

PROPOSED LEMENONG BATTERY ENERGY STORAGE  
FACILITY AND ASSOCIATED INFRASTRUCTURE, LOCATED  
NORTH-EAST OF RUSTENBURG, RUSTENBURG LOCAL  
MUNICIPALITY, NORTH WEST PROVINCE

**SITE SENSITIVITY VERIFICATION**

MAY 2024



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## TABLE OF CONTENTS

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1	INTRODUCTION .....	2
1.1	Location of the Project .....	2
1.2	Geographical Context .....	5
2	REPORTING PROCESS .....	7
3	SITE SENSITIVITY VERIFICATION REPORT .....	7
4.	OUTCOMES OF THE SITE SENSITIVITY VERIFICATION.....	7
5.	Heritage Impact Assessment.....	14
6.	CONSULTATION .....	15
6.1	Background for initial Public Participation Process.....	15
6.2	Consultation .....	16

## 1 INTRODUCTION

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The South African Government ratified the Paris Agreement in 2016, and thereby showed the country's commitment to contribute to the global effort to address the challenge of climate change. Electricity generation sources need to be diversified to ensure security of supply and reduction in the carbon footprint created by the current heavy reliance of South Africa (SA) on coal to produce electricity. The electricity demand is increasing in SA, and in order to match that demand there is a need to supply a diversified power generation that includes renewable energy technologies. These technologies include solar, wind, small utility scale hydro, biomass, biogas and energy storage that the Department of Mineral Resources and Energy (DMRE) intends to develop and implement as identified in the approved Integrated Resource Plan (IRP) 2019. The DMRE is procuring new capacity from Battery Energy Storage in accordance with the ministerial determinations gazetted under the IRP 2019.

The Applicant intends to bid for the current Battery Energy Storage Independent Power Producer Procurement Programme (BESIPPPP) bid window 2 under the IRP. The BESIPPPP has been designated to facilitate the procurement of 615MW battery energy storage. The BESIPPPP programme has identified eight (8) substations (Mercury, Camel, Hermes, Ngwedi, Midas, Marang, Bighorn and Ararat) dedicated for the connection of 77MW of battery energy storage at each substation via the available Eskom grid.

The Applicant has identified a site adjacent to the existing Eskom Ararat Substation. The proposed 110MW BESF will typically store energy during the low-demand load periods at night (23h00 to 4h59) and provide ancillary energy services into the grid during high-demand periods in the day (5h00 to 22h59). The proposed development will provide energy support to business ancillary services within the area, to achieve the following:

- Strengthen the electricity distribution network and address current voltage and capacity constraints;
- Integrate a greater amount of renewable energy into the electricity grid; and
- Reduce the requirement for investment in new conventional generation capacity (i.e., gas, nuclear, coal) and new distribution substations and powerlines to strengthen networks.

### 1.1 Location of the Project

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The proposed Project consists of the development of a 110MW/440MWh BESF and associated infrastructure on a 4ha site located north of the Eskom Ararat substation, north-west of the town of Rustenburg, North West Province to accommodate the storage of energy.

The Project will consist of the following main components:

- Lithium-ion containerised Battery Energy Storage System (BESS) with an evacuation capacity of 110MW/440MWh;
- Independent Power Producer (IPP) substation to step up from 33kV to 88kV adjacent to the BESS power plant site;
- Eskom 88kV switching station adjacent the IPP substation;
- Grid Connection: Approximately 0.3km of 88kV powerline connecting between the Eskom switching substation and existing Ararat 88kV feeder bay;
- Temporary laydown area;
- Internal roads and perimeter fencing of the footprint area;
- Security Infrastructure; and
- Site access from the existing Ararat substation access road.

The technical details of the proposed Project are tabulated below.

