

**APPENDIX C8**  
**COMMENTS & RESPONSES REPORT**



DRAFT EIA

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## LIMESTONE PV2, NEAR DANIELSKUIL, NORTHERN CAPE PROVINCE (DFFE Ref.no.: 14/12/16/3/3/2/2270) COMMENTS AND RESPONSES REPORT

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### TABLE OF CONTENT

	PAGE
<b>1. COMMENTS RECEIVED DURING THE 30-DAY REVIEW PERIOD FOR THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT PHASE.....</b>	<b>1</b>
1.1. Organs of State.....	1

The Limestone PV2 application for Environmental Authorisation was announced on **Monday, 06 January 2023**. The Background Information Document (BID), distributed on Monday, **06 January 2023**, served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments/queries regarding the proposed project. A notification letter accompanied the BID, announced the availability of the Scoping Report for review and comment. All written comments received from the commencement of the Scoping phase to date have been included in this Comments and Responses Report (C&RR).

The EIAR was made available for a 30-day review and comment period from **Thursday, 18 May 2023** to **Monday, 19 June 2023** and all written comments received have been included in the table below and form part of **Appendix C8** of the revised EIAR. The revised EIAR will be available for review and comment from **Friday, 21 July 2023** to **Monday, 21 August 2023**. All comments received during this review period will be included in the C&RR within the Final EIAR.

**NOTE:**  
In terms of Regulation 44(1) of the EIA Regulations 2014, as amended, please note that the comments raised, and responses provided at the various virtual Meetings held during the 30-day review period of the draft EIA Report are attached as **Appendix C8** of the revised EIA Report Report.

**LIST OF ABBREVIATIONS / ACRONYMS**

EIA	Environmental Impact Assessment	HIA	Heritage Impact Assessment
CBA	Critical Biodiversity Area	I&APs	Interested and Affected Parties
C&RR	Comments and Response Report	NFEPA	National Freshwater Ecosystem Priority Areas
DFFE	Department Forestry, Fisheries and the Environmental	NEMA	National Environmental Management Act
EIAR	Environmental Impact Assessment Report	OoS	Organs of State
EMPR	Environmental Management Programme	PV	Photovoltaic
ESA	Ecological Support Areas	SAHRIS	South African Heritage Resources Information System
FEPA	Freshwater Ecosystem Priority Areas	SEI	Sensitive Ecosystem Inventory

**1. COMMENTS RECEIVED DURING THE 30-DAY REVIEW PERIOD FOR THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT PHASE**

**1.1. Organs of State**

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>The Application for Environmental Authorisation and Draft Environmental Impact Assessment Report (EIAR) received by the Department on 18 May 2023 and acknowledged on 19 May 2023, respectively, refer.</p> <p>This letter serves to inform you that the following information must be included in the final EIAR:</p> <p><b>1. Specific Comments</b></p> <p>a) Please ensure that all issues raised, and comments received during the circulation of the draft EIAR from registered I&amp;APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are addressed and included in the final EIAR. Proof of correspondence with the various stakeholders must be included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 and 44 of the 2014 NEMA EIA Regulations, as amended.</p> <p>b) You are further reminded that the final EIAR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of the EIAR in</p>	<p>Mr Sabelo Malaza</p> <p>Chief Director: Integrated Environmental Authorisations Department of Forestry, Fisheries &amp; the Environment Signed by: Mr Wayne Hector Designation: Deputy Director: Priority Infrastructure Projects Date: 01/06/2023</p>	<p>The Applicant acknowledges the comment raised by Mr Sabelo Malaza on information to be included in the EIAR. Specific responses are provided below.</p> <p>a) The Public Participation Process has been conducted in terms of Regulation 39, 40 41, 42, 43 and 44 of the 2014 NEMA EIA Regulations, as amended. All raised issues and comments received have been addressed in this C&amp;RR. Reference is given to <b>Appendix C8</b> for all the detailing responses to the issues and comments. All correspondence records have been appended to the EIAR. <b>Appendix C4</b> includes correspondence with the Organs of State (OoS) and <b>Appendix C5</b> includes correspondence with Stakeholders and I&amp;APs.</p> <p>b) The EIAR complies with all the requirements in terms of the scope of assessment and content of the EIAR in accordance with Appendix 3 of the 2014 NEMA EIA Regulations, as amended. The</p>

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	<p>accordance with Appendix 3 of the 2014 NEMA EIA Regulations, as amended.</p> <p>c) Kindly consult with the case officer to organise a site inspection prior to the final EIAR being due for submission. Ensure that officials from the Northern Cape provincial department and this Departments Biodiversity and Conservation Directorate are included or invited.</p> <p>d) Kindly indicate the status of the Oryx Wind Energy facility and whether environmental authorisation has been applied for.</p> <p>e) Appendix C6 and C8 has distorted text and it is difficult to read some of the text. Kindly fix the formatting of this document.</p> <p>f) Appendix C6 does not include Comment from the Provincial Authority, however, their comment is responded to in Appendix C8.</p> <p>g) Section 6.5 of the DEIR needs to be expanded on in terms of the above. Please motivate for the proposed development in terms of its location in a CBA and sensitive area. Whilst the proposed development is aligned from a policy and regional perspective, the biodiversity perspective is not clearly understood. Clarify which environmental site sensitivities are being avoided as the layout is</p>		<p>relevant sections where these requirements are met are detailed in the various chapters of the EIAR.</p> <p>c) As agreed with the case officer, the site visit is to be organised in late July or August. It was noted that this would be conducted after the release of the revised EIAR. This correspondence is included in Appendix B of the EIAR. As the report has been released for a second round of public review, arrangements will be made to hold this site visit prior to the submission of the FEIR as far as possible.</p> <p>d) The Oryx Wind Energy Facility will form part of a separate EIA application that will be submitted at a later stage. Specialist studies, including bird and bat monitoring, are currently being undertaken in support this application.</p> <p>e) The distorted text in Appendix C6 and C8 has been corrected and reincluded as part of the EIAR.</p> <p>f) The comments from the provincial authority have been included in Appendix C6.</p> <p>g) Following the screening assessment, consideration of the total PV area was adapted to avoid, as much as possible, the Very High SEI areas as well as the identified Wooded Vaalbosveld habitat which includes the high density of <i>Olea europaea</i> subsp. <i>2uspidate</i>. Following the screening assessment, the Limestone PV2 layout was proposed. The layout in relation to the SEI can be</p>

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	<p>still within a CBA 2 and illustrate whether this type of development is desirable in this environment.</p> <p>h) The location of the site office within the onsite farmhouse or the alternative site must be clarified as it has impact on the recommended buffers in terms of specialist report HIA.</p>		<p>seen in Figure 5-2 of the Ecology Report included in <b>Appendix G</b> of the EIAR. In addition, commitment was made towards the preservation of the remainder of the site, where no development is proposed. Overall, there is an evident avoidance of the central dense woody area, and the loss of trees will be kept to a minimum. Considering the above, the following was avoided:</p> <ul style="list-style-type: none"> <li>• All Very High SEI areas.</li> <li>• Of the total 2130.56 ha PV area, 197.97 ha (9.29 %) is proposed for infrastructure.</li> <li>• Of the 1208.35 ha Wooded Vaalbosveld, 59.63 ha (4.93 %) will be cleared of woody plants only.</li> <li>• Of the total 525.41 ha of High SEI areas (excluding Wooded Vaalbosveld), 113.15 ha (21.53 %) is planned for infrastructure.</li> </ul> <p>In addition, the preparation of the substrate beneath solar arrays depends on the panel technology alternative that is implemented. The developer will retain vegetative ground cover with no clearing for the PV footprint, most likely Monofacial panel technology instead of Bifacial panels which removes vegetation and place white gravel underneath panels. Please see Section 5.1.2.2 of the EIAR.</p> <p>h) The Heritage Impact Assessment recommends the following recommendation regarding the onsite farmhouse (page 36 of the HIA):</p> <p><i>“A 300m buffer around farm werf is recommended for PVs. It would be appropriate for Site 117 to form part of the operational infrastructure for the PV facility on condition that sufficient screening between the Site Office infrastructure and Site 117 and</i></p>

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	<p>i) The final EIAR must present a preferred alternative for the substation location.</p> <p>j) Please include motivation for the current iteration of the layout map and indicate what measures or features were considered in terms of cumulative sensitivity.</p> <p>k) In relation to the Northern Cape Systematic Biodiversity plan; the Siyanda District Municipality EMF as well as the Namakwa Bioregional Plan, illustrate whether the proposed development meets the requirements of these documents in terms of development within a CBA 2; and whether there are requirements for offsets and if</p>		<p><i>the burial ground at SAHRIS Sites 91009 and 85442 is implemented".</i></p> <p>Considering the above, the placement of the site office within the farmhouse area and suitably screened, this is acceptable. The applicant intends to suitably screen the site office. There is no PV infrastructure within 300m of the farmhouse.</p> <p>i) Alternative 1 has been noted as the preferred alternative for the substation in the EIAR. This mention is included in Chapter 3 and 11.6.</p> <p>j) The current iteration of the layout map avoids identified sensitive features. These sensitive features include the main cluster of Olive trees located in the centre of the project site, the depressions and watercourses that appear within the project site. In addition, the current iteration also avoided the placement of PV panels within 300m of the farmhouse with identified heritage importance. The avoidance of the main cluster of olive trees also allows for vegetation underneath the PV panels to be retained and will not be cleared. These measures reduced the cumulative impacts of the project. In addition, the mitigation measures recommended by the specialists as part of their cumulative assessments have been included within the EMPr.</p> <p>k) <i>The Namakwa Bioregional Plan suggest land uses for CBA 2 areas to be managed to maintain near natural landscapes with some loss in ecosystem integrity and functioning.</i></p> <p><i>The terrestrial ecology assessment (Appendix G of the EIAR) indicated that Very High SEI (Site Ecological Importance) habitats and accompanying buffers will be avoided, with further avoidance and impact mitigation achievable for development</i></p>



