

APPENDIX L

COMMENTS AND RESPONSES REPORT

PROPOSED 75MW BEAUFORT WEST SOLAR PHOTOVOLTAIC PROJECT & POWER LINES, WESTERN CAPE

FINAL BASIC ASSESSMENT REPORT

COMMENTS & RESPONSES REPORT

June 2021



P.O. BOX 1673
SUNNINGHILL
2157

147 Bram Fischer Drive
FERNDALE
2194

Tel: 011 781 1730
Fax: 011 781 1731
Email: info@nemai.co.za

1 INTRODUCTION

Beaufort West Photovoltaic (Pty) Ltd (the Applicant) has proposed the development of the Beaufort West Photovoltaic (PV) Project in the Western Cape, with a total generation capacity of not exceeding 75MW renewable solar energy. The associated infrastructure includes access roads, overhead power lines, substation and control building(s). The Project falls within the Beaufort West Local Municipality (BWLM).

2 PREVIOUS ENVIRONMENTAL IMPACT ASSESSMENTS FOR THE PROJECT

The following is noted in terms of Environmental Impact Assessments that were previously undertaken for the Project:

- The former Department of Environmental Affairs (DEA), now known as the Department of Forestry, Fisheries and the Environment (DFFE), previously granted Environmental Authorisation for the Project on 22 February 2012 (ref. no.: 12/12/20/2286), however, the authorisation lapsed prior to the commencement of the Project.
- An Application for Environmental Authorisation (ref. no. 14/12/16/3/3/2/2034) and Draft Scoping Report were submitted to the former Department of Environment, Forestry and Fisheries (DEFF), now known as DFFE, on 12 November 2020. Thereafter, the Final Scoping Report was submitted to the DEFF on 14 December 2020, which was accepted on 4 February 2021. This Application was subsequently retracted.

3 CURRENT BASIC ASSESSMENT

A new Application for Environmental Authorisation for the Project is being made to DFFE in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA).

Nemai Consulting (Pty) Ltd was appointed by the Applicant as the Environmental Assessment Practitioner (EAP) to conduct the Basic Assessment Process contemplated in Regulation 19 and Regulation 20 of Government Notice No. R. 982 of 4 December 2014, as amended, for the proposed Project.

4 COMMENTS AND RESPONSES REPORT

This Comments and Responses Report (CRR) serves to record the comments received from authorities and Interested and Affected Parties (I&APs) as part of the public review of the following:

- The Draft Scoping Report, which was lodged for public review in November 2020 during the previous EIA process (DEFF Reference No. 14/12/16/3/3/2/2034); and
- The Draft Basic Assessment Report (BAR), which was lodged for public review 14 May until 14 June 2021 under the current Basic Assessment process.

This CRR also attempts to address these comments through responses and input provided by the Applicant, project team, EAP and environmental specialists (as relevant).

5 COMMENTS AND RESPONSES – REVIEW OF DRAFT SCOPING REPORT (PREVIOUS EIA PROCESS)

Even though a new Application was submitted to DFFE for a Basic Assessment process, the comments received on the Draft Scoping Report that was compiled as part of the previous EIA process are included in this CRR to provide updated responses to comments received on the aforementioned report based on the current Basic Assessment. The comments received on the Draft Scoping Report in the past provide an understanding of the potential concerns related to the Project and guide the current assessment that is underway.

It is noted that the responses below were updated from the responses originally provided in the CRR that was appended to the previous Scoping Report, based on the findings of the current Basic Assessment. The updated responses are provided in italics.

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE BY	RESPONSE
1.	The document doesn't want to download from the website. I will be in Karoo NP next week and want to visit the site if necessary. Can you please send a locality map. I want to establish if the project is in the buffer zone of the KNP.	M. Alant (SANParks)	Email (13-11-20)	Nemai Consulting	We tested the link by clicking on 'Draft Scoping Report' on the website and the document downloaded fine. We are sending you a copy via a bulk attachment website. You will receive a separate email with a link to download the report. Please let me know if it does not come through. <i>Locality maps were provided on 16-11-20.</i>
2.	Your Draft Scoping Report Notification with reference number 10729 – Beaufort West PV Project dated 12 November 2020 has reference. Transnet pipeline servitudes are not affected by the proposed work/installations/excavations/connections/construction/road upgrade/development/etc as depicted on your Locality and/or Project/Site Layout Plans. This wayleave authorisation is valid for thirty six (36) months from today's date – 13 November 2020.	M.T. Hadebe (Transnet)	Email (13-11-20)	Nemai Consulting	The Applicant will need to apply for all relevant wayleaves. <i>Provision is made in the BAR and Environmental Management Programme (EMPr) to manage impacts to existing infrastructure, as relevant.</i>
3.	Please contact Heritage Western Cape for comments on this development application. SAHRA does not have the jurisdiction to provide comments on development applications within the Western Cape.	N. Higgitt (SAHRA)	Email (13-11-20)	Nemai Consulting	Heritage Western Cape (HWC) are included in the database of authorities and were notified of the proposed Project.

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4.	Please note HWC will await the formal submission of the NID and provide comment thereon.	W. Dhansay (Heritage Western Cape)	Email (13-11-20)	Nemai Consulting	<i>The Notification of Intent to Develop (NID) Form was submitted to HWC.</i>
5.	Water use authorisation to be applied where necessary.	P. Ackerman (Department of Water and Sanitation)	Email (13-11-20)	Nemai Consulting	<p><i>Water requirements for construction and operation will be sourced from the two production boreholes located on the renewable energy property. The water rights for these boreholes, and associated aquifer, are registered to the BWLM for the purposes of potable water for the town of Beaufort West. Previous investigations found that the main production borehole delivers a safe yield of approximately 7,68ℓ per second, while the other production borehole delivers that of ± 4ℓ per second. The total safe yield of the aquifer is estimated at 156 660kℓ per year and has been licenced by DWS in the Municipality's name for service provision.</i></p> <p><i>The proposed Solar PV site falls within the mid-reaches of the Kuils River and the proposed power line crosses numerous drainage lines which drain into the Kuils and Gamka Rivers. The following recommendations from the Aquatic Assessment are noted in terms of the encroachment of the Project footprint into the regulated area of watercourses, which is linked to Section 21(c) (impeding or diverting the flow of water in a watercourse) and Section 21(i) (altering the bed, banks, course or characteristics of a watercourse) water uses in terms of the NWA:</i></p> <ul style="list-style-type: none"> <i>The riparian areas and 50m buffers need to be avoided by the PV site and the towers of the power line. Accordingly, the layout of the PV site was adjusted to avoid the riparian zone in the eastern part of the site. The locations of the towers will be confirmed as part of the walkdown</i>

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					<p>survey, and provision is made in the EMPr that the towers avoid the riparian areas and 50m buffers.</p> <ul style="list-style-type: none"> • The PV site needs to be located outside of the 1:100 year floodline. • It is recommended in Section 18.3 of the BAR that the 2011 Hydrological Study (Flood Management Study) must be updated and that the recommendations from this study must be implemented. A Stormwater Management Plan must also be developed for the PV Site. Thereafter, the final layout must be lodged for public review and submitted to DFFE for approval prior to construction.
6.	<p>ON RECORD NOTIFICATION – POTENTIAL AFFECTED PARTIES: KAROO GATEWAY AIRPORT AND AIFA INTERNATIONAL FLIGHT TRAINING ACADEMY.</p> <p>In referral to your correspondence and our subsequent telephonic conversation earlier today re. the investigation and proposed photovoltaic project as enclosed below, the following:</p> <p>We need to be consulted and informed due to the clear and uninterrupted airspace needed plus all CAA Regulations to be followed for the area in a radius of about 16-18km around the Karoo Gateway Airport. Please note that the airport has been developed substantially over the past 10 years and has a fully functional international flight training academy on the premises. Furthermore it is in the process of further expanding exponentially – both in activities as well as infrastructure. Subsequently also the substantial increase of Commercial and other flights is imminent.</p> <p>Please note and on record:</p> <p>We shall NOT allow or tolerate the slightest potential interference/security risk to any activities or people related to the Karoo Gateway Airport in any way whatsoever. Especially</p>	B. Heiberg (Karoo Gateway Airport)	Email (13-11-20)	Nemai Consulting	<p>The Screening Report that was compiled based on the National Web Based Environmental Screening Tool, and which was attached to the Application Form (contained in Appendix C of the previous Scoping Report), identified the proposed Solar PV Site to have a 'medium, sensitivity in terms of civil aviation as it is within 8 km of a civil aviation aerodrome. Accordingly, a Glint and Glare Assessment was undertaken as part of the Basic Assessment.</p> <p>The proximity of the proposed site to the Karoo Gateway Airport was also described in the previous Scoping Report. The Scoping Report further noted that the glint and glare from solar panels may cause a potential impact from an aviation perspective.</p> <p>As described in the previous Scoping Report, the proposed 132/22kV overhead transmission power line is to follow an existing power line corridor from the new</p>

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	<p>taking dangerous overhead transmission power lines, the glare of panels that can blind pilots and other potential interferences related to the day-to-day activities around a fully and busy functioning airport. We also do pilot training at night and the airport is 24/7 fully functional and in full usage.</p> <p>Important to note that the AIFA International Training Academy basis in Oudtshoorn in being closed by the end of November as well as the AIFA basis in George will be closed in a few months, early in 2021. ALL those aircraft and students will be based and trained in Beaufort West at the Karoo Gateway Airport which will be the HQ of the AIFA International Training Academy in Africa. The existing fleet of aircraft will be virtually tripled and training will be done 24/7 (day and night) from and to the Karoo Gateway Airport.</p> <p>Furthermore due to the upgrades over the past 10 years, including the extensive fuelling facilities, the Karoo Gateway Airport is also being used on a regular and increasing basis by huge Commercial/Business/SANPARKS/SA Airforce aircraft and helicopters/SA Emergency and Red Cross Aircraft, as well as private aircraft.</p> <p>So NO disturbances/potential threats in any way whatsoever can be allowed, also not the slightest potential danger that might arise from any of your activities in the Beaufort West vicinity and in close proximity of the Karoo Gateway Airport. The slightest potential interference and anything whatsoever that can be a threat to our day-to-day activities or to our pilots/students/air travellers or other aviation related people to this well-established and fully functional airport, will without any doubt be faced with the strongest opposition possible, especially due to potential safety risks your activities might cause to the fully functional Karoo Gateway Airport.</p> <p>Planned scheduled flights to Beaufort West is also in the pipeline whilst due to the extensive upgrades over the past few years, the Karoo Gateway Airport can also be used as a diversion airport for flights to George, Cape Town, and other smaller airports should emergencies arise.</p> <p>NB! Please add Jean Rossouw, the CEO AIFA, Mr Pikkie</p>				<p>substation to the existing Beaufort West Substation, then to the Droërivier Substation (beside the N12). This approach of following existing linear infrastructure is intended to minimise the impact of the proposed power line to the receiving environment. Also see response to row no. 15 below.</p> <p>The South African Civilian Aviation Authority (SACAA) is included in our database of I&APs and were notified of the proposed Project. <i>Applications for Approval of Obstacles for the proposed PV site and proposed power line that form part of the Project were submitted to the SACAA.</i></p> <p>The contact details of Jean Rossouw, Pikkie Siebrits and Johan Fourie were added to the database of I&APs, as requested.</p> <p><i>The Glint and Glare Impact Assessment, which is contained in the BAR, concluded the following:</i></p> <ul style="list-style-type: none"> • <i>Yellow Glare (High Risk of After Image) -</i> <ul style="list-style-type: none"> ○ <i>Due to the close distance of the PV panels to the 2-mile flight receptors, it is predicted that receptors will be exposed to solar glint and glare (yellow glare) as a result of the sun rays reflecting off the surface of the PV Panels at various times of the year when landing on Runway 17. The approach path of this runway is directly over the solar panels and glint is to be expected. The results indicate that further mitigation measures will be needed for this approach such as publishing a</i>

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	<p>Siebrits plus the AIFA Base Commander Johan Fourie as parties to ALL future correspondence please. We need to be updated on an ongoing basis re. ALL aspects of this envisaged project: jean@tfasa.co.za, pikkie@aifa.co.za and johanf@aifa.co.za</p> <p>I trust that you will understand my strong stance, firstly due to the past 10 years of extensive financial investments and work that has been done to develop and establish the Karoo Gateway as a fully functional airport. Secondly also as a flagship for the AIFA International Training Academy with huge international aviation related key role players that we can't (and certainly will not), put at risk in any way whatsoever.</p> <p>Thirdly not to underestimate the huge supportive role the Karoo Gateway Airport plays in the local community and economy which is indisputable, firm and set for a decade now. The local Beaufort West economy is boosted by tens of millions of rands each year directly due to the Karoo Gateway Airport and related activities plus extensive and sustainable job opportunities. This is going to expand drastically over the next few years due to the closure of the Oudtshoorn- and the George AIFA basis and all those students, instructors, admin- and aircraft maintenance staff, etc. moving to Beaufort West and working at the Karoo Gateway Airport, further investing additional millions of rands into the local economy and in addition creating further sustainable jobs.</p> <p>PLEASE KEEP US INFORMED AND REGISTER ALSO AIFA INTERNATIONAL FLIGHT TRAINING ACADEMY AS A DIRECT AFFECTED PARTY BY THIS PROPOSED DEVELOPMENT – ALL CORRESPONDENCE ALSO TO BE SENT TO pikkie@aifa.co.za and jean@tfasa.co.za.</p> <p>NB! KINDLY CONFIRM RECEPTION OF THIS E-MAIL – PLEASE SEND THE DRAFT SCOPING-REPORT TO THE ABOVE GENTLEMEN DIRECTLY AS WELL!</p>				<p><i>Notice to Airmen (Notam) to warn pilots of the risk at certain times of the year. It is also noted that Runway 17 is not the preferred runway as it is not tarred, and rarely gets used for extensive periods.</i></p> <ul style="list-style-type: none"> ○ <i>It was noted that some yellow glare may be a result of the PV panels reverting back to the resting angle of 0° before the sun has fully set. It is therefore recommended that the tracking panels remain at the full 60° tilt to the west for 15 minutes after the sun has set in order to mitigate the yellow glare that could impact the receptors.</i> • <i>Green Glare (Low Risk of After Image)-</i> <ul style="list-style-type: none"> ○ <i>The other approach paths to the airfield have a low risk of after image.</i> • <i>It was recommended that the Project receive authorisation from the (SACAA) from a glint and glare perspective.</i> <p><i>According to the findings of the Obstacle Evaluation Report, as contained in the BAR, the obstacles at the specified locations and elevations are clear of the Civil Aviation Organization (ICAO) Annex 14 Obstacle Limitation Surfaces (OLS).</i></p>
				Aviata Consulting	<p><i>The Solar PV plant has no impact on any airspace.</i></p> <p><i>The ANNEX 14 assessment conducted by Aviata confirms that there is no infringement of any Obstacle surfaces by</i></p>

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					<p><i>the pylons of the power lines.</i></p> <p><i>The Glint and Glare report confirms that there is no continuous glare.</i></p> <p><i>The main runway is the only one that can accommodate this statement to a certain point as it is restricted to a PCN 18 only which does not cover huge aircraft.</i></p> <p><i>The writer is to provide more details on possible schedule flights and what aircraft and from which destination. As this airport is only a VFR airport very few operators will risk operating.</i></p>
7.	Kindly put on record that all the short circuit training of the pilots is between the airport towards the Nuweveld Mountains across from the airport. As this airport is a national registered airport and has been in use since the early 1940's, also kindly note that there are extended promulgated fly areas in the space surrounding the airport.	B. Heiberg (Karoo Gateway Airport)	Email (16-11-20)	Nemai Consulting <i>Aviata Consulting</i>	Refer to the response in row no. 6 above regarding civil aviation impacts. <i>The Solar PV plant has no impact on any airspace, based on the findings of the Glint and Glare Impact Assessment as well as the Obstacle Evaluation Report.</i>
8.	Please note that this application may require a water use licence, please liaise with the relevant regional office.	W. Roets (Department of Water and Sanitation)	Email (16-11-20)	Nemai Consulting	See response in row no. 5 above regarding water uses.
9.	Please send me a KMZ file of the proposed development area and proposed grid connection. Please find attached Eskom requirements for works at or near Eskom infrastructure and servitudes, as well as a Setback Guideline for renewable developments.	J. Geeringh (Eskom Transmission Division)	Email (16-11-20)	Nemai Consulting	Spatial data was provided on 19-11-20. The Project layout and design are to adhere to the Renewable Energy Generation Plant Setbacks to Eskom Infrastructure. Refer to response in row no. 2 above with regards to managing impacts to existing infrastructure.
10.	Please note that the proposed power line cannot be between the existing two line exiting the substation, there is not enough space?	J. Geeringh (Eskom Transmission Division)	Email (19-11-20)	CVW Consulting Engineers	The electrical engineer explained that there is a spare feeder bay at the Droërvier Substation, which has been earmarked for the 132 kV power line from the Beaufort West Solar PV Plant. He further noted that