**Table 1: Technical details of the proposed Project**

No.	Component	Description / Dimensions
1.	Total maximum development footprint	4ha
2.	Capacity of the BESS	110MW/440MWh
3.	Type of BESS	Solid State Battery: Lithium-Ion Battery
4.	Area occupied by the BESS	2.5ha
5.	Area occupied by inverter / transformer stations / substations	0.7ha
6.	Area occupied by both permanent and construction laydown areas	1ha
7.	Area occupied by buildings:	0.05ha
8.	Capacity of IPP substation	88 kV/120MVA
9.	Capacity of Eskom switching station	88kV
10.	Length of access road	60m
11.	Width of access road	7m
12.	Length of internal roads	520m
13.	Width of internal roads	5m
14.	Proximity to grid connection	300m
15.	Capacity of grid connection	88kV
16.	Height of fencing	2.4m

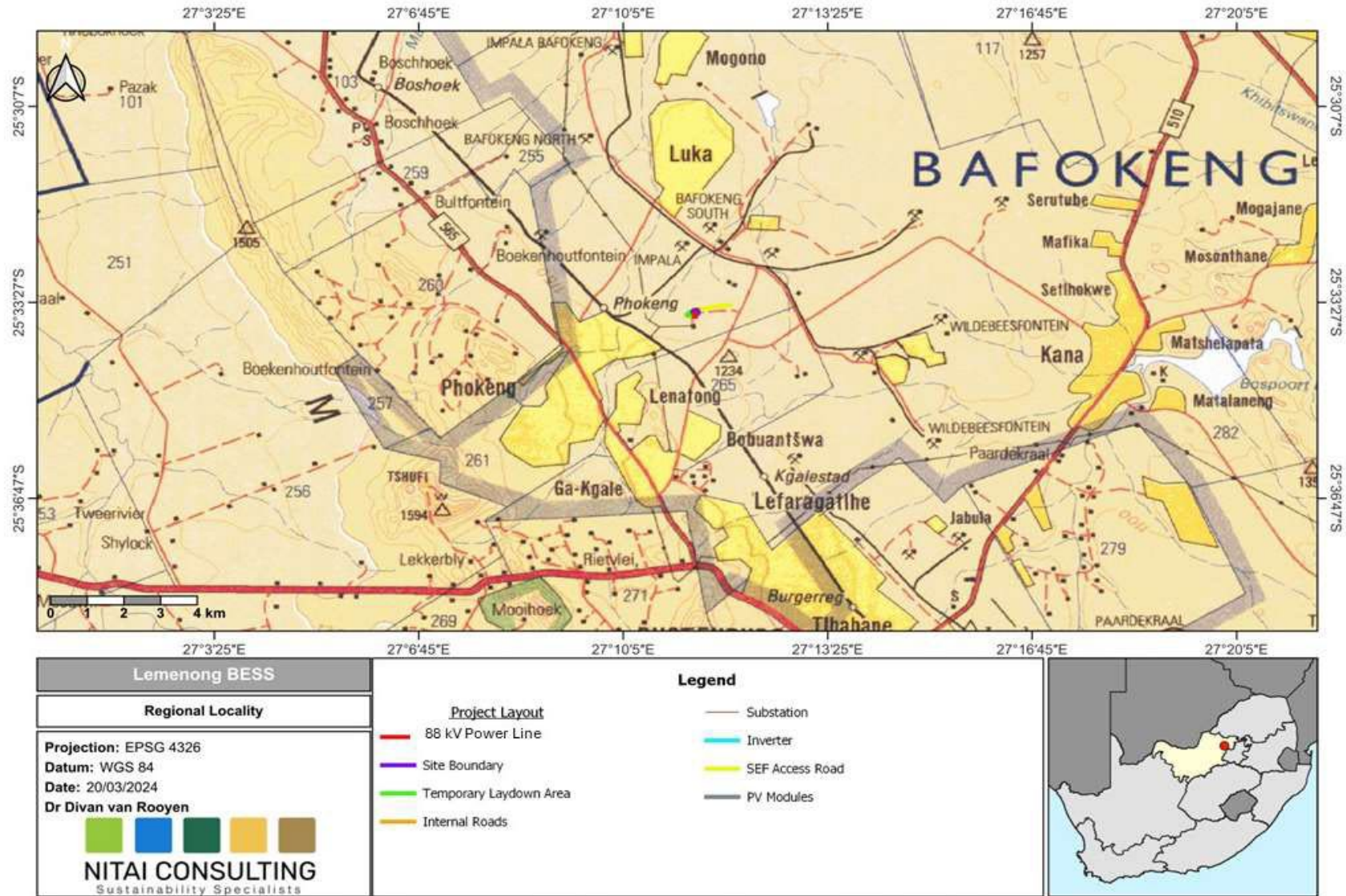


Figure 1: Regional Locality Map (van Rooyen 2024)

## 1.2 Geographical Context

The Project is located in the North West Province and falls within the Bojanala Platinum District Municipality and Rustenburg Local Municipality. The site is located approximately 13km to the north-west of the town of Rustenburg on Portion 2 of the farm Kookfontein 265 JQ.