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	<p>the applicant has considered the implication thereof.</p>		<p><i>within the High SEI habitats. This avoidance will contribute to the maintenance of the near natural and Very High SEI habitats, some maintenance of the High SEI habitat also achievable, albeit at the loss of some biopsychical attributes and functioning.</i></p> <p>In terms of the guideline for interpreting Site Ecological Importance in the context of the development, it is indicated that "Offset mitigation may be required for high impact activities". Renewable energy projects can be considered low intensity developments with the correct implementation of the mitigation hierarchy. Referring to the mitigation hierarchy, the project will achieve avoidance by means of revised and reduced spatial planning, suggested seasonal constraints for construction to prioritise the dry season period and also the 'avoidance' of vegetation clearing beneath the panels. The overall residual impacts are expected to be low, and this will be achieved through reduced durations for selected aspects, minimised footprint areas and supporting measures to reduce the expected impact intensities. Furthermore, rehabilitation has been prescribed to improve degraded habitats stemming from impacts that could not be completely avoided or mitigated.</p> <p>In terms of the overall impact statement, it is stated "Considering that this area has been identified as being of significance for biodiversity maintenance and ecological processes (CBAs and ESAs), development may proceed but with caution and only with the implementation of mitigation measures, specifically the avoidance of clearing of the areas below the panels. The overall residual impacts are expected to be low. Considering the above-mentioned information, no fatal flaws are evident for the proposed project. It is the opinion of the specialists that the project may be favourably considered, on condition that all</p>

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	<p>l) The terrestrial, avifauna and freshwater specialists recommended offset mitigation should development occur within areas assigned a very high sensitivity. The report mentions that the proposed facility layout has avoided all areas of very high sensitivity and it is clear that the proposed development still occurs in areas of high sensitivity. Following point K above, please include further motivation as to why offsets are not being considered.</p>		<p><i>prescribed mitigation measures and supporting recommendations are implemented.</i>" As the project is considered to be a low impact development, no offset is required.</p> <p>l) The very high sensitivity is in relation to the SEI and not the impact assessment of the identified impacts as assessed in Section 9.3 of the EIAR. As stated above, in terms of the guideline for interpreting Site Ecological Importance in the context of the development, it is indicated that "<i>Offset mitigation may be required for high impact activities</i>". Renewable energy projects can be considered low intensity developments with the correct implementation of the mitigation hierarchy. Referring to the mitigation hierarchy, the project will achieve avoidance by means of revised and reduced spatial planning, suggested seasonal constraints for construction to prioritise the dry season period and also the 'avoidance' of vegetation clearing beneath the panels. The overall residual impacts are expected to be low, and this will be achieved through reduced durations for selected aspects, minimised footprint areas and supporting measures to reduce the expected impact intensities. Furthermore, rehabilitation has been prescribed to improve degraded habitats stemming from impacts that could not be completely avoided or mitigated.</p>
2.	<p><b><u>Layout &amp; Sensitivity Maps</u></b> a) A copy of the layout map must be submitted with the final EIAR. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible, e.g., roads.</p>		<p>a) A layout map has been included in <b>Figure 2.1 of the EIAR and Appendix D</b>. A sensitivity map containing all biodiversity data has been included as <b>Figure 9.1 and Appendix D</b>. Existing infrastructure, especially access roads and the onsite farmhouse have been used as far as possible.</p>

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	<p>b) The layout and sensitivity map included in Appendix D shows some of the proposed infrastructure, albeit temporary, within the no-go zones. Motivate for their inclusion.</p> <p>c) Include a map which depicts the proposed Limestone Cluster.</p>		<p>b) The temporary infrastructure noted as being within a no-go zone is within the 300 m heritage no-go buffer surrounding the onsite farmhouse. The Heritage Impact Assessment indicated the following recommendation regarding the onsite farmhouse.</p> <p><i>"A 300m buffer around farm werf is recommended for PVs. It would be appropriate for Site 117 to form part of the operational infrastructure for the PV facility on condition that sufficient screening between the Site infrastructure and Site 117 and the burial ground at SAHRIS Sites 91009 and 85442 is implemented".</i></p> <p>The placement of the site office within the farmhouse buffer area is considered acceptable, should the site be suitably screened. The heritage specialist was consulted, and the recommendation included as part of the HIA. The applicant intends to suitably screen the site office. There is no PV infrastructure within 300m of the farmhouse.</p> <p>c) A map indicating the proposed Limestone cluster has been included as <b>Figure 1.2</b></p>
	<p><b>3. Public Participation</b></p> <p>a) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR. This includes but is not limited to the provincial Department of Agriculture, the local and district Municipality, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), BirdLife SA, the Department of Mineral Resources and Energy, the Department of Rural Development and Land Reform, and the Department of Environment, Forestry and</p>		<p>a) All comments received from all relevant stakeholders are included within the EIAR as <b>Appendix C7</b>.</p>

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	<p>Fisheries: Directorate Biodiversity and Conservation (BCAdmin@dffe.gov.za, for the attention of Mr Seoka Lekota).</p> <p>b) Please ensure that all issues raised, and comments received during the circulation of the final Scoping Report and draft EIA from registered I&amp;APs and organs of state which have jurisdiction in respect of the proposed activity are addressed in the final EIA. Proof of correspondence with the various stakeholders must be included in the final EIA. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</p> <p>c) A Comments and Response trail report (C&amp;R) must be submitted with the final EIA. The C&amp;R report must incorporate all comments for this development. The C&amp;R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter in chronological order. Please refrain from summarising comments made by I&amp;APs. All comments from I&amp;APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to I&amp;AP's comments.</p> <p>d) Comments from I&amp;APs must not be split and arranged into categories. Comments from each submission must be responded to individually.</p> <p>e) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the 2014 NEMA EIA Regulations, as amended.</p>		<p>b) All issues and comments received during the process to date have been included in the C&amp;RR and addressed where relevant. to the CRR is included as <b>Appendix C8</b> of the EIA. Where applicable, these comments have been addressed within the EIA. All correspondence records have been appended to the draft EIA. <b>Appendix C4</b> includes correspondence with the OoS and <b>Appendix C5</b> includes correspondence with Stakeholders and I&amp;APs.</p> <p>c) A Comments and Responses Report is included as <b>Appendix C8</b> of the EIA. This includes all comments received to date as well as responses to these comments. Comments have not been summarised and have been copied verbatim and responded to clearly. No comments have been responded to as "noted".</p> <p>d) Comments have not been split and arranged into categories. Comments from each submission have been responded to individually.</p> <p>e) The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the 2014 NEMA EIA Regulations, as amended, as detailed in the EIA (Chapter 7).</p>

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	<p><b>4. Specialist Declaration of Interest</b> Specialist Declaration of Interest forms must be attached to the final EIAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Department's website (please use the Department's template).</p>		<p>The original signed Specialist Declaration of Interest forms are included in <b>Appendix S</b> of the Final EIAR. These are submitted in electronic format as per the DFFE requirements.</p>
	<p><b>5. Undertaking of an Oath</b></p> <p>a) Please note that the final EIAR must have an undertaking under oath/ affirmation by the EAP.</p> <p>b) Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 3 of the 2014 NEMA EIA Regulations, as amended, which states that the EIAR must include:</p> <ul style="list-style-type: none"> <li>• <i>"an undertaking under oath or affirmation by the EAP in relation to:</i></li> <li>• <i>the correctness of the information provided in the reports;</i></li> <li>• <i>the inclusion of comments and inputs from stakeholders and I&amp;APs;</i></li> <li>• <i>the inclusion of inputs and recommendations from the specialist reports where relevant; and</i></li> <li>• <i>any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties."</i></li> </ul>		<p>The affirmation by the EAP has been included as part of the application which was submitted to the Department. This is included in <b>Appendix E</b> of the revised EIAR</p>

