Draft Motivation Report

27 March 2023

PART 2 AMENDMENT:

The development of a 150MW Springbok Photovoltaic Solar Facility and Associated Infrastructure, near Welkom/Virginia, Free State Province

ENVIRONAMICS

PROJECT DETAIL

DFFE Reference No.	:	14/12/16/3/3/2/2087
Project Title	:	Part 2 Amendment for the development of a 150MW Springbok Photovoltaic Solar Facility and Associated Infrastructure, near Welkom/Virginia, Free State Province
Authors	:	Mrs. Lisa de Lange Mr. Herman (Attie) Alberts
Client	:	Springbok Solar Power Plant (RF) (Pty) Ltd
Report Status	:	Draft Motivation Report released for a 30-day review period
Submission date	:	27 March 2023

When used as a reference this report should be cited as: Environamics (2023) Draft Motivation Report: Part 2 Amendment for the development of a 150MW Springbok Photovoltaic Solar Facility and Associated Infrastructure, near Welkom/Virginia, Free State Province

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GLOSSARY OF TERMS AND ACRONYMS

BESS	Battery Energy Storage Systems
BMS	Battery Management System
DFFE	Department of Forestry, Fisheries and the Environment
DM	District Municipality
DoE	Department of Energy
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects.
ESS	Energy Storage System
GNR	Government Notice Regulation
I&AP	Interested and affected party
IPP	Independent Power Producer
kV	Kilo Volt
Mitigate	Activities designed to compensate for unavoidable environmental damage.
MW	Megawatt
NEMA	National Environmental Management Act No. 107 of 1998
PPP	Public Participation Process
PV	Photovoltaic
REIPPP	Renewable Energy Independent Power Producer Procurement Programme

EXECUTIVE SUMMARY

The holder of the Environmental Authorisation (EA) of the Springbok SPP is proposing amendments to the EA which mainly involves changes to the facility layout including an increase of the development footprint within the EIA footprint initially assessed for the development, change in the description provided for the BESS within the EA, which includes a reduction in extent and changes to the coordinates of the location, the relocation and increase in size of the laydown area and the inclusion of an additional laydown area. Furthermore, the Applicant seeks to obtain approval of the amended layout, as well as approval of the amended and solar power plant Environmental Management Programme (EMPr).

Environamics has been appointed as the independent consultant to undertake the Part 2 amendment process on Springbok SPP's behalf. This Motivational report is compiled in accordance with the provisions of Regulation 32 (1) of the EIA Regulations 2014, (as amended).

As part of this Part 2 Amendment Process specialist input has been sought from suitably qualified independent specialists to provide an indication of what the implications will be in terms of environmental impact associated with the proposed amendments, as well as provide an indication of whether the mitigation measures included in the EMPr will be sufficient for the impacts associated with the updated layout. The assessment determined that the potential negative impacts resulting from the proposed amendments to the approved layout are not significant and that it does not increase the significance ratings determined as part of the EIA process. The proposed layout has been refined and optimised from a technical perspective.

The advantages and disadvantages of the proposed amendments have also been explored to provide an indication of the potential benefits and drawbacks. Limited disadvantages are associated with the proposed amendments by the Holder of the EA, with primarily advantages expected to be relevant to the amendment request.

A Public Participation Process (PPP) as required in terms of Chapter 6 of the EIA Regulations, 2014, (as amended) is being conducted in respect of the Amendment to the Environmental Authorisation. All comments received throughout the amendment process will be included in the Comments and Response Report (Appendix B6) to be included as part of the Final Motivation Report to be submitted to the DFFE for decision-making.

Considering the above, it is concluded that the EA should be amended in line with the amendments and specifications as proposed and that potential environmental risks identified can be mitigated to acceptable levels provided the recommended mitigation measures provided in the amended EMPr are implemented.

1 INTRODUCTION

This report motivates for the proposed amendments of the EA as part of the 150MW Springbok Photovoltaic Solar Facility and Associated Infrastructure, near Welkom/Virginia, Free State Province (DFFE Reference: 14/12/16/3/3/2/2087).

The EA for the Springbok SPP was issued on 25 April 2022, for the development of a 150 MW photovoltaic solar facility and associated infrastructure on the Farm Weltevrede No. 638, Registration Division Theunissen, situated within the Matjhabeng Local Municipality in the Free State Province. The town of Virginia is located approximately 10km north-northeast of the proposed development and the town of Welkom is located approximately 23km north-northwest of the proposed development.

The total footprint of the project, as authorised, is 280 hectares (including supporting infrastructure on site). A larger area was fully assessed and considered as part of the EIA process for the placement of the development footprint, which was referred to as the EIA Footprint with an extent of 350 hectares. The following activities listed in the EIA Regulations were authorised with special reference to the proposed development:

- Activity 11(i) (GN.R. 327): *"The development of facilities or infrastructure for the transmission and distribution of electricity outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts."*

- Activity 12(ii)(a)(c) (GN.R. 327): "*The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32 meters of a watercourse measured from the edge of a watercourse."*

- Activity 19 (GN.R. 327): "*The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse."*

- *Activity 24 (ii) (GN.R. 327): "The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters."*

- Activity 28(ii) (GN.R. 327): *"Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare."*

- Activity 56 (ii) (GN.R 327): "*The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre (ii) where no reserve exists, where the existing road is wider than 8 metre."*

- Activity 1 (GN.R. 325): *"The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more."*

- Activity 15 (GN.R. 325): *"The clearance of an area of 20 hectare or more of indigenous vegetation."*

- Activity 4 (b)(i)(ee) (GN.R 324): "*The development of a road wider than 4 metres with a reserve less than 13,5 metres within (b) the Free State, (i) outside urban areas, (ee) within critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans."*

- Activity 10 (b)(hh) (GN.R. 324): *"The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."*

- Activity 12 (b)(i)(ii)(vi) (GN.R 324): *"The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (i) within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment of 2004, (ii) within critical biodiversity areas identified in bioregional plans and (vi) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."*

- Activity 14(ii)(a)(c)(b)(i)(ff) (GN.R 324): "*The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (a) within a watercourse or (c) within 32 metres of a watercourse, measured from the edge of a watercourse, (b) within the Free State, (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans."*

- Activity 18 (b)(i)(hh) (GN.R 324): *"The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (b) in the Free State (i) outside urban areas and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."*

The following sections will explain the legal mandate and purpose of the report, details of the environmental assessment practitioner, the status of the amendment process and the structure of the report.

1.1 LEGAL MANDATE AND PURPOSE OF THE REPORT

Regulation 31 (GNR 326) determine that: "*An Environmental Authorisation (EA) may be amended by following the process prescribed in this Part if the amendment will result in a change to the scope of a valid EA where such change will result in an increased level or change in the nature of impact where such level or change in nature of impact was not—(a) assessed and included in the initial application for environmental authorisation; or (b) taken into consideration in the initial*

environmental authorisation; and the change does not, on its own, constitute a listed or specified activity."

This report is the Draft Motivation Report that has been submitted to the Department of Forestry, Fisheries and the Environment (DFFE). According to Regulation 32 all identified and registered I&APs and relevant State Departments must be allowed the opportunity to review the motivation report. This report has been made available to all identified and registered I&APs and all relevant State Departments. They have been requested to provide written comment on the report within 30 days of receiving it. All issues identified during the 30-day review and comment period will be documented and compiled into a Comments and Response Report (Appendix B6) as part of the Final Motivation Report to be submitted to the DFFE for decision-making. According to Regulation 32(1) of GNR 326 the objective of the report is to, through a consultative process:

- Assess all impacts related to the proposed change;
- Describe the advantages and disadvantages associated with the proposed change;
- Provide measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and
- Indicate any changes to the EMPr.

1.2 DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP)

Environamics has been appointed by the applicant as the independent EAP to conduct the Part 2 Amendment process and prepare all required reports. All correspondence to the EAP can be directed to:

Contact person:	Lisa de Lange (Opperman)
EAPASA Reg.:	2020/2150
Postal Address:	PO Box 6484, Baillie Park, 2526
Telephone:	084 920 3111 (Cell)
Electronic Mail:	lisa@environamics.co.za

And/or

Contact person:	Herman (Attie) Alberts
EAPASA Reg.:	2019/1328
Postal Address:	PO Box 6484, Baillie Park, 2526
Telephone:	063 685 2093
Electronic Mail:	herman@environamics.co.za

Regulation 13(1)(a) and (b) determines that an independent and suitably qualified and experienced EAP should conduct the assessment process. In terms of the independent status of the EAP a declaration is attached as part of the Application for Amendment of the EA. The

expertise of the EAP responsible for conducting the EIA is also summarised in the curriculum vitae included as part of Appendix A.

1.3 STATUS OF THE AMENDMENT PROCESS

The Amendment process is conducted strictly in accordance with the stipulations set out in Regulations 31-33 of GNR. 326 (as amended). Table 1.1 provides a summary of the amendment process and future steps to be taken. It can be confirmed that to date:

- The DFFE confirmed on 21 November 2022 that a Part 2 amendment process must be followed and that a pre-application meeting is not required. This confirmation was received via email.
- An advert was placed in English in a local newspaper (Vista) on 09 March 2023.
- Site notices of the Amendment Process were placed on the affected property on 14 March 2023.
- The Draft Motivational Report has been available to all identified and registered I&APs and relevant State Departments on 27 March 2023 and request for comments on the report to be submitted by 02 May 2023. The 30-day review period is therefore from 27 March 2023 to 02 May 2023.

It is envisaged that the Part 2 Amendment process will be completed within approximately six months of submission of the Draft Motivational Report– see Table 1.1.

