

**PROPOSED BOUNDARY SOLAR ENERGY FACILITY, FREE STATE PROVINCE  
COMMENTS AND RESPONSES REPORT**

**COMMENTS RECEIVED DURING THE REVIEW PERIOD FOR THE REVISED FINAL SCOPING REPORT : 22 JANUARY 2014 – 3 MARCH 2014**

1. ORGANS OF STATE REQUIREMENTS .....	1
2. HERITAGE IMPACTS.....	2
1. LETTERS OF ACKNOWLEDGEMENT RECEIVED FROM ORGANS OF STATE.....	4
2. CONNECTION TO THE ESKOM GRID .....	4
3. IMPACTS TO ROADS.....	5
4. VISUAL IMPACTS .....	5
5. SOCIO-ECONOMIC IMPACTS.....	6
6. IMPACTS ON ECOLOGY .....	8
7. WATER SUPPLY AND USAGE.....	9
8. EIA AND PUBLIC PARTICIPATION PROCESS .....	9
9. IMPACTS ON CURRENT LAND USE ACTIVITIES.....	11
10. GENERAL.....	12

PROPOSED BLACKWOOD SOLAR ENERGY FACILITY COMMENTS RECEIVED DURING THE REVIEW PERIOD FOR THE REVISED FINAL SCOPING REPORT <sup>1</sup> 22 JANUARY 2014 – 3 MARCH 2014			
NO.	ISSUE	RAISED BY	RESPONSE
<b>1. ORGANS OF STATE REQUIREMENTS</b>			
1.1	<p>Please be advised that the SA National Roads Agency (SANRAL) has no objection to the proposed development subject to the following:</p> <ul style="list-style-type: none"> <li>a) The closest portion of the structure should be positioned at least 60 metres from the National Road Reserve boundary.</li> <li>b) The application must be evaluated for glint and glare parameters and motorists using the N8 must not be exposed to glint and glare as this could potentially cause a traffic safety hazard.</li> <li>c) Glint and glare mitigation measures shall be looked at prior to construction.</li> <li>d) Approval shall be obtained from SANRAL in terms of Section 48(3)(iii) and Section 44 of the SA National Roads Agency Limited and National Roads Act, Act 7 of 1998.</li> <li>e) Access roads to and from the site shall be identified and will have to be upgraded to a standard acceptable to SANRAL. Access roads must comply with Geometric standards depending on the type of vehicles and the frequency of visits to the site during and after construction.</li> <li>f) Access must be approved by SANRAL.</li> </ul>	<p>Mr Casper Landman                      Regional Manager                      Eastern Region</p> <p>South African                      National Roads                      Agency (SANRAL)</p> <p>Letter:                      5-11-2013</p>	<p>An email was sent to Mr Landman of SANRAL on 25 November 2013 in response to the point below of the letter dated 5 November 2014. The following was noted:</p> <ul style="list-style-type: none"> <li>a) All infrastructure related to the Blackwood solar facility are positioned beyond the required 60metres distance from the National Reserve boundary</li> <li>b) If the solar energy facility utilises fixed axis or tilt trackers, then these would be north facing on an axis of approximately 28 degrees. The N8 is south of the site and therefore under fixed axis or tilt trackers scenario there will be no glint and glare.</li> <li>c) Glint and glare would need to be studied should the project use single axis trackers. These would typically be mounted on a horizontal axis and track the sun from east to west. There may be concerns for people driving out of Kimberley on the N8 in the afternoons when the panels are facing west. Options available to address this concern include using mono crystalline panels as opposed to poly crystalline panels which has fewer glares.</li> <li>d) This information has been forwarded to the developer for consideration in the final design of the layout.</li> <li>e) The developer will consider SANRAL's requirements in the design of the project.</li> <li>f) This requirement has been forwarded to the developer</li> </ul> <p>A layout plan was attached to the email and SANRAL were requested to provide further input.</p>
1.2	<p>Kindly provide the Department with the layout map, foot print and locality map of the project.</p>	<p>Ms Motsei Mothibi                      Land Use Officer</p>	<p>The locality map and the layout map depicting the foot print of the project were emailed to Ms Mothibi on 24 January 2014.</p>

<sup>1</sup> Comments received after the submission of the Final Scoping Report to the DEA on 30 October 2013 are included in this Comments and Responses Report.