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	<p>6. <u>Environmental Management Programme</u></p> <p>a) The EMPr must also include the following:</p> <ul style="list-style-type: none"> <li>• All recommendations and mitigation measures recorded in the EIAR and the specialist studies conducted.</li> <li>• An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.</li> <li>• 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.</li> <li>• An alien/invasive plant management report; plant rescue and protection report; and revegetation and habitat rehabilitation report.</li> </ul> <p>b) In addition to the above, the EMPr must comply with Appendix 4 of the 2014 NEMA EIA Regulations, as amended.</p>		<p>a) The EMPr (<b>Appendix N</b>) includes:</p> <p>all relevant recommendation and mitigation measures recorded in the EIAR and specialist studies. These include measures to protect hydrological features from construction impacts, including the spillage of pollutants. This has been included within the various objectives that are included in the EMPr and especially within <b>Objective 13</b>.</p> <p>A sensitivity map has been included as <b>Appendix A</b></p> <p>An alien/invasive plant management report has been included as <b>Appendix C</b>; a plant rescue and protection has been included as <b>Appendix E</b> and revegetation and habitat rehabilitation report has been included as <b>Appendix D</b></p> <p>b) The EMPr complies with Appendix 4 of the 2014 NEMA EIA Regulations, as amended.</p>
	<p><b>General</b></p> <p>You are further reminded to comply with Regulation 23(1)(a) of the 2014 NEMA EIA Regulations, as amended, which states that: "The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority –</p> <p>a) <i>an environmental impact assessment report inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report</i></p>		<p>a) The notification letter and EIAR with all specialist reports that has been subjected to 30 days of public participation was submitted to the DFFE (the competent authority) within 106 days of acceptance of the scoping report. Comments were provided following review of the report and Comments and response report was compiled. In response to comments raised through the public participation process, additional information has now been included and forms part of the revised draft EIAR. In terms of Regulation 19(1) (b), the draft EIA has been revised and will be released for a second public comment period of 30 days. A</p>

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	<p><i>and calculations contemplated in the Financial Provisioning Regulations, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."</i></p> <p>Should there be significant changes or new information that has been added to the EIAR or EMPr's which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: <i>"The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the documents contemplated in sub-regulation 1(a) will be submitted within 156 days of acceptance of the scoping report by the competent authority or where regulation 21(2) applies, within 156 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents, which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in sub-regulation (1)(a), and that the revised documents contemplated in sub-regulation 1(a) will be subjected to another public participation process of at least 30 days"</i>.</p> <p>Should you fail to meet any of the timeframes stipulated in Regulation 23 of the 2014 NEMA EIA Regulations, as</p>		<p>notification that the final report will be submitted to the DFFE within 156 days of the acceptance of scoping was submitted to the Department on 07 July 2023 and acknowledged on 11 July 2023.</p>

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	<p>amended, your application will lapse. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department</p>		
<p>2.</p>	<p>RE: PROPOSED LIMESTONE PV2 SOLAR FACILITY</p> <ol style="list-style-type: none"> <li>1. The above matter refers.</li> <li>2. We wish to advise that SENTECH SOC Ltd ("SENTECH") has received an application from AVG Projects (Pty) Ltd ("the applicant"), which plans to construct one solar PV as described in annexure 1 hereto "Site", in accordance with the provisions of Section 29(1) (b) of the Electronic Communications Act no. 36 of 2005 ("the Act").</li> <li>3. SENTECH has analysed the information provided by the applicant in accordance with the provisions of Section 29(1) (c) of the Act, and specifically the location of the site and confirm that there would be limited degradation of SENTECH transmitted Terrestrial UHF/VHF Television (TV), and/or FM radio services in the planned deployment area, as indicated in annexure 1.</li> <li>4. SENTECH hereby grants the applicant approval to proceed with the construction of its energy project at the site subject to the following terms and conditions:               <ol style="list-style-type: none"> <li>4.1. Due to the fact that the findings made by SENTECH are based on simulations and calculated on a theoretical model, using available data and assumptions where no data was provided, such findings may change at any time should any further information be made available to or come to SENTECH's attention.</li> </ol> </li> </ol>	<p>Mr Serame Motlhake Manager: SSDD and QAO Date: 13 June 2023</p>	<p>The applicant acknowledges the comments made by SENTECH. Further information will be provided to SENTECH if required should any project details change.</p>



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	<p>4.2. At any time after the approval, and during construction of the project, should any radio transmissions be affected by construction activities, SENTECH will give the applicant 7 (seven) day's written notice to remove the cause of the interference.</p> <p>4.3. Under no circumstances whatsoever will SENTECH be liable to the applicant or any third party for any damages, loss or costs, of any nature whatsoever or howsoever arising, suffered as a consequence of the aforementioned request and the applicant fully indemnify SENTECH;</p> <p>4.4. SENTECH prior written consent must first be obtained before any construction activities underneath, along, across or within close proximity to SENTECH infrastructure can begin and shall comply with the applicable SENTECH guidelines relating to clearances between equipment and the proposed construction activity. Furthermore, the applicant shall clearly adhere to, and ensure all installations shall be fully compliant with the Occupational Health and Safety Act No. 85 of 1993.</p> <p>5. This approval is further subject to the submitted applications boundaries or structures listed in annexure 1 hereto, the materials used, as well as the size and positioning of structures declared in the application. If the services of SENTECH or its clients is in any way compromised by a deviation or change of this submission, the applicant shall be liable for all costs to re-establish, or relocate the services, and</p>		

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	<p>under no circumstances whatsoever will SENTECH be liable to the applicant or any other third party for any damages, loss or costs, of any nature whatsoever or howsoever arising, suffered as a consequence.</p> <p>6. This approval is valid and applicable between SENTECH and the applicant only. It does not include any approval for any of the other electronic communication operators which have current co-sharing agreements to utilise SENTECH's radio masts.</p> <p>7. Any additions, amendments, additional structures to be built, or any change to the energy farm boundaries, will require a new application to SENTECH.</p> <p>8. The validity of this approval is for a period of 12 (twelve) months. If construction of the designed project commences after the expiry of the twelve month period, the application must be re-submitted to SENTECH for further evaluation and approval.</p> <p>9. This approval does not imply any rights of access whatsoever to SENTECH property or use of SENTECH's access roads for construction or maintenance of the design project. Separate permission must be obtained from SENTECH in this regard. Furthermore, SENTECH reserves the right to claim damages in terms of Section 29 of the Act, for any loss or damages sustained as a result of damages to any of Sentech's electronic broadcast and communications infrastructure.</p> <p>10. The applicant shall, in carrying out any work or project, take all the necessary precautions for the safety of SENTECH's employees, contractors, representatives and its property, including the radio</p>		

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	<p>transmitters and links on or near the site against damages as a result of construction of the applicant's energy project.</p> <p>11. The applicant shall be liable for all and any direct and/or indirect, and/or consequential damages or injury that may be caused by the applicant, its contractors, subcontractors, employees, agents or representatives to any employee, contractor, representative or property of SENTECH including radio network transmitters and/or links or land which may have been disturbed shall be restored to the same condition in which it was before commencement of the construction of the energy project.</p> <p>12. In no event will SENTECH, its employees, contractors, or representatives be liable to the applicant or any third party whatsoever for special, collateral, exemplary, direct, indirect, incidental, consequential or any other damages of any nature whatsoever or howsoever arising (including without limitation, loss of goodwill, loss of profits or revenues, loss of savings, loss of use, interruptions or noisiness, or injury) whether or not such damages or injury occurred prior or subsequent to, or are alleged as a result of any SENTECH radio network approved and/or not approved in terms of this letter, even if SENTECH has been advised of the possibility of such damages or injury.</p> <p>All SENTECH rights are fully reserved.</p>		