Table 1.1: Project schedule

Activity	**Prescribed timeframe**	**Timeframe**
Pre-Application Meeting with the DFFE – email confirmation of the process has been received	-	Not Applicable
Submit Application and Draft Motivational Report	-	27 March 2023
Public participation process – 30-day review and comment period (considering all public holidays)	30 Days	27 March – 02 May 2023
Public Meeting (date to be confirmed and details of the meeting to be communicated to I&APs)	-	April 2023
Submit Final Motivational Report	90 Days	May 2023
Decision	107 Days	August 2023
Public participation (decision) & submission of appeals	20 Days	August 2023

1.4 STRUCTURE OF THE REPORT

This report is structured in accordance with the prescribed contents stipulated in Regulation 32 of Regulation No.326. It consists of nine sections demonstrating compliance to the specifications of the regulations as illustrated in Table 1.2.

Table 1.2: Structure of the report

Requirements for the contents of a Motivational Report as specified in the Regulations		Section in report
Regulation 32 (1) – The applicant must… submit to the competent authority a report reflecting:		
(i)	an assessment of all impacts related to the proposed change	4
(ii)	advantages and disadvantages associated with the proposed change; and	6
(iii)	measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and	5
(iv)	any changes to the EMPr;	Section 5 and Appendix E
(iv)	Which report –	7
(aa)	had been subjected to a public participation process, which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential and registered interested and affected parties, including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority, and	
(bb)	reflects the incorporation of comments received, including any comments of the competent authority.	

2 PROJECT OVERVIEW

This section aims to provide background information of the location of the activity, property description, activities authorised, photovoltaic technology and approved layout. The information provided below indicates the details of what is currently authorised as part of the Environmental Authorisation. The amendments being requested to the authorised details are discussed in section 3.

2.1 THE LOCATION OF THE ACTIVITY AND PROPERTY DESCRIPTION

Springbok Solar Power Plant (RF) (Pty) Ltd was issued with an EA for the development of a 150 MW photovoltaic solar facility and associated infrastructure on the Farm Weltevrede No. 638, Registration Division Theunissen, situated within the Matjhabeng Local Municipality in the Free State Province The town of Virginia is located approximately 10km north-northeast of the proposed development and the town of Welkom is located approximately 23km north-northwest of the proposed development. (Refer to figure 1.1 for the locality map).

The project entails the generation of up to 150MW electrical power through photovoltaic (PV) panels. The total authorised footprint of the project is approximately 280 hectares (including supporting infrastructure on site), which was placed within a 350 hectare EIA footprint that was fully assessed as part of the EIA process – refer to table 2.1 for general site information.

Table 2.1: General site information in terms of the current EA

Description of affected farm portion	<u>Solar Power Plant:</u> • Farm Weltevrede No. 638 <u>Power Line Corridor:</u> • Farm Weltevrede No. 638 • Portion 5 of the farm Doorn Rivier No. 330 • Portion 21 of the farm Doorn Rivier No. 330 • Portion 6 of the farm Doorn Rivier No. 330
Registration Division	Theunissen
Local Municipality	Matjhabeng Local Municipality
District Municipality	Lejweleputswa District Municipality
Province	Free State Province
21 Digit Surveyor General codes	<u>Solar Power Plant:</u> • Farm Weltevrede No. 638 - F03300000000063800000 <u>Power Line Corridor:</u> • Farm Weltevrede No. 638 - F03300000000063800000 • Portion 5 of the farm Doorn Rivier No. 330 - F03300000000033000005 • Portion 21 of the farm Doorn Rivier No. 330 - F03300000000033000021

	• Portion 6 of the farm Doorn Rivier No. 330 - F03300000000033000006
Title Deed(s)	T1885/2019
Type of technology	Photovoltaic solar facility
Structure Height	• Panels~6m, • buildings~6m, • powerlines~32m, and • battery storage facility~8m
BESS Facility (lithium-ion)	Within a 4ha area within the development footprint
Area assessed for the development (EIA footprint)	Approximately 350 ha
Surface area to be covered (authorised development footprint)	Approximately 280 ha
Structure orientation	The panels will either be fixed to a single-axis horizontal tracking structure where the orientation of the panel varies according to the time of the day, as the sun moves from east to west or tilted at a fixed angle equivalent to the latitude at which the site is located in order to capture the most sun.
Laydown area dimensions	Assessed 280 hectares for the development of the solar power plant and a 5km long and 100m wide corridor for the placement of the proposed power line.
Generation capacity	Up to 150MW

The property on which the facility is to be constructed will be leased by Springbok Solar Power Plant (RF) (Pty) Ltd from the property owner, Goldfields Game Ranch (Pty) Ltd, for the life span of the project (minimum of 20 years).

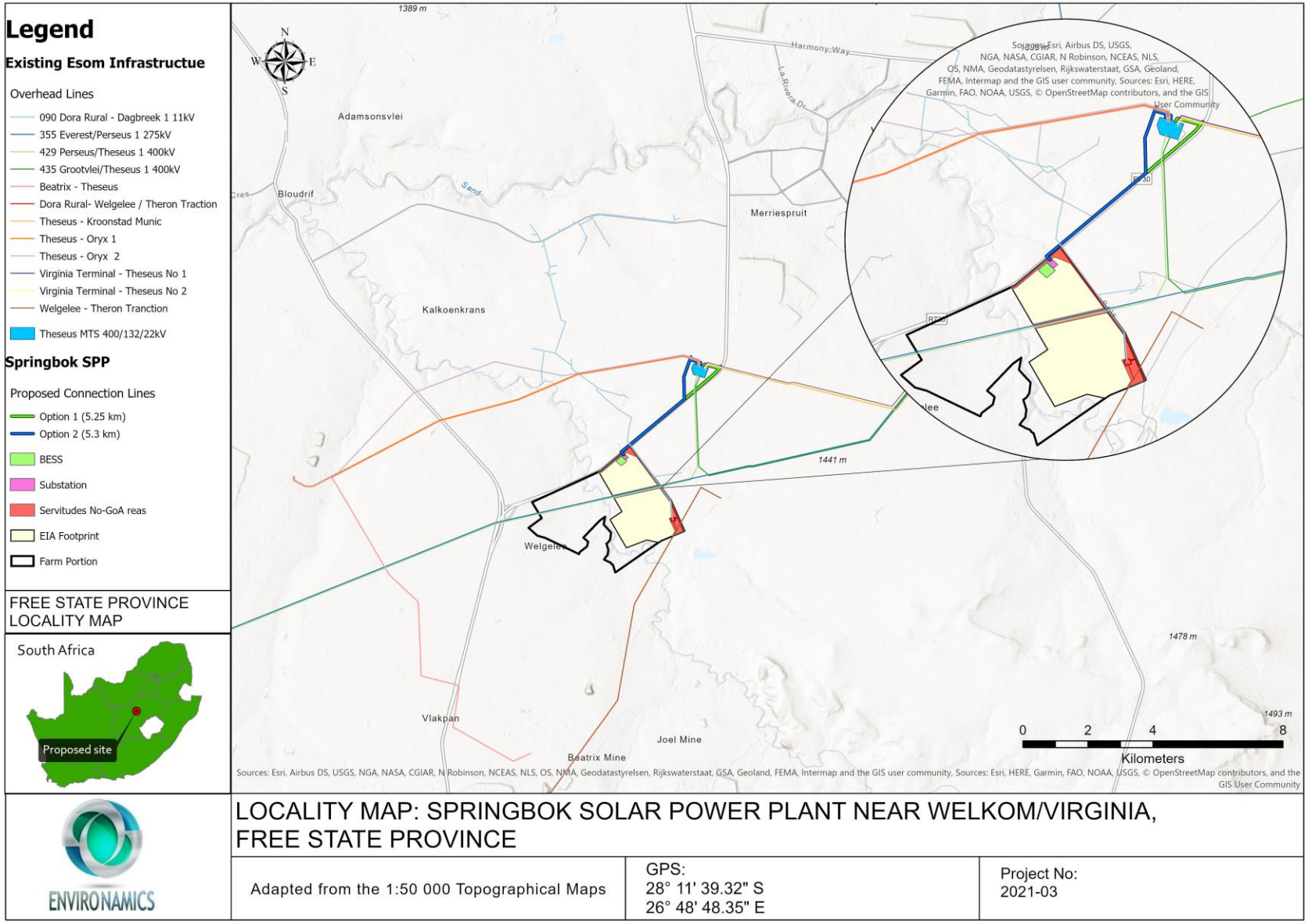

Figure 1.1: Locality Map

2.2 ACTIVITY DESCRIPTION

The development triggered several activities in terms of the EIA Regulations, 2014. The following activities were approved as per the EA dated 25 April 2022:

Table 2.2: Listed activities

Relevant notice:	**Activity No (s)**	**Description of each listed activity as per project description**:
GN R327, 08 December 2014 (as amended on 07 April 2017)	Activity 11(ii)	• *"The development of facilities or infrastructure for the transmission and distribution of electricity (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts"* • The proposed photovoltaic solar facility will transmit and distribute electricity of 132 kilovolts outside an urban area. The proposed power line and on-site facility substation will each have a capacity of up to 132kV.
GN R327, 08 December 2014 (as amended on 07 April 2017)	Activity12(ii)(a)(c)	• *"The development of (ii) infrastructure or structures with a physical footprint of 100 square metres or more; (a) within a watercourse or (c) within 32meters of a watercourse measured from the edge of a watercourse."* • The presence of wetlands within the grid connection corridor which will have to be crossed by the service road associated with the power line infrastructure for operation and maintenance purposes.
GN R327, 08 December 2014 (as amended on 07 April 2017)	Activity 19	• *The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse.* • *The presence of wetlands located within the grid connection corridor which will have to be crossed by the service road associated with the power line infrastructure for operation and maintenance purposes. The construction of the associated service road will require the infilling of material of ~11cubic meters into the wetlands*

GN R327, 08 December 2014 (as amended on 07 April 2017)	Activity 24(ii)	• *"The development of a road (ii) with reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 meters."* • The internal roads will not have a reserve and will vary between 6 and 12 meters in width.
GN R327, 08 December 2014 (as amended on 07 April 2017)	Activity 28(ii)	• *Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare."* • The farm has been previously used for agricultural purposes and the property will be re-zoned to "special". The development footprint of the solar power plant will be 280ha in extent.
GN R327, 08 December 2014 (as amended on 07 April 2017)	Activity 56 (ii)	• *"The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre(ii) where no reserve exists, where the existing road is wider than 8 metres."* • The existing access does not have a reserve and will need to be widened by more than 6 metres.
GN R325, 08 December 2014 (as amended on 07 April 2017)	Activity 1	• *"The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more. The proposed photovoltaic solar facility will generate up to 150 megawatts electricity from solar energy.*
GN R325, 08 December 2014 (as amended on 07 April 2017)	Activity 15	• *"The clearance of an area of 20 hectares or more of indigenous vegetation."* • The site falls within the Highveld Alluvial Vegetation which is described by Mucina and Rutherford (2006) as least threatened. A section of the grid connection corridor is located within the Vaal-Vet Sandy Grassland which is endangered. Activity 15 is triggered since portions of the site has not been lawfully disturbed during the preceding ten years; therefore, more than 20 hectares of indigenous vegetation will be removed. The development footprint of the solar power plant will be 280ha in extent.

