

Appendix C9:  
Public Participation Plan and Approval

## **PUBLIC PARTICIPATION PLAN**

### **IN TERMS OF THE DIRECTIONS REGARDING MEASURES TO ADDRESS, PREVENT AND COMBAT THE SPREAD OF COVID-19 RELATING TO NATIONAL ENVIRONMENTAL MANAGEMENT PERMITS AND LICENCES DURING COVID-19 ALERT LEVEL 3**

Proposed development of the 100MW Vrede Solar Energy Facility and Battery Energy Storage System (BESS), near Kroonstad, Free State Province.

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Proposed development of the 100MW Rondawel Solar Energy Facility and Battery Energy Storage System (BESS), near Kroonstad, Free State Province.

### **Application to be submitted**

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

#### **Project Details:**

Mainstream Renewable Power South Africa (Pty) Ltd (hereafter 'Mainstream') is proposing the development of two Solar Energy Facilities (SEF), including the required grid connection infrastructure, within the Free State Province, as follows:

- » **Full Scoping and Environmental Impact Assessment (S&EIR)** process towards environmental authorisation for the Vrede SEF, comprising a minimum generation capacity of 100MW, road width and length up to 12m and 11km respectively, with associated operations infrastructure, and on-site battery storage. The site will occupy ~ 207ha.
- » **Full Scoping and Environmental Impact Assessment (S&EIR)** process towards environmental authorisation for the Rondawel SEF, comprising a minimum generation capacity of 100MW, road width and length up to 12m and 11km respectively, with associated operations infrastructure, and on-site battery storage. The site will occupy ~ 303ha.

As the proposed sites are located outside of REDZ areas, and outside of the power line corridors, and separate Environmental Authorisations (EA) are required for each project, full Scoping and EIA processes are to be undertaken for the Vrede and Rondawel 100MW Solar Energy Facilities respectively. Similarly, two separate Basic Assessment processes are required for the associated grid connection infrastructure (**please note:** these are conducted as separate applications).

The projects are both located within the Moqhaka Local Municipality of the Fezile Dabi District Municipality, on various farm portions immediately south of Kroonstad, Free State. The affected properties for the two projects include:

Vrede SEF:

- » Farm Vrede, No. 1152, Remaining Extent; and
- » Farm Uitval, No 1104, portion 1;

Rondawel SEF:

- » Farm Rondavel-Noord, No. 1475, Remaining Extent; and
- » Farm Rondavel No. 627, Remaining Extent.

Based on the current project description, the following listed activities are triggered for the two projects:

GNR 327 (Listing Notice 1):

- » No. 11: The development transmission infrastructure outside urban areas with a capacity of more than 33 but less than 275 kilovolts
- » No. 12: The development infrastructure of 100 m<sup>2</sup> or more within 32m of a watercourse;
- » No. 19: The infilling or depositing of more than 10m<sup>3</sup> into or from a watercourse;
- » No. 24: Development of a road wider than 8m or with reserve wider than 13.5m;
- » No. 28: Development of commercial institution on agricultural land.

GNR 324 (Listing Notice 3):

- » No. 2: development of reservoirs, excluding dams, with a capacity of more than 250 m<sup>3</sup> within sensitive biodiversity areas;
- » No. 4: The development of a road wider than 4 metres with a reserve less than 13,5 metres;
- » No. 12: The clearance of an area of 300 m<sup>2</sup> or more of indigenous vegetation except;
- » No. 14: The development of infrastructure of 10 m<sup>2</sup> or more within 32 metres of a watercourse

GNR 325 (Listing Notice 2):

- » No. 1: The development of facilities or infrastructure for the generation of electricity from a renewable resource of 20 megawatts or more;
- » No. 15: The clearance of an area of 20 hectares or more of indigenous vegetation
- » No. 26: The development of a road with a reserve wider than 30 metres or catering for more than one lane of traffic in both directions;

### **Public Participation Plan:**

The public participation (PP) process will be undertaken in accordance with the requirements of Regulations 39 to 44 of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, (GNR 326). The aim of the public participation process is primarily to ensure that:

