

FINAL ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr) REPORT AND FINAL LAYOUT FOR THE AUTHORISED 140MW SUTHERLAND 2 WIND ENERGY FACILITY (WEF) AND ASSOCIATED INFRASTRUCTURE, NORTHERN CAPE PROVINCE (DFFE REF: 12/12/20/1782/3/MP1)

COMMENTS & RESPONSES REPORT (C&RR)

The public participation process for the Final Environmental Management Programme (EMPr) and layout approval process for the authorised 140MW Sutherland 2 Wind Energy Facility (WEF): (DFFE Ref.: 12/12/20/1782/3/MP1), Northern Cape Province, was announced on Wednesday, 16 November 2022. The process notification served to invite Interested and/or Affected Parties (I&APs) and Stakeholders to register their interest in the project and to submit any comments / queries that they might have. Comments received have been responded to within this C&RR and have been considered within the Final EMPr and Layout (where required).

The EMPr report and Final Layout was made available for a 30-day public review and comment period from **Tuesday, 22 November 2022 until Monday, 16 January 2023 (both days inclusive)**. This Comments and Responses report (C&RR) has been updated with comments received during the public participation process and during the review period, and has been submitted to the DFFE with the Final EMPr and Layout.

A copy of the Final C&RR will be made available to all parties that have submitted comments upon submission of the Final EMPr and Layout to the DFFE for decision making.

Number	Comment received	Details of Comment Received	Response	Responded to, by and method
1.	<p>Final Layout and EMP for the Sutherland 2 Wind Energy Facility and Associated Infrastructure</p> <p>Enquiries: Natasha Higgitt</p> <p>Date: Friday January 13, 2023</p> <p>Tel: 021 462 4502</p> <p>Email: nhiggitt@sahra.org.za</p> <p>Page No: 1</p> <p>CaselD: 14522</p> <p>.....</p> <p>Final Comment</p> <p>In terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999)</p> <p>Attention: Mainstream Renewable Power South Africa (Pty) Ltd</p> <p>P.O. Box 45063</p> <p>Claremont</p> <p>7735</p> <p>FINAL ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT AND FINAL LAYOUT</p>	<p>Name: Natasha Higgitt</p> <p>Organisation: SAHRA</p> <p>Date: 13 January 2023</p> <p>Email: nhiggitt@sahra.org.za</p>	<p><i>*Please see further below for responses to comments provided by SAHRA.</i></p>	<p>Arlene Singh (EAP) via CGRR</p>

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	<p>FOR THE AUTHORISED 140MW SUTHERLAND 2 WIND ENERGY FACILITY AND ASSOCIATED INFRASTRUCTURE, NORTHERN CAPE PROVINCE (OFFE REF: 12/12/20/1782/3) AND ASSOCIATED GRID CONNECTION (IPP PORTION OF THE 132KV ON-SITE SUBSTATION) INCLUDING THE 132KV OVERHEAD POWERLINE AND ESKOM PORTION OF THE ON-SITE SUBSTATION)</p> <p>Nala Environmental Consulting has been appointed to compile the Final Environmental Management Programme for the Final Layout of the authorised 140MW Sutherland 2 Wind Energy Facility and associated infrastructure, near Sutherland, Northern Cape Province (OFFE Ref: 12/12/20/1782/2).</p> <p>A previous SAHRIS Case ID 10500 has reference https://sahris.sahra.org.za/cases/ea-amendment-process-sutherland-wind-energy-facility-wef-northern-and-western-cape-provinces)</p>			

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	<p>The Final EMPr and requested heritage and palaeontological walkdown report have been submitted for review.</p> <p><i>Almond, J. E. 2022. Palaeontological Heritage Report: Combined Desktop & Field-based study. Sutherland 2 Wind Energy Facility and associated grid infrastructure near Sutherland, Karoo Hoogland Municipality (Namaqua District), Northern Cape.</i></p> <p>An additional four (4) palaeontological resources were identified as part of the walkdown. These include rolled bone fragments and invertebrate burrows of Grade IIIC significance and a fragmented long bone of a large tetrapod and an isolated bone fragment of a large tetrapod of Grade IIIB significance.</p> <p>Recommendations provided in the report include the following:</p> <ul style="list-style-type: none"> • The final authorised layouts of the WEF and its associated grid connection infrastructure should be cross-checked against the known available palaeontological 			

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	<p>database. Residual, potentially sensitive, unsurveyed sectors of the western sector of the grid connection footprint – notably those between the Sutherland 2 WEF on-site substation and Sutherland / Rietrug WEF on-site substations - may need to be surveyed prior to commencement of clearing activities by a professional palaeontologist, with recording and judicious sampling or collection of any scientifically valuable fossil material;</p> <ul style="list-style-type: none"> • New fossil material encountered or exposed during the Construction Phase is best handled through the Chance Fossil Finds Protocol outlined in Appendix 2. This tabulated protocol should be incorporated into the EMPr for each development and fully implemented by the responsible Environmental Control Officer (ECO) / Environmental Site Officer (ESO); • The palaeontologist will be required to apply for a Fossil 			

