <p>Should monitoring be required during the construction of the Moeding Solar PV Facility, monitoring will be undertaken by either a qualified archaeologist or trained ECO. The</p>

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	<ul style="list-style-type: none"> <li data-bbox="168 304 981 555">• If it is not possible to avoid the identified heritage sites, permits must be applied for in terms of the relevant sections of the NHRA prior to the construction phase. It must be noted that section 34 applications must be made to the North West Provincial Heritage Resources Authority (NWPHERA). Section 35 (for archaeological and palaeontological sites) and 36 applications must be made to SAHRA; <li data-bbox="168 555 981 730">• Following vegetation clearance a qualified palaeontologist must conduct a site visit to determine if extraordinary stromatolites can be preserved. A report detailing the finding of the site visit must be submitted to SAHRA upon completion of the site visit; <li data-bbox="168 730 981 946">• The recommended HMP must be submitted to SAHRA prior to the construction phase for comment; <li data-bbox="168 946 981 1121">• As the BAR has been finalised, this comment must be forwarded directly to the competent authority to be included in the decision-making process in terms of section 38(8) of the NHRA. Proof of the delivery and receipt thereof must be supplied to SAHRA; <li data-bbox="168 1121 981 1370">• If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial 		<p data-bbox="1429 228 2159 304">monitoring reports will be submitted to SAHRA upon completion of the construction phase.</p> <p data-bbox="1429 304 2159 555">Should any heritage sites be required to be disturbed, the relevant permits will be applied for to the relevant heritage authorities prior to disturbance.</p> <p data-bbox="1429 555 2159 730">The requirement for a qualified palaeontologist to undertake a site visit following vegetation clearance has been acknowledged and included in the EMPr under Objective 1 (Appendix K of the final BA Report). A report detailing the findings of the site visit will be submitted to SAHRA.</p> <p data-bbox="1429 730 2159 946">The Heritage Management Plan (HMP) recommended by the specialist was included in the Heritage Impact Assessment (refer to Appendix H), the EMPr under Objective 18 and the Chance Find Procedure (Appendix K of the EMPr) which was included in the BA Report available to public review from 16 January 2019 to 18 February 2019.</p> <p data-bbox="1429 946 2159 1121">The comment from SAHRA was received prior to finalising the BA Report and has therefore been included in the final BA Report submitted to the Department of Environmental Affairs for decision-making.</p> <p data-bbox="1429 1121 2159 1370">The recommendation made by SAHRA has been included under Objective 18: Protection of Heritage Resources of the construction management programme in the EMPr (Appendix K of the final BA Report).</p>

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	<p>Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 35(5) and 36(6) of the NHRA. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. 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;</p> <ul style="list-style-type: none"> The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application. 		<p>The decision on the Application for Environmental Authorisation for the Moeding Solar PV Facility will be communicated to SAHRA and uploaded to the SAHRIS Case application once the decision has been made available from the Department of Environmental Affairs.</p>
5.	<p>Your notification and request for comments for <i>Environmental Impact Assessment and Public Participation Process</i> for Moeding Solar PV Facility dated 16 January 2019 has reference. This comment/ consent is issued in terms of the Advertising on Roads and Ribbon Development Act No 21 of 1940 and Roads Ordinance No 22 of 1957 as amended.</p> <p>There is no objection to the development, since none of the existing proclaimed and or planned provincial roads are affected. The affected Road P4.2(n18) is a national road, you are therefore advised to contact SANRAL.</p>	<p>KA Sitase Director: Planning and Design Chief Directorate: Transport Infrastructure NW DPWR</p> <p>Letter: 07-02-2019</p>	<p>The letter and advice provided was acknowledged. The letter received from the NW DPWR was forwarded to SANRAL for their attention. The project team is aware that Road P4/2 (N18) is a national road, however the NW:DPWR advised that SANRAL be contacted. The BA Report was however submitted to SANRAL on 16 January 2019 at the commencement of the public review period (proof attached under Appendix C4).</p>
6.	<p>This Department has the following comments on the abovementioned application:</p> <p>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.</p>	<p>Herman Alberts Deputy Director: Strategic Infrastructure Developments DEA</p> <p>Letter: 14-02-2019</p>	<p>The comments received from the Department of Environmental Affairs are noted. The responses to the comments are included below.</p> <p>All relevant listed activities related and required for the development of the Moeding Solar PV Facility have been applied for and are specific to the requirements of the development and infrastructure. The listed activities applied</p>