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					<p>the existing 132 kV Dysselsdorp Feeder is currently used as a 22 kV Feeder and the Feeder Bays can be swapped around.</p> <p>He indicated that there is sufficient space at the Droërvier Substation to accommodate the project.</p> <p>He also provided a map of the proposed connection point to the Droërvier Substation.</p>
11.	<p>I am in a, let us call it uncertain position.</p> <p>What do you plan at Beaufort, is that the same as the field at Touwsrivier, what is the size of your plan, Touwsrivier is 2 500m long.</p> <p>Is there a restriction for aircraft to overfly the field?</p>	P. Siebrits (AVIC International Flight Training Academy)	Email (19-11-20)	Nemai Consulting	<p>An extract from the Draft Scoping Report, which provides an overview of the proposed Project and its associated infrastructure, was provided. A locality map was also provided.</p> <p>Refer to the response in row no. 6 above regarding civil aviation impacts.</p>
12.	<p><i>Follow-on email from row no. 10 above.</i></p> <p>Thanks, I was just referring to the alignment shown on the plan I received and it was placing the new line in between the two existing lines that is currently separated by the legal separation distance.</p>	J. Geeringh (Eskom Transmission Division)	Email (23-11-20)	CVW Consulting Engineers	<p>Please find attached the Coordinated Drawing between the 132 kV Droërvier – 132 kV Hoodia overhead line and the Droërvier 132 kV Substation Layout.</p> <p>Do you have a Microstation Drawing of Droërvier 400/132/22 kV Substation?</p>
13.	Do I understand correctly that according to your drawing you want to cross the 400kV line as well the 132Kv Line between Tower 12 and 13?	A. Minnie (Eskom)	Email (19-11-20)	CVW Consulting Engineers	Drawings and photographs were provided by the electrical engineer to A. Minnie. He indicated that the distance between Tower 12 and 13 is approximately 370m, and he noted that there will be a 2 x Structure underneath the 400 kV power line.
14.	<p>Thank you for your reply 23 November 2020. I do not feel that my questions were answered and for that reason I would like to present the South African Civil Aviation Authority guidelines to you. Website attached. OBSTRUCTION NOTICE 3/2020 – SOLAR PANEL APPLICATION in particular.</p> <p>AIFA is the OPERATOR of the Airfield and clearly has a mandate to this development near Karoo Gateway Airport. Very important are the “Glint and Glare assessments” as well</p>	P. Siebrits (AVIC International Flight Training Academy)	Email (26-11-20)	Nemai Consulting	<p>Thank you for the information contained in your email. We are aware of the SACAA Guidelines. Lizell Stroh from this organisation is included in our database and was notified of the review of the Draft Scoping Report.</p> <p>Both your and Johan Fourie’s particulars were included in our database of I&APs</p>

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	<p>of the obstacle limitation 8-15 km and solar panel construction, within 3 km from the airport.</p> <p>I realise that you mentioned that your EIA, is in process, but nobody has made any contact with AIFA in this regards.</p> <p>Please take note of the new procedure as published on the SACAA website: http://www.caa.co.za/Pages/Obstacles/Urgent-notice.aspx</p> <p>Obstacle Notice 5/2020 Consent Letters from Airports All obstacle applicants must obtain permission letters from the licensed aerodrome if an obstacle is within a radius of 8 / 15 km (as applicable) from such an aerodrome. Aerodrome contacts may be obtained by clicking here... Reference is made to SA-CAR Part 139 & the following extract from ICAO Doc 9137, Part 6; ICAO Doc 9137, Part 6 (AIRPORT SERVICES MANUAL, PART 6, CONTROL OF OBSTACLES) Chapter 2 Controlling Obstacles at an Airport 2.2.4 Ultimate responsibility for limitation and control of obstacles must, in practice, rest with the airport operator. This includes the responsibility for controlling obstacles on airport property and for arranging the removal or lowering of existing obstacles outside the airport boundaries. The latter obligation can be met by negotiations leading to purchase or condemnation (where authorized) of air easements or title to the property. 2.2.5 Each airport manager should designate a member of his staff to be responsible for the continuing process of making sure that airport approach, departure and manoeuvring areas remain clear of obstacles which may jeopardize safety. The airport manager, or his designee, should work closely with government agencies at all levels, national and local, to ensure that all possible steps have been taken to prevent erection of obstacles, including providing information to zoning authorities on the location, length, orientation and elevation of runways on which obstacle limitation surfaces are based. The airport manager must maintain constant vigilance to prevent erection of obstacles around his airport and he should alert other agencies to potential problems which may arise under</p>			<p></p> <p><i>Aviata Consulting</i></p>	<p>(refer to notification email sent on 16 November 2020). We will keep you informed as the EIA process unfolds.</p> <p>Refer to the response in row no. 6 above regarding civil aviation impacts and the applications submitted to the SACAA.</p> <p><i>The Glint and Glare Impact Assessment was completed. However no Annex 14 Obstacle assessment could not be done as no WGS84 survey data could be traced. This data should have been made available by the airport authority. Also, the SA Aeronautical Information Publication on Beaufort West indicates no data available.</i></p>

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	<p>their jurisdiction order to fulfil these obligations, the airport manager should establish a programme of regular and frequent visual inspections of all areas around the airport in order to ensure that any construction activity or natural growth (i.e. trees) likely to infringe any of the obstacle limitation surfaces is discovered before it may become a problem. This inspection programme should also include a dally observation of all obstacle lights, both on and off the airport, and corrective action in the case of light failure.</p>				
15.	<p>May I please request the maps showing the proposed layout of the individual solar panels and structures on the ground opposite and near to the Karoo Gateway Airport, as referred to in the Scoping Report.</p> <p>I also require the coordinates of the overhead power line, as referred to in the Scoping Report, as well as the exact height and length of the power line.</p> <p>Also please send me all the information related to the planned main entrance to the solar panel site. Based on my understanding, their proposed N1 entrance is directly opposite our exiting N1 main entrance to the Karoo Gateway Airport.</p>	B. Heiberg (Karoo Gateway Airport)	Email (27-11-20)	Nemai Consulting	<p>The following information was provided to B. Heiberg:</p> <ul style="list-style-type: none"> • The 3 alternative layouts for the Solar PV Plant, as contained in Appendix E of the Scoping Report; • Details of the proposed power lines; and • The proposed intersection layout of the Solar PV Plant. <p><i>Refer to updated maps contained in the BAR of the PV site and power line route.</i></p> <p><i>The height of the 132kV power line will be approximately 30m and the distance of the route from the PV site to the existing Droërivier Substation (next to N12) is approximately 14.9km.</i></p> <p>The proposed power line follows an existing power line corridor, which consist of higher towers.</p> <p>Refer to the response in row no. 6 above regarding civil aviation impacts and the applications submitted to the SACAA.</p> <p><i>Access to the site is proposed via the existing farm access off the N1 (N1-8, 8.85). Refer to maps contained in the BAR.</i></p>
16.	Can you please confirm that SANRAL has been notified of the proposed development?	B. Heiberg (Karoo Gateway Airport)	Email (27-11-20)	Nemai Consulting	We confirm that the contact details of representatives from SANRAL were

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					included in our database of I&APs, and that they were notified of the review of the Draft Scoping Report.
17.	<p>Origin Town and Regional Planning (PTY) LTD act on behalf of the registered owner of the Karoo Gate Airport (KGA) in this matter. The airport is situated on, and utilises, the following properties:</p> <ul style="list-style-type: none"> • Portion 10 of the Farm 161 Kuils Port, Beaufort West; • Portion 11 of the Farm 161 Kuils Port, Beaufort West; • Portion 39 of the Farm 162 South Lemoenfontein, Beaufort West; • Portion 21 (a portion of portion 6) of the Farm 161 Kuils Port, Beaufort West; • Portion 17 (a portion of Portion 6) of the Farm 161 Kuils Port, Beaufort West. <p>We have been appointed to assess the available documentation pertaining to the Environmental Impact Assessment (EIA) process and to protect our clients' interests in context of the intended development of the photovoltaic project on the above-mentioned properties (herein after referred to as the subject properties).</p> <p>Suffice to state that the KGA is situated adjacent to the subject properties on which the proposed photovoltaic project is proposed to be developed. The proposed development would result in adverse negative impacts on our client's property and the operations of the airport, due to undesired impacts that could negatively affect safety of users of the airport and, thereby, place human lives at risk.</p> <p>We hold the opinion that certain crucial elements may have been overlooked at this early stage of the EIA process, which poses the risk that these matters may not be assessed by the appointed consultants and may also not be evaluated by the responsible authorities due to the structure and the dynamics of the EIA process. Matters that are not identified during the early stages of an EIA process are typically not further assessed by the EIAP and are not considered by the authorities, during later stages of the process.</p>	G Makkink (Origin Town and Regional Planning)	Letter (04-12-20)	Nemai Consulting	<p>Refer to the response in row no. 6 above regarding civil aviation impacts and the applications submitted to the SACAA.</p> <p>As noted in the previous Scoping Report, an Environmental Authorisation was previously granted for the Project on 22 February 2012 (DEA reference number: 12/12/20/2286). However, the Environmental Authorisation lapsed prior to the commencement of the Project. The following is noted in the previous EIA Report (dated 16 January 2012) in terms of the comments received:</p> <ul style="list-style-type: none"> • The SACAA were registered as an I&AP in the previous environmental process, and did not raise any objection to the proposed PV Park; and • DELplan Urban & Regional Planning were previously appointed to undertake the planning application for a consent use on Agricultural land for the purposes of the proposed Solar PV Park. A copy of the Planning Report is available on request. <p>In a letter dated 27 February 2012 from the BWLM it is stated that the "...Municipality identified tracts of unused and fallow agricultural land within its boundaries as being suitable for renewable energy projects". Kalabash Holdings (Pty) Ltd, trading as E4SA, signed a lease agreement in 2009 with the Beaufort West Local Municipality (BWLM) who is the landowner, to develop a renewable energy project (i.e. solar/wind energy) on the</p>

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	<p>It should be noted that our client has an established interest in Beaufort West, in the form of the existing KGA which facility enjoys support from municipal, provincial and even national government levels. The existing airport benefits the larger community by way of providing much needed employment, substantial economic investment and a gateway for tourists and visitors to the Beaufort West and surrounds. The facility is also regularly used by government institutions such as the Airforce and Emergency Services, as well as humanitarian organizations such as the Red Cross, whilst numerous private and business aircraft make use of the KGA to fuel on their way to Cape Town or George.</p> <p>In context of the above we therefore deem it important and appropriate to place certain interests of our client (and evident impacts of the proposed development on our client's interests) on record to ensure that these matters are properly assessed and considered. It may well prove that some of these matters could indicate towards fatal flaws in context of the intended development, should appropriate mitigation prove to be impossible, or should a better alternative be available.</p> <p>The following sections deal with the anticipated negative impacts of the proposed development on our client's property and interests.</p> <p>2. Anticipated Negative Impacts</p> <p>The anticipated negative impact of the proposed photovoltaic project on the KGA could be summarized as follows.</p> <p>2.1 Safety risk to Airport Users</p> <p>In addition to normal airport users, such as aircraft owners and charters, the airport is also used by the AIFA International Training Academy, which academy has until recently operated from three airports in close proximity, being KGA, George International Airport and Oudtshoorn Airport.</p> <p>The academy (AIFA) currently has 19 aircraft at KGA but has recently decided to relocate the other branches (George and Oudtshoorn) to KGA, implying that KGA could soon double the</p>			<p><i>Aviata Consulting</i></p>	<p>target properties. This agreement came in response to the 'Request for Proposal' launched by the Municipality in February 2009, which was unanimously considered by the Council to be the most appropriate land use for the needs of Beaufort West. The Municipality has since provided approval for the proposed PV Park.</p> <p><i>Section 7 in the BAR explains the need (time) for and desirability (place) of the proposed development.</i></p> <p>The Project Proponent will need to apply for all the other consents related to the proposed development, including a Planning Application to the municipality.</p> <p>The SACAA is included in our database of I&APs and were notified of the proposed Project.</p> <p>With reference to the suggested alternative site on Portion 4 of the farm Hans Rivier 169, kindly note that based on DEFF's SA Renewable Energy EIA Application (REEA) Database, an application has already been made on this piece of land (refer to Section 6.7 in the Scoping Report).</p> <p><i>The writer is to provide a list of all the negative impacts envisaged. The Glint and Glare report could not establish any negative risks or impacts.</i></p> <p><i>The SACAA will determine if there are any safety issues at stake.</i></p> <p><i>There should be no distractions, as there will be a warning published in the SAAIP to mitigate this concern. In actual fact Runway 17 will be the only one effected directly.</i></p>

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	<p>number of aircraft that it currently has. This implies that the airport (which is already regarded as a busy airport that is being operated on a 24/7 basis) would be even busier in near future (Oudtshoorn has already relocated), particularly in context of pilot training.</p> <p>The location of the proposed photovoltaic project, directly north of, and adjacent to, the airport would have obvious impacts on the operations of the academy as well as potential life- threatening impacts on the lives of pilots and trainees, due to impacts associated with glint and glare.</p> <p>The circuit that has been used by the academy for many years is situated directly above the proposed site, between the airport and the Nuweveld Mountains. The glint and glare factor would be hugely distracting to pilots and may lead to serious and fatal accidents.</p> <p>In addition, the solar plant could negatively affect communication and surveillance equipment which could result if further fatal situations. In absence of a glint and glare study by a credible specialist (where e.g., the CSSR is recommended, and which is a legislative requirement for solar farm applications in context of aviation policies of the Civil Aviation Authority) this particular impact remains unmeasured and neglected in context of current submissions. Seeing that the KGA is an existing facility that has been in existence since the 1940's and given the seriousness of this impact, it is evident that the interests of the airport should enjoy priority.</p> <p>The additional overhead power line infrastructure which is required to link the solar farm with the existing substations (which are situated 3,5 kilometers and 13,5 kilometers away from the solar farm) poses further risk from an aviation safety perspective. It is noted that the proposed new power line would run parallel to an existing power line for most of the route, but the cumulative impact of these power lines cannot be ignored and have not been addressed in current submissions. Furthermore, and especially in the light of the KGA being 24/7 functional and being used for day- as well as night landings/departures.</p>				<p><i>There are no impacts to communication. There are not surveillance installations in the Beaufort West area, thus this becomes irrelevant.</i></p>

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	<p>In context of the development/construction phase of the development, the dust emanating from the construction/ground works could have further negative impacts on the operations of the airport from an aviation perspective.</p> <p>While the proposed solar panels would not face the primary landing strip directly (as the panels would be oriented to the north) it would profoundly affect the circuits that are currently flown by trainee pilots, instructors and general users waiting for the landing call form the air traffic control tower.</p> <p>In the event that certain adjustments could be made to address this impact it would still pose a safety risk during maintenance periods when solar panels are being worked on or replaced. Panels would, during this period (which could happen very often due to the size of the proposed facility) be held at different angels, which would affect the glint and glare factor.</p> <p>This impact on safety, and the associated risk to human life alone, poses the question why alternative sites were not considered for purposes of the intended development. The draft scoping report is silent on the rationale that has been adopted from a location perspective. From a spatial planning perspective, it raises concern that alternative sites were not considered, particularly in light of the seriousness of the potential impact of safety of pilots and trainees, as well as other aircraft making use of the KGA on a regular basis.</p> <p>We could not find any information on site selection that could have been used to determine the preferred alternative from a location perspective. It would appear as if the only reason why the subject property has been selected is due to the fact that the applicant has an existing lease agreement with the municipality. The sequence of events is placed under suspicion when considered that the applicant has entered into a lease agreement before even knowing that the subject property would be the preferred alternative from an environmental perspective. It would have made more sense if several sites were investigated to determine the preferred alternative (seeing that the municipality owns numerous land portions around Beaufort West). It would not be sensible to</p>				