GN R324, 08 December 2014 (as amended on 07 April 2017)	Activity 4 (b)(i)(ee)	• "*The development of a road wider than 4 metres with a reserve less than 13,5 metres within (b) the Free State, (i) outside urban areas, (ee) within critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans."* • A service road with a width between 4 and 5 metres associated with the power line infrastructure will be constructed and a section of the grid connection corridor is located within a CBA 1 area. .
GN R324, 08 December 2014 (as amended on 07 April 2017)	Activity 10 (b)(hh)	• *The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres (b) in the Free State (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."* • The proposed development will need to develop infrastructure for the storage and handling of dangerous goods (diesel and oils) in containers with a capacity exceeding 30 but not exceeding 80 cubic metres. The project is located within the Free State Province and the site borders on the Doring River. Therefore, the development will take place within 100 m of the edge of a watercourse or wetland
GN R324, 08 December 2014 (as amended on 07 April 2017)	Activity 12 (b)(i)(ii)(vi)	• *"The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (i) within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment of 2004, (ii) within critical biodiversity areas identified in bioregional plans and (vi) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."* • The proposed development is located in the Free State province and portions of the site has not

		been lawfully disturbed during the preceding ten years and therefore indigenous vegetation is present on the site. A section of the grid connection corridor is located within the Vaal-Vet Sandy Grassland which is endangered. The site borders on the Doring River and an exoreic depression is located in the proposed power line corridor. Therefore, more than 300 square meters of indigenous vegetation will be removed which is located within 100m of a watercourse and within an endangered ecosystem. The development footprint of the solar power plant will be 280 ha.
GN R324, 08 December 2014 (as amended on 07 April 2017)	Activity 14(ii)(a)(c)(b)(i)(ff)	• "*The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (a) within a watercourse or (c) within 32 metres of a watercourse, measured from the edge of a watercourse, (b) within the Free State, (i) outside urban areas within (ff) critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans."* • The presence of wetlands located within the grid connection corridor which will have to be crossed by the service road associated with the power line infrastructure for operation and maintenance purposes. A section of the power line corridor is located within an area classified as CBA 1.
GN R324, 08 December 2014 (as amended on 07 April 2017)	Activity 18 (b)(i)(hh)	• *"The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre (b) in the Free State (i) outside urban areas and (hh) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."* • The existing access road to the site will need to be widened by more than 4 metres. The project is located within the Free State Province and outside urban areas. The site borders on the Doring River.

The proposed amendments will not result in any changes to the authorised activities and will not trigger any new listed activities. The amendments are located within the EIA footprint which was fully considered and assessed as part of the EIA process and was included in assessments by all the independent specialist studies that were undertaken.

2.3 PHOTOVOLTAIC TECHNOLOGY

The term photovoltaic describes a solid-state electronic cell that produces direct current electrical energy from the radiant energy of the sun through a process known as the Photovoltaic Effect. This refers to light energy placing electrons into a higher state of energy to create electricity. Each PV cell is made of silicon (i.e., semiconductors), which is positively and negatively charged on either side, with electrical conductors attached to both sides to form a circuit. This circuit captures the released electrons in the form of an electric current (direct current). The key components of the proposed project, in terms of the current EA, are described below:

- PV Panel Array - To produce up to 150MW, the proposed facility will require numerous linked cells placed behind a protective glass sheet to form a panel. Multiple panels will be required to form the solar PV arrays which will comprise the PV facility. The PV panels will be tilted at a northern angle in order to capture the most sun.

- Wiring to Central Inverters - Sections of the PV array will be wired to central inverters. The inverter is a pulse width mode inverter that converts direct current (DC) electricity to alternating current (AC) electricity at grid frequency.

- Connection to the grid - Connecting the array to the electrical grid requires transformation of the voltage from 480V to 33kV to 132kV. The normal components and dimensions of a distribution rated electrical substation will be required. Output voltage from the inverter is 480V and this is fed into step up transformers to 132kV. An onsite substation will be required on the site to step the voltage up to 132kV, after which the power will be evacuated into the national grid. Whilst Springbok Solar Power Plant (RF) (Pty) Ltd has not yet received a cost estimate letter from Eskom, it is expected that generation from the facility will tie in with Theseus MTS 400/132/22kV Substation or to any of the existing 132kV lines. The Project will inject up to 100MW into the National Grid. The installed capacity will be approximately 150MW.

  The connection line route authorised to the Theseus MTS 400/132/22kV Substation is Option 1 which is approximately 5.25km long. The option is located north-east of the project footprint. The proposed power line was assessed within a 100m wide corridor. The area surrounding the substation was also assessed.

- Electrical reticulation network – An internal electrical reticulation network will be required and will be lain ~2-4m underground as far as practically possible.

- Supporting Infrastructure – The following auxiliary buildings with basic services including water and electricity will be required on site:

    - Office (~200m²);

    - Switch gear and relay room (~400m²);

    - Staff lockers and changing room (~200m²); and

    - Security control (~60m²)

- Battery storage – Up to 500 MW Battery Storage Facility with a maximum height of 8m and a maximum volume of 1740 m^3 of batteries and associated operational, safety and control infrastructure.

- Roads – Access will be obtained via the S239 gravel road off the R730 Regional Route. An internal site road network will also be required to provide access to the solar field and associated infrastructure. The access and internal roads will be constructed within a 25-meter corridor.

- Fencing - For health, safety and security reasons, the facility will be required to be fenced off from the surrounding farm. Fencing with a height of 2.5 meters will be used.

2.4 LAYOUT DESCRIPTION

The layout plan of 13 December 2021 (Appendix F2 and Figure 1.2), as approved in the EA, follows the limitations of the site and aspects such as environmentally sensitive areas, roads, fencing and servitudes on site were considered. The total surface area proposed for the layout includes the PV panel arrays spaced to avoid shadowing, access and maintenance roads and associated infrastructure (BESS, buildings, power inverters, transmission lines and perimeter fences). Limited features of environmental significance exist on site (refer to Appendix F1 for the environmental sensitivity map that is superimposed over the layout plan).

Table 2.3 below provides detailed information regarding the layout and the components that were authorised.

Table 2.3: Technical details for the proposed facility

Component	Description / dimensions
Height of PV panels	6 meters
Area of PV Array	280 Hectares (Development footprint)
Number of inverters required	Minimum 50
Area occupied by inverter / transformer stations / substations / BESS	Central inverters+ LV/MV trafo: 20 m^2 HV/MV substation with switching station: 15 000 m^2 BESS: 4 000 m^2
Capacity of on-site sub- and switching station	Minimum 130MVA in HV/MV substation / 132kV

Capacity of the power line	132kV
Power Line servitude	32m
Area occupied by both permanent and construction laydown areas	Permanent Laydown Area: 280ha Construction Laydown Area: ~2000 m^2
Area occupied by buildings	Security Room: ~60 m^2 Office: ~200 m^2 Staff Locker and Changing Room: ~200 m^2
Battery storage facility	Maximum height: 8 m Maximum volume: 1740 m^3 Capacity: 500MW
Length of internal roads	Approximately 20 km
Width of internal roads	Between 6 & 12 meters
Proximity to grid connection	Approximately 5 kilometers
Height of fencing	Approximately 2.5 meters