NO.	COMMENT	RAISED BY	RESPONSE
3.	<p>Background</p> <p>Savannah Environmental (Pty) Ltd (the EAP) have submitted an application on behalf of the proponent, AGV Projects (Pty) Ltd, to obtain an environmental authorization in terms of the National Environmental Management Act, 1998, as amended, in respect of listed activities that have been triggered as a result of the proposed Limestone PV 1 and Limestone PV 2 Photovoltaic Solar Plants and its associated infrastructure, near the town of Daniëlskuil in the Northern Cape Province. Two separate EIA processes are being conducted parallel to each other for both projects. This Department has provided comments and recommendations on the DSRs on a previous occasion.</p> <p>1. Table 3.1 (page 14) of the Terrestrial Ecology and Freshwater Ecology Assessment (Appendix G) and the DEIR (page 152) states that the proposed development is located a 100 km from the nearest Strategic Water Source Area (SWSA) and in addition the Terrestrial Ecology and Freshwater Ecology Assessment merely mentions that the proposed site is associated with the Southern Ghaap Plateau groundwater SWSA. This frivolous reference of the proposed development site being associated with the largest groundwater SWSA in the Northern Cape Province is quite worrisome considering that the EMPR states that water will be abstracted from the ground (ref. page 29 of the EMPR: "A water use authorization application must be submitted to the DWS prior to any abstraction of groundwater"). It should be noted that ground SWSAs are formed</p>	<p>Elsabe Swart Manager: SSDD and QAO Date: 13 June 2023</p>	<p>1. As stated in the EIAR (Chapter 2), the source of water for the project is still to be confirmed. Should water be required to be abstracted from groundwater resources for the project, a Water Use Authorisation application would be submitted to DWS, and the impacts on groundwater assessed to inform this application.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>when water collate in saturated layers or zones below the land surface and covers around 9% of the land surface of South Africa. Discharges or outflows of groundwater from ground SWSAs sustain springs and river flows in the dry season (known as baseflow) and plays a critical role in supporting livelihoods and the formal economy.</p>		
	<p>2. The EIR failed to quantify the impacts of the proposed Limestone PV 1 and PV 2 facilities on the dense stand of <i>Olea europaea</i> subsp. <i>africana</i> found within the vicinity i.e., this Department is aware of a dense stand of <i>Olea europaea</i> subsp. <i>africana</i> trees in the area surrounding the Grootpan, specifically where the Olien substation is located. Furthermore, the specialist reports have not provided significant scientific context to assist decision making in this regard i.e., no interpretation of species function, ecosystem function and landscape functionality have been considered or discussed in an interrogative manner to guide sound impact evaluations. Please note that most of the BRAHMS distribution records collected for Olive trees (under the synonym name <i>Olea europaea</i> subsp. <i>cuspidata</i>) are confined to the Ghaap Plateau Vaalbosveld (SVk 7) in this specific area, thus its unique status.</p>		<p>2. The Ecology Impact Assessment has been revised to include additional information in this regard. The following is stated in the revised report:</p> <p>Following the screening assessment, consideration of total PV area was adapted to avoid, as much as possible, the Very High SEI areas as well as the identified Wooded Vaalbosveld habitat which includes the high density of <i>Olea europaea</i> subsp. <i>cuspidata</i>. Following the screening assessment, the Limestone PV2 layout was proposed. The layout in relation to the SEI can be seen in Figure 5 3 of the Ecology Report included in Appendix G of the EIAR. In addition, commitment was made towards the preservation of the remainder of the site, where no development is proposed. Overall, there is an evident avoidance of the central dense woody area, and the loss of trees will be kept to a minimum. Considering the abovementioned, the following was avoided:</p> <ul style="list-style-type: none"> <li>• All Very High SEI areas;</li> <li>• Of the total 2130.56 ha PV area, 197.97 ha (9.29 %) is proposed for infrastructure.</li> <li>• Of the 1208.35 ha Wooded Vaalbosveld, 59.63 ha (4.93 %) will be cleared of woody plants only;</li> <li>• Of the total 525.41 ha of High SEI areas (excluding Wooded Vaalbosveld), 113.15 ha (21.53 %) is planned for infrastructure.</li> </ul>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>3. Both PV developments is proposed for CBA2s and hence the cumulative impact on the associated CBA 2 would be in the extent of ~600ha, which is regarded as significant. Further to the fact that both Limestone PV2 and PV 2 are proposed for habitat types classified by the specialist as being of high sensitivity prior to mitigation, the proposed site is also located within the Ghaap plateau, a primary focus area of the Northern Cape Protected Area Expansion Strategy (NCPAES, 2017), the Griqualand West Centre of Endemism, which contains range restricted endemic plant species [redefined by Frisby et al. (2019) &amp; Van Staden et al. (2020)], an area containing numerous natural NFEPA wetlands, and is habitat to the provincially protected <i>Olea europaea</i> subsp. <i>africana</i> trees, this Department is of the opinion that the proposed PV development will likely have an unacceptable Medium – High negative impact on broad-scale ecological processes and habitat quality for sensitive species post mitigation, the need for a biodiversity offset assessment is an unavoidable requirement. The biodiversity offset assessment must be guided by the recent published National Draft Biodiversity Offset Guideline, Provincial CBA map and Provincial Protected Area expansion strategy and consider all, but not limited to, the above-mentioned environmental features.</p>		<p>The terrestrial ecology assessment (Appendix G of the EIAR) concluded "<i>The overall medium cumulative low residual impact does not present a fatal flaw for the development, and the project may be favoured for authorisation. Due to the low residual impacts expected for the project, no biodiversity offset strategy is required.</i>"</p> <p>In terms of the guideline for interpreting Site Ecological Importance in the context of the development, it is indicated that "<i>Offset mitigation may be required for high impact activities</i>". Renewable energy projects can be considered low intensity developments with the correct implementation of the mitigation hierarchy. Referring to the mitigation hierarchy, the project will achieve avoidance by means of revised and reduced spatial planning, suggested seasonal constraints for construction to prioritise the dry season period and also the 'avoidance' of vegetation clearing beneath the panels. The overall residual impacts are expected to be low, and this will be achieved through reduced durations for selected aspects, minimised footprint areas and supporting measures to reduce the expected impact intensities. Furthermore, rehabilitation has been prescribed to improve degraded habitats stemming from impacts that could not be completely avoided or mitigated.</p> <p>Independent specialist have been appointed to identify and assess the impacts the proposed development will have on terrestrial biodiversity and aquatic sensitivities. The specialist in their report has noted that the aquatic sensitivity features identified will have an overall anticipated risk of low residual impact significance provided that the mitigation measures are implemented. In terms of the proposed layout, the very high SEI areas have been avoided which includes the watercourse / river.</p> <p>In addition, the specialist notes that:</p>

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			<p>of the 1208.35 ha Wooded Vaalbosveld, 59.63 ha (4.93 %) will be cleared of woody plants; and  of the total 525.41 ha of High SEI areas (excluding Wooded Vaalbosveld), 113.15 ha (21.53 %) is planned for infrastructure.  Furthermore, the specialist notes the applicant's commitment "towards the preservation of the remainder of the site, where no development is proposed. Overall, there is an evident avoidance of the central dense woody area, and the loss of trees will be kept to a minimum".</p> <p>The proposed layout as discussed in Section 5.1.2.2 of the EIAR notes the alternatives considered, especially the design alternatives, and has been considered in the assessment of the identified impacts. The impact significance after mitigation in the construction and operation phases are assessed as low impact significance. The specialist notes that:</p> <p><i>"The expected cumulative impact of PV development as a whole is expected to be of a 'Moderate' significance, however, the contribution of the project development footprint itself (173.89 ha) is calculated at 0.96% of the total (PV Development Projects), with overall low significance when considering the contribution in isolation. The overall medium cumulative residual impact does not present a fatal flaw for the development, and the project may be favoured for authorisation."</i></p> <p>Considering that complete clearance is not proposed, or recommended, no offsets are required for the proposed development. This considers the alternatives discussed in Section 5.1.2.2 of the EIAR.</p> <p>It should be noted that no vegetation will be removed without the necessary permits first being obtained.</p> <p>In terms of the need for an offset and in relation to the National Draft Biodiversity Offset Guideline an offset is only required when an unavoidable significant residual negative impact on biodiversity is evident. Furthermore, the management outcomes for biodiversity are outlined in the specialist report which does not conclude that an</p>

NO.	COMMENT	RAISED BY	RESPONSE
			<p>offset would be required. This is in consideration of the mitigation measures recommended and assessed by the specialist.</p> <p>An offset is also required when the mitigation hierarchy cannot be implemented to counterbalance the impact of the proposed development. In the instance of this environmental assessment process, the mitigation hierarchy has been implemented and considered as outlined in Chapter 5 of the EIAR:</p> <ul style="list-style-type: none"> <li>• avoidance of the Very High SEI areas;</li> <li>• development in the high SEI areas will not result in the clearance of all vegetation since vegetation clearance will only be conducted under the following circumstances (extracted from the specialist report in Section 5.1.2):                         <ul style="list-style-type: none"> <li>- <i>"The excavation for and installation of subterranean equipment such as the earth mat; electrical cables and ducting from the solar PV module installation to the power stations (inverters, transformers &amp; switchgear) and from the power stations to the substation; and required stormwater infrastructure.</i></li> <li>- <i>The casting of foundations and clearing of footprints for permanent buildings, laydown areas, power station plinths and the substation.</i></li> <li>- <i>The footprints of foundations or piles of the site fencing posts and solar mounting structures.</i></li> <li>- <i>The footprints of internal- and access roads.</i></li> <li>- <i>Trees with heights, or potential to reach heights, of 0.5 m or higher located within the solar PV plant, and any other necessary areas."</i></li> </ul> </li> </ul> <p>Section 6.2 of the National Draft Biodiversity Offset Guideline which states that:</p> <p><i>"Where residual negative biodiversity impacts are evaluated to be of medium or high significance, a biodiversity offset would be required. Biodiversity offsets are unlikely to be required when the</i></p>