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	<p>merely provide an existing lease agreement as the reason for site selection.</p> <p>When considered that the subject property is not situated in close proximity to the existing substations to which it would be linked, it raises further questions regarding the suitability of the subject property for purposes of the intended development. The municipality owns properties much closer to the existing substations, and further away from the built environment and the airport, which sites would be much more appropriate for purposes of the intended development. Development of the photovoltaic plant on these properties would require less infrastructure would accordingly decrease the impact of the intended development on the local community, the airport and the environment compared to the subject properties.</p> <p>The deed slip of Portion 4 of the farm Hans Rivier 169 (which property is also owned by the municipality) is attached hereto as Annexure A. Said property measures 2557,37 hectares in extent and would be suitable for purposes of the intended development. Development of the intended photovoltaic plant on this property would require shorter power line infrastructure (compared to the subject property) which would be less intrusive on the environment and on the safety of airport users.</p> <p>We attach a locality plan for Portion 4 of the farm Hans Rivier 169 hereto (Annexure B) indicating the favorable locality of said property for purposes of the photovoltaic plant. Said property would not have any impact on aviation safety of the airport and would require less power line infrastructure, thereby reducing the installation costs and impact on the receiving environment.</p> <p>2.2 Impact on Viability of Airport</p> <p>The negative impacts associated with the introduction of a photovoltaic plant on the subject properties could affect the desirability of the airport for flight training purposes, which would have devastating impacts on the viability of the airport. The airport is a major economic contributor to Beaufort West, apart from the obvious benefits it holds from a gateway perspective. It is the only airport serving Beaufort West and</p>				

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	<p>surrounds and provides extended employment opportunities which could be jeopardized should the airport lose its attraction as a flight training facility.</p> <p>There has over the past years been an extended drive, supported by government, the district and local councils and furthermore earmarked as a Presidential Node, to enhance Tourism to the area through the gradual upgrade of the Karoo Gateway Airport. All can be placed on hold or nullified should the planned photovoltaic farm go ahead as currently intended on the adjacent land to the KGA. Enhancing Tourism to this arid area that offers so much but is in deer need of sustainable jobs, should become a key and sustainable economic driver as numerous meetings and workshops have proven over the past few years and hosted by the Karoo Gateway Airport as well as the Karoo Parliament.</p> <p>The airport has undergone upgrading worth tens of millions of Rands in the past few years (including tarring of runways and taxiways, as well as upgrading of fueling and other facilities) and such investment would also be placed at risk, should the airport be regarded as "unsafe" from an aviation perspective.</p> <p>Apart from the negative impacts on the local community and local economy, the owner of the airport also stands the chance of losing millions that have been invested in above-mentioned facilities, should the desirability of the airport be negatively affected by the proposed photovoltaic farm on its doorstep.</p> <p>The airport owner is of intention to further upgrade and expand the airport due to the popularity and desirability thereof for purposes of flight training and with both AIFA Oudtshoorn as well as George flight Academy, joining the local KGA AIFA Base. As mentioned, Tourism should be enhanced to the whole region with wide and established government support to extend the KGA facilities to enhance Tourism and with the aim of introducing future scheduled flights to the KGA. Said upgrading and expansion would create a substantial number of additional employment opportunities not only during the construction and operational phase of the development, but also afterwards and which would be of ongoing benefit to the economy and the local community. Further sustainable jobs for</p>				

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	<p>years to come will be created and have a huge and positive impact on the local community and yearly revenue poured into the local Beaufort West economy and beyond.</p> <p>2.3 Policy and Legislative Framework</p> <p>The Draft Scoping Report is silent on the zoning of the subject properties. We have requested a zoning certificate from the local municipality but have not received such as of yet. From the limited information at our disposal, it would appear as if the subject properties are zoned "Agricultural Zone I" (AZI), which zoning category only allows for Agriculture as a primary land use. Permission could be obtained from the municipality (by way of a formal town planning application process) to erect renewable energy structures on land zoned AZI.</p> <p>It would therefore appear as if the existing zoning of the property was not considered when the desirability of the property, for the intended purpose, was assessed. A further application is required to procure the desired consent and said application process includes public participation.</p> <p>We take note of the statements in the Draft Scoping Report alluding to the support for a photovoltaic plant in Beaufort West, in context of the IDP and SDF. We further take note that the subject properties have, allegedly, been earmarked for purposes of development of said plant. In context of the preceding paragraphs, it is evident that the zoning scheme provisions of the Beaufort West Municipality allows for photovoltaic plants to be developed (as a secondary use, therefore with consent) on any farm portion zone AZI, irrespective of whether said property is earmarked for such purposes in the IDP and SDF or not. Photovoltaic plants are regarded as infrastructural developments that could be supported outside of Urban Edge Areas, as long as the required consent is obtained from the municipality.</p> <p>We do not question the acknowledgement of the project in the policy documents, nor do we question the need for said facility. We do, however, question the desirability of the subject properties for this development for the reasons mentioned, and for the reason that other properties that are also owned by</p>				

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	<p>the municipality are more suitable and desirable for said purpose.</p> <p>Suffice to state that the KGA is also acknowledged in the policy documents (and enjoys support on municipal, provincial and national level) and it has the status of a fully existing operating and functional facility, which stands to be affected by an undesirable development on a property that are not favorably situated for the intended purpose.</p> <p>2.4 <u>General Comments</u></p> <p>The statement is made on Page 34 of the Draft Scoping Report that the subject properties has limited development options, may be correct. It is further stated that the land has been subjected to overgrazing and that the remainder of the property (once the photovoltaic plant is developed) would, over time recover to its former glory.</p> <p>In this regard it should be noted that the whole property would recover over time, irrespective of whether the development takes place or not. The reason why the property has limited development potential is because it is situated outside of the Urban Edge of the municipality and it is therefore not earmarked for development (similar to most other farm portions outside the Urban Edge).</p> <p>Portion 4 of the farm Hans Rivier 169 also has limited development potential for the same reason but is more desirable from a location perspective, as it would not affect any interested parties due to location.</p> <p>The statement is made on Page 34 that the location of the property favors the land use on the property, subject to mitigation. The fact that mitigation is required implies that the locality is not desirable and does not favor the land use. Some impacts could be mitigated successfully in practice (if it would not be threatening human lives), but when such mitigation is required in an attempt to de-risk potentially fatal impacts on human life, the question must be asked whether it is worth taking the chance and thereby risking human lives. The mitigation measures (so-called improved technology to reduce</p>				

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	<p>glare) may degrade over time, and it could end up in tragic and possible fatal accidents. The statement is accordingly incorrect therein that the location of the properties does not favor the intended land use (without having to try and engineer solutions for challenges that could result in fatalities).</p> <p>The statement on page 35 that the intended development would have a visual impact on certain parties (including the KGA or Beaufort West Airport as it is referred to in the statement) represents a serious underestimation of the impact of the proposed facility on human health and well-being. The impact would not only be visual, but the glint and glare factor could result in fatal aircraft accidents, which is much worse than a mere visual impact. The solar plant would also have negative impacts on communication and navigation systems, which could also be negative in context of human health and well-being. The negative impacts on the viability of the airport for flight training purposes (due to negative impacts that could be caused by the proposed development) would definitely have negative impacts on the well-being of many parties that are dependent of an income stream from the airport and its extended operations, and cause millions of Rands that could have been poured in the local economy, lost forever. Just the loss to the Oudtshoorn economy due to AIFA now moving to the KGA in Beaufort Wes, is officially estimated at R70m per year!</p> <p>The statements on Page 35 relating to opportunity cost do not consider the opportunity cost by the owner of the airport. Should the airport lose its desirability due to negative impacts, it would come at a great loss to the owner of the airport, the operators of the AIFA Flight Academy and numerous employees of these facilities.</p> <p>The specialist studies that are triggered by the initial scoping are listed on page 58 of the Draft Scoping Report. No mention is made of a Glint and Glare study, which study is a legislative requirement by CAA in context of development of solar plants in close proximity to airports. It is highly recommendable that such a study is executed by a reputable organization like the CSIR which should also be acknowledged by the CAA.</p>				

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	<p>Table 9 in the Draft Scoping Report (Page 90 thereof) list impacts associated with glint and glare as aesthetic impacts which, again, confirms these impacts are seriously underestimated by the EIAP. These impacts should sort under the "Health" category and the seriousness of these impacts, and potential threat to human lives that make use of the airport, should be properly assessed and addressed to enable the responsible authorities to properly consider the impacts. These impacts may well prove to be a fatal flaw that could result in relocation of the proposed development to a more appropriate location (as has been suggested in preceding sections).</p> <p>In context of the cumulative impacts listed on Page 91 we, again, would like to emphasize that the impact of glint and glare on the airport and its operations should be properly articulated for assessment by the responsible authorities.</p> <p>In context of the content of the conclusion on Page 100 of the Draft Scoping Report we wish to point out that CAA, being a key stake holder in context of the airport, was not appropriately consulted, and that such institution should be consulted prior to proceeding with the next steps in the process.</p> <p>We hold the opinion that the statement that no fatal flaws were identified is based on lack of proper assessment of the impacts of the proposed development on the health and well-being of users of the existing airport (in absence of proper consultation with key stakeholders and without undertaking required specialist reports), and that this calls for re-assessment. Any potential threat to human life should be regarded as a fatal flaw from a development perspective.</p>				
18.	<p>COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED BEAUFORT WEST PHOTOVOLTAIC (PV) PROJECT, WESTERN CAPE PROVINCE</p> <p>The Application for Environmental Authorisation and Draft Scoping Report (SR) dated November 2020 and received by the Department on 12 November 2020, refer.</p> <p>This letter serves to inform you that the following information must be included to the Final Scoping Report:</p>	L. Dlova (Department of Environment, Forestry and Fisheries)	Letter (05-12-20)	Nemai Consulting	Introductory section of letter. No response required.

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19.	<p>(a) Scoping Report and Application</p> <ul style="list-style-type: none"> The project title for the proposed project must be specific and that can be linked to the development activity or infrastructure as described in the project description. 			Nemai Consulting	<p>The project title reflected on the Final Scoping Report has been changed to the 'Proposed 75MW Beaufort West Photovoltaic Project, Western Cape'.</p> <p><i>The same project title has been used for the BAR.</i></p>
20.	<ul style="list-style-type: none"> Please ensure that you make use of the latest application form dated November 2020 not outdated one dated June 2020. Also required to ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms. 			Nemai Consulting	<p>When the application form was initially completed in November 2020, the latest version of the form was obtained from the Department's website.</p> <p>It is noted that the Application Form for Environmental Authorisation contained on the Department's website, as accessed on 14 December 2020, still refers to "This application form is current as of June 2020".</p> <p>At the stage of finalisation of the Scoping Report, no changes to the listed activities had been identified.</p> <p><i>The April 2021 Application Form template was used for the current Basic Assessment process. The most recent listed activities triggered by the Project have been included in the Application Form and BAR.</i></p>
21.	<p>(b) Layout & Sensitivity Maps</p> <p>Please provide a layout map which indicates the following:</p> <ul style="list-style-type: none"> The proposed Beaufort West PV with associated infrastructure; The grid infrastructure for the above PV facility, overlain by the sensitivity map; All supporting onsite infrastructure e.g. roads (existing and proposed); The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected; Buffer areas; and All "no-go" areas. 			Nemai Consulting	<p>The layout alternatives are contained in Appendix E of the previous Scoping Report. Also refer to maps contained in Section 11 of the Scoping Report, which show sensitive environmental features in relation to the portions of land targeted for the proposed development.</p> <p><i>As part of the EIA that was undertaken in 2011, which received Environmental Authorisation (ref. no.: 12/12/20/2286), Site Specific Constraints Maps were developed based on constraints identified and assessed by the various specialist studies</i></p>

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	<p>The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure.</p>				<p><i>and through input received from stakeholders. The layout for the PV Park was revised to avoid these constraints. The PV site that is currently being assessed as part of the Basic Assessment is based on the layout that was compiled during the previous EIA. As explained in Section 16 of the BAR, additional adjustments were made to the layout in accordance with the findings of the recent specialist studies.</i></p>
22.	<p>(c) Public Participation Process</p> <ul style="list-style-type: none"> • Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have Jurisdiction (Including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the Final SR. Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. • The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended. • A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as 'Noted' is not regarded as an adequate response to I&AP's comments. • The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development. 			Nemai Consulting	<p>Copies of the comments received from authorities and I&APs during the review period for the Draft Scoping Report were contained in Appendix K of the Final Scoping Report. These comments were incorporated into the CRR, which is contained in Appendix L of the Final Scoping Report.</p> <p>Refer to Appendix H of the Final Scoping Report for proof of notification of Authorities and IAPs via email.</p> <p>Copies of the Draft Scoping Report were also provided to the following parties, which include key regulatory and commentary authorities:</p> <ul style="list-style-type: none"> • DEFF; • Western Cape Department of Environmental Affairs and Development Planning (DEA&DP); • Breede-Gouritz Catchment Management Agency; • CapeNature; • SANRAL; • Central Karoo District Municipality; and • BWLM. <p>It is noted that the letter from DEFF did not contain an Annexure 1. Hence, a standard format for the CRR was used.</p>

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					<p><i>Refer to Section 17 of the BAR for an overview of the public participation process that was undertaken for the Basic Assessment.</i></p>
23.	<p>(d) <u>Specialist Assessments</u></p> <ul style="list-style-type: none"> • Specialist studies need to be of recent and must provide a detailed description of their methodology, as well as indicate the locations and descriptions of PV position, and all other associated infrastructure that they have assessed and are recommending for authorisations. • The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted. • Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice. 			Nemai Consulting	<p>These requirements listed by DEFF were included in the Terms of Reference for the specialist studies in Section 14.4.2 of the Final Scoping Report.</p> <p><i>The previous specialist studies were updated during the Basic Assessment and are contained in Section 14 of the BAR.</i></p>
24.	<p>(e) <u>Cumulative Assessment</u></p> <ul style="list-style-type: none"> • Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following: <ul style="list-style-type: none"> ○ Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land. ○ Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. ○ The cumulative impacts significance rating must also inform the need and desirability of the proposed development. ○ A cumulative impact environmental statement on 			Nemai Consulting	<p>Section 6.7 in the Scoping Report discusses other renewable energy applications within a 50 km radius of the Project, based on DEFF's SA REEA Database.</p> <p><i>The BAR assesses the potential cumulative impacts associated with similar projects within a 30km radius of the proposed development site, which takes into consideration the findings of the specialist studies.</i></p>

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	whether the proposed development must proceed.				
25.	<p>General</p> <p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: <i>"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30. days and which reflects the incorporation of comments received, including any comments of the competent authority".</i></p> <p>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p> <p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p>			Nemai Consulting	<p>The Application Form and Draft Scoping Report were submitted to DEFF on 12 November 2020. The 30-day review period ended on 14 December 2020. The Final Scoping Report was submitted to the Department before the lapsing of the 44 days.</p> <p>As a minimum, the Scoping Report aimed to satisfy the requirements stipulated in Appendix 2 of GN No. R 982 of 4 December 2014 (as amended). Table 1 in the Scoping Report presents the document's composition in terms of the aforementioned regulatory requirements.</p>
26.	You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.			Nemai Consulting	The Applicant is to comply with this legislated requirement.
27.	<p>Follow up on emails send below and answer received from you, I would like to stress the following.</p> <p>Attached also find a chart of AIFA's flight path for Approach and Landing at FABW. The circuit is to the north of the Airport regardless of landing direction, easterly or westerly. Any "glint or glare" any part of this "circuit" is totally unacceptable. I also attached photos taken of a single house's solar panel reflection, indicating the glare radiated, what will this glare be from 150 ha of solar panels?</p>	P. Siebrits (AVIC International Flight Training Academy)	Email (14-12-20)	Nemai Consulting	<p>Refer to the response in row no. 6 above regarding civil aviation impacts and the applications submitted to the SACAA.</p> <p>The following representatives from FABW are included in the database of I&APs and were notified of the review of the Draft Scoping Report:</p> <ul style="list-style-type: none"> • Jean Rossouw (CEO); • Pikkie Siebrits; and • Johan Fourie (Base Commander).

