

## Appendix 21      Comments and Responses Report (CRR)

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## 1. Responses to comments from the National Department of Forestry, Fisheries and the Environment (DFFE) (the Competent Authority for Environmental Authorisation)

See Appendix 17 for original comment as received.

| Date of comment, format of comment, name of organisation / I&AP   | Comment   | Response from EAP / Applicant / Specialist   |
|---|---|--|
| <p><b>13 September 2021</b></p> <p><b>Letter, received via email.</b></p> <p><b>DFFE, Integrated Environmental Authorisations Directorate (Sabelo Malaza, Lydia Kutu)</b></p> | <p>a) Listed Activities<br/>Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed.</p>  | <p>All relevant listed activities have been included in the BAR (see Section 4.2.1) and applied for. The applicable listed activities are specifically related to watercourse crossings (Listing Notice 1, Activity 19) and vegetation clearance (Listing Notice 3, Activity 12) to install the proposed fibre optic cable underground.</p>  |
|   | <p>If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted.</p>   | <p>The activities listed in the application and BAR do not differ.</p>   |
|   | <p>It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.</p> | <p>The proposed fibre optic cable traverses the Western Cape and Northern Cape provinces. Key Provincial Authorities were included in the PPP and provided with the BAR summary and access to the full BAR documentation, which also included a map depicting the fibre optic cable in the respective provinces and relevant geographical areas.</p> <p>The key provincial authorities included:</p> <ul style="list-style-type: none"> <li>▪ <u>Comments received</u> <ul style="list-style-type: none"> <li>▪ Breede-Gouritz Catchment Management Agency (Regional DWS).</li> <li>▪ CapeNature.</li> <li>▪ Heritage Western Cape (HWC).</li> <li>▪ Lower Orange Water Management Area (Regional DWS).</li> <li>▪ South African Heritage Resource Agency (SAHRA).</li> <li>▪ Western Cape Department of Environmental Affairs and Development Planning (DEA&amp;DP).</li> <li>▪ Western Cape Government: Department of Transport and Public Works.</li> </ul> </li> </ul> |

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|   |  | <ul style="list-style-type: none"> <li>▪ <u>No comments received:</u> <ul style="list-style-type: none"> <li>▪ Northern Cape Chamber of Commerce and Industry.</li> <li>▪ Northern Cape Department of Agriculture, Land Reform &amp; Rural Development.</li> <li>▪ Northern Cape Department of Economic Development and Tourism.</li> <li>▪ Northern Cape Department of Environment and Nature Conservation (DENC) (now known as Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAEARDLR)).</li> <li>▪ Northern Cape Department of Roads and Public Works.</li> <li>▪ Northern Cape Department of Transport, Safety and Liaison.</li> <li>▪ Northern Cape Economic Development, Trade and Investment Promotion Agency.</li> <li>▪ Northern Cape Government: Department of Roads and Public Works.</li> <li>▪ Western Cape Department of Agriculture.</li> <li>▪ Western Cape Department of Economic Development and Tourism.</li> </ul> </li> </ul> |
|   | <p>b) Layout &amp; Sensitivity Maps</p> <p>i. Please provide a layout map which indicates the following:</p> <ul style="list-style-type: none"> <li>- The proposed infrastructure which includes all supporting onsite infrastructure existing roads, new roads (if applicable), access points, route corridor, route alternatives etc.</li> </ul> | <p>Refer to Sections 1.1 and 3.2 of the BAR.</p>  |
|   | <ul style="list-style-type: none"> <li>- The proposed infrastructure overlain by the sensitivity map.</li> </ul>   | <p>Refer to Section 7.2.5 of the BAR.</p>   |
|   | <ul style="list-style-type: none"> <li>- The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines, surface water, nesting areas, heritage sites etc. that will be affected;</li> </ul>   | <p>Refer to CHAPTER 6 of the BAR.</p>   |
|   | <ul style="list-style-type: none"> <li>- Buffer areas; and - All “no-go” areas.</li> </ul>   | <p>Refer to CHAPTER 7 of the BAR. No “no-go” areas have been identified as part of the BA process. A buffer of 10 m has been</p>  |

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|   |   | specified for the recorded heritage resource 'Anniversary Monument'.   |
|   | ii. The layout map must be overlain by a sensitivity map.   | Refer to Section 7.2.5.  |
|   | iii. Google maps will not be accepted.  | All maps generated using Esri® ArcMap software. No google maps are included in the main BAR.   |
|   | c) Alternatives   | Refer to CHAPTER 3 of the BAR.   |
|   | i. Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content: | <p>The proposed Fibre Optic Project has a specific purpose, i.e. high-speed, low latency data transfer between the SKA radio-telescope and the data processing centre in Cape Town. This purpose can only be reasonably achieved through fibre optic technology and the shortest possible route between the required start and end points. As such, no other activity and technology alternatives can be considered as appropriate to meet this goal. Alternatives relevant to and considered for the proposed Fibre Optic Project include the “no-go alternative” (i.e. the Project does not realise – Section 3.1 and “routing (or layout) alternatives” (Section 3.2). Additionally, a requirement for the fibre optic cable is to follow existing roads as far as possible, to enable access to the cabling during the life-cycle of the project, and reduce the financial and environmental costs of constructing new roads for the purpose of the project.</p> <p>Two routing alternatives were considered pre-BA (Environmental Screening Study phase), and only the preferred alternative was taken forward into the BA phase for impact assessment.</p> |
|   | - details of all the alternatives considered;   |  |
|   | - details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;   |  |
|   | - a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;  |  |
|   | - the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;  |  |
|   | - the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts—   |  |
|   | - (aa) can be reversed;   |  |
|   | - (bb) may cause irreplaceable loss of resources; and   |  |
|   | - (cc) can be avoided, managed or mitigated;  |  |
|   | - the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of   |  |

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|   | <p>potential environmental impacts and risks associated with the alternatives;</p> <ul style="list-style-type: none"> <li>- positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</li> <li>- the possible mitigation measures that could be applied and level of residual risk;</li> <li>- the outcome of the site selection matrix;</li> <li>- if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and</li> <li>- a concluding statement indicating the preferred alternatives, including preferred location of the activity.</li> </ul> <p>ii. Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.</p> |  |
|   | <p>d) Specialist Declaration of Interest</p> <ul style="list-style-type: none"> <li>i. Specialist Declaration of Interest forms must be attached to the final BAR. 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).</li> </ul>  |  |
|   | <p>e) Specialist Assessments</p> <ul style="list-style-type: none"> <li>i. All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.</li> </ul>  | <p>Specialist studies are final and complete. No other specialist studies are recommended post-EA.</p> |

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|   | ii. Specialist studies to be conducted must provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed and are recommending for the authorisation.  | Refer to Appendices 2 - 6 of the BAR which contain the full specialist assessments, including detailed descriptions of their methodologies followed and recommendations.  |
|   | iii. 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.  | Refer to Appendices 2 - 6 of the BAR which contain the full specialist assessments, including the limitations and assumptions underpinning the assessments.   |
|   | iv. Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.   | No contradicting recommendations have been made by the specialists.   |
|   | v. 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. | The Terrestrial Ecology and Aquatic Ecology specialist assessments (Appendix 2 and Appendix 3 of the BAR) for the proposed Fibre Optic Project have been completed in accordance with the applicable protocols (i.e. Aquatic Biodiversity and Terrestrial Biodiversity published in GN 320 in March 2020). The Terrestrial Ecology specialist assessment (Appendix 2 of the BAR) was commissioned before the publication of the Terrestrial Animal Species and Terrestrial Plant Species protocols (30 October 2020). See Appendix 10 to the BAR for specialist Purchase Order dated 11 September 2020. |
|   | f) Undertaking of an Oath<br>i. Please ensure that the final BAR includes an undertaking under oath or affirmation by the EAP.<br>ii. Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must   | Refer to Appendix 14 of the BAR for EAP (including peer-review EAP) curricula vitae, declarations, and undertakings.  |

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|   | include: "an undertaking under oath or affirmation by the EAP in relation to:   |   |
|   | a) the correctness of the information provided in the reports;  |   |
|   | b) the inclusion of comments and inputs from stakeholders and I&APs;  |   |
|   | c) the inclusion of inputs and recommendations from the specialist reports where relevant; and  |   |
|   | d) 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".  |   |
|   | g) Details and Expertise of the EAP<br>i. You are required to include the details and expertise of the EAP in the BAR, including a curriculum vitae, in order to comply with the requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations, 2014, as amended.   |   |
|   | h) Public Participation Process   |   |
|   | i Comments must be obtained from this Department's Biodiversity Conservation Directorate at BCAdmin@environment.gov.za.   | The Department's Biodiversity Conservation Directorate was included in the PPP and comments received (see comment #15 under Section 4 of this CRR). |
|   | ii Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered Interested and Affected Parties (I&APs) and organs of state, as listed in your I&APs Database, and others that have jurisdiction in respect of the proposed activity, are adequately addressed and included in the final BAR. | All comments and issues raised are addressed in this CRR.   |
|   | iii Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final BAR.  | Copies of comments from and communication with authorities, stakeholders and I&APs, including written notice of availability                        |

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|   | <p>iv Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. In terms of Regulation 41(2)(b) of the EIA Regulations, 2014, as amended, please provide proof of written notice for the availability of the BAR for comment.</p> | <p>of the BAR for comment, and reminders to submit comments before the closing date, are included as appendices to the BAR:</p> <ul style="list-style-type: none"> <li>• Appendix 16: Public Participation Proof;</li> <li>• Appendix 17: Authority consultation and comments;</li> <li>• Appendix 20: Comments received proof; and</li> <li>• Appendix 21: Comments and Reponses Report.</li> </ul> |
|   | <p>v All issues raised and comments received during the circulation of the draft BAR from I&amp;APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final BAR, including comments from this Department, and must be incorporated into a Comments and Response Report (CRR).</p>  | <p>All comments and issues raised are included and addressed in this CRR.</p>  |
|   | <p>vi The CRR report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter.</p>   | <p>This CRR is in the format requested by the Department and included as a separate document (Appendix 21) to the BAR. It must be noted that the Department's comments did not include a CRR template as Annexure. The CRR template was sourced separately.</p>  |
|   | <p>vii 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 an I&amp;AP's comments.</p>  | <p>Comments from I&amp;AP shave been included verbatim, whilst official copies of comments (letters, emails etc.) have been included as Appendix 17 (Authority consultation and comments) and Appendix 20 (Comments received proof) to the BAR.</p>  |
|   | <p>viii Minutes and attendance registers (where applicable) of any physical/virtual meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&amp;APs) and other role players must be included in the final BAR.</p>  | <p>Notes and attendance registers from EA pre-application meetings (x2) with the Department are included in Appendix 17.</p> <p>Two site visits were executed: 1) Nov 2020, before EA Application lodged, with DWS and SANParks; 2) Nov 2021 with SANParks and DFFE Directorate for Protected Areas Planning &amp; Management Effectiveness Directorate. Email correspondence</p>                    |



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|   |   | between participants, presentation, photographs and key notes are included in Appendix 16.   |
|   | ix The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA Regulations 2014 as amended and as per the approved PP Plan.  | PPP has been conducted in accordance to these requirements (refer to Section 5.6 of the BAR).  |
|   | i) Environmental Impact Statement<br>i. You are reminded that an environmental impact statement must be included in the final BAR, therefore you are kindly requested to include an environmental impact statement which contains –                       | Refer to CHAPTER 9 of the BAR.   |
|   | a) a summary of the key findings of the environmental impact assessment;  | Refer to CHAPTER 9 of the BAR.   |
|   | b) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and   | Refer to Section 7.2.5 of the BAR.<br><br>(Due to the length of the proposed fibre optic cable [183 km], the sensitivity mapping consists of 8 separate maps, which have not been repeated in the concluding statement, but have been cross-referenced). |
|   | c) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.   | Refer to CHAPTER 9 of the BAR.   |
|   | j) The EMPr must include the following:<br>i. Please be informed that the following content must be incorporated within the EMPr as indicated in Appendix 4 of the EIA Regulations 2014, as amended:  | Refer to Appendix 1 to the EMPr.   |
|   | a) Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including a curriculum vitae.  |  |
|   | b) A <u>map</u> at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers. | Refer to Appendix 2 to the EMPr.   |