**Table 2: Details of the affected property**

Farm Name	21-digit Surveyor General No.
Portion number 2 of the Farm Kookfontein 265 JQ	T0JQ00000000026500002

**Table 3: Project Site Boundary Coordinates**

Description	Coordinates
Corner Coordinates of buildable area	25°33'36.22"S; 27°11'5.19"E
	25°33'34.60"S; 27°11'18.02"E
	25°33'39.79"S; 27°11'18.85"E
	25°33'41.39"S; 27°11'6.03"E

**Table 4: Grid Connection Coordinates**

Description	Coordinates
<b>Powerline</b>	
<b>Start</b>	25°33'39.12"S; 27°11'14.81"E
<b>Middle</b>	25°33'40.56"S; 27°11'14.98"E
<b>End</b>	25°33'41.97"S; 27°11'15.13"E
<b>Servitude Boundary</b>	
<b>Start</b>	25°33'39.10"S; 27°11'15.38"E
<b>Middle</b>	25°33'40.54"S; 27°11'15.54"E
<b>End</b>	25°33'41.93"S; 27°11'15.71"E
<b>Servitude Boundary</b>	
<b>Start</b>	25°33'39.19"S; 27°11'14.25"E
<b>Middle</b>	25°33'40.58"S; 27°11'14.41"E
<b>End</b>	25°33'42.02"S; 27°11'14.56"E

**Table 5: IPP Substation Coordinates**

Description	Coordinates
Corner Coordinates of buildable area	25°33'36.69"S; 27°11'13.93"E
	25°33'36.69"S; 27°11'14.37"E
	25°33'37.48"S; 27°11'14.46"E
	25°33'37.53"S; 27°11'13.97"E

**Table 6: Eskom Switching Substation Coordinates**

Description	Coordinates
Corner Coordinates of buildable area	25°33'37.66"S; 27°11'13.05"E

Description	Coordinates
	25°33'37.47"S; 27°11'15.18"E
	25°33'39.09"S; 27°11'15.37"E
	25°33'39.29"S; 27°11'13.22"E

**Table 7: BESS area Coordinates**

Description	Coordinates
Corner Coordinates of buildable area	25°33'35.44"S; 27°11'14.95"E
	25°33'35.15"S; 27°11'17.84"E
	25°33'39.04"S; 27°11'18.38"E
	25°33'39.33"S; 27°11'15.47"E

**Table 8: Construction yard/laydown/storage area Coordinates**

Description	Coordinates
Corner Coordinates of buildable area	25°33'35.73"S; 27°11'6.44"E
	25°33'35.32"S; 27°11'10.81"E
	25°33'40.73"S; 27°11'11.44"E
	25°33'41.14"S; 27°11'7.07"E

## 2 REPORTING PROCESS

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An Application for Environmental Authorisation in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA) and the Environmental Impact Assessment (EIA) Regulations of 2014 (as amended) was made for the proposed Project on 27 March 2024. The Department of Forestry, Fisheries and the Environment (DFFE) responded by advising the applicant to consider if the Lemenong BESF falls within the ambient of the Battery Storage Exclusion Norm (GN 4557 of 27 March 2024) (Norms Standard).

## 3 SITE SENSITIVITY VERIFICATION REPORT

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The site sensitivity verification was undertaken by the EAP based on the following:

- Site visit undertaken in March 2023; and
- A desktop appraisal of the site using GIS and Google Earth imagery.

The following specialist studies were conducted for the Basic Assessment Process for the Lemenong Battery Energy Storage Facility, have been utilized as the specialists site sensitivity verification reports as the specialists have conducted a site visit and determined the site sensitivity verification for the proposed project:

- Aquatic and Wetland Assessment;
- Terrestrial Biodiversity Compliance Statement; and
- Heritage Impact Assessment.