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			for and the description of the activities considering the project requirements are included in Chapter 5, section 5.3 Table 5.1 of the final BA Report.
	ii. If the activities applied for in the application form differ from those mentioned in the final BAR, 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.environment.gov.za/documents/forms .		All relevant activities applied for in the application for Environmental Authorisation (submitted to the DEA on 15 January 2019) and included in the final BA Report are identical and relevant to the Moeding Solar PV Facility. Therefore, an amended application for Environmental Authorisation will not be required.
	iii. Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final BAR.		Comments received from I&APs and organs of state during the 30-day public review period are included in Appendix C6 and Appendix C4 of the final BA Report respectively and have been incorporated into this C&RR attached as Appendix C8 to the final BA Report. Where applicable, comments received have been utilised in the preparation and finalisation of the BA Report.
	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.		Proof of correspondence with various stakeholders is attached in Appendix C4 (organs of state correspondence) and Appendix C5 (stakeholder correspondence) of the final BA Report. Proof of attempts that were made to obtain comments is attached in Appendix C4 (organs of state correspondence) and Appendix C5 (stakeholder correspondence) of the final BA Report. The database with the registered I&APs are included as Appendix C1 in the final BA Report.
	v. The Public Participation Process (PPP) must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended).		Savannah Environmental is cognisant of the need to comply with Regulations 39, 40, 41, 42, 43 and 44 of the 2014 EIA Regulations (GNR 326). » Regulation 39 (GNR 326):

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			<p>Written consent was obtained from the landowner and was included in the Application Form submitted to the DEA on 15 January 2019.</p> <p>» Regulation 40 (GNR 326): The BA Report and EMPr has been made available for a 30-day public review period from, 16 January 2019 to 18 February 2019. The public participation process was undertaken in accordance with Regulation 40 and access to all information that may have the potential to influence any decision regarding the application was provided.</p> <p>» Regulation 41 (GNR 326): The public participation process for the Moeding Solar PV Facility was undertaken according to Regulation 41 of the EIA Regulations, 2014 (as amended). Chapter 5, Section 5.4 of the final BA Report describes this process in detail.</p> <p>» Regulation 42 (GNR 326): A project database has been compiled according to the above mentioned regulation. Additional to the regulation, previous databases for projects within the surrounding area were also consulted and networking with various stakeholders were undertaken. Furthermore, I&APs who requested to be registered, has been captured on the project database and is included as Appendix C1 of the final BA Report.</p> <p>» Regulation 43 (GNR 326):</p>

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			<p>This BA Report has been made available for a 30-day public review period from, 16 January 2019 to 18 February 2019. The BA Report has been distributed to relevant Organs of State and a copy has been made available at the Vryburg Public Library, Vryburg and Huhudi Public Library, Huhudi, Vryburg. The BA Report which has been submitted to the DEA, the North West READ, and relevant Organs of State was also available for download from www.savannahsa.com or on CD on request from Savannah Environmental (Pty) Ltd.</p> <p>» Regulation 44 (GNR 326): Comments from I&APs received are included in the C&RR and attached as Appendix C8 to this final BA Report.</p>
vi.	The final BAR must contain a comment and response report with all the comments provided during the PPP and the corresponding responses from the Environmental Assessment Practitioner (EAP) and Applicant to those comments.		Comments from I&APs received, with the responses from the EAP and Applicant are included in this C&RR and attached as Appendix C8 to the final BA Report.
vii.	Please provide a full 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 1 (2) (e) and 3 (1) (h) (i) of the EIA Regulations, 2014 (as amended).		A full description of alternatives, including layout alternatives, technology alternatives, grid connection alternatives and the no-go alternative have been described in Chapter 2, Section 2.5 of the final BA report.
viii.	Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 4 of the EIA Regulations, 2014 (as amended).		Reasonable and feasible alternatives were identified and assessed through the Basic Assessment process. Details of alternatives are provided in Section 2.5 of the final BA Report.
ix.	In accordance with Appendix 1 (3) (1) (a) of the EIA Regulations, 2014 (as amended), the following details must be submitted: <ul style="list-style-type: none"> • the EAP who prepared the report: and 		The details and expertise of the EAP who prepared the final BA Report is included in Chapter 1, Section 1.4 of the final BA