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		Department of Agriculture, Forestry and Fisheries  Email: 24-01-2014	
2. HERITAGE IMPACTS			
2.1	<p>The proposed development entails the construction of a 75MW photovoltaic facility and associated infrastructure on the farm Pandamsfontein in the western Free State, south east of Kimberley. The project will include photovoltaic panels and mounting structures, cabling, an on-site substation, a loop-in/loop-out power line across the site, a 20km distribution power line, access roads and fencing, as well as workshops and offices.</p> <p>In terms of archaeological heritage resources, the author notes that, based on previous experience, the study area may exhibit Stone Age archaeological resources, rock engravings, structures and graves from the nineteenth- and twentieth-centuries, and that intangible heritage values may be recoverable from current or previous inhabitants. The author recommends that a full Heritage Impact Assessment be conducted on the study area prior to any development.</p> <p>In terms of palaeontological heritage resources, the author notes that the proposed development will impact primarily on Quaternary-age Aeolian deposits, surface calcretes, dolerite outcrops, as well as older Ecca sediments of the Prince Albert Formation. The author notes that the likely impact on palaeontological heritage resources from the proposed development range from moderate to high and the author recommends that a Phase I Palaeontological Impact</p>	Mr Andrew Salomon Heritage Officer: Archaeology  South African Heritage Resources Agency (SAHRA)  Letter: 20-11-2013	Comments noted. A Heritage Impact Assessment (HIA) which will include archaeological and palaeontological heritage, will be undertaken by the heritage specialist. The findings of the HIA will be included in the draft Environmental Impact Assessment (EIA) report which will be submitted to SAHRA.

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	Assessment be conducted on the study area prior to any development.  Case Decision  The SAHRA Archaeology, Palaeontology and Meteorites Unit supports the recommendations of the authors and requires that a full Heritage Impact Assessment, that will include archaeological and palaeontological heritage, be conducted on the study area and submitted to SAHRA for comments, prior to any development.		

PROPOSED BLACKWOOD SOLAR ENERGY FACILITY COMMENTS RECEIVED DURING THE SCOPING PHASE 25 SEPTEMBER 2013 – 24 OCTOBER 2013				
No.	RAISED BY	COMMENT	RESPONDENT	RESPONSE
<b>1. LETTERS OF ACKNOWLEDGEMENT RECEIVED FROM ORGANS OF STATE</b>				
1.1	K. Maluleke  Department of Agriculture, Forestry and Fisheries  Letter: 8 August 2013	This serves as a notice of receipt and confirms that your application has been captured in our electronic AgriLand tracking and management system. It is strongly recommended that you use the on-line AgriLand application facility in future. Detail of your application as captured: Type: PROPOSED SOLAR ENERGY FACILITY Your reference number: 14/16/3/3/3/2/281 Property Description: BLACKWOOD Dated: 01 AUGUST 2013 AgriLand reference number: 2013_08_0078		Acknowledgment noted.
1.2	Mr C Landman  SANRAL  Reply Form: 13 August 2013	This property lies adjacent to the N8. SANRAL will need to provide comment on the positioning of the solar panels in relation to the road reserve and access to the facility.		The Draft Scoping Report and a layout plan has been sent to SANRAL for their review and comment.
<b>2. CONNECTION TO THE ESKOM GRID</b>				
2.1	Dewald Kirsten Manager Environmental Health  Lejweleputswa District Municipality  Focus Group Meeting: 18 September 2013	Why is a 20km power line option being investigated for the Blackwood Solar Energy Facility?	Sheila Muniongo Environmental Consultant  Savannah Environmental  Focus Group Meeting: 18 September 2013	Eskom needs to confirm whether there is sufficient capacity to accommodate the solar energy facility on the existing power line. An alternative option needs to be investigated in case there is insufficient capacity on the existing power line.
2.2	Kelehile Mothlale Municipal Manager	Does Eskom support the project?	David Peinke Engineering Manager	The Developer has met with Eskom. It the developer's understanding that there is sufficient capacity at the Boundary Substation to accommodate the solar energy facility.

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No.	RAISED BY	COMMENT	RESPONDENT	RESPONSE
	Tokologo Local Municipality  Focus Group Meeting: 18 September 2013		Ventusa Energy  Focus Group Meeting: 18 September 2013	
<b>3. IMPACTS TO ROADS</b>				
3.1	Issue raised at the public meeting held on 18 September 2013 in Kimberley.	How will the trucks access the site?	David Peinke Engineering Manager  Ventusa Energy  Public Meeting: 18 September 2013	The trucks will access the site from the N8. Existing access roads within the farm will be also used.
3.2	W Geldenhuis Neighbouring landowner  Landowners Focus Group Meeting: 19 September 2013	Where will the access points to the solar energy facility be?	Sheila Muniongo Environmental Consultant  Savannah Environmental  Landowner Focus Group Meeting: 19 September 2013	Based on the current layout the site will be accessed from the N8 via a gravel road south-west of the project site.
<b>4. VISUAL IMPACTS</b>				
4.1	Kirsten Dewald Manager Environmental Health  Lejweleputswa District	Will the solar panels reflect the sunlight? The reflection of sunlight could disturb motorists travelling on the N8.	Sheila Muniongo Environmental Consultant  Savannah Environmental	The sunlight is absorbed by the solar panels so the glare will be minimal and would not cause a disturbance.