NO.	COMMENT	RAISED BY	RESPONSE
			<p><i>residual negative impacts of a proposed activity, or activities, on biodiversity are evaluated to be of low significance."</i></p> <p>In terms of the need for an offset, the specialist is clear that through the mitigation hierarchy and the recommended mitigation measures which respond to the management outcomes, the project's residual impacts are expected to be low. The cumulative residual impact assessed as medium significance is not presented as a fatal flaw.</p> <p>There will be no significant loss of sensitive and significant aquatic features.</p> <p>In addition to the above, the proposed development site is not located within a protected area, and rather is considered in an expansion strategy. The intention of the environmental assessment process, and the appointment of an independent specialist is to ensure a process that identifies and assesses the potential impacts of the proposed development on the environment. Subsequent to this process, and the specialist noting no fatal flaws, and because of the mitigation measures proposed, which the Applicant will implement, and that the development has been through an iterative public process noting and subsequently addressing the issues highlighted, the proposed development will not result in high negative significant impact after mitigation.</p>
	<p><b>Recommendations:</b></p> <p>a) Groundwater assessments should be done if water will be abstracted from groundwater / groundwater will be impacted on by the proposed Limestone PV 1 and PV 2 developments.</p> <p>b) The EIR should quantify the impacts of the proposed Limestone PV 1 and PV 2 facilities on the dense stand of <i>Olea europea</i> subsp. <i>africana</i> found within the vicinity.</p>		<p>a) As stated in the EIAR (Chapter 2), the source of water for the project is still to be confirmed. Should water be required to be abstracted from groundwater resources for the project, a Water Use Authorisation application would be submitted to DWS, and the impacts on groundwater assessed to inform this application. No water will be abstracted before the completion of the WUL process.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>c) A biodiversity offset assessment should be done to quantify the impacts of both Limestone PV 1 and PV 2 guided by the recent published National Draft Biodiversity Offset Guideline, Provincial CBA map and Provincial Protected Area expansion strategy and consider all, but not limited to, the above-mentioned environmental features.</p> <p>We hope you find these recommendations in order.</p>		<p>b) The Ecology Impact Assessment has been revised to include additional information in this regard, specifically referring to the project alternatives.</p> <p>c) As stated above, in terms of the guideline for interpreting Site Ecological Importance in the context of the development, it is indicated that "Offset mitigation may be required for high impact activities". Renewable energy projects can be considered low intensity developments with the correct implementation of the mitigation hierarchy. Referring to the mitigation hierarchy, the project will achieve avoidance by means of revised and reduced spatial planning, suggested seasonal constraints for construction to prioritise the dry season period and also the 'avoidance' of vegetation clearing beneath the panels. The overall residual impacts are expected to be low, and this will be achieved through reduced durations for selected aspects, minimised footprint areas and supporting measures to reduce the expected impact intensities. Furthermore, rehabilitation has been prescribed to improve degraded habitats stemming from impacts that could not be completely avoided or mitigated.</p>
4.	<p>Based on the information provided in the report, the project site consists of natural grassland, low shrubland and open woodland classified as an area of intact and functional Critical Biodiversity (Dominated by CBA2). Two provincially protected tree species namely, <i>Prepodesma orpenii</i> and <i>Olea europaea</i> subsp. <i>cuspidae</i> were recorded on site. A lot of faunal species are expected to occur on site, but few were identified. However, the study area present potential habitat for such species. The environmental features led to the delineation of 6 different terrestrial habits within the study area which were</p>	<p>Mr. Seoka Lekota Control Biodiversity Officer Grade B: Biodiversity Conservation Department of Forestry, Fisheries &amp; the Environment</p>	<p>The terrestrial ecology assessment (Appendix G of the EIAR) concluded "<i>The PAOI has been altered, albeit limited, both currently and historically. The present land use has had a direct impact on both the fauna and the flora in the area, which is evident in the transformed habitats. Historically, grazing from livestock and mismanagement has led to (limited) deterioration of the area. Most areas can be regarded as important, not only within the local landscape, but also regionally; as they are used for habitat, foraging and movement corridors for fauna within a landscape fragmented by development. This is especially true regarding the water resource habitats.</i></p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>rated high to very high SEI by ecology and avifaunal specialist. However, it was noted that one habitat was rated very low, but the area is very minimal within the study area.</p> <p>Given the above, the study area is associated with high functional integrity and low to very low receptor resilience. Furthermore, the study area contributed largely to the natural functioning of the ecosystem process and services, therefore are of conservation importance. The Directorate Biodiversity and Conservation does not support developments within areas of highly sensitive areas.</p> <p>All Public Participation Process documents related to Biodiversity Conservation at Email: BCAdmin@environment.gov.za for the attention of Mr Seoka Lekota</p>		<p><i>The habitat sensitivity of these habitats is regarded as High to Very High, and the following aspects support this classification:</i></p> <ul style="list-style-type: none"> <li>• <i>Functions as CBA 1 and CBA 2 as per the Northern Cape Critical Biodiversity Areas spatial database;</i></li> <li>• <i>As true NFEPA wetlands, as well as a FEPA River (NBA CR River), classed as Freshwater Ecosystem Priority Area; and</i></li> <li>• <i>Support various organisms and may play an important role in the ecosystem, if left to recover from the superficial impacts.</i></li> </ul> <p><i>The ecological integrity, importance and functioning of these terrestrial biodiversity areas provide a variety of ecological services considered beneficial, with one key service being the maintenance of biodiversity. The preservation of these systems is the most important aspect to consider for the proposed project."</i></p> <p>In terms of the guideline for interpreting Site Ecological Importance in the context of the development, it is indicated that "Offset mitigation may be required for high impact activities". Renewable energy projects can be considered low intensity developments with the correct implementation of the mitigation hierarchy. Referring to the mitigation hierarchy, the project will achieve avoidance by means of revised and reduced spatial planning, suggested seasonal constraints for construction to prioritise the dry season period and also the 'avoidance' of vegetation clearing beneath the panels. The overall residual impacts are expected to be low, and this will be achieved though reduced durations for selected aspects, minimised footprint areas and supporting measures to reduce the expected impact intensities. Furthermore, rehabilitation has been prescribed to improve degraded habitats stemming from impacts that could not be completely avoided or mitigated.</p>

NO.	COMMENT	RAISED BY	RESPONSE
			<p>In terms of the overall impact statement, it is stated "<i>Considering that this area has been identified as being of significance for biodiversity maintenance and ecological processes (CBAs and ESAs), development may proceed but with caution and only with the implementation of mitigation measures, specifically the avoidance of clearing of the areas below the panels. The overall residual impacts are expected to be low. Considering the above-mentioned information, no fatal flaws are evident for the proposed project. It is the opinion of the specialists that the project may be favourably considered, on condition that all prescribed mitigation measures and supporting recommendations are implemented.</i>" As the project is considered to be a low impact development, no offset is required.</p> <p>All Public Participation Process documents related to Biodiversity EIA review and other Biodiversity EIA queries will be submitted to the Directorate: Biodiversity Conservation at Email: <a href="mailto:BCAdmin@environment.gov.za">BCAdmin@environment.gov.za</a> for attention of Mr Seoka Lekota.</p>

SCOPING PHASE

**LIMESTONE PV2, NEAR DANIELSKUIL, NORTHERN CAPE PROVINCE**  
**(DFFE Ref.no.: 14/12/16/3/3/2/2270)**  
**COMMENTS AND RESPONSES REPORT**

**TABLE OF CONTENT**

	<b>PAGE</b>
<b>1. COMMENTS RECEIVED DURING THE SCOPING PHASE AND SCOPING REPORT 30-DAY REVIEW PERIOD.....</b>	<b>1</b>
1.1. Organs of State.....	1
1.2. Interested and Affected Parties .....	15

The Limestone Solar PV2 application for Environmental Authorisation was announced on Monday, 06 January 2023. The Background Information Document (BID), distributed on Monday, 06 January 2023, served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments/queries regarding the proposed project. A notification letter accompanied the BID, announced the availability of the Scoping Report for review and comment. All written comments received from the commencement of the Scoping phase to date have been included in this Comments and Responses Report (C&RR).

The Scoping Report was made available for a 30-day review and comment period from **Friday, 06 January 2023** to **Monday, 06 February 2023**. The C&RR has been updated with comments received during the review and comment period and the written comments are included in **Appendix C6** of the final Scoping Report.

**NOTE:**  
In terms of Regulation 44(1) of the EIA Regulations 2014, as amended, please note that the comments raised, and responses provided at the various virtual Meetings held during the 30-day review period of the Scoping Report are attached as **Appendix C7** of the final Scoping Report.