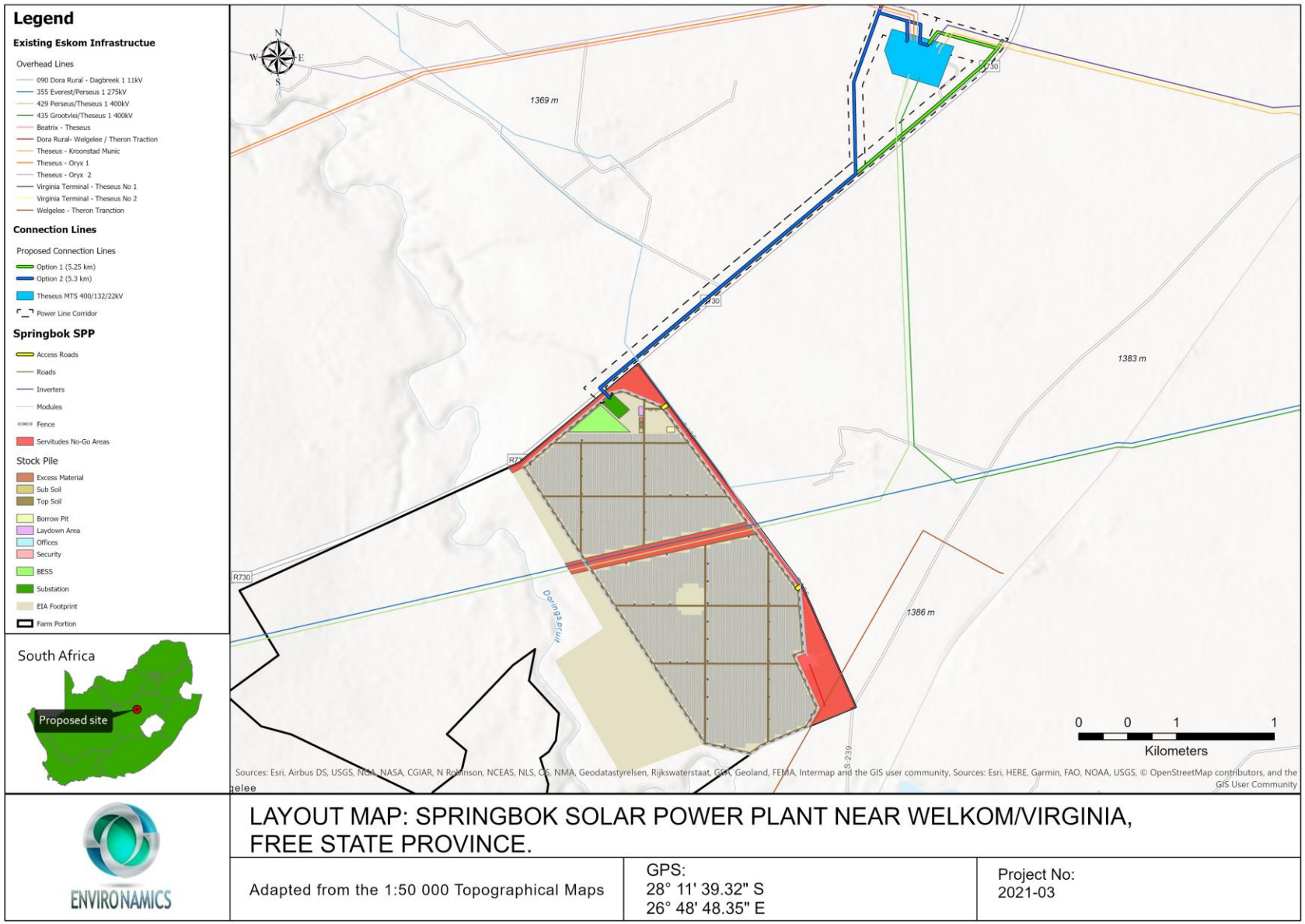

Figure 1.2: Facility Layout Map approved in the Environmental Authorisation

2.5 ASSESSMENT OF ENVIRONMENTAL IMPACTS

As part of the original EIA process undertaken for the Springbok SPP, the following specialist studies were undertaken to investigate potential significant impacts:

- Terrestrial Biodiversity Impact Assessment;
- Avifauna Impact Assessment;
- Wetland Impact Assessment;
- Visual Impact Assessment;
- Agricultural and Soils Compliance Statement;
- Heritage Impact Assessment;
- Palaeontological Impact Assessment;
- Traffic Impact Assessment; and
- Social Impact Assessment.

The findings of the specialist studies and impact assessment undertaken as part of the original environmental authorisation process are summarised in the table below:

Table 2.4: Original Rating of Impacts during construction of the proposed SPP and associated infrastructure

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING
Terrestrial biodiversity impact assessment	Habitat destruction caused by clearance of vegetation.	Negative Medium	Negative Medium
	Habitat fragmentation caused by clearance of vegetation	Negative Low	Negative Low
	Increased Soil Erosion and Sedimentation	Negative Medium	Negative Low
	Soil, Water and air Pollution	Negative High	Negative Low
	Spread and establishment of alien invasive species	Negative Medium	Negative Low
	Negative effect of human activities on fauna and road mortalities	Negative Low	Negative Low

Avifauna Impact Assessment	Displacement of priority avian species from important habitats	Negative Medium	Negative Low
	Displacement of resident avifauna through increased disturbance	Negative Medium	Negative Low
	Loss of important avian habitats	Negative Medium	Negative Low
Wetland Assessment	Soil compaction and increased risk of sediment transport and erosion in the wetland	Negative Medium	Negative Low
	Soil and water pollution in the wetland	Negative High	Negative Low
	Spread and establishment of alien invasive species in the wetland	Negative Medium	Negative Low
Visual Impact Assessment	Visual impact of construction activities on sensitive visual receptors in close proximity to the Springbok SPP.	Negative Medium	Negative Low
Agricultural and Soils Compliance Statement	Loss of agricultural potential by occupation of land	Negative Low	Negative Low
	Loss of agricultural potential by soil degradation	Negative Low	Negative Low
	Dust impact	Negative Low	Negative Low
	Erosion	Negative Low	Negative Low
	Topsoil loss	Negative Low	Negative Low
Heritage Impact Assessment	Loss or damage to sites, features or objects of cultural heritage significance	Negative Medium	Negative Low
Palaeontological Impact Assessment	Disturbance, destruction or damage to fossils preserved at or below surface through surface	Negative Low	Negative Low

	clearance and excavations during construction phase.		
Social Impact Assessment	Creation of direct and indirect employment opportunities.	Positive Low	Positive Medium
	Economic multiplier effects from the use of local goods and services.	Positive Low	Positive Medium
	Potential loss in productive farmland	Negative Medium	Negative Low
	In-migration of labourers in search of employment opportunities, and a resultant change in population, and increase in pressure on local resources and social networks, or existing services and infrastructure.	Negative Medium	Negative Low
	Temporary increase in safety and security concerns associated with the influx of people	Negative Medium	Negative Low
	Impacts on daily living and movement patterns	Negative Medium	Negative Medium
	Nuisance impacts (noise and dust)	Negative Medium	Negative Low
	Increased risk of potential veld fires	Negative Medium	Negative Low
	Impacts on the sense of place	Negative Medium	Negative Low
Traffic Impact Assessment	Increase in traffic on the Durban or Saldanha delivery routes	Negative Low	Negative Low
	Increase in traffic for commuter trips	Negative Low	Negative Low

Table 2.5: Original Rating of Impacts during operation of the proposed SPP and associated infrastructure

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING
Terrestrial Biodiversity Impact Assessment	Habitat destruction caused by clearance of vegetation.	Negative Medium	Negative Medium
	Habitat fragmentation caused by clearance of vegetation	Negative Low	Negative Low
	Increased Soil Erosion and Sedimentation	Negative Low	Negative Low
	Soil, Water and air Pollution	Negative Medium	Negative Low
	Spread and establishment of alien invasive species	Negative Low	Negative Low
	Negative effect of human activities on fauna and road mortalities	Negative Low	Negative Low
Avifauna Impact Assessment	Displacement of priority avian species from important habitats	Negative Medium	Negative Medium
	Displacement of resident avifauna through increased disturbance	Negative Medium	Negative Low
	Collisions with PV panels leading to injury or loss of avian life	Negative Medium	Negative Low
	Collision when flying into power line infrastructure	Negative High	Negative Low
	Electrocution when perched on power line infrastructure	Negative High	Negative Low
Wetland Impact Assessment	Soils compaction and increased risk of sediment transport and erosion in the wetland and exorheic depression (pan)	Negative Medium	Negative Low
	Soil and water pollution in the wetland	Negative Low	Negative Low

	Spread and establishment of alien invasive species in the wetland	Negative Medium	Negative Low
Visual Impact Assessment	Visual impact on observers travelling along the roads and residents at homesteads within a 5km radius of the SPP.	Negative Medium	Negative Low
	Visual impact on observers travelling along the roads and residents at homesteads within a 5-10km radius of the SPP.	Negative Low	Negative Low
	Visual impacts of lighting at night on visual receptors in close proximity to the SPP.	Negative Medium	Negative Low
	Glint and glare on sensitive visual receptors in close proximity to the proposed facility.	Negative Low	N/A
	Visual impact on sensitive visual receptors located within a 500m radius of the proposed power line.	Negative Medium	Negative Medium
	Visual impact and impacts on sense of place	Negative Medium	Negative Low
Agricultural and Soils Compliance Statement	Enhanced agricultural potential through increased financial security for farming operations	Positive Low	Positive Low
	Erosion	Negative Low	Negative Low
	Topsoil Loss	Negative Low	Negative Low
Heritage Impact Assessment	Loss or damage to sites, features or objects of cultural heritage significance	Negative Low	Negative Low
Social Impact Assessment	Creation of employment opportunities and skills development	Positive Low	Positive Medium

	Development of non-polluting, renewable energy infrastructure	Positive Medium	Positive Medium
	Loss of agricultural land and overall productivity	Negative Medium	Negative Low
	Contribution to LED and social upliftment	Positive Medium	Positive High
	Potential impacts related to the impact on tourism.	Positive Low	Positive Low
	Visual impact and impacts on sense of place	Negative Medium	Negative Low

Table 2.6: Original Rating of Impacts during the decommissioning of the proposed SPP and associated infrastructure.

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING
Terrestrial Biodiversity Impact Assessment	An increased infestation of exotic or alien invasive plant species owing to clearance or disturbance where the footprint took place.	Negative Medium	Negative Low
	Continued loss of indigenous vegetation owing to poor recovery of vegetation.	Negative Medium	Negative Low
	Contamination of soil by leaving rubble/ waste or spilling petroleum fuels or any pollutants on soil which could infiltrate the soil during rehabilitation	Negative Medium	Negative Low
Avifauna Impact Assessment	Displacement of priority avian species from important habitats	Negative Low	Negative Low
	Displacement of resident avifauna through increased disturbance	Negative Low	Negative Low

Wetland Assessment	Soils compaction and increased risk of sediment transport and erosion in the river/riparian and exorheic depression (pan).	Negative Medium	Negative Low
	Soil and water pollution in the river/riparian and exorheic depression (pan).	Negative Medium	Negative Low
	Spread and establishment of alien invasive species in the river/riparian and exorheic depression (pan).	Negative Medium	Negative Low
Agricultural and Soils Compliance Statement	Erosion	Negative Low	Negative Low
	Top Soil	Negative Low	Negative Low
Social Impact Assessment	Loss of employment opportunities	Negative Low	Negative Low

3 PROPOSED AMENDMENTS

Springbok Solar Power Plant (RF) (Pty) Ltd is applying for the amendment of the EA (DFFE Ref: 14/12/16/3/3/2/2087) issued on 25 April 2022. Various amendments are proposed which are discussed and motivated for in the sections which follow.