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	Municipality  Focus Group Meeting: 18 September 2013		Focus Group Meeting: 18 September 2013	
4.2	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley.	Will the solar energy facility cause reflection or glare. This would disturb motorists and aircraft flying over the facility.	David Peinke Engineering Manager  Ventusa Energy  Public Meeting 18 September 2013	There are various technologies that could be used to minimize the glare. The bidding process requires us to obtain authorization from the South Africa Civil Aviation Authority before bidding the solar energy facility to the Department of Energy (DoE). Air traffic would not need to be rerouted as the solar energy facility would not cause a visual disturbance.
<b>5. SOCIO-ECONOMIC IMPACTS</b>				
5.1	WJ Geldenhuys Neighbouring Landowner  Reply Form: 16-09-2013	What impacts would the project have on safety and livestock theft?	Sheila Muniongo Environmental Consultant  Savannah Environmental	There would be no impact on safety as the site would be fenced off. Livestock theft would not necessarily increase as there will be security on site during the construction and operational phases of the project.
5.2	Kelehile Mthlale Municipal Manager  Tokologo Local Municipality  Focus Group Meeting: 18 September 2013	Will there be opportunities for employment for the local community on these projects?	David Peinke Engineering Manager  Ventusa Energy  Focus Group Meeting: 18 September 2013	This opportunity will exist, the extent thereof will be guided by the economic development requirements imposed by the DoE. There would typically be between 350 – 400 people employed during the peak construction phase of a project the size of Blackwood. There could be as many as 65 permanent positions available for the project's operational phase. All employment targets have to be disclosed to the DoE.  The DoE requires that the Independent Power Producer (IPP) establish a community trust as part of the project. The community trust will typically have a 2.5 – 5 % shareholding in the project;

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				however this will be determined as the project progresses. A consultant specializing in local economic development will be appointed to facilitate this process.
5.3	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley.	How many jobs will be created by the project?	David Peinke Engineering Manager  Ventusa Energy  Public Meeting 18 September 2013	There could be a maximum of 350 - 400 jobs created during the construction phase. As many as 68 permanent jobs could be created for the operational phase of the project.
5.4	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley.	Where will the construction workers reside?	David Peinke Engineering Manager  Ventusa Energy  Public Meeting 18 September 2013	It is proposed that construction workers, who will be sourced from Kimberley and other surrounding towns, will be provided with transport to the site. There is no intention to accommodate construction workers on site, if anything, only key construction management staff.
5.5	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley.	What measures would be put in place to prevent stock theft on the site and the surrounding farms?	Gabriele Wood Public Participation Consultant  Savannah Environmental  Public Meeting 18 September 2013.	These issues would be assessed in the Social Impact Assessment. There will be security onsite during the construction and operation phases.
5.6	JS Waldetz Neighbouring landowner  Landowners	Will construction workers stay on the site?	Sheila Muniongo Environmental Consultant  Savannah	Key construction management staff may reside on site, however the majority of construction workers will be brought in from Kimberley and other surrounding towns on a daily basis. There will be no accommodation for them on the site.



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	Focus Group Meeting: 19 September 2013		Environmental  Landowners Focus Group Meeting: 19 September 2013	
<b>6. IMPACTS ON ECOLOGY</b>				
6.1	Carolyn Ah Shene-Verdoorn Policy & Advocacy Manager  BirdLife  Email: 8 August 2013	<p>BirdLife South Africa would like to thank you sending us the Background Information Document for the proposed Blackwood Solar Energy Facility. Please register us as an interested and affected party.</p> <p>BirdLife South Africa supports the responsible development of renewable energy. We have therefore developed the attached guidelines to help minimise the impact on birds from solar facilities and associated infrastructure. We trust that these guidelines will prove useful in this impact assessment process.</p> <p>In particular we would like to note the close proximity to the Benfontein Private Nature Reserve Important Bird Area, as well as a number of wetland clusters. We therefore urge that care be taken to minimise the loss of important bird habitat and reduce the probability of collisions with power lines.</p>		Acknowledgement noted. BirdLife has been registered as an I&AP on the project's database. A copy of the draft Scoping Report will be submitted.
6.2	WJ Geldenhuys Neighbouring Landowner  Reply Form: 16-09-2013	What impact would the project have on eagles, vultures and other wild animals in the area? There is a very rare butterfly species in the area.	Sheila Muniongo Environmental Consultant  Savannah Environmental	The impact on birds will be assessed by an avifaunal specialist during the EIA phase. The results of this study will be included in the Draft Environmental Impact Assessment Report (EIR) which will be made available for public review in the beginning of 2014.  The flora and fauna of the site will be assessed by an ecologist. The impacts on wildlife will also be included in the Draft EIR.