The Agricultural Site Sensitivity Verification Report was conducted to meet the requirements of the Norms Standard.

Refer to Appendix A for the following reports:

- Appendix A.1 Agriculture Site Sensitivity Verification Report
- Appendix A.2 Aquatic and Wetland Assessment;
- Appendix A.3 Terrestrial Biodiversity Compliance Statement; and
- Appendix A.4 Heritage Impact Assessment.

Refer to Appendix B for the Environmental Management Plan for the Lemenong BESF.

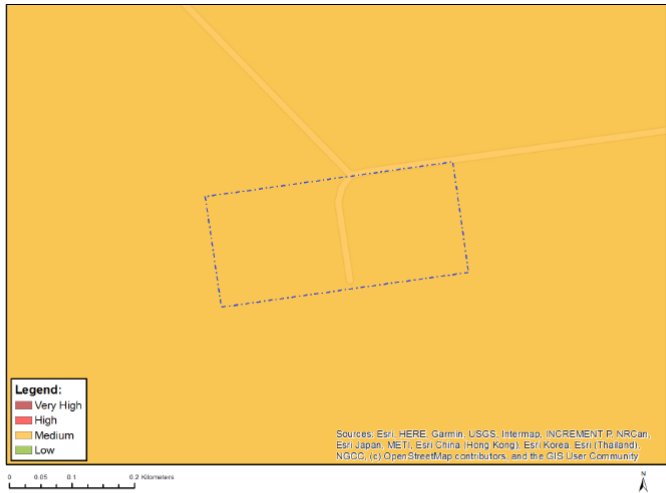
## 4. OUTCOMES OF THE SITE SENSITIVITY VERIFICATION

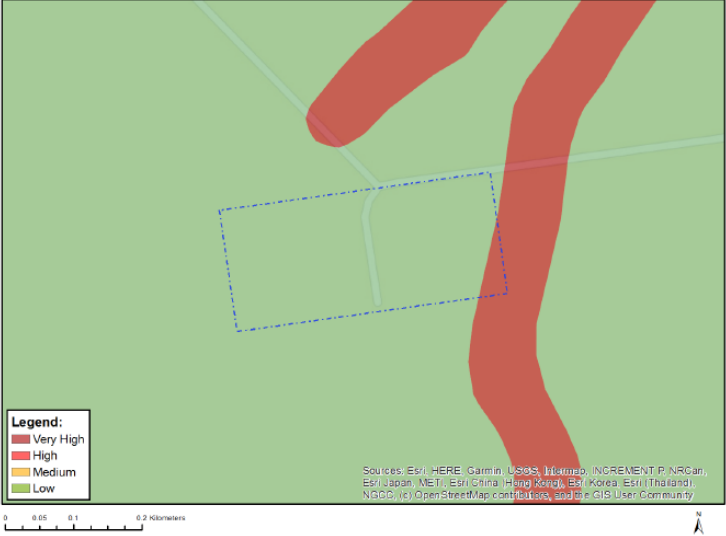
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Refer to Table below for the outcome of the site sensitivity verification.



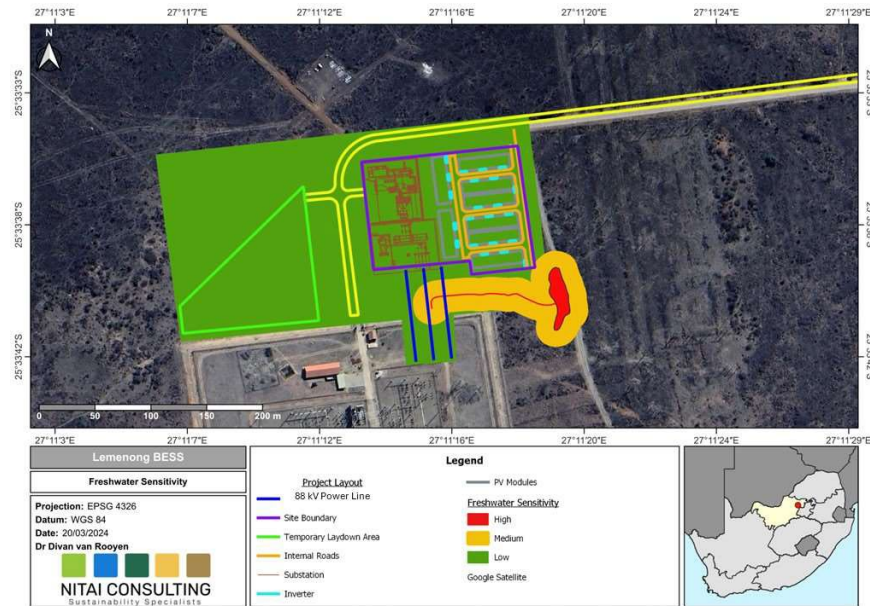
**Table 9: Sensitivity Rating for Specialist Themes**