**LIST OF ABBREVIATIONS / ACRONYMS See**

EIA	Environmental Impact Assessment	SR	Scoping Report
DFFE	Department Forestry, Fisheries and the Environmental	IRP	Integrated Resources Plan (IRP)
I&APs	Interested and Affected Parties		

## 1. COMMENTS RECEIVED DURING THE SCOPING PHASE AND SCOPING REPORT 30-DAY REVIEW PERIOD

### 1.1. Organs of State

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p><u>Transnet has reviewed the SR and brings the following comment.</u></p> <p>This project will not affect Transnet due to its locality. The closest point of the area of concern to our rail is about 3km North-East.</p>	<p>L Boye Transnet - Acting Depot Manager Letter dated: 12 January 2023</p>	<p>It has been noted that the Transnet area of concern for their rail is about 3km North-East and the project would not impact on it due to locality. No further action is required.</p>
2.	<p><u>The department has reviewed the SR and the following information must be included to the final Scoping Report (SR):</u></p> <p><b>1. Competent Authority</b></p> <p>a) Clarify the reason for this department being the competent authority in terms of S24C of NEMA. This must be expanded on and updated in the application form. State clearly whether the applicant intends to bid the project in terms of the REIPPPP and IRP. This is especially in reference to page 6 of the application form which states that: 'The developer intends to submit a bid in terms of a regulated power purchase procurement process (e.g., REIPPPP) to evacuate the generated power into the national grid or obtain a commercial PPA (Power Purchase Agreement.' and further states: The site is also in proximity to large electricity users which opens opportunities for commercial PPAs, either behind the meter connection or Wheeling to a 3rd party off-taker.</p> <p>b) The applicant must clarify the intention of the application as this has direct implications in terms of the identification of the competent authority.</p>	<p>Ms Millicent Solomons Acting Chief Director: Integrated Environmental Authorisation Letter Dated: 03 February 2023</p>	<p>The developer intends to submit a bid in terms of a regulated power purchase procurement process (e.g., REIPPPP) evacuate the generated power into the national grid. This forms part of the Integrated Resources Plan (IRP).</p> <p>In terms of GN R779 of 1 July 2016, the Minister of the Department of Forestry, Fisheries and the Environment (DFFE) is the Competent Authority for all activities relating to the Integrated Resources Plan (IRP) of 2010 –2030 (and any updates thereto) that require environmental authorisation. As the application for environmental authorisation relates to the proposed solar facility and associated infrastructure, which is related to the IRP and national energy provision, the Minister is the Competent Authority.</p> <p>The intention of the application has been further clarified in the Final Scoping Report. The applicant intends to bid the solar PV facility into a regulated power purchase procurement process, such as the REIPPPP.</p>



NO.	COMMENT	RAISED BY	RESPONSE
	<p><b>2. Listed Activities</b></p> <p>a) Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed. Furthermore, kindly ensure that the latest listed activities, as amended in 2021, are applied for.</p> <p>b) It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property falls within geographically designated areas in terms of Listing Notice 3 Activities. Written comments must be obtained from the relevant authorities (or proof of consultation if no comments were received) and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.</p> <p>c) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application</p>		<p>All relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development have been applied for and assessed. All listed activities applied for are indicated in <b>Section 7.2</b> of the Final Scoping Report.</p> <p>All identified and relevant competent authorities have been consulted during the scoping process. Evidence that all identified and relevant competent authorities were given an opportunity to comment on the proposed development is included in <b>Appendix C8</b> of the final Scoping Report.</p> <p>In addition, they will be continuously consulted throughout the EIA process. Evidence of consultation will be included in the EIA report.</p> <p>A geographical map with a geographical representation of the proposed development has been included in Appendix D of the FSR. A preliminary sensitivity map of the identified sensitivities during the scoping phase is also included as Figure 10.1 in FSR.</p> <p>The activities applied for in the application form do not differ to the activities mentioned in the final Scoping Report, therefore and amended application form will not be submitted with this FSR.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>form template has been amended and can be downloaded from the following link <a href="https://www.dffe.gov.za/documents/forms">https://www.dffe.gov.za/documents/forms</a></p>		
	<p><b>3. Layout &amp; Sensitivity Maps</b></p> <p>a) Please provide a layout map which indicates the following:</p> <ul style="list-style-type: none"> <li>» the PV development area;</li> <li>» Position of all infrastructure e.g. panels, BESS, substations, grid connection etc.;</li> <li>» Permanent laydown area footprint; LY</li> <li>» All supporting onsite infrastructure e.g. roads (existing and proposed);</li> <li>» Substation(s) and/or transformer(s) sites including their entire footprint;</li> <li>» Connection routes (including pylon positions) to the distribution/transmission network; and</li> <li>» All existing infrastructure on the site.</li> <li>» The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;</li> <li>» Buffer areas; and</li> <li>» All "no-go" areas.</li> </ul> <p>b) The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid</p>		<p>An appropriate facility layout map indicating the proposed layout of the Solar PV Facility and associated infrastructure has been included as Figure 10.2 in Section 10.4 of the final scoping report.</p> <p>The grid connection will be a separate process, and that Eskom will determine the final connection plan, which will be included in the EIA</p> <p>The layout map has also been overlaid with site sensitivities including all buffers and "no-go" areas. Based on the sensitivity data that will be obtained from suitably qualified specialists during the EIA Phase the layout map may be updated and included in the EIA report. A cumulative map indicating neighbouring renewable energy</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>infrastructure. All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on extremely sensitive areas as far as possible.</p> <p>c) Ensure that similar colours are not used to differentiate between infrastructure. i.e. items must be easily distinguishable in the Legend.</p> <p>d) Google maps will not be accepted for decision-making purposes.</p>		<p>developments and existing grid infrastructure has been included in Figure 9.7 of the FSR.</p> <p>Google maps have not been included in the FSR and will not be included in the EIA Report.</p>
	<p><b>4. Public Participation</b></p> <p>a) Please ensure that all issues raised, and comments received on the draft SR from registered I&amp;APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: <a href="mailto:BCAdmin@dffe.gov.za">BCAdmin@dffe.gov.za</a>) in respect of the proposed activity are adequately addressed in the Final SR. Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of the approved public participation plan and Regulation 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</p> <p>b) A comments and response trail report (C&amp;R) must be submitted with the final SR. The C&amp;R report must incorporate all historical comments (pre and post submission of the draft SR) for this development. The C&amp;R</p>		<p>All comments received from organs of state Interested and affected parties (I&amp;APs). which have jurisdiction in respect of the application during the commencement of the EIA process and those received on the Scoping Report that was made available for a 30-day review and comment period have been included within this Comments and Responses Report <b>Appendix 8</b>, and have been responded to, as required.</p> <p>Copies of all written comments received from organs of state are included in <b>Appendix C6: Comments Received</b> of the final Scoping Report.</p> <p>Proof of correspondence with the various stakeholders and proof of attempts to obtain comments from the stakeholders on the project database are included in <b>Appendix C5: Stakeholder Correspondence</b> of the final Scoping Report.</p> <p>Proof of correspondence with organs of state and proof of attempts to obtain comments are included in <b>Appendix C4: Organs of State Correspondence</b> of the final Scoping Report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&amp;APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&amp;APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully. Please note that a response such as "Noted" is not regarded as an adequate response to I&amp;AP's comments.</p>		<p>The Public Participation Process has been conducted in terms of Regulation 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended (GNR 326) as follows:</p> <ul style="list-style-type: none"> <li>» Site notices were placed on the boundaries of the development site (refer to <b>Appendix C2: Site Notices &amp; Newspaper Advertisements</b> of the final Scoping Report)</li> <li>» An advertisement announcing the EIA process and availability of the Scoping Report for review and comment was placed in the NoordkaapBulletin on the 15 December 2022 and a reminder Advertisement on the 26 January 2023, published in Afrikaans and English (word text as submitted to the newspaper and tearsheet are in <b>Appendix C2: Site Notices &amp; Newspaper Advertisements</b> of the final Scoping Report)</li> <li>» The availability of the Scoping Report for review and comment was announced by a notification letter, accompanied by the BID, sent to all registered I&amp;APs and organs of state on the project database (refer to <b>Appendix C4: Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the final Scoping Report.)</li> </ul> <p>Virtual Meetings were held with various stakeholder groups on 26 January 2023, and notes of the meetings are included in <b>Appendix C7: Minutes of Meetings</b> of the final Scoping Report</p> <p>The Scoping Report was made available for download on Savannah Environmental's website and could also be sent via other file transfer services i.e. We Transfer, Dropbox, etc. or on CD, on request (refer to <b>Appendix C4: Organs of State Correspondence</b> and <b>Appendix C5: Stakeholder Correspondence</b> of the final Scoping Report.)</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p><b>5. Specialist Assessments to be conducted in the EIA Phase</b></p> <p>a) Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of PV arrays, and all other associated infrastructures that they have assessed and are recommending for authorisations.</p> <p>b) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p> <p>c) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.</p> <p>d) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.</p>		<p>Specialist studies will be conducted as part of the EIA Phase and will be included in the EIA Report. The Specialist studies will include a detailed description of the methodology followed as well as an indication of the location and description of the development and all other associated infrastructure.</p> <p>All specialist reports compiled for the Final Scoping Report include a detailed description of the limitations of the studies. All specialist studies have been conducted in the correct season. During the EIA Phase, all specialist studies, will provide a detailed description of the limitations to the studies submitted as part of the EIA Report.</p> <p>No contradicting recommendations were provided by the specialists as part of the scoping process. This comment is noted and will be taken into consideration during the EIA Phase of the process.</p> <p>The specialist studies will be conducted in accordance with Government Notice No. 320 of 20 March 2020 (i.e., "the protocols"), and Government Notice No. 1150 of 30 October 2020 (i.e., protocols for terrestrial plant and animal species).</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>e) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g.an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatic sciences.</p> <p>f) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.</p> <p>g) Please include a table in the report, summarising the specialist studies required by the Department's Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted. Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report per the requirements of the Protocols.</p>		<p>Specialist assessments will be undertaken by suitably qualified SACNASP registered specialist. The Specialist Assessments will be included in the EIA Report.</p> <p>This comment is noted and will be taken into consideration during the EIA Phase of the process.</p> <p>Table 7.5 of the FSR summarizes the specialist studies required by the Department's Screening Tool and an indication of which studies were undertaken. Where studies have not been undertaken, a motivation has been provided.</p>
	<p><b>6. Cumulative Assessment to be conducted in the EIA Phase</b></p> <p>Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> <li>» Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and</li> </ul>		<p>Potential cumulative impacts have been identified and Section 9.4 of the Final Scoping Report. An assessment of potential cumulative impacts will also be assessed during the EIA Phase and will be included in the EIA report. and included in the EIA report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>indicated, i.e. hectares of cumulatively transformed land.</p> <ul style="list-style-type: none"> <li>» 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.</li> <li>» The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</li> <li>» A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul>		
	<p><b>7. Environmental Management Programme</b> The EMPr must include the following: a) It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the Generic Environmental Management Programme, must be used and submitted with the final report over and above the EMPr for the facility i.e. separate EMPr for the substation, powerline and the facility. b) Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.</p>		<p>An EMPr for the Solar Energy PV Facility will be completed according to Appendix 4 of the EIA Regulations and will be included in the EIA Report. furthermore, the Generic EMPr for the substation will also be included into the EIA Report.</p>
	<p><b>General</b></p>		