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	<p>Collection Permit from SAHRA for professional mitigation in the Northern Cape. All fieldwork and reporting should meet the standards of international best practice as well as those developed for PIA reports by SAHRA (2013). Fossil material collected must be safeguarded and curated within an approved palaeontological repository (e.g. museum or university collection) with full collection data.</p> <p><i>Orton, J. 2022. Preconstruction Archaeological Survey of the Mainstream Sutherland 2 Wind Energy Facility, Northern Cape.</i></p> <p>The report states that many new archaeological sites were identified within the WEF layout, however, these are not highlighted in the list of all identified heritage sites provided in Table 2 of the report. A total of 64 heritage resources are located in the WEF development and 11 are located within the powerline route. These include Stone Age and historical artefact</p>			

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	<p>scatters of medium-high heritage significance, a small rock shelter with patches of red paint of medium-high heritage significance, stone walled structures of low, medium and medium high heritage significance, stone boundary markers of low and medium heritage significance, leiwater furrow of medium heritage significance, farm complexes of medium-high and high heritage significance. Table 3 provides a list of heritage resources located within or in close proximity to the proposed development footprints with associated mitigation and management measures.</p> <p>Recommendations provided in the report include the following:</p> <ul style="list-style-type: none"> • Wherever project infrastructure comes within 30 m of heritage resources, the infrastructure should be micro-sited to get the distance between the resource and infrastructure as close to 30 m as possible. This applies to waypoints 1176, 1184, 1194-1199 inclusive, 1301 and 1309; 			

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	<ul style="list-style-type: none"> • Any heritage sites located within 30 m of the final layout should be physically flagged on site as no-go areas. This applies to the waypoints listed above unless infrastructure is moved beyond 30 m; • The ECO must regularly (suggest at least weekly) monitor the flagged sites to ensure that the no-go areas are complied with; • No stones are to be removed from any heritage site; • All construction work must occur within the demarcated project footprints and vehicles may not move outside of these areas; • A Permit application must be lodged with SAHRA for any mitigation required; and • If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is 			

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	<p>the property of the state and may require excavation and curation in an approved institution.</p> <p>The recommendations from both the above heritage reports have been included in the Final EMPr.</p> <p>Final Comment</p> <p>The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final EMPr:</p> <ul style="list-style-type: none"> • 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit is satisfied with the provided recommendations in the heritage reports and the EMPr with regards to heritage resources; • 38(4)b – Should additional surveys be conducted as recommended in the palaeontological walkdown 		<ul style="list-style-type: none"> • The comments received from SAHRA are acknowledged by the EAP. • Any additional surveys undertaken as recommended in the walkthrough report and Final EMPr will be submitted to SAHRA for review and comment. SAHRA will be notified of such submissions. • The necessary permits in terms of section 35 of the NHRA will be applied for prior to the commencement of any work undertaken at the site. • The Developer has committed to the implementation of all mitigation measure as specified within the Heritage Walkdown report and the final EMPr (inclusive of management plans). • Should any evidence of archaeological sites or remains, fossils or other categories of heritage resources be found during construction of the development the SAHRA APM unit will be contacted immediately as per the contact details provided and as per the Final EMPr. 	

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	<p>report, any reports regarding these surveys must be submitted to SAHRA for review and comment;</p> <ul style="list-style-type: none"> • Permits in terms of section 35 of the NHRA must be applied for from SAHRA prior to any mitigation work commencing; • All mitigation and management measures provide in Table 3 of the Heritage Walkdown report must be adhered to and completed; • 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with 		<ul style="list-style-type: none"> • Should any unmarked human burials be uncovered during the construction of the development the SAHRA Burial Grounds and Graves (BGG) unit will be contacted immediately as per the contact details provided and as per the Final EMPr. • The NHRA offences as per Section 51(1) are acknowledged by the Developer as such the Developer has committed to the implementation of the mitigation measures for the development in order to ensure non-compliance is avoided. 	

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	<p>section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</p> <ul style="list-style-type: none"> • 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/ Ngqabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule; • 38(4)d – See section 51(1) of the NHRA with regards to offences; • 38(4)e – The following conditions apply with regards to the appointment of specialists: • i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the 		<ul style="list-style-type: none"> • It is acknowledged that if new heritage resources are uncovered during the course of the development that a professional palaeontologist or archaeologist will be appointed as soon as possible. <p>The Final EMPr will be submitted to SAHRA for record purposes upon approval from the DFFE. SAHRA will be notified once this has been done.</p>	

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	<p>finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;</p> <p>The Final EMPr must be submitted to SAHRA for record purposes.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p> <p>Yours faithfully</p> <p>Natasha Higgitt Heritage Officer South African Heritage Resources Agency</p> <p>Phillip Hine</p>			

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	<p>Manager: Archaeology, Palaeontology and Meteorites Unit</p> <p>South African Heritage Resources Agency</p> <p>.....</p> <p>ADMIN:</p> <p>Direct URL to case: https://sahris.sahra.org.za/node/530712</p> <p>(DEA, Ref: 12/12/20/1782/2/AM3) (DEA, Ref: 12/12/20/1782/2/AM5) (DEA, Ref: 12/12/20/1782/2/AM5)</p> <p>Terms & Conditions:</p> <p>1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.</p> <p>2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.</p> <p>3. SAHRA reserves the right to request additional information as required.</p>			