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	<ul style="list-style-type: none"> the expertise of the EAP to carry out EIA procedures; 		Report. A Curricula Vitae of the EAP is also included in Appendix A of the final BA Report.
x.	The final BAR must provide the four corner 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.		The corner coordinate points for the site and the start, middle and end point of all power line alternatives and the main access road are included in Appendix O of the final BA Report.
xi.	The final BAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions.		The technical details of the Moeding Solar PV Facility and associated infrastructure is included in table format in Chapter 2, Table 2.1 of the final BA Report.
xii.	If there are similar applications in the area, all the specialist assessments must include a cumulative environmental impact assessment for all identified and assessed impacts. The cumulative impact assessment must indicate the following: <ul style="list-style-type: none"> 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. 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. The cumulative impacts significance rating must also inform the need and desirability of the proposed development. A cumulative impact environmental statement on whether the proposed development must proceed. 		<p>The assessment of cumulative impacts has been included in Chapter 8 of the final BA Report as a whole. The cumulative impact assessment was undertaken through the consideration of input provided for ecology, hydrology, avifauna, land use, soil and agricultural potential, heritage (including archaeology and palaeontology), visual and social by the independent specialists. The assessment of cumulative impacts considered similar projects within a 30km radius from the project site.</p> <p>The cumulative impacts included have been clearly defined and assessed accordingly by the specialists. All cumulative impacts were assessed through the application of the Savannah Environmental significance rating methodology. Recommendations considering the development of other solar energy facilities were made by the independent specialists (refer to Appendix D to Appendix J of the final BA Report).</p> <p>The cumulative significance rating has informed the need and desirability of the Moeding Solar PV Facility in terms of the geographical location of the project site in relation to</p>