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	<p>1. I still have not received any enquiries from anybody in respect the EIA on proposed project at FABW.</p> <p>2. I also want to stress the LIMITATION as set out in SACAA documentation on any developments within the 8-15 km radius as well as the 3 km radius of any development regarding solar developments. Obstacle Notice 3/2020 and 5/2020 in particular.</p> <p>In conjunction of the above, AIFA request a complete assessment of the proposed project in the fields mentioned below:</p>			Aviata Consulting	Only a low impact could be when Runway 17 is used, which the operator needs to provide traffic figures detailing which month, days and time period during the day is this runway used.
28.	(1) A CSIR qualitative and quantitative written analysis and detailed risk assessment of potential solar photovoltaic panels/apparatus, related activities and its potential impact on all aviation related work/activities to be provided by the Developer. This report has to be done in collaboration and in consultation with CAA officials, its regulations and best practises, as well as AIFA as a directly affected party, (AIFA International Flight Academy) residing and operating at the Karoo Gateway Airport, plus officials at the AIFA Air Traffic Control Tower, Air Traffic Navigation and Communication systems, Pilots, and Airport Officials;				
29.	(2) A recent aviation glint and glare assessment for the dedicated development sites under discussion to be provided, also assessing baseline reflective conditions, tests in the field and geometric analysis. It has to be confirmed in writing due to research results, identifying and addressing potential hazards, that the PV panels will not have an adverse impact on safety, especially through the critical stage flight distraction or eye-damaging glare to pilots or airport officials within aircraft operating in the vicinity.				
30.	(3) A demonstration field test with solar panels at the proposed site in co-ordination with CAA, AIFA and the Karoo Gateway Airport Air Traffic Control Tower;				
31.	(4) A geometric analysis to determine days and times where there may be an ocular impact on all airport related activities – glint and glare study should also include glare duration, glare time, and the angles between all reflecting surfaces and the position of the sun. Potential dazzling effect to be quantified, as well as immission dose (strength and duration) and direction(s) of the glare as well as solutions to avoid and/or				

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	minimize the glare factor.				
32.	(5) High wind speed factor on panels and the securing of all structures analysis.				
33.	(6) Light pollution and heat radiation factor.				
34.	(7) Chemical contamination impact study on the very limited surface water, water resources and aquifer, associated with repetitive and ongoing cleaning of the PV panels.			Nemai Consulting	<p><i>The EMPr provides measures to manage impacts associated with the cleaning of panels during the operational phase of the Project.</i></p> <p>There are two production boreholes on the renewable energy property. The water rights for these boreholes, and associated aquifer, are registered to the BWLM for the purposes of potable water for the town of Beaufort West. Previous investigations found that the main production borehole delivers a safe yield of approximately 7,68 l per second, while the other production borehole delivers that of ± 4 l per second. The total safe yield of the aquifer is estimated at 156 660 k l per year and has been licenced by DWS in the Municipality's name for service provision.</p>
35.	(8) Technical report with suggestions on sustainable anti-reflective coatings to neutralize the glare factor as far as possible and to allow energy to be transmitted into panel and not radiated into space.			Nemai Consulting	Refer to the response in row no. 6 above regarding civil aviation impacts.
36.	(9) N1 Traffic Impact Assessment, including hazards related to heavy vehicle traffic during construction, operation and maintenance work, transportation of construction and maintenance materials and personnel, plus recommendations for two off-ramps on both sides of the N1, leading to the Solar Farm and the Karoo Gateway Airport respectively.			Nemai Consulting	<p>Key findings from the Transport Impact Assessment, which is included in the BAR, are as follows:</p> <ul style="list-style-type: none"> Access to the site is proposed via the existing farm access off the N1 (N1-8, 8.85). The required Shoulder Sight Distance (SSD) for heavy vehicles along roads with a posted speed limit of 120km/h is 300m based on the geometric design guidelines of the Department of Transport Urban Transport Guideline. The available SSD for the access point is in excess

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					<p>of 500m which is acceptable and safe for the existing posted speed limits along the N1.</p> <ul style="list-style-type: none"> The assessment concluded that the existing road network has sufficient spare capacity to accommodate the proposed Beaufort West PV Project without any road upgrades required to the existing road infrastructure. It was recommended that the proposed Project be approved from a transport impact perspective.
37.	(10) Developer to provide and guarantee safety assurance documentation regarding the FULL potential impact of the installation on all aviation and all aviation related interests at the Karoo Gateway Airport and it's immediate vicinity.			Nemai Consulting	Refer to the response in row no. 6 above regarding civil aviation impacts.
38.	Please notice the NEW PROCEDURES Published by SACAA on their WEBSITE.			Nemai Consulting	Refer to the response in row no. 6 above regarding the applications submitted to the SACAA.
39.	<p>I note that the deadline for comments is today; however, I am still waiting for comments from the Directorate: Development Management (our George office) on the DSR. The purpose of this e-mail is thus to ask for a possible one-day time extension on the DSR please. I'm not sure by what time I will receive their comments today (possibly late afternoon if not tomorrow), so I'm rather opting to ask for a time extension, if that would at all be possible.</p> <p>Noting that you will most likely only be able to submit the FSR to DEFF from 06 January 2021 onwards, would it be possible to grant me the one-day time extension please?</p>	A. La Meyer (Department of Environmental Affairs and Development Planning (DEA&DP))	Email (14-12-20)	Nemai Consulting	<p>We were intending to submit the Final Scoping Report to DEFF during the course of today (14 December 2020). We will forward your comments to the Case Officer.</p> <p>We will incorporate your comments into the Comments and Reponses Report that will be appended to the Draft BAR.</p>
40.	<p>The e-mail notification of 12 November 2020 regarding the availability of the Draft Scoping Report ("DSR") refers.</p> <p>Please find consolidated comments from various directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated November 2020 that was downloaded from website of the environmental practitioner ("EAP").</p>	A. Oosthuizen (DEA&DP)	Letter (15-12-20)	Nemai Consulting	Introductory section of letter. No response required.
41.	The Draft EIA Report must indicate that the proposed solar photovoltaic ("PV") facility will form part of the Renewable	A. La Meyer (DEA&DP Directorate:	Letter (15-12-20)	Nemai Consulting	<i>The BAR indicates that the Applicant intends to bid for the Renewable Energy</i>

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	Energy Independent Power Producer Procurement Bidding Programme, which will confirm the National Department of Environmental Affairs, Forestry and Fisheries (“DEFF”) as the competent authority for the EIA application.	Development Facilitation)			<i>Independent Power Producer Procurement Programme (REIPPPP) Bid Window 5, which was launched by the Department of Mineral Resources and Energy (DMRE) on 12 April 2021.</i>
42.	The DSR indicates that an environmental authorisation (“EA”) for the project was previously granted by the DEFF on 22 February 2012 (reference 12/12/20/2286), but that validity period of the EA lapsed prior to commencement of construction activities. Please include a copy of the EA granted on 22 February 2012 in the Draft EIA Report for information purposes.			Nemai Consulting	<i>The EA previously granted is appended to the BAR.</i>
43.	It is noted that Activity 14 of Listing Notice 1, Activity 4 of Listing Notice 2 and Activity 10 of Listing Notice 3 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) EIA Regulations, 2014 (as amended) are applicable for the proposed battery energy storage system (“BESS”). Please note that only one of these activities will be applicable, depending on the volume of dangerous goods that will be stored and handled. The Draft EIA Report must provide clarity on the anticipated volume of dangerous goods that will be stored and handled and indicate which one of the mentioned listed activities are applicable to the proposed BESS.			Nemai Consulting	<i>The BESS was excluded from the new Application.</i>
44.	The Final Scoping Report (“FSR”) and Draft EIA Report must indicate which of the sub-thresholds [(aa) – (hh)] of Activity 14 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) is/are applicable to the proposed development of infrastructure or structures with a physical footprint of 10m ² or more within a watercourse (refer to Table 5, page 13 of the DSR).			Nemai Consulting	<i>The sub-thresholds of the listed activities triggered under Listing Notice 3 by the Project were updated and are included in the Draft BAR.</i>
45.	Section 8.2 of the DSR must be updated, using the DEFF’s Guideline on Need and Desirability (first version published in terms of section 24J of the NEMA in 2014, and second version in 2017).			Nemai Consulting	<i>The BAR explains the need and desirability of the Project in accordance with the Guideline on Need and Desirability, EIA Guideline and Information Document Series (DEA&DP, 2010)</i>
46.	The Screening Tool Report dated 12 November 2020 for the proposed solar PV facility (Appendix 11 of the DSR) identified the following list of specialist assessments for inclusion in the Draft EIA Report: <ul style="list-style-type: none"> • Agricultural Impact Assessment; 			Nemai Consulting	<i>The specialist studies triggered by the nature of the proposed development and its receiving environment include the following:</i> <ul style="list-style-type: none"> • Aquatic Assessment;

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	<ul style="list-style-type: none"> • Animal Species Assessment; • Aquatic Biodiversity Impact Assessment; • Archaeological and Cultural Heritage Impact Assessment; • Avian Impact Assessment; • Civil Aviation Assessment; • Defence Assessment; • Geotechnical Assessment; • Landscape/Visual Impact Assessment; • Palaeontology Impact Assessment; • Plant Species Assessment; • RFI Assessment; • Socio-Economic Assessment; and • Terrestrial Biodiversity Impact Assessment. <p>The Plan of Study for EIA indicates that only the Agricultural, Terrestrial Ecology, Aquatic Ecology, Visual, and Heritage Impact Assessments will be undertaken during the EIA phase. It is the responsibility of the EAP to motivate the reason for not including all the above-mentioned specialist studies, including the provision of photographic evidence of the site situation. This Directorate recommends that an Avian Impact Assessment be undertaken, especially since the Screening Tool Report for the proposed solar PV facility indicated that the avian theme has a high sensitivity. Furthermore, impacts of the proposed transmission power line on avian species must be assessed by a suitably qualified avian specialist.</p>				<ul style="list-style-type: none"> • <i>Terrestrial Ecological Assessment;</i> • <i>Avifaunal Assessment;</i> • <i>Heritage Impact Assessment;</i> • <i>Desktop Palaeontological Impact Assessment;</i> • <i>Land Capability and Soil Assessment;</i> • <i>Visual Impact Assessment;</i> • <i>Transport Impact Assessment;</i> • <i>Glint and Glare Impact Assessment;</i> • <i>Obstacle Evaluation; and</i> • <i>Socio-Economic Impact Assessment.</i> <p><i>The Defence Assessment and RFI Assessment were not catered for, as these themes were found to have low sensitivity in relation to the proposed development area in the Screening Report.</i></p>
47.	<p>The Draft EIA Report must include a site layout plan that includes all the components of the proposed solar PV facility and overhead power line, superimposed on an environmental sensitivity map which indicates any sensitive/"no-go" areas, and any buffers proposed by the various specialists.</p>			Nemai Consulting	<p><i>Refer to the response in row no. 21 above regarding the layout in relation to environmental sensitivity.</i></p> <p><i>The sensitivity map is provided in the Draft BAR.</i></p>
48.	<p>The Plan of Study for EIA provided generic terms of reference ("ToR") for the proposed specialist studies. Please ensure that the ToR for the specialist studies is amended based on the Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5) (a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation ("the Protocols") promulgated in Government Notice ("GN") No. 320 of 20 March 2020, which came into</p>			Nemai Consulting	<p><i>The relevant specialist studies were undertaken in accordance with the Protocols applicable to their respective environmental themes.</i></p>

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	effect on 09 May 2020. Where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the NEMA EIA Regulations, 2014 (as amended).				
49.	This Directorate is generally supportive of renewable energy developments as it will aid the shortage of electricity supply in the Republic of South Africa. 75 Megawatt could supply electrical energy to 90 000 households that use 600kWh per month, or 0.833kW per month. This figure ignores peak electrical demands but illustrates the potential of this development to aid the shortage of electricity in the country, which may be a reasonable assumption as the other electrical power stations accommodate the peaks. Furthermore, if 58.8 million people reside in 14.7 million households (4 people per household), then this development could supply electricity to about 0.61% of households, or 360 000 people. These figures will be less, when the peak demands are considered, thus the figures discussed may be inaccurate, but the positive impact renewable energy developments, in terms of electricity supply, is substantially evident.	W. Galvaan (DEA&DP Directorate: Waste Management)	Letter (15-12-20)	Nemai Consulting	This comment is linked to the strategic motivation for the Project.
50.	Furthermore, and in consideration of the 49 586 people residing in the Beaufort West Municipality (Census 2011) as well as the growth rate of 1.36% by extrapolation, about 56 758 people would be present 10 years later, which is much less than 360 000 people. This means that the excess electrical energy could be supplied to businesses, other facilities that require electricity in the area, and the greater Western Cape electrical network. It is noted that the 75MW of electrical energy generation cannot be sustained during inclement weather. The Draft EIA Report must provide more details about the planned use of the electricity generated by the proposed solar PV facility, which would address the need for this development more specifically.			Nemai Consulting	<i>The Applicant intends to bid for the DMRE's REIPPPP. The electricity generated by the PV Park will be transferred to the national Eskom grid.</i>
51.	The proposed abstraction of groundwater for cleaning of solar PV modules is noted. The Draft EIA Report must specify what will happen to the wastewater from the cleaning process of the PV modules, and the impact from the washing process must be addressed by the relevant specialists.			Nemai Consulting	<i>The EMPr makes provision for managing wastewater that will be generated during the construction and operational phases of the Project.</i>
52.	Furthermore, it is recommended that the repair and			Nemai Consulting	<i>The EMPr makes provision for managing</i>

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	maintenance of the modules be mitigated by implementing the appropriate management measures. It should be noted that construction, assembling and maintenance of the models may lead to spills of soaps, grease, lubricants, oils, etc. It is important that this matter be addressed in the forthcoming Environmental Management Programme ("EMPr"), should the competent authority accept the FSR.				<i>these types of impacts that may be caused during the construction and operational phases of the Project.</i>
53.	The management of waste must under all circumstances be done in accordance with section 16 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) ("NEM: WA") - "general duty in respect of waste management". Furthermore, section 16(1)(d) of the NEM: WA states that "A holder of waste must, within the holder's power, take all reasonable measures to manage waste in such a manner that it does not endanger health or the environment or cause a nuisance through noise, odour or visual impacts". Any vegetation that is removed during site clearance activities may not be illegally dumped under any circumstances. Such vegetation may be chipped for reuse or be taken to a waste management facility that will process the waste prior to further reuse or disposal. The waste management hierarchy must be implemented as far as possible and the disposal of waste must be considered as a last resort.			Nemai Consulting	<i>The EMPr provides measures to manage waste that may be generated during the construction and operational phases of the Project.</i>
54.	Section 9.6.1 of the DSR states that water usage on-site, during the construction and operation phase, will be sourced from an existing on-site borehole. Considering the ongoing drought, has the possibility of utilising treated wastewater from the Beaufort West wastewater treatment works been investigated?	A. van Wyk (DEA&DP Directorate: Pollution and Chemicals Management)	Letter (15-12-20)	Nemai Consulting	The reuse of treated effluent may be explored during the final design phase.
55.	To ensure full exposure to the sun, please provide an indication of the control of plant growth during the operational phase of the project, particularly if herbicides will be used? It is noted that soil persistence, or herbicide accumulation in the soil, can be mobilised during rain events leading to stormwater contamination and negative impacts elsewhere.			Nemai Consulting	<i>The EMPr provides measures to control vegetation by using appropriate methods.</i>
56.	Care should be taken with the construction and installation of the proposed conservancy tank as any crack may lead to leakages over time, and proper and regular servicing must be scheduled to prevent possible groundwater contamination. This must be addressed in the forthcoming EMPr.			Nemai Consulting	<i>The EMPr provides measures to manage impacts associated with sanitation facilities.</i>
57.	The DSR indicates that fugitive dust emissions will be	G. Mhlarhi / P. Harmse	Letter	Nemai Consulting	<i>The EMPr makes provision for monitoring</i>

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	generated as a result of construction activities and vehicles using dirt roads during the construction phase of the proposed project. Dust generated on-site (i.e. from the construction, operational and decommissioning phases) must comply with the National Dust Control Regulations (GN No. R. 827 of 1 November 2013), promulgated in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fall, has a detrimental effect on the environment, including health. It is recommended that dust suppression/collection methods be implemented through a Dust Monitoring Programme or Fugitive Dust Control Plan, which should be included in the EMPr.	(DEA&DP Directorate: Air Quality Management)	(15-12-20)		<i>and managing dust that may be generated by the Project.</i>
58.	Noise generated on-site must comply with the Western Cape Noise Control Regulations (Provincial Notice 200/2013) of 20 June 2013. This Directorate recommends that any noise levels generated at the source of the proposed activity be controlled on-site (e.g. via a noise management programme).			Nemai Consulting	<i>The EMPr makes provision for monitoring and managing noise that may be caused by the Project.</i>
59.	Kindly quote the abovementioned reference numbers in any future communication in respect of this correspondence. Please direct any enquiries to the official/s indicated in this correspondence should you require any clarity on any of the comments provided. The Department reserves the right to revise or withdraw comments or request further information based on any information received.	A. Oosthuizen (DEA&DP)	Letter (15-12-20)	Nemai Consulting	<i>As a key authority, DEA&DP will be kept informed throughout the Basic Assessment process. A copy of the Draft BAR will also be submitted to DEA&DP for review and comments.</i>
60.	The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned draft report. Based on the information provided in the report, the majority of the intact vegetation on site is restricted to the Kuilspoortspruit drainage system, while the remaining indigenous vegetation found on the majority of the proposed PV site is in a highly disturbed state, due to past overgrazing activities and subsequent wind and water erosion. The project area does not fall within any of the threatened ecosystems but rather near two protected areas, namely the Karoo National Park and Steenbokkie Private Nature Reserve. Therefore, no fatal flaws	M. Rabothata / T. Sekonko (DEFF: Directorate: Biodiversity Conservation)	Letter (09-12-20)	Nemai Consulting	<i>The status of the vegetation in the Project area was confirmed as part of the updated Terrestrial Ecological Assessment. The power line is located 350m from the Steenbokkie Private Nature Reserve and the PV site's property boundary is 2.1km from the Karoo National Park</i>