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|   | <p>c) A description of the <u>impact management outcomes</u>, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including –</p> <ul style="list-style-type: none"> <li>(i) Planning and design;</li> <li>(ii) Pre-construction activities;</li> <li>(iii) Construction activities;</li> <li>(iv) Rehabilitation of the environment after construction and where applicable post closure; and</li> <li>(v) Where relevant, operation activities.</li> </ul> | <p>Refer to CHAPTER 4 of the EMPr.</p>     |
|   | <p>d) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) of Appendix 4 of the EIA Regulations 2014, as amended, will be achieved, and must, where applicable, include actions to —</p> <p>e) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;</p> <p>f) Comply with any prescribed environmental management standards or practices;</p>  | <p>Refer to CHAPTER 4 of the EMPr.</p>     |
|   | <p>g) Comply with any applicable provisions of the Act regarding closure, where applicable; and</p>  | <p>Not applicable.</p>                     |
|   | <p>h) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.</p>  | <p>Not applicable.</p>                     |
|   | <p>i) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.</p>  | <p>Refer to CHAPTER 4 of the EMPr.</p>     |

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|   | j) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.   |   |
|   | k) An indication of the persons who will be responsible for the implementation of the impact management actions.  |   |
|   | l) The time periods within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.  |   |
|   | m) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.  |   |
|   | n) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.  |   |
|   | k) General:<br>Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.   | Refer to CHAPTER 9 of the BAR.                                |
|   | You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that:<br><i>“Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (a) a basic 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 and calculations contemplated in the Financial Provisioning Regulations, which have been subjected to a public participation process of at least 30 days and</i> | The final BAR was submitted within the stipulated timeframes. |

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|   | <p><i>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 BAR or EMPr 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 19(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: <i>“the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the documents contemplated in subregulation 1(a) will be submitted within 140 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 subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days.”</i></p> | <p>No significant changes, necessitating additional PPP, were required to the BAR and EMPr between the draft and final versions.</p> |

## 2. Responses to comments from the South African Heritage Resources Agency (the Competent Authority for heritage permits in the Northern Cape)

See Appendix 17 for original comments as received.

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|--|---|--|
| <p><b>20 September 2021</b></p> <p><b>Letter, received via email</b></p> <p><b>South African Heritage Resources Agency (SAHRA) (Natasha Higgitt)</b></p> | <p>The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:</p> <p>38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;</p> <p>38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;</p> <p>38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</p> <p>38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</p> | <p>The comments received from SAHRA in terms of Section 3(4) of the 2014 NEMA EIA Regulations (as amended) and Section 38(8) of the NHRA are included in Appendix 17 of the Final BAR and responded to in this CRR (Appendix 21). It is acknowledged that the SAHRA APM unit does not have any objections to the proposed development.</p> <p>The recommendations of the specialists have been incorporated into the EMPr, as relevant, and will thus be implemented and enforced during the relevant phases of the project. It is acknowledged that the SAHRA APM unit does not have any further additional conditions.</p> <p>This measure, together with the SAHRA APM unit contact persons (for heritage finds in the Northern Cape Province) is included in the EMPr. No additional measures suggested.</p> <p>This measure, together with the SAHRA BGG unit contact persons, is included in the EMPr. No additional measures suggested.</p> |

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|   | 38(4)d – See section 51 of the NHRA for offences;  | The Project Applicant has taken note of Section 51 (1) of the NHRA with regards to offences. Box 2 of the EMPr contains a summary of offences most prominent to the proposed SKA Fibre Optic Project.  |
|   | 38(4)e – The following conditions apply with regards to the appointment of specialists:<br>If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA; | The EMPr recommends that in the event of a heritage resources find, the relevant heritage authority be contacted to advise on the next steps required (e.g. contracting of a specialist archaeologist / palaeontologist for further recommendations; implementation of subsequent excavation, where required, with the necessary permits in place beforehand). |
|   | The Final BAR and EMPr must be submitted to SAHRA for record purposes;   | The final BAR and EMPr will be submitted to SAHRA, via SAHRIS once complete.   |
|   | The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.   | The decision on the EA by the Competent Authority (DFFE) will be uploaded to SAHRIS once issued.   |

### 3. Responses to comments from Heritage Western Cape (the Competent Authority for heritage permits in the Western Cape)

See Appendix 17 for original comments as received.

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|--|---|--|
| <p><b>04 November 2021</b></p> <p>Letter, received via email</p> <p>Heritage Western Cape (HWC) (Collette Scheermeyer)</p> | <p>The Committee endorses the HIA prepared by CTS Heritage dated August 2021 as meeting the requirements of the NHRA in compliance with Section 38(3) with the following recommendations on pages 40-41;</p>  | <p>Noted, it is acknowledged that the HWC endorses the HIA prepared for the project.</p>                                   |
|  | <p>No mitigation is required prior to construction operations commencing.</p>   | <p>Noted, it is acknowledged that no mitigation is required prior to construction operations commencing.</p>               |
|  | <p>During the construction phase, all excavations must be monitored for fossil remains by the responsible ECO using the HWC Chance Fossil Finds Procedure. Should substantial fossil remains such as vertebrate bones and teeth, petrified wood, plant-rich fossil lenses or dense fossil burrow assemblages be exposed during construction, the responsible ECO should safeguard these, preferably in situ, and alert HWC in the Western Cape so that appropriate action can be taken by a professional palaeontologist.</p> | <p>This measure is included in the EMPr. No additional measures suggested.</p>   |
|  | <p>Should any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources be found during the proposed development, HWC (Colette Scheermeyer, 021 483 5959) in the Western Cape must be alerted.</p>  | <p>This measure, together with the HWC unit contact person, is included in the EMPr. No additional measures suggested.</p> |
|  | <p>If unmarked human burials are uncovered in the Western Cape, HWC (Colette Scheermeyer, 021 483 5959) must be alerted immediately as per section 36(6) of the NHRA. A professional archaeologist must be contracted as soon as possible to inspect the findings. A Phase 2 rescue excavation operation may be required subject to permits issued by SAHRA and/or HWC.</p>   | <p>This measure, together with the HWC unit contact person, is included in the EMPr. No additional measures suggested.</p> |
| <p>The above recommendations must be included in the Environmental Management Programme (EMPr) for the project</p>         | <p>The suggested measures have been included in the EMPr.</p>   |  |

#### 4. Responses to comments from commenting authorities, other stakeholders and I&APs

See Appendix 20 for original comments as received.

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| <p><b>Comment # 1 in Appendix 20</b></p> <p><b>24 August 2021</b></p> <p>Email</p> <p>Loxton Lodge (Lynette Grayling)</p>            | <p>...I am requesting permission to join your group, so I can be kept up to date when they are coming through Loxton. I also want to inform you that we have accommodation available @ the Lodge. Small cottages, flats and rooms. There is a choice of furnished or unfurnished units. Should it come that workers need to stay on a daily, weekly or monthly basis, we can negotiate a reasonable price. We are self catering, but do have the option of providing meals on bookings...</p> | <p>Action: I&amp;AP added to database and included in all subsequent project communications. Email forwarded to project proponent or consideration.</p>   |
| <p><b>Comment # 2 in Appendix 20</b></p> <p><b>27 August 2021</b></p> <p>Email</p> <p>Eskom, Land Development (Rochelle Fortuin)</p> | <p>We have received your application with reference No:14/12/16/3/3/1/2419, Between Beaufort West and Carnarvon The Eskom Reference for this application is 02815-21 Please ensure you use this reference with all future correspondence.</p>   | <p>Wayleave applications to construct the fibre optic cable is being managed by the project proponent (SANReN) directly and does not directly relate the BA process.</p> <p>Action: Email forwarded to project proponent for consideration.</p> |
| <p><b>Comment # 3 in Appendix 20</b></p> <p><b>31 August 2021</b></p> <p>Email</p>   | <p>Kindly can you send me the shapefiles for the proposed application.</p>  | <p>Action: Shapefiles provided to CapeNature, via email, as requested.</p>  |



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| CapeNature, Conservation Operations (Megan Simons)   |  |   |
| <p><b>Comment # 4 in Appendix 20</b></p> <p><b>02 September 2021</b></p> <p><b>Email</b></p> <p><b>South African Civil Aviation Authority (SACAA) (Lizell Stroh)</b></p> | <p>All fibre installation takes place underground, if equipment are used to assist with the operation, distance and HGT should be considered if any effect towards any Aviation, in around the proposed project. Effected Party's (Airports) could provide input if required.</p> <p>Please find guidance Regulations for your Consideration.</p> <p><i>Attachment:</i><br/>           CIVIL AVIATION REGULATIONS, 2011 to the CIVIL AVIATION ACT, 2009 (ACT NO 13 OF 2009)<br/>           Regulations from The Civil Aviation Act relating to Obstacles (Extract)<br/>           Obstacle limitations and markings outside aerodrome or heliport<br/>           139.01.30<br/>           (3) Buildings or other objects which will constitute an obstruction or potential hazard to aircraft moving in the navigable air space in the vicinity of an aerodrome, or navigation aid, or which will adversely affect the performance of the radio navigation or instrument lading systems, must not be erected or allowed to come into existence without the prior approval of the Director.<br/>           (5) No building, structure or object which projects above a slope of 1 in 20 and which is within 3000 meters measured from the nearest point on the boundary of an aerodrome or heliport must, without the prior approval of the Director be erected or be allowed to come into existence.</p> | <p>The majority (162 km) of the fibre optic cable is underground. There are three shorter sections Moleno Pass, Blounek Pass and Rosedene Pass (21 km cumulatively) where the cabling will be installed overhead on poles at a maximum installed height of 09 m. The closes airport / aerodrome is the Karoo Gateway Airport near Beaufort west, which is approximately 9 km (9000 m) away from the closest overhead cabling sections at the Molteno pass. The new overhead cabling follows corridors where overhead power- and telephone cables already exist. Therefore, no significant impact on civil aviation relating to obstacle limitations and markings outside an aerodrome or heliport are expected.</p> |

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|   | <p>(8) In the event of a conflict of interest between land use authorities and air space users, air safety must be regarded as predominant and not to be compromised by land development projects or other obstacles.</p> <p>Endangering safety<br/>91.01.10</p> <p>(1) No person shall, through any act or omission –</p> <p>(a) endanger the safety of an aircraft or person therein; or</p> <p>(b) cause or permit an aircraft to endanger the safety of any person or property.</p>   |  |
| <p><b>Comment # 5 in Appendix 20</b></p> <p><b>10 September 2021</b></p> <p><b>Letter, received via email</b></p> <p><b>Eskom, Land Development (Owen Peters)</b></p> | <p>I hereby inform you that Eskom has no objection to the proposed work indicated on your drawing in principle. This approval is valid for 12 months only, after which reapplication must be made if the work has not been completed.</p> <p>1. Eskom services are affected by your proposed works and the following must be noted:.</p> <ul style="list-style-type: none"> <li>a) Eskom has no objection to the proposed work and include a drawing indicating Eskom 11kV/LV underground services in close proximity.</li> <li>b) Please note that underground services indicated are only approximate and the onus is on the applicant to verify its location.</li> <li>c) There may be LV overhead services / connections not indicated on this drawing.</li> <li>d) The successful contractor must apply for the necessary agreement forms and additional cable information not indicated on included drawing, in order to start construction.</li> </ul> <p>Application for Working Permit must be made to:<br/>Customer Network Centre: Beaufort West<br/>Hennie Van Der Westhuizen 021 915 2890 / 079 849 5167<br/>vdWestH@eskom.co.za</p> | <p>Wayleave applications to construct the fibre optic cable is being managed by the project proponent (SANReN) directly and does not directly relate to the BA process.</p> <p>Action: Email and all attachments forwarded to project proponent for consideration.</p> |