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			<p>other facilities within the area, which is considered as a node for renewable energy projects (refer to Section 4.6 and Section 8.9 of the final BA Report).</p> <p>A cumulative impact statement and conclusion regarding the consideration of all cumulative impacts associated with the development of the Moeding Solar PV Facility is included in Section 9.2 of the final EIA Report.</p>
xiii.	<p>The final BAR must provide the following:</p> <ul style="list-style-type: none"> • Clear indication of the envisioned area for the proposed PV facility. • Clear description of all associated infrastructure. This description must include, but not limited to the following: <ul style="list-style-type: none"> ➢ Power lines; ➢ Internal roads infrastructure; and; ➢ All supporting onsite infrastructure such as laydown area, guard house and control room etc. 		<p>Chapter 2, Section 2.2 and 2.3 of the final BA Report provides a clear indication of the area to be developed for the Moeding Solar PV Facility. Figure 2.1 provides an illustration of the development area located within the project site and the 300m power line corridor. Section 2.2 also provides a description of all associated infrastructure.</p>
xiv.	<p>You are further reminded that the final BAR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of BARs in accordance with Appendix 1 and Regulation 19(1) of the EIA Regulations, 2014 (as amended).</p>		<p>The final BA Report has been compiled in accordance with Appendix 1 and complies with Regulation 19(1) of the EIA Regulations of 2014, as amended (refer to beginning of each Chapter).</p>
xv.	<p>An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process must be included in the final BAR.</p>		<p>A map which indicates sensitive areas and features identified within the project site and power line corridor is included in Appendix O of the final BA Report.</p>
xvi.	<p>A map combining the final layout map superimposed (overlain) on the environmental sensitivity map</p>		<p>A map which superimposes the layout of the Moeding Solar PV Facility over the environmental sensitivity map is included in Appendix O of the final BA Report.</p>
xvii.	<p>A shapefile of the preferred development layout/footprint must be submitted to this Department. The shapefile must be created using the Hartebeesthoek 94 Datum and the data should be in Decimal Degree Format using the WGS 84 Spheroid. The</p>		<p>Shapefiles of the preferred development layout / footprint has been submitted to the DEA with a copy of the final BA Report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>shapefile must include at a minimum the following extensions i.e. .shp; .shx; .dbf; .prj; and, .xml (Metadata file). If specific symbology was assigned to the file, then the .avl and/or the .lyr file must also be included. Data must be mapped at a scale of 1:10 000 (please specify if an alternative scale was used). The metadata must include a description of the base data used for digitizing.</p> <p>The shapefile must be submitted in a zip file using the EIA application reference number as the title. The shape file must be submitted to:</p> <p>Postal Address: Department of Environmental Affairs Private Bag X447 Pretoria 0001</p> <p>Physical address: Department of Environmental Affairs Environment House 473 Steve Biko, Arcadia, Pretoria</p> <p>For Attention: Muhammad Essop Integrated Environmental Authorisations Strategic Infrastructure Developments Telephone Number: (012) 399 9406 Email Address: MEssop@environment.gov.za</p>		
	<p>The Environmental Management Programme (EMPr) to be submitted as part of the final BAR must comply with all the requirements in terms of the content of EMPrs in accordance with Appendix 4 of the EIA Regulations, 2014 (as amended).</p>		<p>The EMPr for the Moeding Solar PV Facility has been compiled in accordance with Appendix 4 of the EIA Regulations, 2014 (as amended) and is included as Appendix K of the final BA Report.</p>
	<p>The EMPr must also include, but is not limited to the following:</p> <ol style="list-style-type: none"> i. All recommendations and mitigation measures recorded in the BAR and the specialist studies conducted. 		<ol style="list-style-type: none"> i. The EMPr contains all recommendations and mitigation measures recorded in the BA Report and the specialist

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	<ul style="list-style-type: none"> ii. The final site layout map. iii. An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process. iv. A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. v. An alien invasive management plan to be implemented during construction and operation of the facility. 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. vi. 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. vii. A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. 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. viii. A traffic management plan for the site access roads. This plan must include measures to minimize impacts on local commuters. ix. A transportation plan for the transport of components, main assembly cranes and other large pieces of equipment. x. An erosion management plan for monitoring and rehabilitating erosion events associated with the facility. Appropriate erosion mitigation must form part of this plan to prevent and reduce the risk of any potential erosion. xi. A fire management plan to be implemented during the construction and operation of the facility. 		<p>studies conducted (refer to Appendix D to Appendix J of the BA Report).</p> <ul style="list-style-type: none"> ii. The final site layout map is included in Appendix A of the EMPr prepared for the project. iii. The environmental sensitivity map of the project site and 300m power line corridor is included in Appendix A of the EMPr prepared for the project. iv. A map which superimposes the layout of the Moeding Solar PV Facility over the environmental sensitivity map is included in Appendix A of the EMPr prepared for the project. v. An alien invasive management plan has been prepared for the project, and is included in Appendix C of the EMPr prepared for the project. vi. A plant rescue and protection plan was compiled by Savannah Environmental and submitted as part of the BA Report for public review (refer to Appendix E of the EMPr). A vegetation specialist familiar with the site has reviewed the plant rescue and protection plan and considered the plan sufficient for successful rescue and protection of plants located within the development area. The reviewer's letter is attached to the plan in Appendix E of the EMPr. vii. A re-vegetation and habitat rehabilitation plan has been prepared for the project, and is included in Appendix D of the EMPr prepared for the project. viii. A traffic and transportation management plan has been prepared for the project, and is included in Appendix F of the EMPr prepared for the project. ix. A traffic and transportation management plan has been prepared for the project, and is included in Appendix F of the EMPr prepared for the project.