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	<p>were identified in terms of the proposed activities and the receiving environment.</p> <p>Notwithstanding the above, the following recommendations must be considered in the final report:</p>				
61.	<ul style="list-style-type: none"> Erosion and Alien Invasive plant species Management Plan and Rehabilitation Plan must be developed and submitted as part of the final report to mitigate on habitat degradation due to erosion and alien plant invasion. 			Nemai Consulting	<p>Provision is made in the EMPr for the following (amongst others):</p> <ul style="list-style-type: none"> Rehabilitation; Management of stormwater and erosion; and Management of invasive alien plant species.
62.	<ul style="list-style-type: none"> The sensitivity Layout map overlaid with sensitivities and indicating the final footprint for the proposed area for solar PV construction must be included in the final report. The layout map must be refined and incorporate the findings of the specialist studies and avoid environmentally sensitive areas. 			Nemai Consulting	<p>Refer to the response in row no. 21 above regarding the layout in relation to environmental sensitivity.</p>
63.	<ul style="list-style-type: none"> Guideline for the review of specialist input in Environmental Impact Assessment (EIA) processes must be consulted in order to include the findings of the specialist studies in the final report. The detailed Biodiversity specialist studies must be conducted, updated and submitted in your final report. A detailed impact assessment must be conducted to evaluate all the potential impacts and suitable mitigation measures must be identified to manage the environmental impacts and be included in the final report. 			Nemai Consulting	<p>The following biodiversity specialist studies were undertaken, for which the findings are included in the BAR:</p> <ul style="list-style-type: none"> Terrestrial Ecological Assessment; Aquatic Assessment; and Avifaunal Assessment.
64.	<p>The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Revised Best Practice Guideline for Wind Energy & Avifauna for assessing and monitoring the impact of wind energy generating facilities on birds in Southern Africa.</p>			Nemai Consulting	<p>The Avifaunal Assessment took into consideration the Guidelines for Assessing and Monitoring the Impact of Solar Power Generating Facilities on Birds in Southern Africa (BirdLife South Africa, 2017).</p>
65.	<p>NB: Please note that all Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr. Seoka Lekota.</p>			Nemai Consulting	<p>Mr. Seoka Lekota is included in the database of authorities. A copy of the draft BAR will be submitted to the DFFE Directorate: Biodiversity Conservation.</p>

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66.	With reference to the application received by the Breede-Gouritz Catchment Management Agency on 14 November 2020 and after having had the opportunity to assess the application, herewith the following:	Z. Mbunquka (Breede-Gouritz Catchment Management Agency)	Letter (28-12-20)	Nemai Consulting	Introductory section of letter. No response required.
67.	It is noted on page 48 of the draft scoping report that water requirements for the construction phase is estimated to be 50 000kl, the estimated water requirements during operational phase is 10 000kl per year. It is further noted that there are two production boreholes that are registered under the Beaufort West Local Municipality. Please note that the proposed abstraction of water from the boreholes triggers section 21(a) in terms of the National Water Act (Act 36 of 1998). Please note that the Water Use Licence Application must be lodged with this office prior to abstraction of the aforementioned volumes. Please also confirm with this office if the Municipality will continue to use the boreholes for the purpose of supplying potable water.			Nemai Consulting	Based on the information contained in the previous EIA Report (Cape EAPrac, 2012), the water rights for these boreholes, and associated aquifer, are registered to the BWLM for the purposes of potable water for the town of Beaufort West. Previous investigations found that the main production borehole delivers a safe yield of approximately 7,68 l per second, while the other production borehole delivers that of \pm 4 l per second. The total safe yield of the aquifer is estimated at 156 660 k l per year and has been licenced by DWS in the Municipality's name for service provision.
68.	It is also noted on page 18 of the draft scoping report that the project may trigger section 21 (c) and (i) of the National Water Act, 1998 (Act 36 of 1998). Should it become evident that section 21 (c) and (i) water uses will be triggered, an aquatic assessment report must be conducted for this project.			Nemai Consulting	See response in row no. 5 above regarding water uses.
69.	It is stated on page 48 of the report that sanitation services will be required for construction workers in the form of chemical toilets, which will be serviced at regular intervals by the supplier. Please note that chemical toilets must be located out side of the 1: 100 year flood line. Notwithstanding the above, the responsibility rests with the applicant to identify any sources of pollution from his undertaking and to take appropriate measures to prevent any pollution of the environment. Failure to comply with the requirements of the National Water Act 1998 (Act 36 of 1998) could lead to legal action being instituted against the applicant.			Nemai Consulting	<i>The EMPr provides measures to manage impacts associated with sanitation facilities, and to control potential pollution.</i>
70.	The BGCMA reserves the right to revise initial comments and request further information based on any additional information that might be received.			Nemai Consulting	<i>The BGCMA will be kept informed as the Basic Assessment process unfolds.</i>
71.	I last had contact with you 15 December 2020, on the aspect of the PV PLANT at BEAUFORT WEST. In that correspondence I mentioned the threat that might exist from	P. Siebrits (AVIC International Flight Training Academy)	Email (16-02-21)	Nemai Consulting	Refer to the response in row no. 6 above regarding civil aviation impacts.

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	<p>“glint and glare” which might be radiated from the PV Panels.</p> <p>I received the emails below from Charlotte Cilliers, Global Green, for your information.</p> <p>As a registered AIRPORT, I want to bring under your attention that there are THREE different runways at FABW as indicated on the second attachment. The first attachment indicates the “circuits” the aircraft fly for the specific runways. Take-off’s and landings could happen in all the directions as indicated. The threat of Glint and Glare should not be debated on any runway any time of day.</p> <p>In my previous email only the Main runway 26/08 was mentioned. This runway is been used 80% of the time. Possible expansion of AIFA’s operation, in the future, necessitates the mention of the other runways at FABW.</p>				

6 COMMENTS AND RESPONSES – REVIEW OF DRAFT BASIC ASSESSMENT REPORT

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE BY	RESPONSE
72.	Your wayleave application with project reference number 10729 dated 13 May 2021 has reference. Transnet pipeline servitudes are not affected by the proposed work/installations/excavations/connections/construction/road upgrade/development/etc as depicted on your Locality and/or Project/Site Layout Plans. This wayleave authorisation is valid for thirty six (36) months from today's date – 14 May 2021.	M.T. Hadebe (Transnet)	Email (14-05-21)	Nemai Consulting	The Applicant will need to apply for all relevant wayleaves. Provision is made in the BAR and EMPr to manage impacts to existing services and infrastructure, as relevant.
73.	Please note that SAHRA does not have jurisdiction to provide comments on development applications in the Western Cape. Please contact Heritage Western Cape for comments in this regard.	N. Higgitt (SAHRA)	Email (14-05-21)	Nemai Consulting	Heritage Western Cape (HWC) are included in the database of authorities and were notified of the proposed Project. The NID was also submitted to HWC. Refer to row no. 89 below.
74.	AIFA herewith register the following members to attend any Public Meetings for the Proposed Beaufort West PV Project: 1. Mr Pikkie Siebrits (CEO) 2. Mr Johan Fourie (Base Manager – BW) 3. Mr Jaco Nel (Safety Manager)	J. Nel (AVIC International Flight Training Academy)	Email (14-05-21)	Nemai Consulting	These representatives from AIFA attended the virtual public meeting that was held on 1 June 2021.
75.	Please find attached Eskom general requirements for works at or near Eskom servitudes and infrastructure. Also find attached the Eskom setbacks guideline for consideration by the applicant. Please send me updated KMZ files of the affected property, site layout and proposed grid connection. I see this project was earlier started as an EIA by another company, please indicate what has changed or if this is now a new application?	J. Geeringh (Eskom Transmission Division)	Email (14-05-21)	Nemai Consulting	Spatial data was provided on 17 May 2021. The previous Application was retracted and a new Basic Assessment process was commenced with by the Proponent under the Beaufort West Renewable Energy Development Zone 11. The project description is the same as for the previous Application. The Project layout and design are to adhere to the Renewable Energy Generation Plant Setbacks to Eskom Infrastructure.
76.	ALL CORRESPONDENCE MUST INCLUDE AS FOLLOWS PLEASE: 1. Dr Bambie Heiberg E-mail: bambie@karoogateway.co.za 2. CEO AIFA Pikkie Siebrits: pikkie@aifa.co.za	B. Heiberg (Karoo Gateway Airport)	Email (14-05-21)	Nemai Consulting	All these parties are included in the database of I&APs and were notified of the review of the Draft Basic Assessment Report.

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE BY	RESPONSE
	3. Lizelle Stroh CAA: StrohL@caa.co.za 4. My Townplanner: Gawie Makkink: gawie@origintrp.co.za				
77.	Thank you for sending the link for the attachments. CapeNature will provide comments on or before the due date. Appendix 6 have all the specialist studies but I would like to ask, if possible, are you able to send me a link to the individual specialist reports? I would like to distribute these for internal inputs.	M. Simons (CapeNature)	Email (14-05-21)	Nemai Consulting	The separate Specialists' Reports were sent via WeTransfer on 17 May 2021.
78.	Please notify the relevant regional office of DWS.	W. Roets (Department of Water and Sanitation)	Email (14-05-21)	Nemai Consulting	The DWS' Western Cape Regional Office and the Breede-Gouritz Catchment Management Agency (BGCMA) were notified.
79.	To determine if water use authorisation is required.	P. Ackerman (Department of Water and Sanitation)	Email (14-05-21)	Nemai Consulting	<p>Water requirements for construction and operation will be sourced from the two production boreholes located on the renewable energy property. The water rights for these boreholes, and associated aquifer, are registered to the BWLM for the purposes of potable water for the town of Beaufort West. Previous investigations found that the main production borehole delivers a safe yield of approximately 7,68ℓ per second, while the other production borehole delivers that of ± 4ℓ per second. The total safe yield of the aquifer is estimated at 156 660kℓ per year and has been licenced by DWS in the Municipality's name for service provision.</p> <p>The proposed Solar PV site falls within the mid-reaches of the Kuils River and the proposed power line crosses numerous drainage lines which drain into the Kuils and Gamka Rivers. The following recommendations from the Aquatic Assessment are noted in terms of the encroachment of the Project footprint into the regulated area of watercourses, which is linked to Section 21(c) (impeding or diverting the flow of water in a watercourse) and Section 21(i) (altering the bed, banks, course or characteristics of a</p>

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					<p>watercourse) water uses in terms of the NWA:</p> <ul style="list-style-type: none"> The riparian areas and 50m buffers need to be avoided by the PV site and the towers of the power line. Accordingly, the layout of the PV site was adjusted to avoid the riparian zone in the eastern part of the site. The locations of the towers will be confirmed as part of the walkdown survey, and provision is made in the EMPr that the towers avoid the riparian areas and 50m buffers. The PV site needs to be located outside of the 1:100 year floodline. It is recommended in Section 18.3 of the BAR that the 2011 Hydrological Study (Flood Management Study) must be updated and that the recommendations from this study must be implemented. A Stormwater Management Plan must also be developed for the PV Site. Thereafter, the final layout must be lodged for public review and submitted to DFFE for approval prior to construction.
80.	<p>It appears that our Farm are adjacent to your intended project.</p> <p>Please contact us when visiting Beaufort West. We operate a 4 Star Guest house on Lemoenfontein Farm.</p>	K. Heiberg (Lemoenfontein Game Lodge)	Email (18-05-21)	Nemai Consulting	<p>Emailed response: <i>Thank you for your correspondence and completed Comment Sheet. Is there any information that we can share with you at this stage regarding the proposed project? Also, would you be interested in attending a public meeting if one is arranged? The meeting may be held on a virtual platform (e.g. MS Teams).</i></p> <p>The Visual Impact Assessment identified the Lemoenfontein Game Lodge as a Key Observation Point and assessed the visual impacts to the lodge that may be caused by the Project's technology alternatives. The study found the following:</p>

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					<ul style="list-style-type: none"> • The proposed Project will be seen within the side view of the receptor and partially screened by localised vegetation. The view of the main entrance of this historic location will not be impacted as the Project would not be visible from this vantage point. However, the general visual intrusion for Alternative 1 would be High as the PV structures are over four metres in height (2m above the surrounding vegetation). The structures would dominate the surrounding landscape which is also used for tourist related activities. • For Alternatives 2, 3 & 4, the Visual Resource Management objectives would be met without mitigation. The visual intrusion would be Low but will probably be noticeable in the distance due to the large scale of the Project and the elevated location of the receptor. The significance is Low. This is due to the localised screening and the Project being outside of the main receptor views. • For the proposed power line, the distance from receptors and the existing precedence created by the railway line infrastructure would significantly reduce the visual intrusion of this landscape modification. The power line would be visually absorbed into the existing landscape that includes the Eskom power line, thus retaining the existing character of the landscape with a low level of change to the characteristic landscape and not attracting the attention of the casual observer. The visual objectives for this landscape change would be met.

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81.	<p>We are developing three wind farms east of the R381 between Beaufort West and Loxton and also proposing to develop a +/- 120 km 132/400kV gridline from our wind farms to the Droerivier Substation.</p> <p>I have attached the alignment from where it crosses over the N1 and routed to the Droërivier SS. Please note that this alignment has been submitted as part of a Basic Assessment process and servitude rights for this routing have been secured via agreements. Please take note of our grid alignment relative to the one presented in the BA Report. If the proposed line runs parallel to ours, then appropriate spacing must be implemented which adheres to the Eskom requirements.</p> <p>Please can you send me the proposed alignment presented in the BA Report via a kmz and notify us if the alignment changes?</p>	S. Laurie (Red Cap Energy (Pty) Ltd)	Email (24-05-21)	Nemai Consulting	<p>Provided the kml file for the proposed Project on 24 May 2021.</p> <p>Section 15.28.2 of the Final BAR shows the Gridline of the Nuweveld Wind Farm in relation to the Project and notes that where these power lines run parallel with the Project's power lines for approximately 4.5km, appropriate spacing will be implemented that adheres to the Eskom's requirements. The BAR further notes that the grid connection points for the Project and the Nuweveld Wind Farm Projects are in the southern and northern areas of the Droërivier Substation, respectively</p>
82.	Indicated that he will still submit detailed comments on the Draft Basic Assessment Report. He enquired whether any alternative properties had been considered for the proposed development that may be more suitable and closer to the Droërivier Substation, which will reduce cumulative impacts. He further noted that the municipality owns many other properties in the Beaufort West area.	G Makkink (Origin Town and Regional Planning)	Public Meeting (01-06-21)	Nemai Consulting	D. Henning stated that no site alternatives were considered during the Basic Assessment. He explained that the Beaufort West Local Municipality, who is the landowner, had entered into a lease agreement with the Project Proponent for a renewable energy project to be developed on the target properties. He also indicated that according to the SA Renewable Energy EIA Application (REEA) Database, an application has already been made by another proponent for the piece of land that was previously pointed out by G. Makkink as a potential alternative site.
83.	Stated that the Project would pose significant glint and glare risks to the Karoo Gateway Airport, and he raised a concern with regards to the associated mitigation measures that were reliant on operational requirements.	G Makkink (Origin Town and Regional Planning)	Public Meeting (01-06-21)	Nemai Consulting	<p><i>Response included following public meeting: The Glint and Glare Impact Assessment, which is contained in Appendix E10 of the BAR, concluded the following:</i></p> <ul style="list-style-type: none"> • <i>Yellow Glare (High Risk of After Image) -</i> <ul style="list-style-type: none"> ○ <i>Due to the close distance of the PV panels to the 2-mile flight</i>

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					<p><i>receptors, it is predicted that receptors will be exposed to solar glint and glare (yellow glare) as a result of the sun rays reflecting off the surface of the PV Panels at various times of the year when landing on Runway 17. The approach path of this runway is directly over the solar panels and glint is to be expected. The results indicate that further mitigation measures will be needed for this approach such as publishing a Notice to Airmen (Notam) to warn pilots of the risk at certain times of the year. It is also noted that Runway 17 is not the preferred runway as it is not tarred, and rarely gets used for extensive periods.</i></p> <ul style="list-style-type: none"> ○ <i>It was noted that some yellow glare may be a result of the PV panels reverting back to the resting angle of 0° before the sun has fully set. It is therefore recommended that the tracking panels remain at the full 60° tilt to the west for 15 minutes after the sun has set in order to mitigate the yellow glare that could impact the receptors.</i> • <i>Green Glare (Low Risk of After Image)-</i> <ul style="list-style-type: none"> ○ <i>The other approach paths to the airfield have a low risk of after image.</i> • <i>It was recommended that the Project receive authorisation from the SACAA from a glint and glare perspective.</i>
84.	Expressed AIFA's concerns with regards to the Project's glint and glare risks to flight safety. He pointed out that any glare	J. Fourie (AVIC International Flight	Public Meeting	SkyPower	N. Seifkar explained solar PV technology. He indicated that the solar panels are not