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<b>7. WATER SUPPLY AND USAGE</b>				
7.1	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley.	Where will water be sourced from during the construction and operational phases of the project?	David Peinke Engineering Manager  Ventusa Energy  Public Meeting: 18 September 2013	We are aware of the water scarcity issues in the area. A hydrologist from the area will be appointed to undertake a hydro-census to understand whether sufficient underground water exists from which to extract by means of a borehole. The quantities of water required for construction and operation is low. Water can also be trucked in from urban centres such as Kimberley if necessary. In addition, the local municipality has indicated that they could possibly supply water to the project.
7.2	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley.	If boreholes are used, will water quantity be monitored?	David Peinke Engineering Manager  Ventusa Energy  Public Meeting: 18 September 2013	This will be confirmed once the hydro- census is complete and the hydrologist publishes their findings.
7.3	W Geldenhuys Neighbouring landowner  Landowners Focus Group Meeting: 19 September 2013	Where will water be sourced from?	Sheila Muniongo Environmental Consultant  Savannah Environmental  Landowners Focus Group Meeting: 19 September 2013	Not much water would be required during the construction and operational phases of the project. The developer is investigating various options including boreholes and bringing water in via trucks from urban centers such as Kimberley.
<b>8. EIA AND PUBLIC PARTICIPATION PROCESS</b>				
8.1	Kelehile Mothlale Municipal Manager	When will the EIA be completed?	Sheila Muniongo Environmental Consultant	We are aiming to complete the EIA by June 2014.

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	Tokologo Local Municipality  Focus Group Meeting: 18 September 2013		Savannah Environmental  Focus Group Meeting: 18 September 2013	
8.2	Issue raised at the public meeting held on 18 September 2013 in Kimberley.	Will the landowners who could be impacted by the 20km power line be consulted?	Gabriele Wood Public Participation and Social Consultant  Savannah Environmental  Public Meeting: 18 September 2013	All affected land owners will be notified of the EIA and a meeting will be arranged with them in due course.
8.3	Issue raised at the public meeting held on 18 September 2013 in Kimberley.	Is the 20km power line being assessed in a separate EIA?	Sheila Muniongo Environmental Consultant  Savannah Environmental  Public Meeting: 18 September 2013	The power line is being assessed in the current EIA application.

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<b>9. IMPACTS ON CURRENT LAND USE ACTIVITIES</b>				
9.1	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley.	There are game/hunting farms surrounding the site. Who would be liable for the repair of solar panels if a stray bullet had to accidentally hit the panels?	David Peinke Engineering Manager  Ventusa Energy  Public Meeting 18 September 2013	It is likely that accidental damage will be covered by the owner of the solar energy facility, however not in the case of damage resulting from the negligent use of a firearm. There should be concern that a stray bullet could strike a person walking in the veld.
9.2	JS Waldetz Neighbouring landowner  Landowners Focus Group Meeting: 19 September 2013	What impact will the solar panels have on the livestock?	Sheila Muniongo Environmental Consultant  Savannah Environmental  Landowners Focus Group Meeting: 19 September 2013	Agricultural activities will continue on the site. The solar panels will not have any impact on the health of the animals.
9.3	W Geldenhuys Neighbouring landowner  Landowners Focus Group Meeting: 19 September 2013	There are game/hunting farms surrounding the site. Who would be liable for the repair of solar panels if a stray bullet had to accidentally hit the panels?	David Peinke  Ventusa Energy	It is likely that accidental damage will be covered by the owner of the solar energy facility, however not in the case of damage resulting from the negligent use of a firearm.