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

The traditional means and opportunities available for the undertaking of public participation is still covered and implemented as part of this plan considering the current limitations. Alternative means of undertaking consultation has been designed and will be implemented by Savannah Environmental to ensure that I&APs are afforded sufficient opportunity to raise comments on the project through an interactive web-based platform readily available and accessible to any person illustrating interest in the project and enables the public participation process to be undertaken in line with Regulations 41 to 44 of the EIA Regulations, 2014, as amended. This online stakeholder engagement platform allows the EAP to visually present details regarding the project and our consultation documentation, including project maps and plans, presentations and posters regarding the project, and reports available for review. The use of online tools enables stakeholders and I&APs to explore the project-specific content in their own time, and allow them to participate in a meaningful way in the consultation process. The online platform allows for instant feedback and comments to be submitted, in so doing saving time for the stakeholder and also giving the assurance that their comments have been submitted for inclusion in the project reporting. The online stakeholder engagement platform considers the limitations applied by the Disaster Management Act Regulations prohibiting the gathering of people, as well as limitations which certain I&APs may have in terms of access to computers and internet as well as access to public spaces not open for operation or which have restricted access.

The benefits of the online stakeholder engagement platform include:

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

Where I&APs do not have the applicable facilities i.e. access to internet, mobile phones, or computers, provision has been made to include these I&APs in the consultation process by consulting with the Ward Councillor, the ward committee members, community representatives and local community forum members.

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

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

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

The PP plan is submitted to the Department of Environmental Affairs, for discussion and agreement before the PP process is undertaken for the proposed project.

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

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

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



Regulation	Approach & Methodology to meet requirements
<p>law, and must include <b>consultation</b> with Competent Authority, Organs of State &amp; registered I&amp;APs.</p> <p>Regulation 41(6) – Relevant <b>information available and accessible</b></p>	<ul style="list-style-type: none"> <li>• Correspondence sent via post where email or telephonic means are not available.</li> <li>• SMS and/or WhatsApp.</li> <li>• The Savannah Environmental online stakeholder engagement platform will ensure that I&amp;APs are afforded sufficient opportunity to participate in the project and raise comments on the project to any person with interest in the EIA process for the project. This online stakeholder engagement platform which will include the following:               <ul style="list-style-type: none"> <li>○ A means to register on the project database and provide details of their interest in the project</li> <li>○ Background information on the project</li> <li>○ Project maps</li> <li>○ Photos of the project site and surrounds</li> <li>○ Presentation with narration providing a summary of the project details and the findings of the EIA</li> <li>○ Posters providing a summary of the findings of the EIA</li> <li>○ A means of submitting written comment or queries.</li> </ul> </li> <li>• Virtual focus group meetings using an appropriate platform agreeable to all parties (such as Zoom, Skype or Teams). The meeting will be recorded and the attendees' details captured in an attendance register. Confirmation of their attendance will also be requested by e-mail and the correspondence will be included in the report.</li> <li>• Communities will be consulted via one of the following, where available: the relevant Ward Councillor, ward committee members, community representative or local community forum members, as determined and confirmed during the consultation process.</li> </ul> <p><u>Opportunity and means of consultation where applicable facilities are not available to I&amp;APs:</u></p>

Regulation	Approach & Methodology to meet requirements
	<ul style="list-style-type: none"> <li>• Telephonic consultation</li> <li>• Post (where email or telephonic means are not available)</li> <li>• SMS and/or WhatsApp</li> <li>• Consultation and communication through one of the following, where available: the ward councillor, ward committee members and confirmed community representatives and local community forum members.</li> </ul>
Regulation 41(2)(a) – <b>Site notice</b>	<ul style="list-style-type: none"> <li>• Site notices will be placed at affected properties by the EAP, landowner or specialist, depending on specific travel restrictions applicable at the time.</li> <li>• Size and content will be in accordance with Regulation 41(3) &amp; 41(4).</li> </ul>
Regulation 41(2)(b) – <b>Written notification</b> to affected and neighbouring landowners and occupiers; municipality; ward councillors; Organs of State & other parties required by the CA	<ul style="list-style-type: none"> <li>• Notification letter to be sent via email, fax or post.</li> </ul> <p><u>Opportunity and means of consultation where applicable facilities are not available to I&amp;APs:</u></p> <ul style="list-style-type: none"> <li>• Post (where email or telephonic means are not available)</li> <li>• SMS or WhatsApp notification.</li> </ul>
Regulation 41(2)(c) – (e) – <b>Advertisements</b>	<ul style="list-style-type: none"> <li>• Advert to be placed in a local newspaper.</li> </ul>
Regulation 42 – <b>Project database</b>	<ul style="list-style-type: none"> <li>• I&amp;APs to be identified through a process of networking and referral, obtaining information from the Savannah Environmental existing stakeholder database, liaison with potentially affected parties in the greater surrounding area and a registration process involving the completion of a reply form.</li> <li>• Organs of State, key stakeholders and affected and surrounding landowners will be identified and registered on the project database.</li> <li>• Other stakeholders will be required to formally register their interest in the project through either directly contacting the Savannah Environmental Public Participation team via email or fax or use of the Savannah Environmental website.</li> <li>• In order to access the Savannah Environmental online stakeholder engagement platform for a specific project, I&amp;APs will be required to provide their details such that they are automatically registered on the project database.</li> </ul>