3.1 CHANGES TO AUTHORISED ELEMENTS AND MOTIVATION THEREFORE

The following amendments are being applied for in terms of the EIA Regulations, 2014 (as amended in 2017):

1. **<u>Amendment 1: Increase of the development footprint within the EIA footprint assessed.</u>**

   As part of the EIA process a wider EIA footprint was assessed for the placement of the solar power plant development footprint. The EIA footprint was 350ha in extent and the development footprint 280ha in extent. It is confirmed that the entire EIA footprint of 350ha was assessed fully within the EIA process by the EAP and the independent specialists. The Holder of the EA seeks to utilise the entire extent of the EIA footprint and is therefore requesting an amendment to the EA and layout to increase the development footprint from 280ha to 350ha. Furthermore, the increase in footprint is also required to accommodate the increase in size of the laydown area, as well as the addition of a second laydown area (refer to Amendments 4 and 5 below).

   The Holder of the EA has identified that from a technical perspective it will not be possible for the 280ha authorised development footprint to generate a capacity of 150MW, as was

authorised. The EIA footprint assessed (350ha) therefore provides opportunity and flexibility to place panels within these areas assessed during the EIA process in order to achieve a generation capacity of 150MW. Furthermore, existing Eskom servitudes on the site and a heritage buffer identified during the EIA process reduces the developable area available for the placement of PV panels and must therefore be considered in order to achieve the proposed and authorised generation capacity for the facility.

2. **Amendment 2: Correction of Listed Activity 12 of Listing Notice 3**

   Correction of Listed Activity 12 of Listing Notice 3 is requested as the information provided in the Environmental Authorisation of the Activity is not correct and does not correspond to the information provided in the final EIA Report that was submitted to the DFFE for decision-making.

3. **Amendment 3: Change of BESS details, extent and coordinates.**

   The description provided on page 9 of the EA is requested to be updated by the Holder of the EA to ensure that the details match the changes proposed to the BESS as part of the amendments to the layout. The changes to the BESS includes a reduction in extent and changes to the coordinates of the location - the infrastructure is still within the same area as was assessed, however with the reduction of the extent the coordinate points have shifted slightly and therefore needs to be included in the EA to reflect the correct and updated information. Furthermore, the Holder of the EA is also requesting a correction of the capacity of the BESS, which was a typing mistake.

4. **Amendment 4: Relocation and increase in the size of the Laydown Area and relocation of the O&M Building.**

   The Holder of the EA is proposing the relocation of the laydown area and increase in the size of the area as was included and indicated as part of the Approved Layout (Condition 13 of the EA). The laydown area will be relocated to the western boundary of the EIA footprint. The laydown area will increase from 0.19ha to 4.5ha. The motivation for the change is to optimise the layout in terms of storage of equipment and machinery, and to ensure sufficient space is available for the storage requirements.

   The Holder of the EA is proposing the relocation of the O&M building within the area allocated for the substation. The motivation for this relocation is to ensure the O&M buildings are located as close as possible to the substation which optimises the layout from a technical and operational perspective.

5. **Amendment 5: Additional Laydown Area.**

   The Holder of the EA is proposing the development of an additional laydown area to the facility layout. This laydown area is proposed to be located along the southern boundary of the project. The laydown area will only be utilised during the construction phase and will therefore only be temporary. The extent of the laydown area is 13.5ha and will be located within the assessed EIA footprint.

The need for the additional laydown area is based on the optimisation of construction activities to be undertaken and to ensure that equipment, materials and machinery can be stored on the far end of the site. This will also reduce traffic through the site from the original/proposed to be amended laydown area (Amendment 4).

6. **Amendment 6: Additional fencing to the Facility Layout.**

The Holder of the EA proposes additional fencing within the development footprint to close off the existing servitudes within the EIA footprint from the proposed facility infrastructure. The additional fencing is required to close off the Eskom servitude and to ensure the Springbok Solar Power Plant is secure and cannot be freely accessed by unauthorised individuals.

7. **Amendment 7: Approval of the Amended Facility Layout Plan.**

The Holder of the EA is requesting the approval of the amended facility layout as per the amendments 1-6 requested above. The facility layout, dated 13 December 2021, has been approved as per condition 13 of the EA, and therefore approval of the amended layout proposed is requested.

8. **Amendment 8: Approval of the Amended Facility Environmental Management Programme (EMPr).**

The Holder of the EA is requesting the approval of the amended facility EMPr (Appendix E), which has been updated with the amended facility layout, the specific conditions of the EA and the recommendations from the Biodiversity Walk-through Report (Appendix E1). The facility EMPr, dated 13 December 2021, has been approved as per condition 14 of the EA, and therefore approval of the amended EMPr is requested.

9. **Amendment 9: Amendment to the description of key infrastructure and components**

The holder of the EA is requesting amendments to description of the key infrastructure and components to be aligned with the rest of the amendments requested.

It must be noted that the provincial roads authority confirmed the road name to be S485 and not S239 and therefore the information in the EA must be updated accordingly.

3.2 DETAILS OF AMENDMENTS BEING APPLIED FOR CONSIDERING THE EA

Considering the above, it is recommended that the EA dated 25 April 2022 be amended as follow:

1. Amendment 1: Increase of the development footprint within the EIA footprint assessed.

Page 03 of the EA - Table providing the listed activities that have been authorised:

Listed Activity	Activity description in the EA	Proposed amendment
GN R 327, 08 December 2014 (as amended on 07 April 2017) – Activity 28(ii) *"Residential, mixed, retail, commercial, industrial, or institutional developments where such land was used for agriculture or afforestation on or after 1998 and where such development (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare."*	The farm has been previously used for agricultural purposes and the property will be re-zoned to "special". The development footprint of the solar power plant will be 280ha in extent.	The farm has been previously used for agricultural purposes and the property will be re-zoned to "special". The development footprint of the solar power plant will be **350ha** in extent.
GN R 325, 08 December 2014 (as amended on 07 April 2017) – Activity 15 *"The clearance of an area of 20 hectares or more of indigenous vegetation".*	The site falls within the Highveld Alluvial Vegetation which is described by Mucina and Rutherford (2006) as least threatened. A section of the grid connection corridor is located within the Vaal-Vet Sandy Grassland which is endangered. Activity 15 is triggered since portions of the site has not been lawfully disturbed during the preceding ten years; therefore, more than 20 hectares of indigenous vegetation will be removed. The development footprint of the solar powerplant will be 280ha in extent.	The site falls within the Highveld Alluvial Vegetation which is described by Mucina and Rutherford (2006) as least threatened. A section of the grid connection corridor is located within the Vaal-Vet Sandy Grassland which is endangered. Activity 15 is triggered since portions of the site has not been lawfully disturbed during the preceding ten years; therefore, more than 20 hectares of indigenous vegetation will be removed. The development footprint of the solar powerplant will be **350ha** in extent.

GN R 324, 08 December 2014 (as amended on 07 April 2017) – Activity 12 (b)(i)(ii)(vi) *"The clearance of an area of 300 square meters or more of indigenous vegetation…(h) in the North West (iv) within critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority."*	The proposed development is located in the Free State province and portions of the site has not been lawfully disturbed during the preceding ten years and therefore indigenous vegetation is present on the site. A section of the grid connection corridor is located within the Vaal-Vet Sandy Grassland which is endangered. The site borders on the Doring River and an Exoteric depression is located in the proposed powerline corridor. Therefore, more than 300 square meters of indigenous vegetation will be removed which is located within 100m of a watercourse and within an endangered ecosystem. the development footprint of the solar power plant will be 280ha.	The proposed development is located in the Free State province and portions of the site has not been lawfully disturbed during the preceding ten years and therefore indigenous vegetation is present on the site. A section of the grid connection corridor is located within the Vaal-Vet Sandy Grassland which is endangered. The site borders on the Doring River and an Exoteric depression is located in the proposed powerline corridor. Therefore, more than 300 square meters of indigenous vegetation will be removed which is located within 100m of a watercourse and within an endangered ecosystem. the development footprint of the solar power plant will be **350ha**.

2. Amendment 2: Correction of Listed Activity 12 of Listing Notice 3

Page 05 of the EA:

Listed Activity included in the EA	**Requested correction**
GN R 324, 08 December 2014 (as amended on 07 April 2017) – Activity 12 (b)(i)(ii)(vi) *"The clearance of an area of 300 square meters or more of indigenous vegetation…(h) in the North West (iv) within critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority."*	GN R 324, 08 December 2014 (as amended on 07 April 2017) – Activity 12 (b)(i)(ii)(vi) *"The clearance of an area of 300 square metres or more of indigenous vegetation (b) in the Free State, (i) within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment of 2004, (ii) within*

	critical biodiversity areas identified in bioregional plans and (vi) areas within a watercourse or wetland; or within 100 metres from the edge of a watercourse or wetland."

3. <u>Amendment 3: Change of BESS details, extent and coordinates.</u>

<u>Page 08 of the EA – BESS Coordinates</u>

From:

Battery Energy Storage System (BESS)	Latitude	Longitude
1	28°10'57.22"S	26°48'28.41"E
2	28°11'3.61"S	26°48'35.53"E
3	28°11'3.54"S	26°48'20.75"E

To:

Battery Energy Storage System (BESS)	Latitude	Longitude
1	28°10'56.68"S	26°48'28.71"E
2	28°11'2.46"S	26°48'21.97"E
3	28°11'0.10"S	26°48'32.47"E

<u>Page 09 of the EA – key infrastructure and components</u>

Description included in the EA	Requested Amendment
"Battery storage – Up to 500 MW Battery Storage Facility with a maximum height of 8m and a maximum volume of 1740 m3 of batteries and associated operational, safety and control infrastructure."	"Battery Storage- Up to 500 **<u>MWh</u>** Battery Storage Facility with a maximum height of 8m and **occupy 2 hectares of land including** the operational, safety and control infrastructure."