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<b>10. GENERAL</b>				
10.1	WJ Geldenhuys Neighbouring Landowner  Reply Form: 16-09-2013	Where will the site be accessed from?	Sheila Muniongo Environmental Consultant  Savannah Environmental	The site will be accessed from the N8.
10.2	Kirsten Dewald Manager Environmental Health  Lejweleputswa District Municipality  Focus Group Meeting: 18 September 2013	What criteria are used to select the sites for the solar energy facilities?	Sheila Muniongo Environmental Consultant  Savannah Environmental  Focus Group Meeting: 18 September 2013	The factors in determining the suitability of the site included: i. Accessibility as the site is adjacent to the N8; ii. A 132 kV Eskom distribution line traverses the area allowing for good access to the national grid. Access to the Eskom grid is vital to the viability of the facility; iii. The farm is not commercially farmed by the current owner. Parts of the farm are rented out to other commercial farmers. A part of the farm is used to house a Cheetah and Lion breeding facility. The proposed development would not conflict with the current land use; iv. Properties to the north of the site were considered but landowners advised that a mining company has acquired the mineral prospecting rights to most of the neighbouring properties. The properties to the north east are considered more environmentally sensitive due to the large population of Camel Thorn trees.

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10.3	Issue raised at the public meeting held on 18 September 2013 in Kimberley.	What is the construction period?	David Peinke Engineering Manager  Ventusa Energy  Public Meeting 18 September 2013	The total construction period would typically be between 12 – 18 months for a large solar PV project of this nature.
10.4	Kelehile Mothlale Municipal Manager  Tokologo Local Municipality  Focus Group Meeting: 18 September 2013	What is the value of the project?	David Peinke Engineering Manager  Ventusa Energy  Focus Group Meeting: 18 September 2013	The estimated cost for a large solar energy facility such as Blackwood could be in the region of R1.5 – 2 billion, however this depends on numerous factors, some being: which Department of Energy (DoE) bidding round the project will enter, electricity tariff caps, economic development obligations, and so on.
10.5	Kelehile Mothlale Municipal Manager  Tokologo Local Municipality  Focus Group Meeting: 18 September	What is the project's lifespan?	David Peinke Engineering Manager  Ventusa Energy  Focus Group Meeting: 18 September 2013	The project's lifespan is between 20 – 30 years.

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	2013			
10.6	Lakes Chakane Technical Services Director  Tokologo Local Municipality  Focus Group Meeting: 18 September 2013	Who owns the land that the projects are to be constructed on?	David Peinke Engineering Manager  Ventusa Energy  Focus Group Meeting: 18 September 2013	The land is privately owned. The landowners will lease the property on a long-term contract basis.
10.7	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley.	What is the size of the proposed Blackwood Solar Energy Facility?	Sheila Muniongo Environmental Consultant  Savannah Environmental  Public Meeting: 18 September 2013	300 hectares will be assessed in the EIA.

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10.8	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley	How far will the solar energy facility be located from the N8.	Sheila Muniongo Environmental Consultant  Savannah Environmental  Public Meeting: 18 September 2013	The exact location of the solar energy facility will be identified during the EIA phase of the project.
10.9	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley.	What will happen once the solar energy facility has reached its lifespan?	Sheila Mungingo Environmental Consultant  Savannah Environmental  David Peinke Ventusa Energy  Public Meeting 18 September 2013	The site would need to be rehabilitated to its original state.  There is furthermore a possibility that the project owner could renew their power purchase agreement with the government for a further defined period.
10.10	Issue raised at the Public Meeting held on 18 September 2013 in Kimberley.	What would happen if the contractor operating the facility goes bankrupt? Would the area still be rehabilitated?	David Peinke Engineering Manager  Ventusa Energy  Public Meeting 18 September 2013	There will remain a legal mandate for the shareholders/ parent companies to step in and rehabilitate the area.



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10.11	JS Waldetz Neighbouring Landowner  Landowners' Focus Group Meeting: 19 September 2013	Have you identified the site for the solar energy facility?	Sheila Muniongo Environmental Consultant  Savannah Environmental  Landowners Focus Group Meeting: 19 September 2013	The solar energy facility will be located on the farm Padamsfontein 1/1593. The exact location of the facility will be determined in the EIA.
	W Geldenhuys Neighbouring Landowner  Landowners' Focus Group Meeting: 19 September 2013	Will the boundary fences be impacted by the project?	Sheila Muniongo Environmental Consultant  Savannah Environmental  Landowners Focus Group Meeting: 19 September 2013	No, the boundary fences will remain intact.
10.12	JS Waldetz Neighbouring Landowner  Landowners' Focus Group Meeting: 19 September 2013	What size will the solar energy facility be?	Sheila Muniongo Environmental Consultant  Savannah Environmental  Landowners Focus Group Meeting: 19 September 2013	The extent of the solar energy facility is a maximum of 300 hectares.