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	<p>would be unacceptable, as it could cause a fatality. He further stated that FP 17 is directly over the proposed PV site. He noted that take-offs are critical times in terms of potential engine failure for aircrafts and if this should happen then the aircrafts using FP 17 will need to land at the PV site. He asked whether the PV structures were collapsible should such an emergency landing be necessary, and he also asked whether an area could be kept clear on the PV site that may be used as a recovery strip.</p> <p>Indicated that it needs to be understood how glare will influence the airport's operations, and how the students will be able to handle the glare. He asked whether a test panel could be erected to monitor the impacts in this regard.</p>	Training Academy)	(01-06-21)		<p>reflective and that they are also covered with an anti-reflective coating. He mentioned that the preferred option for the PV plant is to use single axis trackers that track the sun east to west, and thus always face the sun to maximise iridescence. He indicated that malfunctions are unlikely.</p> <p>G. Mauro mentioned that it will be difficult to maintain an open strip at the PV site, due to the configuration of the facility.</p> <p>B. Fortin stated that SkyPower has considerable experience with solar plants at airports. He mentioned the solar plant at the Thunder Bay International Airport as an example.</p>
				Aviata Consulting	<i>Response included following public meeting: There is no way glint and glare will adversely affect take-offs as aircrafts are in a nose up situation and pilots will not see the ground straight ahead.</i>
85.	Emphasised that the PV plant must be based on the newest technology and that the risk of glare to the airport must be reduced to zero.	P. Siebrits (AVIC International Flight Training Academy)	Public Meeting (01-06-21)	Nemai Consulting	<i>Response included following public meeting: Refer to the responses in rows no. 6 and 83 above regarding potential glint and glare impacts.</i>
86.	Cautioned against using examples of PV plants at international airports, as the pilots fly using instruments as opposed to the Karoo Gateway Airport, where the training students use visual cues for flying. He also noted that the Thunder Bay International Airport is located in the northern hemisphere, which influences the positioning of the solar panels.	G. Makkink (Origin Town and Regional Planning)	Public Meeting (01-06-21)	Nemai Consulting	<i>Response included following public meeting: The Glint and Glare Impact Assessment contained in the BAR is specifically for the proposed Beaufort West PV Project.</i>
87.	Noted that a PV plant is also located at the George Airport, however, these panels fall outside of the airport's transitional zone, whereas one of the flight paths at the Karoo Gateway Airport goes directly over the proposed PV site.	J. Nel (AVIC International Flight Training Academy)	Public Meeting (01-06-21)	Nemai Consulting	<i>Response included following public meeting: Refer to the responses in rows no. 6 and 83 above regarding potential glint and glare impacts.</i>
88.	Asked whether the process to rezone the land had commenced.	G. Makkink (Origin Town and Regional Planning)	Public Meeting (01-06-21)	Nemai Consulting	<i>Response included following public meeting: A separate process to seek land use consents for the Project will be undertaken by the Applicant.</i>
89.	NOTIFICATION OF INTENT TO DEVELOP PROPOSED	S. Barnardt	Letter	Nemai Consulting	A Heritage Impact Assessment (HIA) was

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	<p>DEVELOPMENT OF A RENEWABLE ENERGY PROJECT ON PTN 9 (RE) FARM KUILS POORT 161, PTN 0 (RE) FARM SOUTH LEMOENFONTEIN 162, PTN 1(RE) FARM BULS KOP 163, BEAUFORT WEST, SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999) CASE NUMBER: 21050410SB0511E</p> <p>The matter above has reference.</p> <p>Heritage Western Cape is in receipt of your application for the above matter received. This matter was discussed at the Heritage Officers Meeting held on 24 May 2021.</p> <p>You are hereby notified that, since there is reason to believe that the proposed development of a renewable energy project on Ptn 9 (RE) Farm Kuils Poort 161, Ptn 0 (RE) Farm South Lemoenfontein 162, Ptn 1(RE) Farm Buls Kop 163, Beaufort West will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA be submitted. Section 38(3) of the NHRA provides</p> <p>(3) The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection (2)(a): Provided that the following must be included:</p> <p>(a) The identification and mapping of all heritage resources in the area affected;</p> <p>(b) an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7;</p> <p>(c) an assessment of the impact of the development on such heritage resources;</p> <p>(d) an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;</p> <p>(e) the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;</p> <p>(f) if heritage resources will be adversely affected by the proposed development,</p> <p>The consideration of alternatives; and</p>	(Heritage Western Cape)	(01-06-21)		<p>undertaken for the Project by ACO Associates. The study included the following:</p> <ul style="list-style-type: none"> • Reviews of the results of the 2011 archaeological (including fieldwork undertaken at the time), palaeontological and visual assessments of the site; • A desktop review of recent project reports and scientific literature from the vicinity of the proposed PV facility to update the previous HIA and inform the assessment of the potential for archaeological, cultural and historic sites on the proposed PV facility site; and • A new desktop Palaeontological Impact Assessment (PIA). <p>The results were integrated in the HIA Report along with:</p> <ul style="list-style-type: none"> • An assessment of the sensitivity and significance (grading) of any identified heritage resources within the proposed PV facility site; • An evaluation of the potential impacts on heritage resources and on the cultural landscape of the proposed Project; • A comment on the socio-economic benefits on the development; and • Recommendations for measures to mitigate any negative impacts of the proposed PV facility on heritage resources. <p>This HIA was submitted to HWC on 25 May 2021.</p> <p>Comments received from I&APs on the Draft BAR are contained in this Comments</p>

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	<p>(g) plans for mitigation of any adverse effects during and after the completion of the proposed development. (Our emphasis) This HIA must in addition have specific reference to the following: - Archaeological Impact Assessment - Palaeontological impact assessment</p> <p>The HIA must have an overall assessment of the impacts to heritage resources which are not limited to the specific studies referenced above.</p> <p>The required HIA must have an integrated set of recommendations.</p> <p>The comments of relevant registered conservation bodies; all Interested and Affected parties; and the relevant Municipality must be requested and included in the HIA where provided. Proof of these requests must be supplied.</p> <p>Please note, should you require the HIA to be submitted as a Phased HIA, a written request must be submitted to HWC prior to submission. HWC reserves the right to determine whether a phased HIA is acceptable on a case-by-case basis.</p> <p>If applicable, applicants are strongly advised to review and adhere to the time limits contained the Standard Operational Procedure (SOP) between DEADP and HWC. The SOP can be found using the following link http://www.hwc.org.za/node/293.</p> <p>Kindly take note of the HWC meeting dates and associated agenda closure date in order to ensure that comments are provided within as Reasonable time and that these times are factored into the project timeframes.</p> <p>HWC reserves the right to request additional information as required.</p> <p>Should you have any further queries, please contact the official above and quote the case number.</p>				and Reponses Report.

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90.	<p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED 75MW BEAUFORT WEST PHOTOVOLTAIC (PV) PROJECT, WESTERN CAPE PROVINCE</p> <p>The Draft Basic Assessment Report (BAR) dated May 2021 and received by this Department on 13 May 2021, refer.</p> <p>This letter serves to inform you that the following information must be included to the final BAR:</p>	M. Myambo (Department of Forestry, Fisheries and the Environment)	Letter (10-06-21)	Nemai Consulting	The Final BAR was updated to include the information requested by DFFE, where relevant, and in accordance with the responses to follow.
91.	<p>(a) <u>Listed Activities</u></p> <ul style="list-style-type: none"> • Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed. • If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms. 			Nemai Consulting	The Application Form was amended based on the comments received from DFFE and DEA&DP on the Draft BAR, and a review of the listed activities and updated technical information. The amended Application Form is contained in Appendix B of the Final BAR.
92.	<p>(b) <u>Layout & Sensitivity Maps</u></p> <p>Please provide a layout map which indicates the following:</p> <ul style="list-style-type: none"> • The proposed Beaufort West PV with associated infrastructure for the development; • The proposed grid infrastructure of the above PV facility, overlain by the sensitivity map; • All supporting onsite infrastructure e.g. roads (existing and proposed); • The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected; • Buffer areas; and, all "no-go" areas. • The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments and existing grid infrastructure (if any). • Google maps will not be accepted. 			Nemai Consulting	<p>Sensitivity maps are provided in Section 18.2 of the Final BAR, which show the Project layout in relation to sensitive areas (including watercourses and riparian zones, terrestrial ecological habitats and archaeological occurrences, as determined by the relevant specialist studies). The layout of the PV site was adjusted to avoid the riparian zone in the eastern part of the site and the associated 50m buffer area.</p> <p>According to the REEA Database, other renewable energy applications have been made for properties that are located approximately 9km to south and approximately 12km to the north-east of the Project's PV site.</p>

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					Figure 90 in the Final BAR shows renewable energy applications within a 30km radius of the Project, as well as the existing transmission network.
93.	<p>(c) <u>Alternatives</u></p> <p>Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content:</p> <p>(a) details of all the alternatives considered;</p> <p>(b) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</p> <p>(c) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;</p> <p>(d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> <p>(e) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts—</p> <p>(f) (aa) can be reversed;</p> <p>(g) (bb) may cause irreplaceable loss of resources; and</p> <p>(h) (cc) can be avoided, managed or mitigated;</p> <p>(i) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;</p> <p>(j) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> <p>(k) the possible mitigation measures that could be applied and level of residual risk;</p> <p>(l) the outcome of the site selection matrix;</p> <p>(m) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering</p>			Nemai Consulting	<p>There were no site alternatives considered. The BWLM, who is the landowner, previously entered into a lease agreement with the Project Proponent for a renewable energy project to be developed on the target properties.</p> <p>The PV site that was assessed as part of the Basic Assessment is based on the layout that was compiled during the previous EIA that was undertaken in 2011, which received Environmental Authorisation (ref. no.: 12/12/20/2286). This layout was adjusted during the previous EIA to avoid the site-specific constraints and sensitive features. In addition, the recent Aquatic Assessment recommended that the layout be adjusted to avoid the riparian zone and its associated 50m buffer area in the eastern part of the PV site.</p> <p>Technical options were the only alternatives considered. As explained in Section 16.2.2 of the BAR, the option consisting of single axis trackers, bifacial mono-crystalline modules and string inverters was identified as the preferred alternative from a technical perspective, based on the reasons provided in the BAR.</p> <p>Refer to the following sections in the Final BAR for the information requested pertaining to alternatives:</p> <p>(a) Details of alternatives considered – See Sections 6 and 16 of the Final BAR.</p>

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	<p>such; and (n) a concluding statement indicating the preferred alternatives, including preferred location of the activity. Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.</p>				<p>(b) Details of public participation process – See Section 17 of the Final BAR. Copies of comments received on the Draft BAR are contained in Appendix I of the Final BAR.</p> <p>(c) Summary of issues raised by I&APs – An I&AP suggested that an alternative site on Portion 4 of the farm Hans Rivier 169 be considered, however, based on the REEA Database, an application has already been made on this piece of land (refer to Section 9.8 of the Final BAR). The Proponent has also secured a 99-year lease with the BWLM for renewable energy development on the property.</p> <p>(d) Environmental attributes associated with the alternatives – Section 13 of the Final BAR provides a description of the status quo of the receiving environment. The Specialist Studies (refer to Section 14 of the Final BAR) further explain the implications of the Project in terms of specific environmental features.</p> <p>(e) Impacts and risks identified for each alternative – Section 15 of the Final BAR assesses the impacts associated with all the technical alternatives for the Project. The footprints of the PV areas for each technical alternative were regarded as similar, with the major difference being the height of the solar panel racks.</p> <p>(i) Methodology used in determining and ranking potential environmental impacts and risks associated with the alternatives – The impact assessment methodology is presented in Section 15.7 of the Final BAR.</p> <p>(j) Positive and negative impacts of the</p>

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					<p>proposed activity and alternatives – Section 15 of the Final BAR assesses the impacts associated with all the technical alternatives for the Project. The footprints of the PV areas for each technical alternative were regarded as similar, with the major difference being the height of the solar panel racks.</p> <p>(k) Possible mitigation measures and residual risk – As part of the impact assessments undertaken in Section 15 of the Final BAR, mitigation measures are provided based on the identified impacts for all the technical alternatives. The impact assessments consider impacts before and after mitigation, where in the latter instance the <u>residual</u> impacts following the application of the mitigation measures was evaluated (refer to significance ratings “<u>after mitigation</u>” in the impact assessment tables).</p> <p>(l) Site selection matrix – No site alternatives were assessed, as explained in Sections 6 and 16 of the Final BAR. The motivation for the selection of the preferred alternative is provided in Section 16.2.2 of the BAR.</p> <p>(m) Motivation for not considering alternatives, including alternative locations – As explained in Sections 6 and 16 of the Final BAR, alternative locations were not considered, only technical alternatives.</p> <p>(n) Concluding statement indicating the preferred alternatives – The Environmental Impact Statement (Section 18.3 of the Final BAR) states that based on the recommendations of the specialists, technical considerations and the comparison of the impacts, the single axis trackers,</p>

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					bifacial mono-crystalline modules and string inverters, Alternative 4 (panel arrays of 1.5m to 2.5m height) was identified as the Best Practicable Environmental Option.
94.	<p>(d) <u>Cumulative Assessment</u></p> <p>i. Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ol style="list-style-type: none"> a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land. b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development. d) A cumulative impact environmental statement on whether the proposed development must proceed. 			Nemai Consulting	<ul style="list-style-type: none"> • Renewable energy applications within a 30km radius of the Project are shown in Figure 90 of the Final BAR. • The cumulative impacts of other renewable energy applications within a 30km radius of the Project are discussed in Section 15.28.2 of the Final BAR, which includes the findings and ratings of specialist studies. • Section 15.28.2 of the Final BAR includes the findings and ratings of specialist studies for cumulative impacts. • In terms of the need and desirability of the Project, it is noted that proposed PV Site is located within the newly adopted Beaufort West Renewable Energy Development Zone (REDZ) and the Project's power line falls within the Central Corridor of the Strategic Transmission Corridors. From a strategic perspective, the Project is thus located in a geographical area that was deemed suitable for the rollout of wind and solar PV energy projects and the supporting electricity grid network. • A cumulative environmental impact statement is provided in Section 15.28.4 of the Final BAR. • From a cumulative impact perspective in terms of other renewable energy developments within a 30km radius of the PV Site, the Beaufort West Solar Power Plant Sites 1, 2 and 3 that is located more than 8km to south-west

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					of the Project's PV Site is currently the only approved application according to the REEA Database. In addition, the power lines for the proposed Project and the Nuweveld Wind Farm Projects run parallel for approximately 4.5km towards the Droërivier Substation. Cumulative impacts in relation to the Project were assessed and mitigation measures were developed for each of the impact categories.
95.	<p>(e) <u>Public Participation Process</u></p> <p>i. The following information must be submitted with the final BAR:</p> <p>a) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;</p> <p>b) Copies of all comments received during the Draft BAR comment period; and</p> <p>c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the Draft BAR. Please note that comments received from this Department must also form part of the comment and response report.</p> <p>ii. Please ensure that all issues raised and comments received during the circulation of the Draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.</p> <p>iii. Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p>			Nemai Consulting	<ul style="list-style-type: none"> The database of authorities, stakeholders and I&APs is contained in Appendix G of the Final BAR. Copies of all comments received during the review of the Draft BAR are contained in Appendix I of the BAR. This document serves as the Comments and Responses Report. Section 17 of the Final BAR explains the tasks undertaken as part of the public participation process. Proof of notification of the review of the Draft BAR is contained in Appendix J of the Final BAR, which includes newspapers, site notices and emails. Copies of comments received on the Draft BAR are contained in Appendix I of the Final BAR.
96.	Please also ensure that the Final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix			Nemai Consulting	It is requested that the Environmental Authorisation remain valid for a period of 10 years (refer to Section 5.6 of the Final

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	1(3)(1)(q) of the NEMA EIA Regulations 2014, as amended.				BAR). It is expected that construction will last for 18 months.
97.	You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: <i>"Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority -</i> <i>(a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."</i>			Nemai Consulting	The Application Form and Draft BAR were submitted to DFFE on 13 May 2021. The Final BAR will be submitted by 16 June 2021. The regulated timeframes are thus adhered to.
98.	Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: <i>"the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority — (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days"</i> .			Nemai Consulting	No significant changes were made to the BAR and EMPr from the draft versions that were lodged for public review.
99.	Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.			Nemai Consulting	To date all regulated timeframes have been adhered to.
100.	You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.			Nemai Consulting	The Applicant is to comply with this legislated requirement.
101.	I find it extremely alarming that CAA as an affected party, was	B. Heiberg	Email	Nemai Consulting	The CAA received the same notification