Theme / Specialist Study identified as per 2.1.2	Sensitivity Rating as per the Screening Report	Sensitivity Rating as per Verification Findings	Site Sensitivity Verification												
<p><b>2.1.2.1</b></p> <p><b>Agriculture Site Sensitivity Verification</b></p>	<p>Medium</p>	<p>N/A</p>	<p>The Screening Tool assigned a Medium sensitivity rating for the Agriculture Theme (see extract below). Upon interrogation of the surrounding environment, through the site visit, desktop review and satellite imagery, no evidence was found of agriculture activities that could be impacted upon by the proposed development.</p> <div style="text-align: center;">  <table border="1" data-bbox="1041 1114 1644 1155"> <thead> <tr> <th>Very High sensitivity</th> <th>High sensitivity</th> <th>Medium sensitivity</th> <th>Low sensitivity</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td>X</td> <td></td> </tr> </tbody> </table> <p>Sensitivity Features:</p> <table border="1" data-bbox="1041 1217 1554 1259"> <thead> <tr> <th>Sensitivity</th> <th>Feature(s)</th> </tr> </thead> <tbody> <tr> <td>Medium</td> <td>Land capability:06. Low-Moderate/07. Low-Moderate/08. Moderate</td> </tr> </tbody> </table> </div> <p><b>Figure 2: Extract from Screening Tool</b></p> <p>The sensitivity verification assessment in terms of the protocol found that the BESS site is medium sensitive. The size of the affected land is too small and isolated to be used gainfully for any farming purpose. There are no no-go areas on the</p>	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity			X		Sensitivity	Feature(s)	Medium	Land capability:06. Low-Moderate/07. Low-Moderate/08. Moderate
Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity												
		X													
Sensitivity	Feature(s)														
Medium	Land capability:06. Low-Moderate/07. Low-Moderate/08. Moderate														

Theme / Specialist Study identified as per 2.1.2	Sensitivity Rating as per the Screening Report	Sensitivity Rating as per Verification Findings	Site Sensitivity Verification														
			site														
<p><b>2.1.2.2</b></p> <p><b>Aquatic biodiversity inclusive of flora and ecosystem</b></p>	<p>High</p>	<p>High</p>	<p>The screening Tool rated the aquatic biodiversity theme as Very high for only a small section (south eastern corner) of the footprint (see extract below). This sensitivity is attributed to the footprint (&lt;1 ha) traversing an ESA1 area.</p>  <p><b>Legend:</b>  <span style="color: red;">■</span> Very High  <span style="color: orange;">■</span> High  <span style="color: yellow;">■</span> Medium  <span style="color: green;">■</span> Low</p> <p>Sources: Esri, HERE, Garmin, USGS, Imagery, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Swi, Korea, Esri (Thailand), NGDD, (c) OpenStreetMap contributors, and the GIS User Community</p> <table border="1" data-bbox="1010 1137 1675 1182"> <thead> <tr> <th>Very High sensitivity</th> <th>High sensitivity</th> <th>Medium sensitivity</th> <th>Low sensitivity</th> </tr> </thead> <tbody> <tr> <td>X</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p><b>Sensitivity Features:</b></p> <table border="1" data-bbox="1010 1249 1249 1313"> <thead> <tr> <th>Sensitivity</th> <th>Feature(s)</th> </tr> </thead> <tbody> <tr> <td>Low</td> <td>Low sensitivity</td> </tr> <tr> <td>Very High</td> <td>ESA 1</td> </tr> </tbody> </table> <p><b>Figure 3: Extract from Screening Tool</b></p> <p>Ground truthing of the project footprint, validated through a site visit, led to the classification of the wetland and drainage line as High sensitivity which confirmed the sensitivity as per the Screening Tool. Additionally, the majority of the project</p>	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity	X				Sensitivity	Feature(s)	Low	Low sensitivity	Very High	ESA 1
Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity														
X																	
Sensitivity	Feature(s)																
Low	Low sensitivity																
Very High	ESA 1																