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|   | <p>Should it be necessary to move, relocate or support any existing services for possible future needs, it will be at the developer's cost. Application for relocating services must be made to Customer Services on 08600 37566 or customerservices@eskom.co.za.</p> <p>2. Underground Services<br/>The following conditions to be adhered to at all times:</p> <ul style="list-style-type: none"> <li>a) Works will be carried out as indicated on plans.</li> <li>b) No mechanical plant to be used within 3.0m of Eskom underground cables.</li> <li>c) All services to be verified on site.</li> <li>d) Cross trenches to be dug by hand to locate all underground services before construction work commences.</li> <li>e) If Eskom underground services cannot be located or is grossly misplaced from where the wayleave plan indicates, then all work is to be stopped and Graham Hector from the Land Development Office to be contacted on 021 980 3551 / HectorG@eskom.co.za, to arrange the capturing of such services.</li> <li>f) In cases where proposed services run parallel with existing underground power cables the greatest separation as possible should be maintained with a minimum of 1000mm.</li> <li>g) Where proposed services cross underground power cables the separation should be a minimum of 300mm with protection between services and power cables. (Preferably a concrete slab)</li> <li>h) No manholes; catch-pits or any structure to be built on top of existing underground services.</li> <li>i) Only walk-behind (2 ton Bomac type) compactors to be used when compacting on top of and 1 metre either side of underground cables.</li> </ul> |  |

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|---|--|--|---|-----------|-------|------|--------|-------|--------|---------|------------------|-----------|-------|------|-------|-------|-------|---------|------------------------------|--|--|--|
|   | <p>j) If underground services cannot be located then the Customer Network Centre (CNC) should be consulted before commencement of any work.</p> <p>k) No work can take place within the servitude of a 66kV Cable or 13kV Cable if indicated. Should you need to undertake any work within the proximity of our 66kV or 132kV Cables please contact Graham Hector on HectorG@eskom.co.za to arrange a site visit.</p> <p>3. O.H. Line Services:</p> <p>a) The following building and tree restriction on either side of centre line of overhead power line must be observed:</p> <table border="1" data-bbox="459 743 1155 919"> <thead> <tr> <th>Voltage</th> <th>Building restriction either side of centre line</th> </tr> </thead> <tbody> <tr> <td>11 / 22kV</td> <td>9.0 m</td> </tr> <tr> <td>66kV</td> <td>11.0 m</td> </tr> <tr> <td>132kV</td> <td>15.5 m</td> </tr> </tbody> </table> <p>b) No construction work may be executed closer than 6 (SIX) metres from any Eskom structure or structure-supporting mechanism.</p> <p>c) No work or no machinery nearer than the following distances from the conductors:</p> <table border="1" data-bbox="459 1062 824 1238"> <thead> <tr> <th>Voltage</th> <th>Not closer than:</th> </tr> </thead> <tbody> <tr> <td>11 / 22kV</td> <td>3.0 m</td> </tr> <tr> <td>66kV</td> <td>3.2 m</td> </tr> <tr> <td>132kV</td> <td>3.8 m</td> </tr> </tbody> </table> <p>d) Natural ground level must be maintained within Eskom reserve areas and servitudes.</p> <p>e) That a minimum ground clearance of the overhead power line must be maintained to the following clearances:</p> <table border="1" data-bbox="459 1382 976 1426"> <thead> <tr> <th>Voltage</th> <th>Safety clearance above road:</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table> | Voltage                                    | Building restriction either side of centre line | 11 / 22kV | 9.0 m | 66kV | 11.0 m | 132kV | 15.5 m | Voltage | Not closer than: | 11 / 22kV | 3.0 m | 66kV | 3.2 m | 132kV | 3.8 m | Voltage | Safety clearance above road: |  |  |  |
| Voltage   | Building restriction either side of centre line  |  |   |           |       |      |        |       |        |         |                  |           |       |      |       |       |       |         |                              |  |  |  |
| 11 / 22kV   | 9.0 m  |  |   |           |       |      |        |       |        |         |                  |           |       |      |       |       |       |         |                              |  |  |  |
| 66kV  | 11.0 m   |  |   |           |       |      |        |       |        |         |                  |           |       |      |       |       |       |         |                              |  |  |  |
| 132kV   | 15.5 m   |  |   |           |       |      |        |       |        |         |                  |           |       |      |       |       |       |         |                              |  |  |  |
| Voltage   | Not closer than:   |  |   |           |       |      |        |       |        |         |                  |           |       |      |       |       |       |         |                              |  |  |  |
| 11 / 22kV   | 3.0 m  |  |   |           |       |      |        |       |        |         |                  |           |       |      |       |       |       |         |                              |  |  |  |
| 66kV  | 3.2 m  |  |   |           |       |      |        |       |        |         |                  |           |       |      |       |       |       |         |                              |  |  |  |
| 132kV   | 3.8 m  |  |   |           |       |      |        |       |        |         |                  |           |       |      |       |       |       |         |                              |  |  |  |
| Voltage   | Safety clearance above road:   |  |   |           |       |      |        |       |        |         |                  |           |       |      |       |       |       |         |                              |  |  |  |
|   |  |  |   |           |       |      |        |       |        |         |                  |           |       |      |       |       |       |         |                              |  |  |  |

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|---|--|--|-------|------|-------|-------|-------|--|
|   | <table border="1" data-bbox="459 347 974 478"> <tr> <td>11 / 22kV</td> <td>6.3 m</td> </tr> <tr> <td>66kV</td> <td>6.9 m</td> </tr> <tr> <td>132kV</td> <td>7.5 m</td> </tr> </table> <p>f) That existing Eskom power lines and infrastructure are acknowledged as established infrastructure on the properties and any rerouting or relocation would be for the cost of the applicant/developer.</p> <p>g) That Eskom rights or servitudes, including agreements with any of the landowners, obtained for the operation and maintenance of these existing power lines and infrastructure be acknowledged and honoured throughout its lifecycle which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>i. Having 24 hour access to its infrastructure according to the rights mentioned in (a) above,</li> <li>ii. To perform maintenance (structural as well as servitude – vegetation management) on its infrastructure according to its maintenance programmes and schedules, iii. To upgrade or refurbish its existing power lines and infrastructure as determined by Eskom, iv. To perform any other activity not listed above to ensure the safe operation and maintenance of the Eskom power lines or infrastructure.</li> </ul> <p>h) Eskom must have at least a 10m obstruction free zone around all pylons (not just a 10m radius from the centre).</p> <p>i) Eskom shall not be liable for the death or injury of any person, or for loss of or damage to any property, whether as a result of the encroachment or use of the area where Eskom has its services, by the applicant, his/her agent, contractors, employees, successors in title and assignee.</p> | 11 / 22kV                                  | 6.3 m | 66kV | 6.9 m | 132kV | 7.5 m |  |
| 11 / 22kV   | 6.3 m  |  |       |      |       |       |       |  |
| 66kV  | 6.9 m  |  |       |      |       |       |       |  |
| 132kV   | 7.5 m  |  |       |      |       |       |       |  |

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|   | <p>j) The applicant indemnifies Eskom against loss, claims or damages, including claims pertaining to interference with Eskom services, apparatus or otherwise.</p> <p>k) Eskom shall at all times have unobstructed access to and egress from its services.</p> <p>l) Any development which necessitates the relocation of Eskom's services will be to the account of the developer.</p> <p>m) Lungile Motsisi MotsisL@eskom.co.za, Eskom: Transmission must be contacted on 011 800 5734 to comment on behalf of the 400 kV OVERHEAD POWERLINES, NO WORK WITIN THIS SERVITUDE OR UNDERNEATH POWERLINES IS ALLOWED until comment from Eskom Transmission has been obtained.</p> <p>4.NOTE<br/>Wayleaves, Indemnity form (working permit) and all as-built drawings issued by Eskom to be kept on site at all times during construction period.</p> |  |
| <p><b>Comment # 6 in Appendix 20</b></p> <p><b>22 September 2021</b></p> <p><b>Email</b></p> <p><b>Adjacent landowner, Gordon Verhoef Family Trust (Jeanine Ihlenfeldt)</b></p> | <p>We will NOT allow any access to any of our properties for this project. This includes Farm 437.</p>  | <p>The majority of the cabling will be installed in the road reserve. Where cabling may be installed on private land due to difficult terrain, the project proponent has secured the necessary agreements from affected landowners. These properties are explicitly listed in the Application for EA and BAR. Farm 437 has not been identified or included as an affected property on which the cabling needs to be installed, access is thus not necessary in this regard. It is acknowledged consent is not granted for any activities on the aforementioned property.</p> |

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| <p><b>Comment # 7 in Appendix 20</b></p> <p><b>27 September 2021</b></p> <p><b>Letter, received via email</b></p> <p><b>Western Cape Government, Department of Roads and Public Works (SW Carstens, Lyle Martin)</b></p> | <p>The following refer:</p> <p>1.1 This Branch's letter TPW (Job 27621 ) dated 4 August 2020 to MCT Telecommunications. (Find a copy attached to this letter).</p> <p>1.2 This Branch's letter TPW/CFS/RP/LUD/WLTC-OI /02 (Job 27621 ) dated 17 August 2021 to CSIR. (Find a copy attached to this letter).</p> <p>1.3 Your notice with both Environmental Authorisation Reference 14/12/16/3/3/1/2419 and Water Use General Authorisation Reference WLI 18079 dated 27 August 2021 .</p> <p>1.4 Provided that this Branch's approval of the fibre optic cable in its letter of 4 August 2020 is complied to in full then this Branch, from an environmental point of view, offers no objection to the proposed fibre optic cable along Trunk Road 58 section I (TR05801 ; R381 ) , for which this Branch is the Road Authority.</p> | <p>Wayleave applications to construct the fibre optic cable is being managed by the project proponent (SANREN) directly and does not directly relate to the BA process.</p> <p>Action: Email and all attachments forwarded to project proponent for consideration.</p>   |
| <p><b>Comment # 8 in Appendix 20</b></p> <p><b>27 September 2021</b></p> <p><b>Letter, received via email</b></p> <p><b>CapeNature (Megan Simons)</b></p>  | <p>CapeNature would like to reiterate that all endangered species or protected species listed in Schedules 3 and 4 respectively, in terms of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) may not be picked or removed without the relevant permit, which must be obtained from CapeNature. This is also to ensure that rescued plant material is accounted for and used in the rehabilitation or relocation process.</p> <p>Will translocation of the endemic plant species that was recorded be considered as part of the mitigation measure?</p>   | <p>Permits for the removal of protected plant species as listed in the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) and Northern Cape Nature Conservation Act (Act No. 9 of 2009) will be sought as soon as EA is received (if granted).</p> <p>Only two species endemic to a national vegetation type were recorded during the site visit: <i>Stomatium suaveolens</i> is endemic to the Upper Karoo Hardeveld and <i>Stomatium villetii</i> to the Western Upper Karoo (Mucina &amp; Rutherford, 2006).</p> <p>According to the checklist drawn from the NewPosa database of the South African National Biodiversity Institute (SANBI), which covers an extensive area surrounding the SKA fibre optic route, a few more species endemic to the Upper Karoo Hardeveld could potentially be found along the route (see Appendix A of the Terrestrial Ecology, Biodiversity and Species: Specialist</p> |