Regulation	Approach & Methodology to meet requirements
	<ul style="list-style-type: none"> <li>• The register of I&amp;APs will contain the names of:               <ul style="list-style-type: none"> <li>○ all persons who requested to be registered on the database through the use of the Savannah Environmental website, or in writing and disclosed their interest in the project;</li> <li>○ all Organs of State which hold jurisdiction in respect of the activity to which the application relates; and</li> <li>○ all persons who submitted written comments or attended virtual meetings and viewed virtual presentations on the Savannah Environmental website during the public participation process.</li> </ul> </li> <li>• The information captured on the project database will contain the names, organisation and contact details, as required.</li> </ul> <p><u>Opportunity and means of consultation where applicable facilities are not available to I&amp;APs:</u></p> <ul style="list-style-type: none"> <li>• Process of networking and referral</li> <li>• Email notification (if available)</li> <li>• Telephonic registration</li> <li>• SMS and/or WhatsApp</li> <li>• Fax or post (where email or telephonic means are not available)</li> </ul>
Regulation 44 – <b>Comments</b> to be recorded	<ul style="list-style-type: none"> <li>• Comments will be able to be submitted directly to the EAP using the Savannah Environmental online stakeholder engagement platform. A customised reply form is available on this webpage.</li> <li>• The Savannah Environmental online stakeholder engagement platform includes:               <ul style="list-style-type: none"> <li>○ A means to register on the project database and provide details of their interest in the project</li> <li>○ A means of submitting written comment or queries.</li> </ul> </li> <li>• The online platform allows for instant feedback and comments to be submitted, in so doing saving time for the stakeholder and also giving the assurance that their comments have been submitted for inclusion in the project reporting.</li> </ul>

Regulation	Approach & Methodology to meet requirements
	<ul style="list-style-type: none"> <li>• Written comments can also be submitted via email, post or fax.</li> <li>• Any comments provided telephonically or via instant message will be transcribed and recorded as formal comments.</li> <li>• I&amp;APs without the applicable electronic facilities to access the Savannah Environmental website will be provided with the opportunity to submit their comments and communicate with the public participation team via SMS, WhatsApp or by sending a Please-call-me notification. These comments will be transcribed and recorded as formal comments.</li> <li>• All comments received throughout the EIA process will be acknowledged and captured in the comments and responses report (C&amp;RR) with a relevant response.</li> <li>• The C&amp;RR will be included in the final report submitted to the CA.</li> </ul> <p><u>Opportunity and means of consultation where applicable facilities are not available to I&amp;APs:</u></p> <ul style="list-style-type: none"> <li>• Written comments via post or fax (where email or telephonic means are not available)</li> <li>• Comment submission telephonically and instant messaging (SMS and/or WhatsApp)</li> <li>• Sending a Please-call-me notification to the Public Participation team so that contact can be made.</li> </ul>
Regulation 4(2) – Notification of <b>decision</b> on application	<p><u>Notification of Environmental Authorisation (EA) using the following means:</u></p> <ul style="list-style-type: none"> <li>• Notification letter with details as outlined in EA issued will be sent via email, fax or post.</li> <li>• Notification will be available on the Savannah Environmental website</li> <li>• Notifications that the EA has been issued and where to download and/or obtain a copy to communities via one of the following, where available: Ward Councillor and his/her ward committee members and identified and confirmed community representatives.</li> </ul>

Regulation	Approach & Methodology to meet requirements
	<ul style="list-style-type: none"><li>• SMS or WhatsApp notification.</li></ul> <p><u>Opportunity and means of consultation where applicable facilities are not available to I&amp;APs:</u></p> <ul style="list-style-type: none"><li>• Post (where email or telephonic means are not available)</li><li>• Communication through one of the following, where available: the ward councillor, ward committee members and confirmed community representatives and local community forum members.</li><li>• SMS and/or WhatsApp</li></ul>