NO.	COMMENT	RAISED BY	RESPONSE
	<p>xii. 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.</p> <p>xiii. 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.</p> <p>The EAP must provide detailed and written motivation if any of the above requirements are not required by the proposed development and not included in the EMPr</p>		<p>x. An erosion management plan has been prepared for the project, and is included in Appendix H of the EMPr prepared for the project.</p> <p>xi. An emergency preparedness, response and fire management plan has been prepared for the project, and is included in Appendix J of the EMPr.</p> <p>xii. Objective 20 included in the construction management programme and Objective 8 included in the operation management programme of the EMPr (Appendix K of the final BA Report) provide measures for the appropriate handling and storage of hazardous substances during the construction and operation of the Moeding Solar PV Facility. This includes early detection and management of spills of toxic materials.</p> <p>xiii. Measures to protect hydrological features have been included in Objective 24 of the construction management programme in the EMPr (Appendix K of the final BA Report).</p> <p>All EMPr requirements have been addressed within the final BA Report as stipulated above.</p>
	<p>Furthermore, it must be reiterated that, should an application for Environmental Authorisation be subject to the provisions of Chapter II, Section 38 of the National Heritage Resources Act, Act 25 of 1999, then this Department will not be able to make nor issue a decision in terms of your application for Environmental Authorisation pending a letter from the pertinent heritage authority categorically stating that the application fulfils the requirements of the relevant heritage resources authority as described in Chapter II, Section 38(8) of the National Heritage Resources Act, Act 25 of 1999. Comments from SAHRA and/or the provincial department of heritage must be provided in the BAR.</p>		<p>Final comments, dated 31 January 2019, were submitted by SAHRA to Savannah Environmental. These comments have been included in Appendix C6 of the final BA Report as well as this Comments and Responses Report. SAHRA has confirmed that the SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objection to the development of the Moeding Solar PV Facility and supports the recommendations of the heritage specialists as included in Appendix H and Appendix I of the final BA Report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
7.	Approval is based on the geographic separation between the solar facility and TFR high sites. Transnet SOC Ltd approves the commencement subject the terms and conditions listed below	Tshepo Maloma Chief Engineer Telecommunications	It is acknowledged that the Transnet has no objection to the project, given that several conditions listed in the letter from Transnet dated 19 February 2019 are implemented.
	i. At any time after the approval or during the development of the project, should there be interference with the infrastructure to disrupt train service and impose a risk on operations, the applicant will be required by TFR to reduce and/or remove the cause of the interference immediately, and where necessary the mitigation solution must be implemented in order for TFR to continue to operate safely.	Transnet Freight Rail Letter: 19-02-2019	No disruption of interference is expected to occur to train services as a result of the project. Should the development of the Moeding Solar PV Facility interfere or disrupt train services, the applicant will reduce and/or remove the cause of interference.
	ii. Development activities underneath or within close proximity to TFR infrastructure must adhere to relevant TFR guidelines relating to clearance between equipment and the proposed development activity as well as strict adherence to the Occupational Health and Safety Act 85 of 1993.		No development activities are proposed underneath Transnet Freight Rail infrastructure. All development in close proximity to infrastructure, will adhere to the relevant guidelines.
	iii. This approval is subject to the submitted application of the property boundaries, the materials used as well as the size and positioning of structures provided. If TFR's radio systems are compromised by the deviation of this submission and the deviation cannot be reversed, the applicant shall be liable for cost to re-establish the services to TFR.		The development footprint for the project avoids all Transnet Freight Rail infrastructure. The applicant has been made aware of Transnet's condition should radio systems be compromised.
	iv. This is only a TFR approval. It does not include other telecommunications operators that have a co-sharing agreement for the use of TFR radio masts.		It is noted that the comment from Transnet dated 19 February 2019 is an approval which does not include other telecommunications operators that have a co-sharing agreement for the use of radio masts.
	v. Any additional structures to be built or changed within the property boundaries require a fresh application to TFR.		Should the development footprint of the Moeding Solar PV Facility change, Transnet will be notified accordingly.
	vi. This approval does not imply any rights to access to TFR property or use of the road for construction of the project design. Permission must be obtained from TFR. Furthermore TFR reserves the right to claim damages for any loss sustained as a result of damages to our telecommunication infrastructure.		It is acknowledged that should any access to Transnet Freight Rail be required, permission will be need to be obtained.