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|   |         | <p>Assessment (Appendix 2 to the BAR)). Within this vegetation type, cabling will however, for the most part, be overhead and the chances of finding endemic species on the exact spots where the poles will be planted, is unlikely. If they are found, the poles can easily be shifted to avoid endemic plant species.</p> <p><i>Stomatium villetii</i>, is listed as endemic to the Western Upper Karoo by Mucina &amp; Rutherford (2006). It is a fairly widespread species, with its main centre of occurrence in the Roggeveld.</p> <p>Following SANBI’s guidelines, no translocation of the species endemic to a national vegetation type is proposed as part of the mitigation measures. SANBI’s "Guidelines for Environmental Impact Assessments" (<a href="http://www.redlist.sanbi.org/eiaguidelines.php">www.redlist.sanbi.org/eiaguidelines.php</a>) state the following:</p> <p><i>"In situ conservation is vital and should be recommended as the only option for conserving species of conservation concern. Ex situ conservation, i.e. the removal of a subpopulation from its natural habitat to an artificial environment, a practice often termed 'search and rescue', will result in the erosion of the inherent genetic diversity and characteristics of that species and increase its extinction risk in the wild. Similarly, translocation of subpopulations is an unacceptable conservation measure."</i></p> <p><i>"Translocations are expensive and rarely successful. Even if they are successful, translocated individuals may harm other species within the receiving environment, the translocated individuals may transmit pathogens and/or parasites, and translocation may result in rapid changes in the species itself."</i></p> |



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|   | <p>CapeNature reminds the applicant that it is a legal requirement to remove alien species in terms of the Alien and Invasive Species Regulations, NEM:BA, 2014, specific alien plant species are either prohibited or listed as requiring a permit; aside from restricted activities concerning, <i>inter alia</i>, their spread, and should be removed.</p> <p>We strongly support the recommendation for an Alien Invasive Control Plan and this plan must be included in the Environmental Management Programme (EMPr). The following can be included in the plan:</p> <ul style="list-style-type: none"> <li>• delineate the locations of invasive alien plants in relation to the construction areas and illustrate this on a map;</li> <li>• stipulate a timeframe and strategy for alien plan removal (which are potentially the best months of the year to destabilise and remove the alien plants, based on weather conditions/patterns);</li> </ul> | <p>The implications of these guidelines are that translocation of red-listed species is not encouraged as a conservation measure since the translocated species may have undesirable ecological effects, such as:</p> <ul style="list-style-type: none"> <li>• Habitat alteration by translocated species may be harmful to other species.</li> <li>• Transmission of pathogens or parasites may occur.</li> <li>• Translocation may result in rapid changes in the species itself.</li> <li>• Translocations are expensive and rarely successful.</li> <li>• Success entails not only survival of the translocated individuals, but also establishment of a self-sustaining, viable population which is able to adapt to changing environmental conditions.</li> <li>• Relocation of rescued plants to undisturbed habitats alters the natural species composition of the receiving site.</li> </ul> <p>The EMPr contains an Alien Invasive Plant (AIP) management plan which recommends monitoring the disturbance footprint (i.e. where trenches were dug and backfilled) for the establishment of AIPs. See Section 4.8 of the EMPr. The AIP management plan further recommends that the “location of established alien invasive plants [must be] recorded (geographic coordinates in Degrees, Minutes, Seconds / Decimal Degrees)”. The Alien invasive plant management plan includes a list of NEM:BA (2020) listed alien invasive species known to occur in the region, as well as an indication of the species recorded during the site survey. The GPS locations of where AIPs were observed along the route has been included in Chapter 12 (Section 12.3) in the final report. Images of the most prominent AIP species have been included in the AIP management plan.</p> |

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|   | <ul style="list-style-type: none"> <li>• list potential methods of clearing (i.e. herbicides or cutting); and</li> <li>• list suitable species that occur commonly (with pictures of these species) within the construction sites in an arid ecosystem.</li> </ul>  | <p>It must be noted that long-term and ongoing vegetation management of the road reserves is the responsibility of the relevant roads and public works departments. It is recommended that during installation of the underground cabling, trenched and backfilled areas (disturbance footprint) the establishment of alien vegetation within the road reserve will periodically be monitored by the ECO, and for up to 6 months after construction.</p> <p>The Alien invasive plant management plan recommends that the “location of established alien invasive plants [be] recorded (geographic coordinates in Degrees, Minutes, Seconds / Decimal Degrees)”.</p> <p>The Alien invasive plant management plan includes a list of NEM:BA listed alien invasive species known to occur in the region, as well as an indication of the species recorded during the site survey.</p> <p>Pictures of these species and clearance methods have been added in the EMPr (see Section 4.8 of the EMPr).</p> |
|   | <p>If at any stage during the construction phase any alien species are noted they should be eradicated using suitable methods. Confirmation of eradication of all such species must be recorded within the last monitoring report. The removal of invasive alien plant species must be continuous and should continue beyond the operational phase.</p> | <p>It must be noted that long-term and ongoing vegetation management of the road reserves is the responsibility of the relevant provincial roads and public works department. It is recommended that during installation of the underground cabling, trenched and backfilled areas (disturbance footprint) the establishment of alien vegetation within the road reserve will periodically be monitored by the ECO, and for up to 6 months after construction.</p>   |

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|   | <p>Suitable indigenous vegetation must be used during the rehabilitation. We recommend a rehabilitation plan be compiled with inputs from a local Botanist to inform the plan with regards to the relevant local plant species for planting and stabilising during rehabilitation activities.</p>   | <p>Due to climatic conditions, especially the ongoing drought in the area where the SKA fibre optic cable is proposed, active rehabilitation through the planting of indigenous plants is not feasible (as also pointed out by EWT, see comment # 15).</p> <p>Rehabilitation measures include reinstatement of topsoil when trenches are backfilled and subsequent brush packing with removed vegetation.</p>   |
|   | <p>CapeNature recommend that camera trap monitoring be used for surveying Riverine Rabbit and their threats. To improve the understanding and population trends for this species along the proposed cable routes. We propose that the Endangered Wildlife Trust (EWT) be contacted to assist with the deployment of camera traps or obtaining data on the occurrence of Riverine Rabbit and have a specialist delineate suitable buffers.</p> | <p>Camera trapping of the riverine rabbit is generally used to establish the presence of the riverine rabbit. However, in the case of the fibre optic cable, the presence of these animals is a given in the area to the south of Loxton.</p> <p>Comments from EWT (see comment # 15 in this CRR) indicated that <i>“the distribution of rabbits on the farms adjacent to the R381 is reasonably well documented, with historical sightings (physical and with camera traps). As such, we [EWT] do not feel that camera trapping the road reserve will add value to understanding Riverine Rabbit distribution in the area. Riverine Rabbit occurrence on the farms along the R63 is less well documented, but few suitable riparian floodplain areas occur along this route, and we do not feel it is necessary to camera trap this route either. We agree that it is highly unlikely that burrows would occur in the road reserve given the disturbance factor of the traffic, but due diligence requires this be checked (active burrows are lined with fur and often the entrance is closed with fur as well).”</i></p> |

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|   | <p>In the area, many of the mammals are crepuscular or nocturnal and thus difficult to observe directly. Measures must be in place for faunal species entering during construction and operational phases. Therefore, we recommend that mitigation measure for faunal habitat should also include the prevention of poaching.</p> <p>The applicant must consider placing tortoise proof fencing to prevent any road mortalities, unless suitable underpasses in which tortoises can walk through underneath the road will be build. Also, considering the impact of laying underground ducting on fossorial animals, with mitigation.</p> <p>There is no mention of a rehabilitation plan in the dBAR and CapeNature recommends that a rehabilitation plan be compiled for the duration of this project</p> | <p>Although the Riverine Rabbit may cross the road reserve when moving around the landscape, it is unlikely that they should make their burrows in the road reserve. Nevertheless, before trenches are dug in those areas that have been indicated as prime habitat for the riverine rabbit, the route should be walked on foot to ensure that no burrows are present in the path of the trench. Furthermore, construction of the trench in favoured Riverine Rabbit habitat should preferably not be conducted during the breeding season (August to May).</p> <p>This project does not involve the construction of roads. This project does involve the installation of fibre optic cables, predominantly underground within the reserves of existing roads. Suggested measures regarding placement of fences around or underpasses underneath existing roads are not relevant or reasonable to include as management actions for the proposed Fibre Optic Project.</p> <p>Measures have been included in the EMPr to prevent poaching, and to minimise impacts and rescue animals that potentially get stuck in open trenches between the trench excavation and backfilling process.</p> <p>A rehabilitation plan has been included in the Environmental Management Programme Report.</p> <p>Active rehabilitation is a costly exercise, and it is questionable whether planting indigenous plants is justified in a road reserve that is continuously disturbed. Furthermore, under the harsh climatic conditions in the region active rehabilitation by means</p> |

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|   |  | <p>of planting indigenous species is probably not feasible (as also pointed out by EWT, see comment # 15 in this CRR).</p> <p>On the overhead section no rehabilitation of the small patches disturbed for the planting of poles will be necessary.</p> <p>The soil in arid regions is generally replete with a store of seeds in the so-called seedbank (predominantly of annual species). Where the cable will be buried, the trenches should not be left open for long periods. Thus, the seedbank should not unduly decay before the topsoil is returned during backfilling. Returning the topsoil over the fairly narrow trenches should be sufficient to kick-start the revegetation process. After backfilling the trenches, the area should be brush packed with the removed vegetation.</p> <p>Should the planting of indigenous species be essential in designated spots, some species that could be used in rehabilitation include: <i>Pentzia incana</i>, <i>Chrysocoma ciliata</i>, <i>Lycium cinereum</i>, <i>Fingerhuthia africana</i>, <i>Eriocephalus ericoides</i>, <i>Hermannia grandiflora</i>, <i>Felicia filifolia</i>, <i>Pteronia glauca</i>, <i>Sporobolus fimbriatus</i>, <i>Eragrostis obtusa</i>, <i>Eragrostis lehmanniana</i> and <i>Lessertia frutescens</i>. These species are all available at the Renu-Karoo nursery in Prince Albert, either as plants, plugs or seed.</p> |
|   | <p>CapeNature recommend avoiding the watercourse (i.e., river lines and wetlands) as far possible, with the cables. All concrete and cement batching must be done away from the watercourse and other sensitive habitat as this can pollute the watercourse. Thus, the contractors need to be very careful of any potential pollution (litter or otherwise) of the watercourse. We advise that construction vehicles and machinery be washed away from any</p> | <p>Watercourse crossings are unavoidable as the cabling follows existing roads between Beaufort West and Carnarvon. Delineated watercourses will be traversed using Horizontal Directional Drilling (HDD) where possible, or through hand-dug trenching. In addition, the Aquatic Biodiversity Assessment (included in Appendix 3 of the BAR) assessed the impact of the</p>  |

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|   | <p>watercourse. CapeNature supports the mitigation for hand-dug trenching around sensitive habitat.</p> <p>Water run-off and soil disturbance might affect the watercourse, especially in periods with high run-off. For that reason, the activity must seek to minimize and manage water and pollution run-off. Thus, all stormwater runoff within the development area must be managed in a manner as to minimise erosion.</p> <p>The area is highly erodible so extra caution must be taken to mitigate that during all phases. Possible erosion points need to be monitored and rehabilitated when needed. Areas susceptible to erosion must be protected by installing the necessary temporary or permanent structures. The stormwater management designs must include and mitigate natural events as the Karoo is susceptible to flash flooding.</p> | <p>proposed project on watercourses and wetlands, and overall, all of the impacts were rated with a very low significance with mitigation measures. Therefore, the impact has been deemed acceptable by the specialist.</p> <p>The following has been explicitly added to the EMPr:</p> <ul style="list-style-type: none"> <li>▪ <u>No concrete or cement mixing / batching may be conducted within delineated wetlands / watercourses.</u></li> <li>▪ No vehicles or machinery may be parked, refuelled, <u>washed</u> or maintained in delineated watercourses / wetlands</li> </ul> <p>Mitigation / management actions that addresses runoff and erosion issues are included in the EMPr. No additional measures suggested.</p> <p>The Aquatic Biodiversity Assessment (included in Appendix 3 of the BAR) identified and assessed the following related direct impacts for the construction phase:</p> <ul style="list-style-type: none"> <li>▪ Spills and leaks from construction vehicles / machinery when working in or near the delineated systems, impacting localised surface water quality; and</li> <li>▪ Erosion and Sedimentation.</li> </ul> <p>The Aquatic Biodiversity Assessment (included in Appendix 3 of the BAR) identified and assessed the following related indirect impact during the operational phase:</p> <ul style="list-style-type: none"> <li>▪ Creation of hard surfaces, resulting in runoff, erosion and sedimentation – Indirect impact</li> </ul> |