It must be noted that Table 2.1 of the final EIA Report of the Springbok Solar Power Plant indicates that the BESS will have an extent of 4 hectares. There is therefore a reduction of 2 hectares proposed for the BESS by the Holder of the EA.

4. <u>Amendment 4: Relocation and increase in size of the Laydown Area and relocation of the O&M Building.</u>

The Holder of the EA is proposing the relocation of the laydown area and increase in the size of the area as was included and indicated as part of the Approved Layout (Condition 13 of the EA). The laydown area will be relocated to the western boundary of the EIA footprint. The laydown area will increase from 0.19ha to 4.5ha

The Holder of the EA is proposing the relocation of the O&M building within the area allocated for the substation.

It is therefore requested that the proposed amended facility layout be approved to approve the relocation and increase in size of the laydown area and the relocation of the O&M Building. Refer to amendment 7.

5. **Amendment 5: Additional Laydown Area.**

The Holder of the EA is proposing the development of an additional laydown area to the facility layout. This laydown area is proposed to be located along the southern boundary of the project. The laydown area will only be utilised during the construction phase and will therefore only be temporary. The extent of the laydown area is 13.5ha and will be located within the assessed EIA footprint. . It is therefore requested that the proposed amended facility layout be approved to approve the additional laydown area as part of the development footprint. Refer to amendment 7.

6. **Amendment 6: Additional fencing to the Facility Layout.**

The Holder of the EA proposes additional fencing within the development footprint to close off the existing servitudes within the EIA footprint from the proposed facility infrastructure. The additional fencing is required to close off the Eskom servitude and to ensure the Springbok Solar Facility is secure and cannot be freely accessed by unauthorised individuals. It is therefore requested that the proposed amended facility layout be approved to approve include the additional fenced area as part of the development footprint. Refer to amendment 7 below.

It is therefore requested that the proposed amended facility layout be approved to approve the additional fenced area as part of the development footprint. Refer to amendment 7 below.

7. **Amendment 7: Approval of the Amended Facility Layout Plan.**

The Holder of the EA is requesting the approval of the amended facility layout as per the amendments 1-6 requested above. The facility layout, dated 13 December 2021, has been approved as per condition 13 of the EA, and therefore approval of the amended layout proposed is requested.

8. **Amendment 8: Approval of the Amended Facility Environmental Management Programme (EMPr).**

The Holder of the EA is requesting the approval of the amended facility EMPr (Appendix E), which has been updated with the amended facility layout, the specific conditions of the EA and the recommendations from the Biodiversity Walk-through Report (Appendix E1). The facility EMPr, dated 13 December 2021, has been approved as per condition 14 of the EA, and therefore approval of the amended EMPr is requested.

9. Amendment 9: Amendment to the description of key infrastructure and components

The holder of the EA is requesting amendments to the description of key infrastructure and components in order to be aligned with the rest of the amendments.

Page 08 of the EA – List providing description of key infrastructure and components:

From:

"PV Panel Array - To produce up to 150MW, the proposed facility will require numerous linked cells placed behind a protective glass sheet to form a panel. Multiple panels will be required to form the solar PV arrays which will comprise the PV facility. The PV panels will be tilted at a northern angle in order to capture the most sun."

To:

"PV Panel Array - To produce up to 150MW, the proposed facility will require numerous linked cells placed behind a protective glass sheet to form a panel. Multiple panels will be required to form the solar PV arrays which will comprise the PV facility. ***The PV Panels will be tilted at an optimal angle in order to capture the most sun****."*

Page 08 of the EA – List providing description of key infrastructure and components:

From:

"Wiring to Central Inverters- Sections of the PV array will be wired to central inverters. The inverter is a pulse width mode inverter that converts direct current (DC) electricity to alternating current (AC) electricity at grid frequency. "

To:

Wiring to ***Inverters****- Sections of the PV array will be wired to* ***inverters****. The inverter is a pulse width mode inverter that converts direct current (DC) electricity to alternating current (AC) electricity at grid frequency.*

Page 08 and 09 of the EA - List providing description of key infrastructure and components:

From:

"Connection to the grid - Connecting the array to the electrical grid requires transformation of the voltage from 480V to 33kV to 132kV. The normal components and dimensions of a distribution rated electrical substation will be required. Output voltage from the inverter is 480V and this is fed into step up transformers to 132kV. An onsite substation will be required on the site to step the voltage up to 132kV, after which the power will be evacuated into the national grid. Whilst Springbok Solar Power Plant (RF) (Pty) Ltd has not yet received a cost estimate letter from Eskom, it is expected that generation from the facility will tie in with Theseus MTS 400/132/22kV Substation or to any of the existing 132kV lines. The Project will inject up to 100MW into the National Grid. The installed capacity will be approximately 150MW."

To:

"Connection to the grid - Connecting the array to the electrical grid requires transformation of the voltage from 480V to 33kV to 132kV. The normal components and dimensions of a distribution rated electrical substation will be required. Output voltage from the inverter is 480V and this is fed into step up transformers to 132kV. An onsite substation will be required on the site to step the voltage up to 132kV, after which the power will be evacuated into the national grid. ***Springbok Solar Power Plant (RF) (Pty) Ltd has not yet received a cost estimate letter from Eskom, the generation from the facility will tie in with Theseus MTS 400/132/22kV Substation or to any of the existing 132kV lines. The project will inject energy into the National Grid. The capacity will be approximately 150MW."***

Page 09 of the EA - List providing description of key infrastructure and components:

From:

"Roads- Access will be obtained via the S239 gravel road off the R730 Regional Route. An internal site networks will also be required to provide access to the solar field and associated infrastructure. The access and internal roads will be constructed within a 25-meter corridor. "

To:

"Roads- Access will be obtained via the ***S485*** *gravel road off the R730 Regional Route. An internal site networks will also be required to provide access to the solar field and associated infrastructure. The access and internal roads will be constructed within a 25-meter corridor."*

The details of the proposed amendments and the motivation therefore have also been included in the Application for Amendment of the EA submitted to the DFFE with this draft Motivation Report for review and comment.

4 IMPACTS/RISKS RELATED TO PROPOSED AMENDMENTS

This section aims to address the following requirements of the regulations:

Regulation 32(1) The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority:
(a) a report, reflecting—
(i) an assessment of all impacts related to the proposed change;

4.1 IMPACTS ASSOCIATED WITH RELATED AMENDMENTS

The proposed amendments discussed in section 3 of this report will only result in changes within the EIA footprint the was originally assessed. Considering the above it is argued that the proposed amendments would not require further assessment, since it would not result in an increase in the significance of the potential impacts or any new environmental impacts. It will also not impact areas which was not previously assessed, and mitigation measures recommended for. Specialists were consulted to obtain their input on the potential impact of the proposed amendments, whether the significance of potential impacts would remain unchanged and whether the

mitigation and management measures contained in the environmental management programme (EMPr) will still suffice.

4.1.1 Specialist input

In order to ascertain if further input would be required in relation to the above-mentioned proposed amendments, each of the specialist studies conducted during the EIA phase of the development was investigated in terms of its applicability. The following determinations were made:

Table 4.1: Specialist input on the proposed amendments

SPECIALIST STUDY	**APPLICABILITY**
Terrestrial Biodiversity Impact Assessment	Not applicable - The proposed amendments will not result in any additional impacts and will not increase the level or nature of the impact, which was initially assessed and considered when application was made for an EA. This is based on the fact that all amendments are proposed within the area assessed for the development (i.e. EIA footprint). The significance ratings will remain unchanged, and the proposed mitigation and management measures proposed as part of the EIA process will still suffice.
Avifauna Impact Assessment	Not applicable - The proposed amendments will not result in any additional impacts and will not increase the level or nature of the impact, which was initially assessed and considered when application was made for an EA. This is based on the fact that all amendments are proposed within the area assessed for the development (i.e. EIA footprint). The significance ratings will remain unchanged, and the proposed mitigation and management measures proposed as part of the EIA process will still suffice.
Wetland Assessment	Not applicable - The proposed amendments will not result in any additional impacts and will not increase the level or nature of the impact, which was initially assessed and considered when application was made for an EA. This is based on the fact that all amendments are proposed within the area assessed for the development (i.e. EIA footprint). The significance ratings will remain unchanged, and the proposed mitigation and management measures proposed as part of the EIA process will still suffice.
Visual Impact Assessment	Not applicable - The proposed amendments will not result in any additional impacts and will not increase the level or nature of the impact, which was initially assessed and considered when application was made for an EA. This is based on the fact that all amendments are proposed within the area assessed for the development (i.e. EIA footprint). The significance ratings will remain unchanged, and the proposed mitigation and management measures proposed as part of the EIA process will still suffice.

Palaeontological Impact Assessment	Not applicable - The proposed amendments will not result in any additional impacts and will not increase the level or nature of the impact, which was initially assessed and considered when application was made for an EA. This is based on the fact that all amendments are proposed within the area assessed for the development (i.e. EIA footprint). The significance ratings will remain unchanged, and the proposed mitigation and management measures proposed as part of the EIA process will still suffice.
Social Impact Assessment	Not applicable - The proposed amendments will not result in any additional impacts and will not increase the level or nature of the impact, which was initially assessed and considered when application was made for an EA. This is based on the fact that all amendments are proposed within the area assessed for the development (i.e. EIA footprint). The significance ratings will remain unchanged, and the proposed mitigation and management measures proposed as part of the EIA process will still suffice.
Agricultural and Soils Compliance Statement	Not applicable - The proposed amendments will not result in any additional impacts and will not increase the level or nature of the impact, which was initially assessed and considered when application was made for an EA. This is based on the fact that all amendments are proposed within the area assessed for the development (i.e. EIA footprint). The significance ratings will remain unchanged, and the proposed mitigation and management measures proposed as part of the EIA process will still suffice.
Heritage Impact Assessment	Not applicable - The proposed amendments will not result in any additional impacts and will not increase the level or nature of the impact, which was initially assessed and considered when application was made for an EA. This is based on the fact that all amendments are proposed within the area assessed for the development (i.e. EIA footprint). The significance ratings will remain unchanged, and the proposed mitigation and management measures proposed as part of the EIA process will still suffice.