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	<p>seemingly not invited or included in the Zoom meeting nor not CC'd or informed of the latest spate of events re. the proposed photovoltaic park, that will definitely impact on the activities and security of the day-to-day activities at the Karoo Gateway Airport should it go ahead.</p> <p>Lizell, I specifically draw your attention to point 5 of the Draft Minutes Meeting where concerns by AIFA that operate the Karoo Gateway Airport were voiced and we all regard the potential hazards and threats to human life and day-to-day activities at the very busy Karoo Gateway Airport, especially in specific referral to the glint-and-glare factor, as a growing concern. Please note that both the AIFA International Pilot Training activities from Oudtshoorn and George Airports, are now based at the Karoo Gateway Airport. This has increased the usage and activities at the Karoo Gateway Airport on a daily as well as during the night basis, tremendously.</p> <p>The examples given by Nemaï of other international airports and research done there, is hardly relevant as it seems that they neglected to take into account that the sun has a total other trajectory and fall of light in the Southern Hemisphere and SHOULD/CAN NOT BE COMPARED to glint-and-glare in the Northern Hemisphere. To fall back on dated research reports/results done at airports in the Northern Hemisphere, can't be taken into account as it is basically irrelevant when it comes to the Karoo Gateway Airport's circumstances and located in the Southern Hemisphere and as such, will definitely not be acceptable as point of reference in this whole matter.</p> <p>As per previous written requests and conditions as stipulated by both me as CEO of the Karoo Gateway Airport as well as CAA, a proper study by a professional and acknowledged institution like the CSIR, needs to be done as a matter of real urgency with specific referral but not limited thereto, to the glare factor and changing light taking LOCAL conditions into account! I also refer to several e-mails sent to Nemaï in this specific regard during the course of last year, with very little response/acknowledgement.</p> <p>ONLY THEN CAN A TOTAL PICTURE BE ESTABLISHED RE. THE SAFETY OF ALL PEOPLE INVOLVED IN ALL</p>	(Karoo Gateway Airport)	(11-06-21)		<p>email that was sent to all other Interested and Affected Parties (I&APs). As indicated in the notice, only pre-registered parties that confirmed interest in attending the virtual public meeting received the invitation. The minutes that were circulated on 11 June 2021 was sent to all meeting attendees and copied to other parties that expressed an interest in attending but did not do so. The minutes will be appended to the Final BAR and will also be incorporated into the CRR.</p> <p>A Glint and Glare Impact Assessment and an Obstacle Evaluation were undertaken for the Project, and these reports are contained in Appendix E10 and Appendix E11 of the Draft BAR, respectively, which is currently out for public review. It is noted that the specialist that undertook the Glint and Glare Impact Assessment, Aviata Consulting, was one of the specialists recommended by the CAA.</p> <p>Apart from notification provided to the CAA as part of the Basic Assessment, Applications for the PV Site and associated power lines were submitted to CAA in May 2021.</p> <p>As reflected in the minutes, SkyPower had provided the example of the international airport during the meeting, not Nemaï Consulting. The Glint and Glare Impact Assessment contained in the BAR is specifically for the proposed Beaufort West PV Project.</p> <p>Your emails submitted to date to Nemaï Consulting were acknowledged. The trigger for the Glint and Glare Impact Assessment and Obstacle Evaluation that were</p>

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	<p>KAROO GATEWAY AIRPORT AND RELATED ACTIVITIES. ALSO SINCE ACTIVITIES ARE PLANNED TO BE EXTENDE OVER A BROAD FRONT AND TO INCLUDE COMMERCIAL FLIGHTS IN THE YEARS TO COME. PEOPLE'S SAFETY IS NOT NEGOTIABLE IN ANY WAY WHATSOEVER.</p> <p>I specifically refer you Ms Stroh to point 5.2 where EP17 is directly above the proposed PV site and if it continues as planned in the present format, there will be NO empty land to land aircraft should there be engine failures or any emergencies! The request is for sure to ensure that there should be enough open land made EXCLUSIVELY available on this site to allow for emergency procedures for all aircraft, including Bombardier Q400's as potential commercial aircraft that might be used in the nearby future for scheduled flights to and from the Karoo Gateway Airport. It is NOW the time to make provisions before any proposed PV project site development plans can be finalised and approved by us as directly affected parties. The provision of enough empty land on this proposed PV Site to make provision for any flight related emergencies that can occur over a wide spectrum, will not be negotiable at all. People's lives are at stake here.</p> <p>ON RECORD: I HEREWITH REQUEST THAT IN THE PROPOSED PV PROJECT ZONING APPLICATION, THERE WILL BE SPECIFIC REFERRAL TO AN OPEN STRIP OF LAND EXCLUSIVELY RESERVED AND SERVITUTED FOR THE KAROO GATEWAY AIRPORT FOR EMERGENCY LANDINGS AND SPECIFICALLY WORDED, FORMALIZED AND APPROVED AS SUCH IN THE ZONING APPLICATION SHOULD THIS PROJECT GO AHEAD.</p> <p>I request your support Ms Stroh/CAA in the above and will appreciate it if you could consequently also respond in writing to Nemaï which once again – seem to have not included/updated you in this latest spate of events.</p>				<p>undertaken during the Basic Assessment was triggered by <i>inter alia</i> the concerns raised by I&APs (including yourself).</p> <p>Refer to the responses in rows no. 6 and 83 above regarding potential glint and glare impacts.</p>
102.	<p>COMMENTS ON DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED 75MW BEAUFORT WEST PHOTOVOLTAIC PROJECT, WESTERN CAPE PROVINCE.</p> <p>The Directorate: Biodiversity Conservation reviewed and</p>	M. Rabothata / T. Sekonko (DFFE: Directorate: Biodiversity Conservation)	Letter (11-06-21)	Nemaï Consulting & The Biodiversity Company (Terrestrial	The Terrestrial Ecology Assessment that was undertaken for the Project rated the sensitivity of the CBA 1 areas as predominantly 'medium', with drainage lines rated as 'very high' (refer to Section

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	<p>evaluated the aforementioned draft report. Based on the information provided in the report, the PV site overlaps with areas classified as Critical Biodiversity Area (CBA1), CBA2 and Ecological Support Area (ESA1) while the power line overlaps with areas classified as CBA1, ESA1, ESA2 and Other Natural Areas. Developments are not permitted on CBA1 as these areas are required to meet biodiversity targets but rather on areas that are transformed or classified as "other natural areas". Furthermore, the development occurs within the newly adopted Beaufort West Renewable Energy Development Zone (REDZ) and the power line falls within the Central Corridor of the Strategic Transmission Corridors.</p>			Ecologist)	<p>14.5.4.4 of the BAR). In response, the following management objectives were included in the BAR and EMPr's to safeguard the sensitive drainage lines:</p> <ul style="list-style-type: none"> • Riparian areas and 50m buffers need to be avoided by the PV site and the towers of the power line. The layout of the PV Site was adjusted accordingly; and • The PV site needs to be located outside of the 1:100 year floodline. <p>The BAR and EMPr's also require that a walkdown survey must be undertaken of the power line route by the relevant environmental specialists to identify sensitive environmental features and to confirm the most suitable locations of the towers. Specialists to be involved in the walkdown survey must include inter alia an Aquatic Ecologist.</p>
103.	<p>Notwithstanding the above, the following recommendations must be considered in the final report:</p> <ul style="list-style-type: none"> • Preconstruction walk-through of the approved development footprint must be conducted to ensure that sensitive habitats and species are avoided where possible. • Rehabilitation Plan that guides planting and seeding with indigenous perennial shrubs and succulents from the local area must be developed to avoid erosion and alien invasion. • Sensitive habitats in close proximity to the development footprint must be avoided or demarcated as No-Go area (i.e. Drainage lines and Gamka River). • Appropriate buffer must be established around medium sensitive habitats (i.e. nests). 			Nemai Consulting	<p>The EMPr's make provision for the following related matters:</p> <ul style="list-style-type: none"> • Undertaking a walkdown survey of the power line route by the relevant environmental specialists to identify sensitive environmental features and to confirm the most suitable locations of the towers. Specialists to be involved in the walkdown survey must include <i>inter alia</i> the following disciplines: Heritage, Terrestrial Ecology, Aquatic Ecology and Avifauna. • Undertaking a pre-construction survey of the PV Site by a suitably qualified Ecologist to identify fauna and flora Species of Conservation Concern; • Reinstating and rehabilitating areas disturbed by construction activities, as well as for the ongoing eradication of

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					<p>alien invasive plants and noxious weeds during the operational phase.</p> <ul style="list-style-type: none"> Managing stormwater from the construction site to avoid environmental contamination and erosion. <p>The PV site that was assessed as part of the Basic Assessment is based on the layout that was compiled during the previous EIA that was undertaken in 2011, which received Environmental Authorisation (ref. no.: 12/12/20/2286). This layout was adjusted during the previous EIA to avoid the site-specific constraints and sensitive features, including visual, palaeontology, archaeology, geological, biophysical and floodlines. In addition, the layout was also revised during the current Basic Assessment to remain outside of the delineated riparian zone in the eastern part of the PV site, based on the recommendation of the recent Aquatic Assessment.</p>
104.	The final report must comply with all the requirements as outlined in the Environmental Impact Assessment (EIA) guideline for renewable energy projects and the Best Practice Guideline for Birds & Solar Energy for assessing and monitoring the impact of solar energy facilities on birds in Southern Africa.			Nemai Consulting	Discussions were held with BirdLife South Africa with regards to their Guidelines for Assessing and Monitoring the Impact of Solar Power Generating Facilities on Birds in Southern Africa, which prescribe a specific regime approach. As a way forward, it was determined that new fieldwork would need to be undertaken to assess the status of the site in terms of avifaunal sensitivity, and to determine whether the site conditions have changed from the initial Avifaunal Impact Assessment that was undertaken in 2011 for a Wind Farm that overlaps the PV Site. The Avifaunal Impact Assessment that was undertaken for the Project is contained in Appendix E3 of the BAR.

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105.	In conclusion please note that all Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA enquiries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr Seoka Lekota.			Nemai Consulting	Mr. Seoka Lekota is included in the database of authorities.
106.	<p>The e-mail notification of 13 May 2021 regarding the availability of the Draft Basic Assessment Report ("BAR") for comment refers.</p> <p>An application for environmental authorisation ("EA") was submitted to the then Department of Environment, Forestry and Fisheries ("DEFF") on 12 November 2020. This Department provided comments on 15 December 2020 on the Draft Scoping Report ("DSR") dated November 2020 (DEFF reference 14/12/16/3/3/2/2034). The Final Scoping Report was accepted by the DEFF on 4 February 2021; however, the application for EA was subsequently retracted with the promulgation of the newly adopted Beaufort West Renewable Energy Development Zone ("REDZ") in Government Notice ("GN") No. 144 of 26 February 2021. In terms of GN No. 142 of 26 February 2021, a basic assessment ("BA") process must be followed when applying for EA for large scale wind and solar photovoltaic ("PV") energy facilities occurring in a REDZ.</p> <p>Please find consolidated comments from various directorates within the Department on the Draft BAR dated May 2021 that was available for download from website of the environmental practitioner ("EAP"). Note that due to gaps in information, this Department is unable to endorse the proposed development and recommends that a Revised Draft BAR (inclusive of all relevant specialist studies/opinions) be made available to registered interested and affected parties per regulation 19(2) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended). Please find consolidated comments from various directorates within the Department on the Draft BAR in support of the recommendation of a Revised Draft BAR.</p>	K. Rughoobeer (DEA&DP Directorate: Development Facilitation)	Letter (14-06-21)	Nemai Consulting	Responses are provided below to the comments received from the various directorates within the DEA&DP that commented on the Draft BAR.
107.	1.1. It is noted from the Draft BAR that there are two boreholes on the project site that are registered to the Beaufort West Municipality for the potable water needs of the town. It is	J. Christie (DEA&DP Directorate: Development Management)	Letter (14-06-21)	Nemai Consulting	1.1. Letters from the BWLM, which authorise the use of the registered

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	known that Beaufort West is a water scarce area and that boreholes are over extracted to supply the town's water requirements. This Directorate would like to know whether Beaufort West Municipality has given approval or provided an acknowledgement that the proposal is to potentially utilise potable water from the town for the construction and operational phases of the proposed development.	(Region 3)			boreholes on the municipal renewable energy property by the Applicant for the Project, are attached to the Geohydrological Impact Assessment that is contained in Appendix F of the BAR. Furthermore, the BAR and EMPr includes a mitigation measure which states that all water use from the boreholes must be in accordance with the registered volume that can be abstracted and must comply with the provisions of the NWA.
108.	1.2. Furthermore, it is suggested that other alternatives be investigated to source water for the construction and operational phases of the development. The Draft BAR indicates that all water requirements associated with operation and maintenance activities (flushing of toilets, drinking water, cleaning water for solar panels, etc.) will be sourced from rainwater collection and that the on-site borehole may also be used, especially during times of drought. It is unclear how rainwater will be able to supply the water requirements, especially considering the low rainfall of the area.			Nemai Consulting	1.2. Section 8.2.4 of the BAR indicates that water requirements for construction and operation will be sourced from the two production boreholes located on the renewable energy property. The water rights for these boreholes, and associated aquifer, are registered to the BWLM for the purposes of potable water for the town of Beaufort West. Previous investigations found that the main production borehole delivers a safe yield of approximately 7,68l per second, while the other production borehole delivers that of ± 4l per second. The total safe yield of the aquifer is estimated at 156 660kℓ per year and has been licenced by DWS in the Municipality's name for service provision. As mentioned in item 1.1 above, the BWLM issued a letter that authorises the use of the registered boreholes on the municipal renewable energy property by the Applicant for the Project. The boreholes have sufficient yield to satisfy the water requirements of the Project during the construction and operational phases, which were calculated as 19,065m ³ /annum and 13,819 m ³ /annum, respectively.

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109.	1.3. In terms of storm water, it is noted that storm water run-off from the buildings will be disposed of through soakaways. Uncontaminated storm water should ideally be re-used.			Nemai Consulting	1.3. The use of stormwater, as an alternative water source, may be considered further during detail design. Nonetheless, it was determined that the Project's water requirements could be satisfied by the production boreholes located on the renewable energy property.
110.	1.4. Potential impacts of increased surface water run-off (viz. increased soil erosion) associated with the establishment of hard surfaces and vegetation clearing (mainly during the construction phase), potential impacts on soils due to hydrocarbon spillages from vehicles during the construction and operational phase, and the disruption of ecological processes and loss of landscape connectivity must be addressed.			Nemai Consulting	1.4. The EMPr's make provision for the following related matters: <ul style="list-style-type: none"> o Management of stormwater; o Management of storage and handling of hazardous material; o Management of pollution, including accidental leaks and spillages o Safeguarding water resources from pollution; and o Management of flora and fauna.
111.	1.5. This Directorate does not support development of any solar PV structures or infrastructure, including electricity pylons, in watercourses.			Nemai Consulting	1.5. The BAR and EMPr for the PV Site include the following related mitigation measures: <ul style="list-style-type: none"> o As a management objective, the riparian areas and 50m buffers need to be avoided by the PV site and the towers of the power line. In addition, the PV site needs to be located outside of the 1:100 year floodline. o A walkdown survey must be undertaken of the power line route by the relevant environmental specialists to identify sensitive environmental features and to confirm the most suitable locations of the towers. Specialists to be involved in the walkdown survey must include <i>inter alia</i> an Aquatic Ecologist. o The 2011 Hydrological Study (Flood Management Study) must be updated and the

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					recommendations from this study must be implemented. A Stormwater Management Plan must also be developed for the PV Site. Thereafter, the final layout must be lodged for public review and submitted to DFFE for approval prior to construction.
112.	2.1. This Directorate previously indicated in its comments on the DSR that the need and desirability of the proposed activities must be described in terms of the National Department's Guideline on Need and Desirability (first version published in terms of section 24J of the NEMA in 2014, and second version in 2017). It is however noted that the EAP still consulted this Department's Guideline on Need and Desirability dated 2010. Note that the although the Department published an updated Guideline on Need and Desirability dated March 2013, the competent authority's Guideline on Need and Desirability published in terms of section 24J of the NEMA, 1998 should be consulted.	A. La Meyer (DEA&DP Directorate: Development Facilitation)	Letter (14-06-21)	Nemai Consulting	2.1 Section 7 of the Final BAR was updated to describe the need and desirability of the Project based on the Guideline on Need and Desirability published by the Department of Environmental Affairs in 2017.
113.	2.2. Please amend the project description and the site layout plans to include the description and layout of the proposed solar PV park as indicated in the Land Capability and Soil Assessment compiled by Index (Pty) Ltd dated May 2021. According to said specialist study, two solar PV areas are proposed, which are described as Area A (126 ha) and Area B (38 ha).			Nemai Consulting	2.2 The previous EIA that was undertaken in 2011 considered two PV areas, which were named Area A (126 ha) and Area B (38 ha) in the Land Capability and Soil Assessment undertaken in 2021. Area B was subsequently discarded, as noted in Section 6.3.1 of the Final BAR. The maps and layouts contained in the BAR are thus accurate and focus on Area A only. The findings from the Land Capability and Soil Assessment that are relevant to Area A were included in the BAR. It is noted that the aforementioned study found that the land where the PV Site is proposed has low sensitivity and its loss to agriculture production is insignificant even at a local level.
114.	2.3. Reference is made to a wind farm development which is to be located on the northern portion of the proposed solar PV park development site. Per the Draft BAR, "The Project site			Nemai Consulting	2.3 The wind farm was found to be unfeasible and will thus no longer be developed on the municipal renewable