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|   |  | All of the abovementioned impacts were rated with a very low significance with mitigation measures. Therefore, the impacts have been deemed acceptable by the specialist.   |
|   | CapeNature acknowledges that the cabling is planned within the existing disturbance corridors to avoid undisturbed/ natural areas.   | Correct.  |
|   | There are a few quite extensive renewable developments planned in the general areas thus in section 8.4 the cumulative impacts of the proposed Nuweveld WEF must be included and not just the Gamka Karoo project. | <p>The following existing and potential future developments in the broader region in which the Fibre Optic Project is proposed were considered in determining cumulative impacts:</p> <ul style="list-style-type: none"> <li>▪ Existing road/s and other linear infrastructure currently in the road reserve as observed in the field (powerlines, telephone lines);</li> <li>▪ Renewable energy projects around Beaufort West: (12/12/20/2133: 19MW Photovoltaic Solar Facility Proposed By Lurama 214 Pty Ltd On Portion 1 Of The Farm Steenrotsfontein 168, Beaufort West, Western Cape; 12/12/20/2286: Beaufort West Photovoltaic Park On Portion 9 Of The Farm 161 Kuilspoort in The Western Cape Province; 14/12/16/3/3/2/406: Wind and solar facility on Farm Lombaardskraal, Farm 330, Beaufort West, Western Cape; 14/12/16/3/3/2/772: Establishment of the Beaufort West Solar Power Plant Site 1; 14/12/16/3/3/2/773: Establishment of the Beaufort West Solar Power Plant Site 2; 14/12/16/3/3/2/774: Beaufort West Solar Power Plant Site 3).</li> <li>▪ Housing developments near Beaufort West; and</li> <li>▪ Proposed uranium mining and shale gas extraction.</li> </ul> <p>The Nuweveld Development (14/12/16/3/3/2/2042; 2043; 2044; and 2366: Nuweveld Wind Farm (North; East; West, and</p> |

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|   |   | <p>Gridline)) has been included in the cumulative assessment, but does not change the impact assessment outcome since the contribution of the fibre optic cable, predominantly installed in previously disturbed road reserve, to these impacts are relatively small to negligible, resulting in overall low to very low cumulative impact.</p>   |
|   | <p>Waste generated must be stored on site until it is removed to a landfill and must be away from the watercourse to avoid any waste in the riverine system<br/>No littering by contract staff should be allowed, especially in proximity to the watercourses.</p>  | <p>The following mitigation / management measure has been explicitly added:</p> <ul style="list-style-type: none"> <li>▪ <u>Waste may not be temporarily stored in delineated wetlands / watercourses.</u></li> <li>▪ <u>Do not litter, especially in proximity to delineated wetlands / watercourses.</u></li> </ul>   |
|   | <p>A qualified Environmental Control Officer (ECO) should be appointed to oversee the process and to identify any harmful activities. The ECO must monitor the construction and operational phases, especially when trenching for cable and working near sensitive habitats.</p>  | <p>The appointment of an independent and qualified ECO, as well as their roles and responsibilities, is stipulated in the EMPr. No additional measures suggested.</p>   |
|   | <p>In conclusion, CapeNature reminds the applicant when assessing the impact of the proposed activity on CBA, the reasons behind CBA delineation should be investigated and critically assess whether these will be compromised by the proposed project. The loss of CBA and natural habitat should be avoided (Pool-Stanvliet <i>et al.</i> 2017). Although, the vegetation type is Least Threatened (LT), kindly note that any loss to natural habitat should be avoided. Recovery following rehabilitation in arid habitats can take more than a few decades, even from temporary disturbances, due to the on-going drought.</p> | <p>This issue was addressed in the (draft and final) Terrestrial Ecology, Biodiversity and Species: Specialist Assessment (Appendix 2 to the BAR):<br/>CBAs are regarded as areas of high biodiversity and ecological value and need to be kept in a natural or near-natural state, with no further loss of habitat or species. The proposed construction of the fibre-optic cable will take place in the road reserve, a highly transformed habitat that is not representative of the adjacent land on which the CBA identification was based. Consequently, the classification of the road reserve as CBA1 or CBA2 cannot be upheld.</p> <ul style="list-style-type: none"> <li>• Additionally, the proposed SKA fibre-optic cable does not constitute any of the land uses considered to be</li> </ul> |



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|   | <p>Post construction monitoring of the impacts should be observed for more than one year.</p> | <p>undesirable in a CBA according to Pool-Stanvliet et al. (2017).</p> <ul style="list-style-type: none"> <li>• Since the development will primarily take place in the road reserve it will have little impact on existing protected areas and it will also not affect the NPAES.</li> </ul> <p>Furthermore, the classification of the road reserve as CBA is questionable from a vegetation standpoint, although it might still be marginal Riverine Rabbit habitat. According to the definition of a CBA1, such areas should be “Areas that are irreplaceable for meeting biodiversity targets. There are no other options for conserving the ecosystems, species or ecological processes in these areas”. A road reserve does not comply with these conditions. The definition of a CBA2 refers to “Areas that are the best option for meeting biodiversity targets, in the smallest area, while avoiding conflict with other land uses” and road reserves are not the best option to meet biodiversity targets.</p> <p>It must be noted that long-term and ongoing vegetation management of the road reserves is the responsibility of the relevant roads and public works departments. It is recommended that during installation of the underground cabling, trenched and backfilled areas (disturbance footprint) impacts be periodically be monitored by the ECO, and for up to 6 months after construction. For overhead fibre optic cable sections, evidence of avifauna collisions must be monitored for 2 years after construction.</p> |

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| <p><b>Comment # 9 in Appendix 20</b></p> <p><b>30 September 2021</b></p> <p><b>Letter, received via email</b></p> <p><b>Western Cape Government, Department of Environmental Affairs and Development Planning (DEA&amp;DP) (Thea Jordan, Steve Kleinhans, Shehaam Brinkhuis, Waleed Galvaan)</b></p> | <p>1. Directorate: Development Management (Region 3) – Mr Steve Kleinhans</p> <p>1.2. The information in the Draft BAR indicates that in order to avoid or minimise impacts associated with the development phase of the proposal, that a 30m corridor around the centre line of the roads (i.e. the road reserve) will be established within which the construction activities may occur. This will enable micro-siting during the construction phase to avoid sensitive areas e.g. riverine rabbit burrows and other sensitive areas such as protected/sensitive plant species. This Directorate supports the proposal.</p> <p>However, it must be ensured that individuals with the relevant expertise identify and clearly mark such areas prior to any disturbance by construction crew in those areas.</p> <p>1.3. This Directorate has reviewed the Draft EMPr dated August 2021 submitted as part of the Draft BAR and supports the recommendations and management measures to avoid and minimise the impacts to the environment. The measures must be implemented and strictly adhered to. The EMPr, impact management actions and the impact management outcomes must be monitored by the appointed environmental control officer (“ECO”).</p> <p>1.4. Notwithstanding the above, it is noted that the EMPr indicates that the ECO must undertake periodic audits during the relevant phases of the proposed project. A clear distinction must be made between an environmental monitoring report (to be compiled by the ECO) and an environmental audit report (to be compiled in terms of Appendix 7 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) Environmental Impact Assessment (“EIA”) Regulations, 2014 (as amended) by an independent person with the relevant environmental auditing expertise). In this regard, please note that the environmental auditor</p> | <p></p> <p>Noted.</p> <p>The EMPr specifies that micro-siting must be informed by suitably qualified specialists on-site (including walkdowns) in collaboration with the ECO to identify and clearly demarcate any sensitive areas that need to be avoided.</p> <p>Noted.</p> <p>The role of “Environmental Auditor” has been added to the EMPr under Section 4.3 Roles and responsibilities, and the following added:<br/> <u>An independent environmental auditor, with relevant environmental auditing expertise, must be appointed to audit compliance with the conditions of the EA and EMPr, and compile environmental audit reports to be submitted to the relevant competent authorities (including National Department of Forestry, Fisheries and the Environment; Western Cape</u></p> |

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|   | <p>cannot be the EAP or the ECO. Furthermore, take note of the requirements for auditing of compliance with an EA and EMPr as prescribed in regulation 34 of the NEMA EIA Regulations, 2014 (as amended). As such, the EMPr must be amended to ensure compliance with the requirements.</p> <p>1.5. The contents of the environmental audit report must comply with Appendix 7 of the NEMA EIA Regulations, 2014 (as amended). It is recommended that a timeframe for the submission of the audit report to the competent authority be included in the EMPr.</p> | <p><u>Government Department of Environmental Affairs and Development Planning; Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform). The environmental auditor role must be fulfilled by an independent person with relevant environmental auditing experience.</u></p> <p><u>Environmental auditing and reporting must occur:</u></p> <ul style="list-style-type: none"> <li>• <u>Quarterly during construction;</u></li> <li>• <u>Once, 30 days after construction has been completed;</u></li> <li>• <u>Bi-annually, for a total period of two (02) years, as it relates to post-construction monitoring of alien invasive plants, erosion control and rehabilitation (06 months) and bird collisions with overhead lines (02 years); and</u></li> <li>• <u>A final report 2 years after construction (i.e. all monitoring has been concluded).</u></li> </ul> <p><u>Furthermore, environmental auditing and reporting must adhere to Regulation 34 and Appendix 7 of the NEMA EIA Regulations (refer to Appendix 4 to this EMPr).</u></p> <p>The ECO's role has also been clarified as pertaining to environmental compliance monitoring and not auditing, and compiling environmental compliance reports, not audit reports. An excerpt of the NEMA EIA Regulations, Regulation 34 on environmental audits and Appendix 7 on audit report contents were added as an appendix to the EMPr.</p> |
|   | <p>2. Directorate: Development Facilitation – Mr Ryan Apolles:</p> <p>2.1. This Directorate supports the need and desirability of the development proposal. The environmental impacts have been adequately identified and the proposed mitigation measures are supported.</p>  | <p>Noted.</p>  |

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|   | <p>3. Directorate: Pollution and Chemicals Management – Ms Shehaam Brinkhuis</p>   |  |
|   | <p>3.1. Due to the nature of the proposed development, and given that pollution risks are largely anticipated to be associated with the construction phase of the FOC installation, with potential pollution impacts focussed on soil and water resources (including groundwater), this Directorate supports the recommendations made in the Aquatic Ecology, Biodiversity and Species Specialist Assessment compiled by EnviroSci (Pty) Ltd dated January 2021.</p> | <p>Noted.</p>  |
|   | <p>3.2. Reference is made to the use of water for dust suppression purposes as a last resort, and to be sourced from a water-secure area. Please note that the use of potable water for dust suppression purposes is not supported and should be avoided. Where water is to be used, this should be of a suitable quality so as not to cause any severe/repeated pollution to soil or surface water resources.</p>   | <p>The following has been explicitly added to the EMPr:</p> <ul style="list-style-type: none"> <li>▪ <u>In the event that water for dust suppression is unavoidable, potable water may not be used and the quality of the water used must be of a suitable quality so as not to cause any severe/repeated pollution to soil or surface water resources.</u></li> </ul> |
|   | <p>3.3. Chemical toilets must be regularly maintained, serviced and checked for leaks to prevent ground or surface water pollution. No portable toilets or ablution facilities should be located within 50m of any watercourse.</p>  | <p>The following has been explicitly added to the EMPr:</p> <ul style="list-style-type: none"> <li>▪ <u>Portable sanitation facilities may not be located within 50 m of delineated wetlands / watercourses.</u></li> <li>▪ <u>Portable sanitation facilities must be maintained, serviced and checked for leaks regularly.</u></li> </ul>                             |
|   | <p>3.4. It is noted that the potential use of cement or concrete during the construction phase will be limited, given the nature of the proposal. Where cement will be used, such as the dry cement mixture to secure concrete poles, care must be exercised. Although it is acknowledged that dry cement mix has been proposed, should additional on-site cement mixing be required, this must be undertaken on a contained and impermeable surface.</p>            | <p>The following has been explicitly added to the EMPr:</p> <ul style="list-style-type: none"> <li>▪ <u>Cement mixing / batching must be undertaken on a contained and impermeable surface and may not be conducted within delineated wetlands / watercourses.</u></li> </ul>  |
|   | <p>3.5. Based on the photograph (Figure 11) provided for reference on page 11 of the Draft EMPr, the fuel trailer appears to be portable. Please confirm if any fixed infrastructure for fuel storage is proposed, such as in the basecamps or temporary laydown areas. Where portable tanks, pumps, etc. are used,</p>  | <p>No fixed infrastructure for fuel storage is proposed. Portable fuel storage will be parked at basecamps during non-working hours.</p> <p>The following has been explicitly added to the EMPr:</p>   |