Specialist statements were obtained from almost all specialists that confirmed that the proposed amendments will not result in any additional impacts and will not increase the level or nature of the impact, which was initially assessed and considered when application was made for an EA. Input was not sought from the Geotechnical specialist and Traffic specialist as these studies are highly technical and not considered to be relevant to the environment considering the amendments proposed. The Traffic Impact Assessment undertaken as part of the EIA process focused on the impact of traffic within the surrounding road network and not the traffic within the site. The amendments are not expected to have an impact on the Traffic Impact Assessment due to the nature of the proposed/ requested impacts.

The significance ratings will remain unchanged, and the proposed mitigation and management measures proposed as part of the EIA process will still suffice (refer to Appendix D and Appendix E).

4.1.2 Summary of changes in Impact Ratings

As mentioned above, specialist inputs were obtained to confirm whether the proposed amendments will result in any additional impact or an increase in the significance of any impacts that were previously assessed. Based on their findings Tables 4.2 - 4.4 demonstrate that the proposed amendments will not result in any additional impacts and that the significance ratings of all potential impacts will remain the same.

Table 4.2: Original Rating of Impacts during construction of the proposed SPP and associated infrastructure

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING
Terrestrial biodiversity impact assessment	Habitat destruction caused by clearance of vegetation.	Negative Medium	Negative Medium
	Habitat fragmentation caused by clearance of vegetation	Negative Low	Negative Low
	Increased Soil Erosion and Sedimentation	Negative Medium	Negative Low
	Soil, Water and air Pollution	Negative High	Negative Low
	Spread and establishment of alien invasive species	Negative Medium	Negative Low
	Negative effect of human activities on fauna and road mortalities	Negative Low	Negative Low
Avifauna Impact Assessment	Displacement of priority avian species from important habitats	Negative Medium	Negative Low
	Displacement of resident avifauna through increased disturbance	Negative Medium	Negative Low
	Loss of important avian habitats	Negative Medium	Negative Low
Wetland Assessment	Soil compaction and increased risk of sediment transport and erosion in the wetland	Negative Medium	Negative Low

	Soil and water pollution in the wetland	Negative High	Negative Low
	Spread and establishment of alien invasive species in the wetland	Negative Medium	Negative Low
Visual Impact Assessment	Visual impact of construction activities on sensitive visual receptors in close proximity to the Springbok SPP.	Negative Medium	Negative Low
Agricultural and Soils Compliance Statement	Loss of agricultural potential by occupation of land	Negative Low	Negative Low
	Loss of agricultural potential by soil degradation	Negative Low	Negative Low
	Dust impact	Negative Low	Negative Low
	Erosion	Negative Low	Negative Low
	Topsoil loss	Negative Low	Negative Low
Heritage Impact Assessment	Loss or damage to sites, features or objects of cultural heritage significance	Negative Medium	Negative Low
Palaeontological Impact Assessment	Disturbance, destruction or damage to fossils preserved at or below surface through surface clearance and excavations during construction phase.	Negative Low	Negative Low
Social Impact Assessment	Creation of direct and indirect employment opportunities.	Positive Low	Positive Medium
	Economic multiplier effects from the use of local goods and services.	Positive Low	Positive Medium
	Potential loss in productive farmland	Negative Medium	Negative Low

	In-migration of labourers in search of employment opportunities, and a resultant change in population, and increase in pressure on local resources and social networks, or existing services and infrastructure.	Negative Medium	Negative Low
	Temporary increase in safety and security concerns associated with the influx of people	Negative Medium	Negative Low
	Impacts on daily living and movement patterns	Negative Medium	Negative Medium
	Nuisance impacts (noise and dust)	Negative Medium	Negative Low
	Increased risk of potential veld fires	Negative Medium	Negative Low
	Impacts on the sense of place	Negative Medium	Negative Low
Traffic Impact Assessment	Increase in traffic on the Durban or Saldanha delivery routes	Negative Low	Negative Low
	Increase in traffic for commuter trips	Negative Low	Negative Low

Table 4.3: Original Rating of Impacts during operation of the proposed SPP and associated infrastructure

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING
Terrestrial Biodiversity Impact Assessment	Habitat destruction caused by clearance of vegetation.	Negative Medium	Negative Medium
	Habitat fragmentation caused by clearance of vegetation	Negative Low	Negative Low

	Increased Soil Erosion and Sedimentation	Negative Low	Negative Low
	Soil, Water and air Pollution	Negative Medium	Negative Low
	Spread and establishment of alien invasive species	Negative Low	Negative Low
	Negative effect of human activities on fauna and road mortalities	Negative Low	Negative Low
Avifauna Impact Assessment	Displacement of priority avian species from important habitats	Negative Medium	Negative Medium
	Displacement of resident avifauna through increased disturbance	Negative Medium	Negative Low
	Collisions with PV panels leading to injury or loss of avian life	Negative Medium	Negative Low
	Collision when flying into power line infrastructure	Negative High	Negative Low
	Electrocution when perched on power line infrastructure	Negative High	Negative Low
Wetland Impact Assessment	Soils compaction and increased risk of sediment transport and erosion in the wetland and exorheic depression (pan)	Negative Medium	Negative Low
	Soil and water pollution in the wetland	Negative Low	Negative Low
	Spread and establishment of alien invasive species in the wetland	Negative Medium	Negative Low
Visual Impact Assessment	Visual impact on observers travelling along the roads and residents at homesteads within a 5km radius of the SPP.	Negative Medium	Negative Low
	Visual impact on observers travelling along the roads and	Negative Low	Negative Low

	residents at homesteads within a 5-10km radius of the SPP.		
	Visual impacts of lighting at night on visual receptors in close proximity to the SPP.	Negative Medium	Negative Low
	Glint and glare on sensitive visual receptors in close proximity to the proposed facility.	Negative Low	N/A
	Visual impact on sensitive visual receptors located within a 500m radius of the proposed power line.	Negative Medium	Negative Medium
	Visual impact and impacts on sense of place	Negative Medium	Negative Low
Agricultural and Soils Compliance Statement	Enhanced agricultural potential through increased financial security for farming operations	Positive Low	Positive Low
	Erosion	Negative Low	Negative Low
	Topsoil Loss	Negative Low	Negative Low
Heritage Impact Assessment	Loss or damage to sites, features or objects of cultural heritage significance	Negative Low	Negative Low
Social Impact Assessment	Creation of employment opportunities and skills development	Positive Low	Positive Medium
	Development of non-polluting, renewable energy infrastructure	Positive Medium	Positive Medium
	Loss of agricultural land and overall productivity	Negative Medium	Negative Low
	Contribution to LED and social upliftment	Positive Medium	Positive High
	Potential impacts related to the impact on tourism.	Positive Low	Positive Low

	Visual impact and impacts on sense of place	Negative Medium	Negative Low

Table 4.4: Original Rating of Impacts during the decommissioning of the proposed SPP and associated infrastructure

SPECIALIST STUDY	IMPACT	PRE-MITIGATION RATING	POST MITIGATION RATING
Terrestrial Biodiversity Survey	An increased infestation of exotic or alien invasive plant species owing to clearance or disturbance where the footprint took place.	Negative Medium	Negative Low
	Continued loss of indigenous vegetation owing to poor recovery of vegetation.	Negative Medium	Negative Low
	Contamination of soil by leaving rubble/ waste or spilling petroleum fuels or any pollutants on soil which could infiltrate the soil during rehabilitation	Negative Medium	Negative Low
Avifauna Impact Assessment	Displacement of priority avian species from important habitats	Negative Low	Negative Low
	Displacement of resident avifauna through increased disturbance	Negative Low	Negative Low
Wetland Assessment	Soils compaction and increased risk of sediment transport and erosion in the river/riparian and exorheic depression (pan).	Negative Medium	Negative Low
	Soil and water pollution in the river/riparian and exorheic depression (pan).	Negative Medium	Negative Low

	Spread and establishment of alien invasive species in the river/riparian and exorheic depression (pan).	Negative Medium	Negative Low
Agricultural and Soils Compliance Statement	Erosion	Negative Low	Negative Low
	Topsoil	Negative Low	Negative Low
Social Impact Assessment	Loss of employment opportunities	Negative Low	Negative Low

5 NEW / REVISED MITIGATION MEASURES

This section aims to address the following requirements of the regulations:

Regulation 32(1) The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority:

(a) a report, reflecting—

(iii) measures to ensure avoidance, management and mitigation of impacts associated with such proposed change;

In addition to assessing the risks and impact of the proposed amendments to the Springbok SPP, the EAP aimed to provide measures to ensure avoidance, management and mitigation of any impacts associated with the proposed amendments and identify any changes required to the Environmental Management Programme (EMPr).

Based on the confirmation of no change to impact provided by the specialists no new mitigation measures are relevant to the project. Therefore, the mitigation measures included in the EMPr(s) are considered as sufficient and appropriate for the mitigation and management of impacts to acceptable levels considering the proposed amendments.

It must be noted that the EMPr of the SPP (Appendix E) has been updated to include the amended facility layout (requested to be approved), the specific conditions of the EA and the recommendations from the Biodiversity Walk-through Report (Appendix E1). This EMPr has been made available to the DFFE and registered I&APs as part of the 30-day review and comment period of the draft Motivation Report for the Part 2 Amendment process.