NO.	COMMENT	RAISED BY	RESPONSE
	vii. The applicant shall, in the carrying out of any work or project take all necessary precaution for the safety of TFR and its property including the radio links in the area against damages as a result of development of the applicant's Project. the applicant shall be liable for direct and/or indirect, and/or consequential damages or injury that may be caused by themselves to any work or property of TFR including radio links or land which may be disturbed.		The development footprint of the Moeding Solar PV Facility avoids all Transnet Freight Rail infrastructure. The applicant has been made aware that the necessary precaution should be undertaken to ensure the safety of infrastructure.
	viii. Any work in connection with the development of the applicant's project shall be carried out, in such a manner as to avoid any possible loss or inconvenience to TFR's customers or public, and upon completion of such work, any property of TFR, including radio links or land which may have been disturbed shall be restore to the same condition as that in which it was before the development of the project.		The development footprint of the Moeding Solar PV Facility avoids all Transnet Freight Rail infrastructure. The applicant has been made aware that the necessary precaution to avoid any possible loss or inconvenience to Transnet Freight Rail customers should be undertaken.
	ix. In no event will TFR or its subcontractors be liable to the applicant or anyone else for special, collateral, exemplary, direct, indirect, incidental or consequential damages (including without limitation, loss of goods, loss of profit or revenue, loss of savings, loss of use, interruption of business, and claims of the applicant or injury whether such damages or injury occur prior or subsequent to, or are alleged to be as a result of any TFR radio links approved and/or not approved in terms of this letter or as a result of delict, even if TFR has been advised of the possibility of such damage or injury).		The applicant acknowledges that the Transnet Freight Rail and its sub-contractors will not be liable for special, collateral, exemplary, direct, indirect, incidental or consequential damages.

4. WRITTEN SUBMISSIONS FROM I&APS: BASIC ASSESSMENT REPORT REVIEW PERIOD

NO.	COMMENT	RAISED BY	RESPONSE
1.	I have nothing to say to the some called moeding as it is look like the SME company they will not get any chances to get sup-contract especially in security department I'm was at the meetings but I get more questions than answer as there where no green lights on the	Lebogang Sebeela The Unlimited Cheetahs Group E-mail: 16-02-2019	As per the e-mail dated 18 January 2019 (attached as Appendix C4 of the final BA Report), Savannah Environmental is the independent environmental consultants appointed for the sole purpose of conducting the Basic

	<p>questions I have asked so the moeng project it looks like they have already chosen the security company that is going to operated there it is just a corrupted project that I have not see since I get into business from 2015.</p>		<p>Assessment process for the Moeding Solar PV project. As per Mr. Sebeela's previous request, he was added to the project database (refer to Appendix C1 of the final BA Report) and the applicant has been made aware of the services his organisation provides.</p> <p>The e-mail dated 16 January 2019 informed Savannah Environmental that the Unlimited Cheetahs Group wish to tender for security services when the project is in operation and requested the requirements that would be needed. It has to be noted that the BA process is currently underway and therefore the project is only in the planning phase. The project may only commence with construction if it is selected as a preferred bidder project in the DoE's Renewable Energy Independent Power Producer Procurement (REIPPP) Programme. Savannah Environmental would not be responsible for any construction related activities, including the appointment of sub-contractors.</p> <p>It is important to note that no contractor or sub-contractors have been appointed as the Moeding Solar PV Facility project has not yet been submitted in a bidding round. It should furthermore be noted that the DoE is yet to announce the date of a new bidding round.</p> <p>It is unclear what meeting Mr. Sebeela attended as there is no record of him attending any meetings held for the project. He has not signed any attendance registers of the meetings held. Furthermore, no other comments have been received from Mr. Sebeela to date. Savannah Environmental therefore requests that Mr. Sebeela advise on which date, time and venue he attended a meeting where the Moeding Solar PV Facility project was presented, as well as details of the questions he had raised.</p>
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2.	Do me a favour please, do not, I repeat do not go anywhere near my farm or have your project affect my farm in any way.	Dr Tumelontle Thiba Landowner: Champions Kloof E-mail: 14-02-2019	Dr Thiba's concern is acknowledged. The Remainder of the farm Champions Kloof 731 does not form part of the Moeding Solar PV Facility project. No infrastructure is proposed on this property. Therefore, the requirement of the I&AP has been met.
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5. GENERAL SUBMISSIONS