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|   | <p>drip trays must be utilised that contain enough absorbent material, which is to be regularly disposed of appropriately.</p>  | <ul style="list-style-type: none"> <li>▪ Use drip trays or similar containment measures to avoid contaminated soils <u>under portable fuel storage tanks</u>, and when refuelling and when leaks are evident.</li> </ul>   |
|   | <p>3.6. Stormwater runoff must be controlled to ensure that on-site activities do not culminate in possible offsite contamination. This is with focus on areas used for loading and refuelling of vehicles. Adequate measures must be in place to ensure any minor spills are contained and handled appropriately.</p>  | <p>The EMPr includes mitigation / management actions to address issues around runoff and stormwater resulting in contaminated soils and watercourses, including that vehicles or machinery may be not parked, refuelled, washed or maintained in delineated watercourses / wetlands; and keeping fuel / oil spill kits on-site in the event of spills or leaks. No additional measures suggested.</p>  |
|   | <p>3.7. Only minor repairs and maintenance of vehicles and equipment may be done on-site. Activities, including refuelling, must only be undertaken within a designated on-site area that makes use of unplasticized polyvinyl chloride lining and drip trays. These drip trays should be regular checked for cracks and leakages to prevent spillage into the environment.</p> | <p>The following has been explicitly added to the EMPr:</p> <ul style="list-style-type: none"> <li>▪ Use <u>unplasticized polyvinyl chloride (uPVC) linings</u>, drip trays or similar containment measures to avoid contaminated soils under portable fuel storage tanks, when refuelling and when leaks are evident.</li> <li>▪ <u>Drip trays and / or other containment materials must be checked for cracks and leaks regularly (before each use).</u></li> </ul>  |
|   | <p>3.8. Please amend the EMPr to make provision for section 30 of the NEMA, 1998 pertaining to the control of incidents. In the event of a significant spill or leak of hazardous substances (petrol, diesel, etc.), such incident(s) must be reported to all relevant authorities, including this Directorate, in accordance with section 30 of the NEMA, 1998.</p>            | <p>The following has been explicitly added to the EMPr:</p> <ul style="list-style-type: none"> <li>▪ <u>In the event of a major spill (“incident”), steps must be taken in accordance to Section 30 of the NEMA on Control of Incidents (see Appendix 8), including:</u> <ul style="list-style-type: none"> <li>▪ <u>Taking immediate action to minimise the effects of the incident; and</u></li> <li>▪ <u>Reporting of the incident to all relevant authorities, including Western Cape DEA&amp;DP and Northern Cape DENC where relevant.</u></li> </ul> </li> </ul> <p>An excerpt of the NEMA S30 on the control of incidents was added as an appendix to the EMPr.</p> |

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|   | <p>3.9. The mitigation measures and specialist recommendations, as proposed in the Draft BAR and incorporated into the EMPr must always be implemented and strictly adhered to. In order to achieve this, as potential pollution-related impacts are anticipated to occur mostly only during the construction (and decommissioning) phase, frequent monitoring of construction work, particularly within and in proximity to watercourses, must be conducted by an ECO to ensure compliance with the EMPr throughout the construction phase.</p>  | <p>Frequent (ongoing, daily) monitoring of environmental pollution risks (fuel spills and leaks that may contaminate soils or watercourses) by the ECO is stipulated in the EMPr. No additional measures suggested.</p>   |
|   | <p>4. Directorate: Waste Management – Mr Waleed Galvaan:<br/>4.1. This Directorate supports the strategic objective that aims to allow South Africa to contribute towards global science projects. Additionally, since this is a Strategic Integrated Project prioritised in the National Development Plan, it is also supported.</p>   | <p>Noted.</p>   |
|   | <p>4.2. Evidently a waste management licence is not required for the project. It should be noted that the management of waste must under all circumstances be undertaken in accordance with section 16 (“general duty in respect of waste management”) of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), which states that “A holder of waste must, within the holder’s power, take all reasonable measures to manage waste in such a manner that it does not endanger health or the environment or cause a nuisance through noise, odour or visual impacts.” Any vegetation that is removed during construction activities may be chipped for reuse or be taken to a waste management facility that will process the waste prior to further reuse or disposal. The waste management hierarchy must be implemented as far as possible, and disposal of waste must be considered as a last resort. Any resulting waste that cannot be reused or recycled, must be disposed of at a duly authorised waste management facility. It is advised that this be included in the EMPr.</p> | <p>In addition to the waste management measures included in the EMPr, the following has been explicitly added:</p> <ul style="list-style-type: none"> <li>▪ <u>Waste must, under all circumstances, managed in accordance to Section 16 of the National Environmental Management: Waste Act (59/2008) (NEM:WA) on General duty in respect of waste management, which states that:</u> <ul style="list-style-type: none"> <li>▪ <u>A holder of waste must, within the holder’s power, take all reasonable measures to-</u> <ul style="list-style-type: none"> <li>▪ <u>avoid the generation of waste of waste and where such generation cannot be avoided, to minimise the toxicity and amounts of waste that are generated;</u></li> <li>▪ <u>reduce, re-use, recycle and recover waste;</u></li> <li>▪ <u>where waste must be disposed of, ensure that the waste is treated and disposed of in an environmentally sound manner;</u></li> </ul> </li> </ul> </li> </ul> |

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|   |  | <ul style="list-style-type: none"> <li>▪ <u>manage the waste in such a manner that it does not endanger health or the environment or cause a nuisance through noise, odour or visual impacts;</u></li> <li>▪ <u>prevent any employee or any person under his or her supervision from contravening this Act;</u></li> <li>▪ <u>prevent the waste from being used for any unauthorised purpose.</u></li> </ul> <p>The following has been added under vegetation clearance:</p> <ul style="list-style-type: none"> <li>▪ <u>Any vegetation that is removed during construction activities, and not re-used for rehabilitation (brush packing), may be chipped for reuse or be taken to a waste management facility that will process the waste prior to further reuse or disposal</u></li> </ul> |
|   | <p>The applicant is reminded of its “general duty of care towards the environment” as prescribed in section 28 of the NEMA, 1998 which states that “Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.”</p> | <p>The following has been explicitly added under Section 4.3 Roles and responsibilities of the EMPr:</p> <p><u>The responsibilities of those involved in project implementation, is underpinned by the Duty of care and remediation of environmental damage outlined in the NEMA (Section 28), which states that:</u><br/> <u>Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.</u></p>                                       |

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| <p><b>Comment # 10 in Appendix 20</b></p> <p><b>30 September 2021</b></p> <p><b>Email</b></p> <p><b>SACAA (Lizell Stroh)</b></p>  | <p>Please find extract from the SACAA Regulation for your information.</p> <p>I have included a Contact towards the Airport that could be an Effected party for your information.</p> <p>Find <a href="http://www.caa.co.za/Pages/Obstacles/Urgent-notice.aspx">http://www.caa.co.za/Pages/Obstacles/Urgent-notice.aspx</a> procedure to follow on structures above ground that falls within the criteria provided (21m structures).</p>   | <p><b>Note: this comment was received from SACAA In addition to comments received on 02 Sept, see Comment # 4 in this CRR.</b></p> <p>The majority (162 km) of the fibre optic cable is underground. There are three shorter sections Moleno Pass, Blounek Pass and Rosedene Pass (21 km cumulatively) where the cabling will be installed overhead on poles at a maximum installed height of 09 m. The closest airport / aerodrome is the Karoo Gateway Airport near Beaufort west, which is approximately 9 km (9000 m) away from the closest overhead cabling sections at the Molteno pass. The new overhead cabling follows corridors where overhead power- and telephone cables already exist. Therefore, no significant impact on civil aviation relating to obstacle limitations and markings outside an aerodrome or heliport are expected.</p> <p>Action: contact provided has been added to the I&amp;AP database.</p> |
| <p><b>Comment # 11 in Appendix 20</b></p> <p><b>01 October 2021</b></p> <p><b>Letter, received via email</b></p> <p><b>Breede-Gouritz Catchment management Agency (Jan van Staden, Zama Mbunquka)</b></p> | <p>The proposed installation of a high speed fibre optic internet cable between Beaufort West and Carnarvon will cross numerous water courses. It is noted on page 33 of the Basic Assessment Report that the proposed Fibre Optic Project entails multiple watercourse (rivers and associated wetlands) crossings in the Lower Orange WMA (155 km) and Gouritz WMA (27 km). Since the majority of the proposed Fibre Optic Project is located within the Lower Orange WMA, the regional Department of Water and Sanitation has accepted responsibility as the Competent Authority and has issued a General Authorisation for the project. Please clarify if there is any c&amp;i water use triggered in properties that fall within the jurisdiction of the Breede Gouritz Catchment Management Agency (BGCMA).</p> | <p>There are six (06) watercourse crossings triggering S21c &amp; i within the BGCMA, which has been authorised in the GA. The effected properties are:</p> <ul style="list-style-type: none"> <li>• Land Parcel 36 of the Minor Region BEAUFORT WEST</li> <li>• Land Parcel 3545 of the Minor Region BEAUFORT WEST</li> <li>• Land Parcel 430 of the Major Region BEAUFORT WEST</li> <li>• Portion 1 of Land Parcel 103 of the Major Region BEAUFORT WEST</li> <li>• Land Parcel 187 of the Major Region BEAUFORT WEST</li> </ul> <p>Query to commenter: Is a separate GA required from BGCMA, even though the water crossings in within the BGCMA has been authorised? See response received via email in comment #12 below.</p>   |



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|   | <p>The properties in question are Erf 3545 ,Erf 1707 and Portion 1 of Farm 103 Beaufort West. Although the General Authorisation has been confirmed by the Department of Water and Sanitation (Northern Cape).</p> <p>As soon as it become evident that the crossings within these properties constitutes section c &amp; i, there will be a need to obtain a General Authorisation from the BGCMA.</p> <p>Notwithstanding the above, the responsibility rests with the applicant to identify any sources of pollution from his undertaking and to take appropriate measures to prevent any pollution of the environment. Failure to comply with the requirements of the National Water Act 1998 (Act 36 of 1998) could lead to legal action being instituted against the applicant.</p> | <p><b>Note: in follow-up correspondence with the BGCMA it was confirmed that all watercourse crossings in the Lower Orange Water Management Area (WMA) and Breede Gouritz WMA is authorised under the issued GA. No additional water use applications need to be lodged or authorisations obtained. See response received via email in comment #12 below.</b></p> <p>The EMPr includes measures to avoid and minimised damage to watercourses, including the conditions of General Authorisation. No additional measures suggested.</p> |
| <p><b>Comment # 12 in Appendix 20</b></p> <p><b>01 October 2021</b></p> <p><b>Letter, received via email</b></p> <p><b>Breede-Gouritz Catchment management Agency (Zama Mbunquka)</b></p> | <p>It is noted that these properties have been included in the GA that has been issued by the DWS. Hence there is no need to apply for another GA.</p>   | <p><b>Note: This comment is in response to follow-up correspondence with BGCMA, see Comment # 11 above.</b></p> <p>Noted. All watercourse crossings in the Lower Orange Water Management Area (WMA) and Breede Gouritz WMA is authorised under the issued GA. No additional water use applications need to be lodged or authorisations obtained.</p>  |
| <p><b>Comment #13 in Appendix 20</b></p> <p><b>04 October 2021</b></p>  | <p>My preliminary view is that Agri SA will not be submitting any comments on the report.</p>  | <p>Noted. Aspects relating to agriculture is limited for this project since the cabling will predominantly be installed underground in the road reserve.</p>  |