6 ADVANTAGES AND DISADVANTAGES ASSOCIATED WITH THE PROPOSED AMENDMENTS

This section aims to address the following requirements of the regulations:

> **Regulation 32**(1) The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority:
>
> (a) a report, reflecting—
>
> (ii) advantages and disadvantages associated with the proposed change;

Table 6.1 below weighs up the advantages and disadvantages that are expected with the proposed amendments.

Table 6.1: Advantages and disadvantages associated with the proposed amendments.

Proposed Amendment	Advantages	Disadvantages
Amendment 1 Increase of the development footprint within the EIA footprint assessed	• Optimisation of the layout from a technical perspective • Enable the generation of 150MW as authorised	• Not relevant, change is proposed to be undertaken within the assessed and authorised EIA footprint
Amendment 2 Correction of Listed Activity 12 of Listing Notice 3	• Description of listed activity in the EA will be as per the EIA Regulations	• Not relevant
Amendment 3 Change of BESS details, extent and coordinates.	• Optimisation of the layout from a technical perspective • Inclusion of correct information as part of the EA which matches the proposed amended layout	• Not relevant, change is proposed to be undertaken within the assessed and authorised EIA footprint
Amendment 4 Relocation and increase in size of the Laydown Area	• Optimisation of the layout from a technical perspective • Ensure sufficient space is available for the storage requirements	• Not relevant, change is proposed to be undertaken within the assessed and authorised EIA footprint

Amendment 5 Additional laydown area	• Optimisation of construction activities to be undertaken • Ensure that equipment, materials and machinery can be stored on the far end of the site • Reduce traffic through the site from the original/proposed to be amended laydown area.	• Not relevant, change is proposed to be undertaken within the assessed and authorised EIA footprint
Amendment 6 Additional fencing to the facility layout	• Securing the PV Facility and limiting unauthorized access • Ensuring Eskom still has access to their servitude	• Not relevant, change is proposed to be undertaken within the assessed and authorised EIA footprint
Amendment 7 Approval of the Amended Facility Layout Plan	• Approval of optimised layout within the assessed and authorised EIA footprint	• Not relevant, approval of layout is for the EIA footprint assessed and authorised
Amendment 8 Approval of the Amended Facility Environmental Management Programme (EMPr)	• Approval of the amended EMPr which has been updated to include required information for the development, including the amended layout map proposed for approval	• Not relevant
Amendment 9 Amendment to the description of key infrastructure and components	• Alignment with the layout amendments proposed	• Not relevant

From the above table it is clear that limited disadvantages are associated with the amendments proposed by the Holder of the EA, with primarily advantages expected to be relevant to the amendments requested.

7 PUBLIC PARTICIPATION

The following sections provide detailed information on the public participation process to be conducted as part of the amendment process and to address the following requirements of the regulations:

> **Regulation 32**(1) The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority:
>
> (a) a report, reflecting…
>
> (iv) Which report – (aaa) had been subjected to a public participation process, which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential and registered interested and affected parties, including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority, and (bbb) reflects the incorporation of comments received, including any comments of the competent authority.

7.1 INTRODUCTION

In terms of Chapter 6 of the EIA Regulations, 2014, (as amended), a Part 2 Amendment Application requires a 30- day review and comment period in terms of the Public Participation Process (PPP). The following three categories of variables were considered when deciding the required level of public participation:

- The scale of anticipated impacts
- The sensitivity of the affected environment and the degree of controversy of the project
- The characteristics of the potentially affected parties

The EIA process conducted in 2021 examined the sensitivity of the affected environment and assessed potential environmental impacts. It was concluded that the proposed development will have a net positive impact for the area and will subsequently ensure the optimal utilization of resources. All negative environmental impacts can further be effectively mitigated through the proposed mitigation measures included in the EMPr (Appendix E).

The scale of the anticipated impacts associated with the proposed amendments is expected to be negligible. The proposed project (and its subsequent amendments) is not controversial, and the potentially affected parties generally seem to welcome the proposed development.

Since the scale of anticipated impacts is low, the low environmental sensitivity of the site and the fact that no conflict is foreseen between potentially affected parties, no additional public participation mechanisms were considered. The following steps have been and will be taken as part of the public participation process for the amendment process:

- Newspaper advertisement:

  Since the proposed development is unlikely to result in any impacts that extend beyond the municipal area where it is located, it was deemed sufficient to advertise in a local newspaper. An advertisement has been placed in English in the local newspaper (Vista) on 09 March 2023 to notify the public of the EIA process and requesting Interested and Affected Parties (I&APs) to register with and submit their comments to Environamics Environmental Consultants. I&APs. Refer to Appendix B2 for proof of placement.

- Site notice:

  Site notice was placed on site on 14 March 2023 in English, Afrikaans and Sesotho to inform surrounding communities and immediately adjacent landowners of the Part 2 Amendment Process. I&APs were given the opportunity to raise comments by 11 April 2023. Proof of the placement is included in Appendix B3.

- Direct notification of potential and registered I&APs:

  Identified and registered I&APs, including key stakeholders representing various sectors and affected and surrounding landowners, have been directly informed of the proposed amendment via registered post, telephone calls, WhatsApps and emails (whichever is relevant). A link to access the draft motivational report has been made available as part of the notification. I&APs will be requested to submit written comments on the draft report within 30-days of the notification of availability of the report. For a complete list of I&APs with their contact details see Appendix B1 to this report. Proof of correspondence is included in Appendix B4.

- Submission of Draft Motivational Report:

  A Draft Motivational Report has been submitted electronically to the DFFE on 27 March 2023 for comments. The EAP declaration was included as part of the application for amendment.

- Circulation of the Draft Motivational Report:

  As mentioned above, copies of the draft motivational report have been provided to all I&APs via Dropbox and/or email. I&APs have been requested to provide their comments on the report within 30-days of the notification. The 30-day review and comment period is from 27 March 2023 to 02 May 2023. All issues identified during the 30-day review and comment period will be documented and compiled into a Comments and Response Report (Appendix B6) to be included as part of the Final Motivational Report.

  Hard copies may be made available for review to any interested and affected party who may not have access to the Internet or email communication, where this is requested. The availability of the report was made known through notification via email and SMS (whichever is relevant). Proof of correspondence is included in Appendix B4.

  Furthermore, a Non-technical Summary (NTS) has also been distributed to all I&APs as part of the circulation of the Draft Motivational Report. Refer to Appendix G for the NTS that has been distributed.

- Public Meeting

  A public meeting will be held during the 30-day review and comment period. The comments raised during the meeting will be recorded and considered as part of the final Motivation Report.

  Details of the public is still to be confirmed. The public will be informed of the meeting through the placement of an advert in a local newspaper. Furthermore, all registered I&APs will be invited to attend the meeting through email / WhatsApp (whichever is relevant).

- Circulation of decision and submission of appeals:

  Notice will be given to all identified and registered I&APs of the decision taken by the DFFE. The attention of all registered I&APs will also be drawn to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations. In accordance with the provisions of Regulation 4(1) of Government Notice No. 993, an appellant must submit the appeal to the appeal administrator, and a copy of the appeal to the applicant, any registered I&APs and any organ of state with interest in the matter within 20 days from the date that the notification of the decision was sent to the applicant by the competent authority.

It must be noted that proof of all public participation tasks is included as Appendix B of this draft Motivational Report.

7.2 STAKEHOLDERS AND I&APS

A comprehensive list of registered I&APs and key stakeholder was compiled and is included in Appendix B. The proofs of distribution of the draft report (i.e. email notification) will be included in the Final Motivational Report. Comments received from key stakeholders during the 30-day comment and review period will be incorporated into the Final Motivational Report, which will then be submitted to the competent authority (namely the DFFE) for decision-making.

8 CONCLUSION AND RECOMMENDATIONS

This draft Motivation Report provides an assessment of the potential risks and impacts, advantages and disadvantages associated with the proposed amendments, measures to ensure avoidance, management and mitigation of risks and impacts associated with such proposed changes and an outline of the public consultation process to be undertaken. Because the proposed amendments would be undertaken within the EIA footprint already assessed and authorised for the SPP, it was determined that the proposed amendments would not result in any additional environmental impacts or a change in the significance of the potential impacts.

The advantages and disadvantages were explored providing an indication of the potential benefits and drawbacks of the proposed amendments. From the assessment, the advantages outweigh the disadvantages mainly due to opportunity that the amendments represent to optimise the facility layout from a technical perspective.

A public participation process is being undertaken to obtain any comments from I&APs and key stakeholders on the proposed amendments. The 30-day review and comment period is from 27 March 2023 to 02 May 2023. Any comments raised and responses to these comments and concerns will be integrated into the Final Motivational Report, including the Comments and Responses Report, which will be submitted to the DFFE for decision-making on the Amendment Application.

8.1 ENVIRONMENTAL IMPACT STATEMENT

The final recommendation by the EAP considered firstly if the legal requirements for the Amendment process had been met and secondly the validity and reliability of the substance of the information contained in the draft Motivation Report. In terms of the legal requirements, it is concluded that:

- The Motivational Report complies with the requirements set out in Regulation 32.
- All key consultees have been consulted as required by the 2014 EIA Regulations.
- The recommended mitigation measures of the EIA process will be sufficient to mitigate the impacts associated with the proposed amendments to an acceptable level.

In terms of the contents and substance of the EIA report the EAP is confident that:

- All key environmental issues were identified and adequately assessed to provide the environmental authority with sufficient information to allow them to make an informed decision on the proposed amendments.

The final recommendation of the EAP is that:

The EAP is of the opinion that the significance of the environmental impacts of the proposed amendments are expected to remain the same as those already identified in the original EIA Report.

It is the opinion of the independent EAP that the proposed amendments will have a net positive impact for the area and will subsequently ensure the optimal utilisation of resources and the authorised EIA footprint. Based on the contents of the report it is proposed that the environmental authorisation be amended, subject to the implementation of the mitigation measures provided for during the EIA process.

We trust that the department find the report in order and eagerly await your comment in this regard.

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