NO.	COMMENT	RAISED BY	RESPONSE
	<p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:</p> <p>"If S&amp;EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a SR which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."</p> <p>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of SR in accordance with Appendix 2 and Regulation 21(1) of the NEMA EIA Regulations 2014, as amended.</p> <p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>		<p>The submission of the final Scoping Report with the prescribed timeframes of the EIA Regulations.</p> <p>The Scoping Report has been prepared in accordance with Appendix 2 of the EIA Regulations, 2014, as amended (GNR 326).</p> <p>The Applicant acknowledges that no activity may commence prior to receipt of the Environmental Authorisation.</p>



NO.	COMMENT	RAISED BY	RESPONSE
	<p><b>Department of Agriculture and Rural Development: Northern Cape Province</b> Could you kindly please provide the documentation for the proposed Oryx wind farm development?</p>	<p>Natalie Uys Production Scientist Grade A: Botanist, Acting Scientific Manager Grade B: Research and Development Support  Letter Dated: 07 February 2023</p>	<p>The Oryx Wind Energy Facility does not form part of the solar PV application process. A separate application for Environmental Authorisation will be lodged for the Wind Energy Facility. The Department of Agriculture and Rural Development: Northern Cape Province will be registered notified once the application process commences.</p>
	<p>Please take note that these are general comments relating to the development footprints. Could you please provide an overview document / presentation from the next phase from the results from the EIA studies showing environmental sensitivities and new layouts for both the solar developments and the wind farms.</p>		<p>The facility layout has been included in Section 10.4 of the FSR. The layout may be revised based on the sensitivities that will be identified from the Specialist studies undertaken for the EIA Phase. The Revised layout will be included in the EIA report.  A separate application for Environmental Authorisation will be lodged for the Wind Energy Facility. The Department of Agriculture and Rural Development: Northern Cape Province will be registered notified once the application process commences.</p>
	<p>The availability of foundational and baseline data for the Northern Cape is limited and as a result the Screening Tool as well as the National Vegetation map has limitations and shortcomings when assessing impacts for this area. You cannot only rely desktop surveys and proper site surveys are for that reason critically important and always recommended</p>		<p>A Terrestrial Biodiversity Assessment (including flora and fauna) will be undertaken and will include both a desktop analysis and site sensitivity verifications as part of the EIA Phase. The Terrestrial Biodiversity Assessment will be included in the EIA report.</p>
	<p>There are numerous plant and animal species are protected under the Northern Cape Nature Conservation Act no 9 of 2009 (NCNCA). Some protected and specially protected flora species found in this area include: <i>Boophone disticha</i>, <i>Harpogophytum procumbens</i>, <i>Vachellia haematoxylon</i>, <i>Aloe grandidentata</i>, <i>Boscia foetida</i>, <i>Olea europaea subsp. africana</i> etc. Fauna and flora permits will be needed from the department for handling/ removing/ relocating/ destroying all specially protected and protected flora and fauna. Estimated</p>		<p>A Terrestrial Biodiversity Assessment (including fauna and flora) as part of the EIA Phase. The Terrestrial Biodiversity Assessment will be included in the EIA report.  A permit application will be submitted to the Department, should any protected species be identified during the assessment.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	numbers for species that need to be removed must be provided for permit approval.		
	Boscia albitrunca is protected under both the National Forest Act (NFA) and under the NCNCA. The actual number of trees to be removed must be provided for permit purposes. Contact person for DFFE Forestry in the Northern Cape is Jacoline Mans, <a href="mailto:Jmans@dffe.gov.za">Jmans@dffe.gov.za</a> .		<p>A Terrestrial Biodiversity Assessment (including fauna and flora) as part of the EIA Phase. The Terrestrial Biodiversity Assessment will be included in the EIA report.</p> <p>A permit application will be submitted to the Department, should any protected tree species be identified during the assessment.</p>
	Please consult the Birdlife guidelines for avifaunal assessments for solar (Jenkins et al., 2017).		The avifauna specialist study that formed part of the Final Scoping Report includes a reference list of all resources used. A number of Birdlife publications were consulted. As part of the EIA phase, Birdlife will be consulted.
	<p>An offset investigation report is recommended needed to due to the following:</p> <ul style="list-style-type: none"> <li>a) The site is located in a Critical Biodiversity Area (CBA 2) are and there are immense developmental pressures in the surrounding area.</li> <li>b) The Ghaap plateau is seen as a sensitive ecosystem.</li> <li>c) The site is located in the Griqualand West Centre of Endemism (Van Wyk &amp; Smith, 2001) – recent work by Frisby and Van Staden on this should be consulted (Frisby et al., 2015; Staden, 2021; Van Staden et al., 2020).</li> <li>d) Numerous pan systems are located in the site that are seen as sensitive (Kotze et al., 2019).</li> <li>e) The site is located in a Primary Focus Area for the Northern Cape Protected Areas Expansion Strategy.</li> <li>f) The site is located in Southern Ghaap Plateau Strategic Water Resource Area.</li> <li>g) There is Olive tree woodland in the area</li> </ul>		The comments are noted and acknowledged and will be provided to the Terrestrial Biodiversity Specialist to thoroughly address and include in the Terrestrial Biodiversity Assessment that will be included in the EIA report.

NO.	COMMENT	RAISED BY	RESPONSE
	<p>The Northern Cape Critical Biodiversity Areas (CBA) map <a href="https://bgis.sanbi.org/Projects/Detail/203">https://bgis.sanbi.org/Projects/Detail/203</a> was signed off by the head of department as an "instrument for informing decisions and priorities on biodiversity". The before-mentioned CBA map meets both the criteria of the definition of a systematic biodiversity plan, therefore Listing Notice 3 activities in CBAs and Ecological Support Areas (ESAs) would apply.</p>		<p>The SANBI CBA maps were considered as part of the SR and will be consulted during the EIA Phase. All relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. This included those activities related to and CBA/ESA areas in Listing Notice 3. All listed activities applied for are indicated in Chapter 7, Table 7.1, of the Final Scoping Report</p>
	<p>I.t.o. the terrestrial biodiversity please assess, mitigate and make provision for the following:</p> <ul style="list-style-type: none"> <li>a. Please take note that tortoise populations are affected by the following: <ul style="list-style-type: none"> <li>i. electrocutions with electric fences.</li> <li>ii. predations by crows – (relates to waste management).</li> </ul> </li> <li>b. Giant bull frogs were found in pans after the recent rains. Most of the injuries and mortalities to this species occurs from collision with vehicles when moving between their breeding sites (pans) and their burrows. Their burrows can range from 200m to 1km from the pans and they are capable of estivating underground for 7 years. Herbicide and pesticide use should also be restricted near the sites (Yetman, undated). Please liaise with EWT in this regard.</li> </ul>		<p>The comments are noted and acknowledged and will be provided to the Terrestrial Biodiversity Specialist to thoroughly address and include in the Terrestrial Biodiversity Assessment (including fauna, flora and freshwater) that will be included in the EIA report.</p> <p>EWT will be consulted as recommended.</p>
	<p>The following are concerns i.t.o. of the cumulative footprint should be assessed:</p> <ul style="list-style-type: none"> <li>a. Other land uses in the area, which can be illustrated by the latest land cover map.</li> <li>b. The impact of solar facilities on the drying of pans system. The is evidence from</li> </ul>		<p>The comments are noted and acknowledged and will be provided to the Terrestrial Biodiversity and Avifauna Specialists to thoroughly address and include in the Terrestrial Biodiversity Assessment (including fauna, flora and freshwater) and Avifaunal Assessment that will be included in the EIA report. The Studies will assess potential cumulative impacts associated with the proposed development and provide appropriate mitigation measures to address the impacts.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>existing solar farms changing the surface hardness of the wetland catchments.</p> <p>c. The heat island effect (local warming, impacts on reptiles etc.).</p> <p>d. Lake effect on birds (mortalities and injuries on birds).</p> <p>e. Lake effect on insects (e.g. insects have been laying eggs on panels instead of pans).</p> <p>f. Insect mortalities (security lights at these sites at night attract insects).</p> <p>g. Bat impacts (bats are attracted to by the security lights).</p>		
	<p><b>South African Heritage Resources Agency (SAHRA)</b></p> <p>The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the pending assessment of the impact to heritage resources comply with section 38(3) of the NHRA as required by section 38(8) of the NHRA. The HIA must include an archaeological and palaeontological component.</p> <p>The field-based archaeological component of the HIA must be conducted by a qualified archaeologist and must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports.</p> <p>The proposed development is located within an area of very high Palaeontological Sensitivity as per the SAHRIS Palaeo Sensitivity map. As such, a field-based Palaeontological Impact Assessment (PIA) must be</p>	<p>Natasha Higgitt Manager Development Application Unit</p> <p>Letter Dated: 08 February 2023</p>	<p>A complete HIA which complies with Section 38(8) of the NHRA will be undertaken by a suitably qualified Specialist and will be included in the EIA report.</p> <p>A complete PIA which complies with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments will be undertaken by a suitably qualified Specialist and will be included in the EIA report.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<p>undertaken by a qualified palaeontologist. The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.</p> <p>Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.</p> <p>Further comments will be issued upon receipt of the pending heritage reports and the Draft EIA inclusive of appendices.</p>		
	<p><b>Control Biodiversity Officer Grade: Biodiversity Conservation</b></p> <p>Based on the information provided in the report, the Directorate Biodiversity Conservation does not object the proposed Draft Scoping Report and plan of Study. The final report must comply with the procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(A) and (H) and 44 of the National Environmental Management Act, 1998.</p> <p>All Public Participation Process documents related to Biodiversity EIA review and other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr Seoka Lekota.</p>	<p>Seoka Lekota Control Biodiversity Officer Grade B: Biodiversity Conservation: Department of Forestry, Fisheries &amp; the Environment</p> <p>Letter Dated: 08 February 2023</p>	<p>The NO Objection to the Scoping Report is noted and acknowledged. The EIA report will comply with the procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(A) and (H) and 44 of the National Environmental Management Act, 1998.</p> <p>All Public Participation Process documents related to Biodiversity EIA review and other Biodiversity EIA queries will be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr Seoka Lekota.</p>