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| <p>Email</p> <p>AgriSA (Janse Rabie)</p>   |   | <p>No further comment was received from AgriSA at the time of finalising the BAR.</p>   |
| <p>Comment # 14 in Appendix 20</p> <p>13 October 2021</p> <p>Email</p> <p>Beaufort West Municipality (Asley Mitchell)</p>      | <p>Please find the attach policy and related documents as discussed yesterday during the meeting. Under section 5 Appendixes is attachments that must be completed and submitted to the municipality.</p> <p>Please note also that we are currently in the process of approving an Application fee structure which will be for the interim and applicable to all applications.</p>  | <p>Wayleave applications to construct the fibre optic cable is being managed by the project proponent (SANReN) directly and does not directly relate the BA process.</p> <p>Action: Email and all attachments forwarded to project proponent for consideration.</p>   |
| <p>Comment #15 in Appendix 20</p> <p>14 October 2021</p> <p>Email</p> <p>Endangered Wildlife Trust (EWT) (Bonnie Schumann)</p> | <p>The Endangered Wildlife Trust would like it noted that we support the mitigation and due diligence measures recommended by CapeNature (ito preventing poaching, pollution, litter etc).</p> <p><b>However, with regards to Riverine Rabbits (specifically in relation to camera trapping):</b></p> <ul style="list-style-type: none"> <li>With regards to Riverine Rabbits (RR), as long as the development does not go outside the road reserve, which is, as has been noted quite disturbed in many places, <b>we do not feel that camera trapping is necessary</b>. The distribution of Rabbits on the farms adjacent to the</li> </ul> | <p><i>Note: comments from EWT were not received during the 30-day commenting period. Their input was actively sought after the commenting period based on comments received from Cape Nature (see Comment #8 in this Table), specifically on whether camera trapping would be reasonable and necessary to establish the impact of the underground cabling in the road reserve to Riverine rabbit.</i></p> <p>Measures to avoid and mitigate these impacts are included in the EMPr.</p> <p>Noted. No camera trapping is required. The EMPr stipulates that before trenches are dug in areas that have been indicated as prime habitat for the riverine rabbit, the route should be walked</p> |

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|   | <p>R381 is reasonably well documented, with historical sightings (physical and with camera traps by the EWT), and more recently documented using camera traps by consultants (Simon Todd) as part of the work being carried out as a result of the proposed wind farm developments in this landscape. As such, <b>we do not feel that camera trapping the road reserve will add value to understanding RR distribution in the area.</b> Riverine Rabbit occurrence on the farms along the R63 is less well documented, but few suitable riparian floodplain areas occur along this route, and we <b>do not feel it is necessary to camera trap this route either.</b></p> <ul style="list-style-type: none"> <li>We agree that it is highly unlikely that burrows would occur in the road reserve given the disturbance factor of the traffic, but due diligence requires this be checked (active burrows are lined with fur and often the entrance is closed with fur when as well).</li> </ul> | <p>on foot to ensure that no burrows are present in the path of the trench. No additional measures suggested.</p> <p>EWT is also aware of the current sampling programme being conducted in the region for two wind farms (Nuweveld and Hoogland), which includes camera trapping, located along various properties bisected by the R381.</p> |
|   | <p><b>With regards to the rehabilitation of vegetation:</b></p> <ul style="list-style-type: none"> <li>In terms of the construction, we request that as much care as possible to not trample and destroy the vegetation either side of the trench in the road reserve. A wide spectrum of animals use this vegetation to retreat into from road traffic. This is particularly important where the jackal-proof fencing prevents them escaping further into the veld, that the road reserve vegetation provides refuge. Linear intact vegetation of at least 2m wide should be maintained wherever possible.</li> </ul>   | <p>The EMPr stipulates that vegetation clearance should be confined to the minimum footprint required for construction and unnecessary clearance should be avoided.</p>   |
|   | <ul style="list-style-type: none"> <li>In terms of rehabilitating the trench line, the planting of indigenous plants as part of the rehabilitation process in the current drought conditions is, in our opinion, not really feasible.</li> <li>We recommend that where possible the vegetation that is cleared for the trench be repurposed to “brush pack” the exposed soil once the trench is filled and the topsoil put back in place. Brush packing is one of the more effective ways to encourage revegetation, which if it rains</li> </ul>  | <p>A Rehabilitation Plan has been included in the EMPr.</p> <p>It is noted that due to climatic conditions, especially the ongoing drought in the area where the SKA fibre optic cable is proposed, active rehabilitation through the planting of indigenous plants is not feasible.</p>  |

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|   | <p>should occur, and if the topsoil is put back and surrounding vegetation not destroyed, so it can serve as a seed source should naturally occur.</p> <ul style="list-style-type: none"> <li>Where <i>Prosopis</i> is removed, these branches can be used to brush pack the trench line (do not relocate <i>Prosopis</i> brush for packing if it has seedpods as this will spread the seeds causing problems in new areas.)</li> </ul>  | <p>A Rehabilitation Plan has been included in the EMP, which stipulates the reinstatement of topsoil when trenches are backfilled and subsequent brush packing with removed vegetation. Additionally, the rehabilitation plan stipulates that removed vegetation must not be transported to other sections of the backfilled trench for brush-packing, especially where removed <i>Prosopis</i> is used for brush-packing.</p>   |
| <p><b>Comment #16 in Appendix 20</b></p> <p><b>21 October 2021</b></p> <p><b>Letter, received via email</b></p> <p><b>DFFE Biodiversity Conservation Unit (Seoka Lekota, Mmatlala Rabothatha)</b></p> | <p>Based on the information, the study area is predominantly located in the fenced road reserve and therefore represents a habitat that is in essence transformed and continually disturbed. Since the development footprint is small, the loss of habitat or species will be limited. Part of the fibre optic cabling is proposed within the eastern section of the Karoo National Park next to the R381 road, specifically to traverse the difficult terrain associated with the Molteno Pass.</p> <p>Notwithstanding the above, the following recommendations must be considered in the final report:</p> <ul style="list-style-type: none"> <li>The study shows that some section of the fibre optic cabling falls within the Karoo National Park. Therefore, comments must be obtained from Department of Forestry, Fisheries and the Environment Directorate: Protected Areas Planning and Management Effectiveness.</li> <li>Sensitive habitats in close proximity to the development footprint must be avoided or demarcated as No-Go area (i.e. Drainage lines).</li> </ul> | <p>A site visit to the Karoo National Park was conducted with representatives from the DFFE Directorate: Protected Areas Planning and Management Effectiveness on 04 November 2021, and comments were obtained (see comment #18 below)</p> <p>The EMP stipulates that sensitive areas (incl. at watercourse crossings and any other fine-scale sensitivities identified in the field during pre-construction walk-downs) must be clearly demarcated and corresponding, appropriate actions be implemented. These actions include avoidance and / or the use of specific construction methods (e.g. hand-dug trenching,</p> |

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|  | <ul style="list-style-type: none"> <li>Permits from relevant authorities must be obtained for the removal or disturbance of any TOPs, Red Data listed or provincially protected species.</li> <li>Erosion and Alien Invasive Plant Species Management Plan, and Rehabilitation Plan must be developed to mitigate on habitat degradation due to erosion and alien plant invasion and submitted as part of the final report.</li> </ul>  | <p>Horizontal Directional Drilling (HDD)) as required. No additional measures suggested.</p> <p>Several Provincially protected plant species were recorded in the road reserve during the site visit. The EMPr stipulates that permits for the removal of such plant species must be obtained from the relevant authorities before construction commences. No additional measures suggested.</p> <p>The EMPr (draft and final) included an Alien invasive plant management plan and an Erosion management plan.</p> <p>Based on comments received from various I&amp;APs a Rehabilitation Plan has also been developed and included. It must be noted that the Rehabilitation Plan does not stipulate active rehabilitation due to climatic conditions (as also pointed out by EWT, see comment # 15). Rehabilitation measures include reinstatement of topsoil when trenches are backfilled and subsequent brush packing with removed vegetation.</p> |
| <p><b>Comment #17 in Append 20</b></p> <p><b>08 November 2021</b></p> <p><b>Letter, received via email</b></p> <p><b>South African National Parks (SANParks)</b></p> <p><b>(Maretha Alant)</b></p> | <p>The SANParks comment on the Draft BAR and EMPr will focus specifically on the section of the SKA fibre optic cable within or adjacent to the Karoo National Park (KNP) boundary fence.</p> <p>The proposed cable is in a remote zone, in terms of the approved KNP Management Plan, in an existing footprint used for linear infrastructure.</p> <p>SANParks is familiar with the project and issued a Section 50 (5) approval in terms of the National Environmental Management: Protected Areas Act (Act no. 57 of 2003, as amended) (NEM:PAA) on 2 August 2021</p> <p>Installation method at Molteno Pass:<br/>Due to the terrain, materials will be brought to the closest point with vehicles on existing roads leading to / within the park.</p> | <p>Noted.</p> <p>Correct, the NEM:PAA Section 50 (5) approval for the proposed SKA fibre optic cable in the Karoo National Park is included as Appendix 5 to the EMPr, and Appendix 13 to the BAR.</p> <p>Correct.</p>   |

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|   | Materials will be carried to installation points and installed with hand-held drills  |   |
|   | A meeting and site visit took place on 04 November 2021 with Luanita Snyman-van der Walt (EAP), Thivhulawi Nethononda (DFFE), Rofhiwa Magodi (DFFE); Roland Januarie (SANParks), Riaan Nel (SANParks) and Maretha Alant (SANParks) present.   | Confirmed.  |
|   | SANParks takes note that: <ul style="list-style-type: none"> <li>• Approximately 21 km of the overhead cabling is proposed within the KNP in order to traverse the difficult terrain in the Molteno Pass section.</li> </ul>  | Across the entire fibre optic cable route of 183 km, approximately 21 km will be installed overhead. Of this 21 km, the total Molteno Pass section totals approximately 15 km and the sections within the Karoo National Park is only approximately 4.5 km. |
|   | <ul style="list-style-type: none"> <li>• The proposed fibre optic cabling will follow the same corridor as the disused Telkom telephone line (adjacent to the Eskom power line). The disused Telkom line infrastructure was sold to a local farmer by Telkom and it is being removed in a phased approach.</li> </ul>   | Noted.  |
|   | <ul style="list-style-type: none"> <li>• A combination of timber and concrete poles between 7.5 m and 9 m high at intervals of 20 m - 80 m will be used.</li> <li>• Molteno pass is steep and rugged and some of the locations for the poles to be planted will be difficult to access and rocky and creative solutions may be required.</li> <li>• The proposed corridor for the cable is 30 m wide (from the centre of the road) to enable micro siting of poles.</li> <li>• No trenching will take place in the KNP, only overhead cabling.</li> </ul> | Correct.  |
|   | <ul style="list-style-type: none"> <li>• Monitoring of avifauna will take place post-construction.</li> </ul>   | The EMPr includes that monitoring programme should be initiated by an avifaunal specialist to determine the extent of bird collisions with the overhead cable, and whether any additional measures such as Bird Flight Diverters would be required.         |