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>With reference to the proposed Moeding Solar PV facility planned just south of Vryburg, as per attached public notice publish in The Stellalander newspaper on 1 August 2018. We, as Allsolar Noordwes, wish to register as an interested party, on the project database.</p> <p>Being in the renewable energy industry, we are always interested in any developments in this field, as we are very passionate about it. Our interest stems from various aspects, from pure curiosity, to being able to refer to this project as a good example of solar energy products, to promoting solar energy, to being directly or indirectly involved in this project, as a contractor or service provider, etc.</p> <p>Please use the following information for registration purposes: COMPANY: Allsolar Noordwes CONTACT: Anita de Beer / Debra Brooks CELL: provided EMAIL: provided</p> <p>INTEREST:</p>	Anita de Beer Technical Support ALLSOLAR Noordwes Email: 03-08-2018	Request has been acknowledged and registration on project database has been confirmed.
1.1.	Direct or indirect involvement as subcontractor / service provider.		The interest as involvement as a subcontractor / service provider has been forwarded to the Applicant for their information.
1.2.	General interest as co-solar solution provider.		The company's interest to be a co-solar solution provider has been forwarded to the Applicant for their information.

NO.	COMMENT	RAISED BY	RESPONSE
1.3.	Showcasing Moeding as good example of solar energy production in action, to promote solar energy to the general public and to raise awareness thereof. Look forward to receiving more information about Moeding and to see the project unfold.		The company's positive approach towards renewable energy and the promotion thereof is noted and the e-mail has been forwarded to the Applicant for their information.
2.	Can you please register us as Interested and Affected Parties in respect of the Moeding Solar PV Facility (as per the attached). Can you also please share the location of the Facility and the proposed grid connection route?	Neil van der Merwe AMDA Developments (On behalf of) Email: 08-08-2018	Acknowledged request and confirmed registration on project database on 14 August 2018. The requested information (location of the PV facility and proposed grid connection) was e-mailed on 10 January 2019.
3.	Kindly forward further information to us regarding the Project above. And please note that we will need to register on the Project Database as soon as possible. Your advice will be appreciated.	Lesley L Tsolo OSAA Engineering (Pty) Ltd Email: 08-08-2018	Acknowledged request and confirmed registration on project database. BID has been forwarded and notification of BAR availability provided.
4.	Please register me as an I&AP for this Project. Interest: To keep up to date with the renewable energy sector and projects that are in development stages.	Magdalena Michalowska Building Energy Email: 03-10-2018	Acknowledged request and confirmed registration on project database.
5.	I would like to know more about your project that will be taking place in vryburg. How do one apply for a job and when is the starting date.	Sipho Moreosele I&AP E-mail: 10-02-2019	For information regarding the proposed project, the Background Information Document (BID) that was distributed in July 2018 was attached to the e-mail response. As per the BID attached, Savannah Environmental is conducting the Basic Assessment process as is required for the Environmental Authorisation application and process. The process of applying for a job is forwarded to the applicant. Please be informed that the Basic Assessment Report is currently available for public review and comment at the Huhudi and Vryburg Libraries (please see attached

NO.	COMMENT	RAISED BY	RESPONSE
			<p>notification letter). The comment period ends next week Monday, 18 February 2019.</p> <p>In terms of the starting date, please be informed that should the Applicant be successful in the Bidding process of the Department of Energy's call for tenders, it is envisaged that construction may only start in 3 or 4 years' time.</p> <p>Responding e-mail sent on 11 February 2019</p>