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	belongs to the municipality and was identified as a potential location for renewable energy as early as 2005. Since then, the municipality has granted the rights to develop a wind farm and PV Park." Please provide more information about the status of the wind farm project and whether the developer still intends to develop the wind farm?				energy property that is leased to the Applicant.
115.	2.4. Further to the above, if EA was granted for the wind farm and the EA has not yet lapsed, then the site sensitivity layout for the solar PV park must be amended to indicate the components of the wind farm and associated infrastructure and any "no-go" areas or buffers.			Nemai Consulting	2.4 As mentioned in item 2.3 above, the wind farm will no longer be developed.
116.	2.5. It is noted that Activity 12.i.i of Listing Notice ("LN") 3 of the NEMA EIA Regulations, 2014 (as amended) is applied for, as indicated in Table 7 of the Draft BAR. The Terrestrial Assessment Report compiled by the Biodiversity Company dated May 2021 however indicates that the project area is situated in the Gamka Karoo and the Southern Karoo Riviere vegetation types, which have an ecosystem threat status of Least Concerned. As such, Activity 12 of LN 3 is not applicable to the proposed development as no indigenous vegetation within a critically endangered or endangered ecosystem will be removed.			Nemai Consulting	2.5 Activity 12(i)(ii) of LN 3 is now reflected in Table 7 of the BAR and in the amended Application Form (contained in Appendix B of the Final BAR), and no longer Activity 12(i)(i), as the cumulative area of indigenous vegetation to be cleared within a Critical Biodiversity Area will exceed 300 square metres.
117.	2.6. This Directorate's comments on the DSR requested clarity on which of the sub-thresholds [(aa) – (hh)] of Activity 14 of LN 3 of the NEMA EIA Regulations, 2014 (as amended) are applicable to the proposed development of infrastructure or structures within a watercourse. The EAP is advised that Activity 14 of LN 3 may not be applicable as no critical biodiversity areas or ecosystem service areas have been adopted by the competent authority in systematic biodiversity plans or in bioregional plans.			Nemai Consulting	2.6 Activity 14(ii) - (i)(i)(ff) of LN 3 is now reflected in Table 7 of the BAR and in the amended Application Form (contained in Appendix B of the Final BAR), as the solar PV infrastructure is located within 32 metres of watercourses in certain parts of the site, within Critical Biodiversity Areas. These Critical Biodiversity Areas are based on the Western Cape Biodiversity Spatial Plan.
118.	2.7 Please amend Table 7 of the Draft BAR to include the relevance of section 21 of the National Water Act, 1998 (Act No. 107 of 1998) ("NWA") to the proposed development as the proposed overhead transmission power line and solar PV park may trigger water uses in terms of section 21 of the NWA, 1998.			Nemai Consulting	2.7 Table 7 in the Final BAR was updated to reflect the relevance of the NWA to the Project, in terms of the water uses triggered. This is also explained in Section 8.2.4 of the BAR.
119.	2.8 It is noted that both Activity 27 of LN 1 and Activity 15 of LN 2 of the NEMA EIA Regulations, 2014 (as amended) are			Nemai Consulting	2.8 Activity 27 of LN 1 was removed from Table 7 in the Final BAR and in the

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	applied for. Please note that only Activity 15 of LN 2 is applicable, as more than 20ha of indigenous vegetation will be cleared for the proposed development.				amended Application Form (contained in Appendix B of the Final BAR).
120.	2.9 Please explain what is meant with the statement on page 37 of the Draft BAR, referring to "Footprint of Project on land that was previously used for agricultural purposes, prior to mining, outside of an urban area." Have any mining activities taken place on any of the properties proposed for the proposed solar PV park?			Nemai Consulting	2.9 No mining has taken place on the property earmarked for the PV plant. The reference to mining in Activity 28 of LN 1 was removed in Table 7 in the Final BAR and in the amended Application Form (contained in Appendix B of the Final BAR).
121.	2.10 Table 23 of the Draft BAR (list of activities associated with construction phase) lists the bulk storage of fuel. What is the estimated volume of dangerous goods/fuel that will be stored and/or handled during the construction phase in order to determine whether any activities in terms of the Listing Notices of the NEMA EIA Regulations, 2014 (as amended) are triggered?			Nemai Consulting	2.10 It is not expected that bulk fuel storage will exceed the thresholds for storage of dangerous goods in the Listing Notices. Any related listed activities were thus not applied for. Alternatively, fuel can be sourced from the town of Beaufort West. Provision is made in the EMPr's for managing the storage and handling of hazardous material.
122.	2.11 Reference is made to Table 8-3 (List of mammal species of conservation concern that may occur in the project area) of the Terrestrial Assessment Report. According to said specialist study, the likelihood of occurrence of the critically endangered Riverine Rabbit is "High". The Terrestrial Assessment Report states that "This species is endemic to semi-arid central Karoo regions of South Africa, where they inhabit dense riparian growth along seasonal rivers... Based on the highly suitable habitat in the area, combined with their known presence in the Karoo National park, a High likelihood of occurrence were allocated to it." It is noted that a field survey for flora and fauna (mammals, amphibians and reptiles) was conducted during the last week of April 2021 and the project area was ground-truthed on foot. No information was provided whether the Riverine Rabbit was observed during the field survey, or whether camera trappings were employed specifically to determine the presence of the Riverine Rabbit. The Terrestrial Assessment Report references the Biophysical Impact Assessment compiled by Conservation Management Services dated 2011 and indicates that for the 2011 assessment, "no fauna trapping was completed and the report does not indicate any recorded animals for the project area." The lack of			The Biodiversity Company (Terrestrial Ecologist)	2.11 The desktop assessment found that preferred/suitable habitat and the protection in the form of the Karoo National Park in combination, suggested a high likelihood of occurrence for Riverine Rabbit. Subsequently, during field work the drainage lines were extensively traversed and multiple camera traps (4) were deployed for multiple nights (3) within drainage lines across the Project Area. It must be noted that the land use/management as well as hunting with dogs, which was observed multiple times, were recorded as being major threats to the presence of the Riverine Rabbit. The specific locations of all camera traps were not indicated in the Terrestrial Ecology Assessment Report.

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	information on the presence of Riverine Rabbit in the area proposed for the development of the solar PV park presents a significant gap in information.				
123.	<p>2.12 The Aquatic Assessment Report compiled by the Biodiversity Company dated May 2021 refers. The said study indicated that the locality of the PV area within the floodplain poses a risk to the hydrological function of the Kuils River area. The assessment strongly recommended that a hydrological study be conducted to determine flow paths, and that a fluvial geomorphological study be undertaken to determine the 1:100-year flood line, the extent of the Kuils River floodplain, and whether the floodplain poses a fatal flaw to the proposed project. The assessment also indicated that a comprehensive and site-specific stormwater management plan is critical to negate these potential impacts during high rainfall periods as “the risk assessment did not take into account the floodplain”. In response, the EAP indicated that “The layout of the PV site was adjusted during the previous EIA undertaken in 2011 to avoid various site-specific constraints, which included the 1:100 year floodline of the Kuils River” and that “The layout of the PV site was adjusted to avoid the riparian zone in the eastern part of the site and the associated 50m buffer area.” It is however not apparent how the previous EIA application of 2011 has relevance to the recommendations of the aquatic specialist and if the layout of the two PV areas was adjusted to circumvent the requirements of the aquatic specialist.</p>			Nemai Consulting	<p>2.12 The Aquatic Assessment found that the Kuils River dissipates into a floodplain, which covers a large portion of the PV Site, and this study recommended that a fluvial geomorphologist conduct a comprehensive assessment of the PV Area.</p> <p>The layout of the PV site was adjusted during the previous EIA undertaken in 2011 to avoid various site-specific constraints, which included the 1:100 year floodline of the Kuils River (refer to Section 6.3.1 in the BAR). The aforementioned floodline was determined by Fraser Engineers (then named Adams and Fraser) as part of a Specialist Hydrological Study (Flood Management Study) for a Proposed Wind Energy Farm on the same renewable energy properties in 2011. The same engineers were requested to provide hydrological comments for the proposed PV Site (refer to Appendix N of the Final BAR), and they noted the following:</p> <ul style="list-style-type: none"> ○ The Wind Farm Study was predominantly for the northern catchment whereas the proposed PV Site is predominantly in the southern catchment. However, the hydrological conditions are similar. ○ The watercourses are a series of ill-defined parallel channels and furrows, bifurcations and confluences, which drain in and

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					<p>out of flat dry crusted pans. During peak rainfall events there will be areas of shallow sheet flow.</p> <ul style="list-style-type: none"> ○ During peak rainfall events there will be areas of shallow sheet flow. For this reason, the supporting structures of the Solar Panels should be engineered to allow infrequent occurrences of sheet flow. ○ According to the flood hazard classification, the shallow sheet flow is low hazard. <p>It is recommended in Section 18.3 of the BAR that the 2011 Hydrological Study (Flood Management Study) must be updated and that the recommendations from this study must be implemented. A Stormwater Management Plan must also be developed for the PV Site. Thereafter, the final layout must be lodged for public review and submitted to DFFE for approval prior to construction.</p>
124.	2.13 Final comments from Heritage Western Cape must be obtained and included with the submission of the final report to the competent authority.			Nemai Consulting	2.13 A letter was received from HWC on 1 June 2021, which is contained in Appendix I of the Final BAR. The comments contained in the aforementioned letter, as well as the associated responses, are captured in row no. 89 above.
125.	2.14 Comments from the South African Civil Aviation Authority regarding the glint and glare perspective of the proposed solar panels must be obtained and included in the Final BAR.			Nemai Consulting	2.14 The South African Civilian Aviation Authority (SACAA) is included in our database of I&APs and were notified of the proposed Project. Applications for Approval of Obstacles for the proposed PV site and proposed power line that form part of the Project were also submitted to the SACAA, and the necessary application fees were paid.

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE BY	RESPONSE
126.	3.1. This Directorate has previously commented on the DSR and has no additional comments on the Draft BAR, with the exception that clarity is still requested on what will happen to the wastewater emanating from the cleaning of the solar PV modules.	W. Galvaan (DEA&DP Directorate: Waste Management)	Letter (14-06-21)	Nemai Consulting	3.1 Responses to the comments received from W. Galvaan on the Draft Scoping Report, as part of the previous EIA process, are provided in rows no. 49 – 53 above. It is further noted that the EMPr makes the following provisions for managing wastewater that will be generated during the construction and operational phases of the Project: <ul style="list-style-type: none"> ○ The Contractor shall provide a detailed method statement regarding wastewater management; ○ Ensuring that wastewater is appropriately disposed of; ○ Preventing any environmental contamination and erosion associated with wastewater; ○ Ensuring that all wastewater discharges comply with legal requirements associated with the NWA; and ○ Monitoring of wastewater discharges.
127.	4.1. Previous comments on the DSR provided by this Directorate have not been responded to in the Comments and Responses Report dated May 2021, included as Appendix I of the Draft BAR. This Directorate maintains the following comments: 4.1.1. It is stated that water usage on-site during the construction and operation phases will be sourced from rainwater and an on-site borehole. Considering the ongoing drought, has the possibility of utilising treated wastewater from the Beaufort West wastewater treatment works been investigated?	A. van Wyk (DEA&DP Directorate: Pollution and Chemicals Management)	Letter (14-06-21)	Nemai Consulting	4.1.1. Section 8.2.4 of the BAR indicates that water requirements for construction and operation will be sourced from the two production boreholes located on the renewable energy property. The water rights for these boreholes, and associated aquifer, are registered to the BWLM for the purposes of potable water for the town of Beaufort West. Previous investigations found that the main production borehole delivers a safe yield of approximately 7,68l per second, while the other production borehole delivers that of ± 4l per second. The total safe yield of the aquifer is estimated at 156 660kℓ per year.

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					<p>These boreholes have sufficient yield to satisfy the water requirements of the Project during the construction and operational phases, which were calculated as 19,065m³/annum and 13,819 m³/annum, respectively. The boreholes have been licenced by DWS in the Municipality's name for service provision. The BWLM issued a letter that authorises the use of the registered boreholes on the municipal renewable energy property by the Applicant for the Project. The aforementioned letter is attached to the Geohydrological Impact Assessment that is contained in Appendix F of the BAR. The use of treated wastewater from the Beaufort West wastewater treatment works, as an alternative water source, may be considered further during detail design. However, it was determined that the Project's water requirements could be satisfied by the production boreholes located on the renewable energy property.</p>
128.	<p>4.1.2. To always ensure full exposure to the sun, it is noted that control of plant growth during the operation phase of the project will utilize herbicides. Soil persistence, or herbicide accumulation in the soil can be mobilised during rain events, leading to stormwater contamination and negative impacts elsewhere. The EMPr for the solar PV park does not provide detail on mitigation against pesticide soil persistence.</p>			Nemai Consulting	<p>4.1.2. The following is stated in the EMPr for the PV Plant (Appendix M3 in the Final BAR):</p> <ul style="list-style-type: none"> ○ Ensure that the control of exotic or invasive plants is undertaken by suitable contractors using appropriate methods such hoeing, hand pulling, digging or mowing. Pesticides or herbicides may not be used, unless they are environmentally friendly and will not cause any soil contamination.
129.	<p>4.1.3. Care should be taken with the construction and installation of the conservancy tank as any crack may lead to</p>			Nemai Consulting	<p>4.1.3. The EMPr for the PV Plant (Appendix M3 in the Final BAR)</p>

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	leakages over time, and proper and regular servicing must be scheduled to prevent possible groundwater contamination.				provides measures to manage impacts associated with sanitation facilities. The EMPr was also updated to include the mitigation measure stated in the comment received from A. van Wyk.
130.	<p>5.1. As per this Directorate's previous comments on the DSR, fugitive dust emissions will be generated as a result of construction activities and vehicles using dirt roads during the construction phase of the proposed project. Dust generated during the construction, operational and decommissioning phases must comply with the National Dust Control Regulations (GN No. R. 827 of 1 November 2013), promulgated in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM: AQA"). It is recommended that dust suppression/collection methods be implemented through a Dust Monitoring Programme or Fugitive Dust Control Plan, which should be included in Appendix J3 (EMPr for the solar PV park).</p> <p>5.2. It is recommended that no construction activities be undertaken during extreme windy days (weather conditions should be considered upon commencement of daily operations).</p> <p>5.3. It is reiterated that the generation of noise must also comply with the Western Cape Noise Control Regulations (Provincial Notice 200/2013) of 20 June 2013, in addition to section 34 of the NEM: AQA, as indicated in the Draft BAR and solar PV park EMPr.</p> <p>5.4. This Directorate recommends that any noise levels generated at the source of the proposed activities be controlled on-site (e.g. via a noise management programme). If exceedance of noise levels at the boundaries of the site exceed 7dB above ambient levels, the local health authority must be informed.</p> <p>5.5. Best practice measures are recommended to be employed to minimise any particulate, gaseous or noise emissions that may occur during all phases of the proposed</p>	G. Mhlarhi (DEA&DP Directorate: Air Quality Management)	Letter (14-06-21)	Nemai Consulting	The EMPr for the PV Plant (Appendix M3 in the Final BAR) was updated to include the additional mitigation measures pertaining to dust and noise contained in the comments received from G. Mhlarhi. Furthermore, provision is also made in the EMPr for the PV Plant for dust and noise monitoring.

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	project. All noise levels and expected air emissions are recommended to be monitored and controlled on-site.				
131.	<p>6. The applicant is reminded of its "duty of care" prescribed in section 28 of the NEMA which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment."</p> <p>7. Please direct any enquiries via e-mail to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.</p> <p>8. The Department reserves the right to revise or withdraw comments or request further information based on any information received.</p>	K. Rughoobeer (DEA&DP Directorate: Development Facilitation)	Letter (14-06-21)	Nemai Consulting	<p>The Applicant will remain obligated to his "duty of care" prescribed in Section 28 of the NEMA</p> <p>The DEA&DP will be kept informed during the remainder of the Basic Assessment Process.</p>