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|   | <p>SANParks reviewed the EMPr and the document was well set out. Please include the following additional conditions:</p> <p>1. Construction vehicles or future maintenance vehicles may only drive on existing roads. No off road or fence line driving will be permitted</p> | <p>The following has been added to the EMPr:</p> <ul style="list-style-type: none"> <li>▪ <u>Vehicles may only be driven on existing roads / tracks, no driving in the veld is allowed outside the road reserve.</u></li> <li>▪ <u>Particularly in the Karoo National Park, no off-road or fence-line driving is allowed.</u></li> </ul>  |
|   | <p>2. SANParks will brief the suitably qualified wildlife management security / field rangers to protect construction staff from animals (specifically lions) whilst working in the KNP.</p>  | <p>This measure has been added to the EMPr.</p>   |
|   | <p>3. SANParks will monitor lion movement during the construction period in the KNP and alert contractors if potential conflict situations could arise.</p>   | <p>The following has been added to the EMPr:</p> <ul style="list-style-type: none"> <li>▪ <u>Whilst working in the Karoo National Park, SANParks will monitor lion movement and alert contractors if potential conflict situations could arise.</u></li> <li>▪ <u>The construction team must heed instruction from the Park to halt work if lion movement monitoring indicates lions are likely in the work areas.</u></li> </ul> |
|   | <p>4. Construction access points and laydown areas need to be discussed with Park Management prior to construction.</p>   | <p>The following has been added to the EMPr:</p> <ul style="list-style-type: none"> <li>▪ <u>The following needs to be discussed and established with Karoo National Park in advance of construction commencing:</u></li> </ul>   |
|   | <p>5. The construction schedule needs to be discussed with Park Management at least a week before work is scheduled to start.</p>   | <ul style="list-style-type: none"> <li>▪ <u>method statements detailing how the cabling will be installed in the Park.</u></li> <li>▪ <u>access points,</u></li> <li>▪ <u>laydown area locations, and</u></li> <li>▪ <u>construction work schedule.</u></li> </ul>  |
|   | <p><b>SANParks has no objection to the proposed fibre optic cable footprint in the KNP.</b></p>   | <p>Noted.</p>   |
|   | <p>We will not be opposed to flying in materials in rugged sections if that is the best solution to get the job completed and the relevant approvals are in place.</p>  | <p>Although the use of helicopters to fly in materials / plant poles / string cables was not put forward and assessed as a construction method option at the time of the BA, the following has been added to the EMPr:</p>  |

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|   | <p>SANParks reserves the right to revise comments if additional information becomes available.</p>   | <ul style="list-style-type: none"> <li>▪ <u>In the event that a helicopter will be used to fly in materials / plant poles / string cables (e.g. for overhead sections in remote / difficult terrain), any required authorisations must be obtained from the Civil Aviation Association (CAA) and other relevant authorities.</u></li> <li>▪ <u>In the event that a helicopter will be used to install cabling in the Karoo National Park, the park management must be notified and consulted.</u></li> </ul> <p>Noted.</p>   |
| <p><b>Comment #18 in Appendix 20</b></p> <p><b>09 November 2021</b></p> <p><b>Letter, received via email</b></p> <p><b>DFFE Protected Areas Planning and Management Effectiveness Directorate (Thivhulawi Nethononda)</b></p> | <p>The Minister has, under Section 86 of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003), made the Regulations in the Schedule on the 28<sup>th</sup> of October 2005, including Section 19(1)(a) under Regulations for the Proper Administration of Special Nature Reserves, National Parks and World Heritage Sites.</p> <p>Consequently, the EAP must take into consideration Section 19(1)(a) of the aforementioned regulations which state the following:</p> <p><i>"No development contemplated in section 50(5) of the Act shall be implemented in any area other than an area specifically designated for such development in a management plan"</i></p> | <p>The Regulations for the Proper Administration of Special Nature Reserves, National Parks and World Heritage Sites were considered and adhered to in the process of obtaining NEM:PAA Section 50 (5) approval for the SKA fibre optic cable proposed in the Karoo National Park. Such approval was obtained prior to submitting the Application Form for Environmental Authorisation (EA) for the proposed project. Furthermore, as required by the said regulations, SANParks reviewed the Draft BA Report prior to submitting the Application for EA to the DFFE.</p> <p>The SKA fibre optic cabling is proposed in an area of the Karoo National Park classified in the Park Management Plan as "remote". Furthermore, this area contains existing linear Eskom and Telkom infrastructure. The Park Management Plan acknowledges these servitudes, but does not include specific spatial classifications / plans for infrastructure nodes in the Park itself (as discussed at the site visit with SANParks and DFFE Protected Areas Planning and Management Effectiveness Directorate on 04 November 2021).</p> |



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|   | <p>Therefore, the laydown area and storage for all the materials to be used for the development of the fibre optic cable and associated infrastructure must be an area designated for that purpose in accordance with the approved management plan of the Karoo National Park to avoid the environmental degradation of the sensitive areas.</p> <p>The cable fibre is proposed to traverse within the area zoned as remote for approximately 15km in accordance with the approved Karoo National Park Management Plan. As a result, the remote area is non-motorised, and access is controlled. Therefore, the contractor must only use the existing road and driving off-road is prohibited. In addition, only walking will be allowed in the remote area where the proposed project will be undertaken.</p> | <p>SANParks, in their NEM:PAA Section 50 (5) approval for this project, stipulated:<br/> <i>SANParks confirms that it is the management authority of the Karoo National Park. Approximately 4.7 km of the overhead cabling is proposed within the Park in order to traverse the difficult terrain in the Molteno Pass section. The proposed fibre optic cabling will follow the same corridor as the abandoned Telkom telephone line (adjacent to the Eskom power line). The proposed SKA fibre optic cable is a remote zone, in an existing footprint used for linear infrastructure. SANParks has no objection to the proposed fibre optic cable footprint in the Park.</i></p> <p>Refer to Appendix 13 of the BAR and Appendix 5 of the EMPr</p> <p>The EMPr stipulates that access routes and laydown areas must be discussed and confirmed with Park Management prior to construction in order to avoid any environmentally sensitive areas and ensure alignment with the Park Management Plan. No additional measures suggested.</p> <p>The EMPr stipulates that no-off road driving / driving in the veld is allowed, especially in the Karoo National Park.</p> <p>During construction in the Karoo National Park in areas inaccessible by the drilling and pole-planting trucks, materials will be brought to the closest possible point by existing roads / tracks and manual labour will be used to carry the materials to the installation points, dig holes, plant the poles and string the cables.</p> |

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|   | <p>Furthermore, all areas of increased ecological sensitivity falling outside of the development footprints must be designated as No-Go areas and be off limits to all construction vehicles and personnel.</p> <p>The proposed development will traverse within the 5km buffer of the Dr Appie Van Heerden Private Nature Reserve. Therefore, the landowner of the nature reserve must be consulted and informed about the project and proof of notification must be included in the final BAR.</p> <p>The BAR and EMPr must detail the impacts of noise and mitigation measures in relation to the fauna species in the Karoo National Park more especially during the construction phase which will entail the use of machinery and equipment which generates noise.</p> | <p>The EMPr stipulates that environmentally sensitive areas and areas where work may occur, must be clearly demarcated and appropriate actions (e.g. avoidance or specific construction methods).</p> <p>The Dr. Appie van Heerden Private Nature Reserve is under the management of the Kareeberg Municipality (Carnarvon) (Government Gazettes No. 1026, No. 461 of 21 December 1973 and No. 4481, P.N. 266 of 5 June 1987).</p> <p>The Kareeberg Municipality was identified as an adjacent landowner (as is the case for, <i>inter alia</i>, the Dr. Appie van Heerden Nature Reserve next to the R63 directly south of Carnarvon) and included in the PPP for this project (refer to Appendix 16 for proof of consultation).</p> <p>No comments or objections were received from the Kareeberg Municipality.</p> <p>It must be noted that the cabling will be installed underground in the R63 road reserve, and will have no material lasting impact on the nature reserve.</p> <p>The Terrestrial Biodiversity Assessment (included in Appendix 2 of the BAR) identified and assessed the following related direct impact during the construction phase:</p> <ul style="list-style-type: none"> <li>▪ Increased human activity and noise levels.</li> </ul> <p>The abovementioned impact was rated with a very low significance with mitigation measures. Therefore, the impact of noise generation has been deemed acceptable by the specialist.</p> |

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|   | <p>The BAR mentioned that <i>"dug holes may remain open for a maximum of 3 days before the poles are planted"</i>. Consequently, the Environmental Control Officer (ECO) and contractor must ensure that the dug holes are demarcated or covered to ensure the safety of the fauna species in the national park during construction phase.</p> <p>The final BAR must include the layout map illustrating the proposed fibre cable, laydown areas of materials, zonation map where the development will be undertaken in the national park and other associated infrastructure including the existing infrastructure.</p> | <p>The EMPr stipulates measures to reduce potential noise impacts. Noise generation during construction is unavoidable, but can be mitigated through ensuring that all machinery and vehicles are in good working order to avoid elevated noise levels. Furthermore, construction may only occur during the day. No additional measures included.</p> <p>The EMPr stipulates that all open trenches or holes must be inspected for the presence of trapped animals to be rescued before backfilling trenches. This must be monitored by the suitably qualified and independent ECO.</p> <p>The following has been explicitly added to the EMPr:</p> <ul style="list-style-type: none"> <li>▪ <u>Any open trenches or holes must be clearly demarcated.</u></li> </ul> <p>The final BAR includes various maps showing the routing between Beaufort West and Carnarvon, including the Karoo National Park section (e.g. see Fig. 1, Fig. 32 - 39). Additional maps (Figure 9 &amp; 10, Box 1) were added, overlying the cabling with the Karoo National Park zoning and indicating more detail on the latest engineering Low Level Design for the proposed cable in the Park.</p> <p>The locations of laydown areas, offices etc. has not yet been determined. However, all equipment, materials and infrastructure will be located in the authorised 30 m corridor (if EA is issued), avoid environmental sensitivities and be sited in consultation with Karoo National Park management, roads authorities and other relevant stakeholders before construction commences.</p> |

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|   | <p>The EAP indicated that "fuel will be transported to site and kept in South African Bureau of Standards (SABS)-approved mobile 1 000 (1 m3) fuel trailer or in 25 jerry cans". Therefore, An ECO must be appointed to monitor effectiveness of the drip trays to be placed under stationary vehicles and machinery that will be used to avoid the spillage of toxic chemicals into the environment.</p> | <p>The EMPr clearly stipulates that a suitably qualified and independent ECO must be appointed, and details the roles and responsibilities of the ECO, which includes, <i>inter alia</i>, monitoring the placement of fuel storage tanks, drip trays and other spill containment. No additional measures suggested.</p> |
|   | <p>In general, an appointed ECO must monitor the overall development of the fibre cable and associated infrastructure and report on the level of compliance with the EA and approved EMPr as well as other applicable permits.</p>  | <p>The EMPr clearly stipulates that a suitably qualified and independent ECO must be appointed, and details the roles and responsibilities of the ECO, which includes, <i>inter alia</i>, monitoring and reporting on compliance. No additional measures suggested.</p>   |
|   | <p>All the mitigation measures proposed in the BAR and EMPr must be implemented and adhered to, during all phases of the project.</p>   | <p>Noted, the EMPr and any other conditions in the Environmental Authorisation, if issued, must be adhered to.</p>  |
|   | <p>The EAP must fully comply and implement the comments from the directorate of Protected Areas Planning and Management Effectiveness, SANParks, and all other interested and affected parties.</p>   | <p>Refer to this CRR for responses to all comments received, as well as an indication of how comments were incorporated in the BAR / EMPr, where relevant.</p>  |