NO.	COMMENT	RAISED BY	RESPONSE

### 1.2. Interested and Affected Parties

NO.	COMMENT	RAISED BY	RESPONSE
	Kgatelopele Local Municipality has reviewed the SR and has no objection to the proposed project.	Willie Blundin Municipal Manager Email dated: 31 January 2023	We acknowledge that the Kgatelopele Local Municipality has no objections to the proposed development. No further response is required.
	As a neighbor and member of the farming community we do NOT oppose the project but would like to communicate a few of our concerns.  1. As you will see, if you visit the site, our roads are not in a good condition. With all the extra construction vehicles needed on such a project, our road will become impossible to use with our normal vehicles. Will you maintain the road, because government will not provide more than what they do at the moment, which is already not enough.	Mrs C York Email dated: 05 February 2023	The NO opposition to the development is noted.  A Traffic Impact Assessment will be conducted as part of the EIA phase which will determine potential impacts on roads that may arise from the development. Appropriate mitigation measures will be provided for the identified potential impacts which will be included in the EIA Report and the EMPr
	2. We live in a relative safe community. We really are very concerned about the inflow of people looking for jobs on the site. Not all will be successful, and those who are not, will become a security risk to the rest of the farming community.  To try to prevent that, it would perhaps help to keep the employment office in town and not on site.		A Social Impact Assessment will be conducted as part of the EIA phase and will consider the influx of job seekers. As part of this, appropriate mitigations will be implemented to reduce the impact this may have on the local community, as well as on safety and security.  A project office will be established in town where stakeholder engagements and employment opportunities will be managed from. Site access will be restricted during construction and operation to only project-related personnel.

NO.	COMMENT	RAISED BY	RESPONSE
	<p>3. We live on the Ghaap mountain Plateau and although we have a lot of underground water, it is not very deep and dependent on rainwater for recharge. Almost all of the farms in the vicinity's underground water is connected to 2 or 3 big underground "dams". A study by Golder Associates showed that.</p> <p>We have two concerns regarding our water, contamination and excessive usage which may result in the water level dropping and neighbouring farms boreholes going dry.</p>		<p>Water will either be sourced from the municipality or abstracted from boreholes. Mitigation measures regarding both water contamination and excessive use of water will be covered by actions stipulated in the EMPs which will be included in the EIA report. Hydrogeological studies will also be conducted and Water Use License Applications applied for to ensure that water is abstracted sustainably.</p>
	<p>4. Veldfires is another concern. Not only with more people in the area, but also if they plan a living facility of some kind on site. We had devastating fires in the last couple of years, because of ignorant people.</p>		<p>The comment is noted and acknowledged. Mitigation measures to address veldfires will be covered by actions stipulated in the EMPs which will be included in the EIA report.</p>
	<p>5. We realise that the project can also bring job opportunities to local people, therefore we do not oppose the project, but hope that you will be responsible in planning and executing all of the phases of your project, keeping the wellbeing of our community in mind.</p>		<p>A Social Impact Assessment (SIA) will be conducted as part of the EIA phase and will consider the impact of the development on the local community. The study will also look at potential measures to reduce negative impacts whilst enhancing positive ones.</p>
	<p>1. The development of alternative energy sources is critically important for the electricity supply in South Africa. The South African economy relies on the government to supply stable and adequate electricity to not just keep the current economy going but create capacity for growth. The current dismal electricity supply situation is deeply negatively impacting our economy and leading to more unemployment as</p>	<p>Johan du Plessis Email dated: 06 February 2023</p>	<p>We acknowledge the comments and the lack of objection to the project. No further action is required.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	business suffer or even fail. We support the development of Limestone PV1 and PV2		
	2. We would like to request of governmental, provincial, and local authority structures to expedite all processes required to establish new electricity generation capacity, in particular green energy projects like Limestone PV1 and PV2 in the interest of bringing stability and capacity to the national electricity grid.		
	3. We would like to request government to further relax stringent and time-consuming regulations and requirements to assist in the rapid development of alternative energy generation like Limestone PV1 and PV2. We all need more electricity as soon as possible.		
	4. We know that projects like Limestone PV1 and PV2 will create short-term and long-term job opportunities, aiding much needed regional development in support of the local economy. We would fully support projects like this to bring stability and help elevate poverty in the local community.		As part of the EIA process a Social Impact Assessment will be conducted and included in the EIA Report. This will assess impacts such as job creation, establishment of infrastructure to support job security and socio-economic development and provide recommendations to further enhance these positive benefits.
	5. We would like to see upskilling of the local community to participate in development of projects like these not just for construction but also operation and maintenance of PV and Wind generation infrastructure.		
	6. We would also like to urge Eskom to expedite investment in more grid capacity for the Northern Cape to allow the export of electricity from the Postmasburg, Daniels Kuil and Lime Acres area to unlock even more potential for similar projects in this area. This area has already proven its ability to successfully establish and operate alternative energy		We acknowledge the comments and the NO objection to the project. A separate application will be lodged for the grid connection infrastructure associated with the Solar PV Energy Facility.



NO.	COMMENT	RAISED BY	RESPONSE
	<p>generation and have other projects currently under construction. Grid capacity remains a major constraint for this economic growth point in the region.</p>		
	<p><b>Telkom</b> With reference to your above- mentioned application, I hereby confirm that the proposed work installation is approved in terms of Section 29 of the Electronic Communications Act No. 36 of 2005 as amended.</p> <p>No infrastructure of our Client (Openserve) will be affected by this proposal. 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 to damage our infrastructure. Therefore, any damages occurred during construction of work will be repaired at the customer's account.</p> <p>Although we are not affected by this proposal, Mr Vivian Groenewald must be contacted at telephone number 081 362 6738 from our Network Field Services. Two (2) weeks prior to commencement of Proposed work.</p>	<p>Chris Schutte Letter dated: 05 February 2023</p>	<p>The Approval of the proposed work installation is noted and acknowledged. The details as contained in the correspondence have been provided to the Applicant for further action, as may be required.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	<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.</p> <p>Any changes/deviations from the original planning during or prior to construction must immediately be communicated to this office.</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 {openseve} infrastructure has to be relocated or altered as a result of your activities the cost for such alteration or relocation will be for your account in terms of section 25 of the Electronic communication Act'</p> <p>Mr Vivian Groenewald must be contacted at telephone number 081 352 6738' Two (2) 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</p>		

NO.	COMMENT	RAISED BY	RESPONSE
	<p>prior to construction must immediately to communicate to this office</p> <p>Please notify this office and forward an as built plan, within 30 days of completion of construction'.</p> <p>Mr Vivian Groeneward must be contacted at terephone number o081 362 6738. Two (2) weeks prior to commencement of proposed work, It's important that all services are shown on site before construction starts.</p>		