Theme / Specialist Study identified as per 2.1.2	Sensitivity Rating as per the Screening Report	Sensitivity Rating as per Verification Findings	<b>Site Sensitivity Verification</b>
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footprint was designated as Low sensitivity. Notably, the associated buffer zones were classified as Medium sensitivity. Importantly, the watercourses (wetland and drainage line) are no-go areas for development as well as their associated buffer zones (See Figure 4).

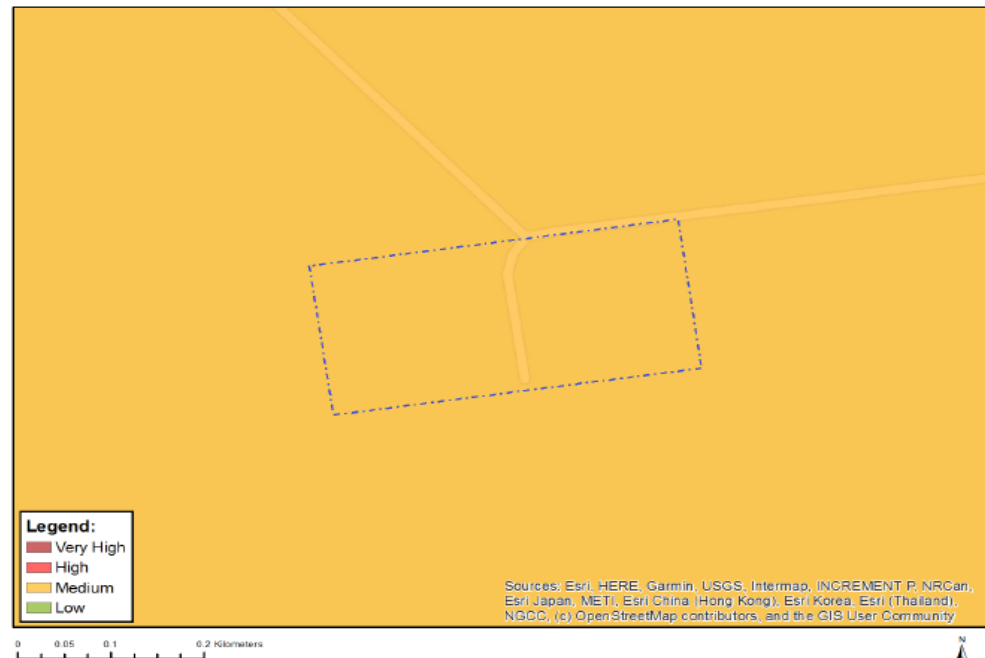


**Figure 4: Freshwater Sensitivity surrounding the proposed Lemenong BESF Development (Van Rooyen, 2024).**

2.1.2.3	Flora: Low	Flora: Low	The Screening Tool assigned a Low sensitivity rating for <b>Plant Species</b> (see extract below). Following the field survey
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Theme / Specialist Study identified as per 2.1.2	Sensitivity Rating as per the Screening Report	Sensitivity Rating as per Verification Findings	Site Sensitivity Verification
<p><b>Terrestrial biodiversity inclusive of flora and ecosystem</b></p>	<p>Fauna: Medium</p>	<p>Fauna: Low</p>	<p>findings, the plant theme is confirmed as having 'Low' sensitivity. This is due to much of the development footprint being located within disturbed areas or along roads and their associated servitudes, which are low sensitivity. No protected trees or SCC flora species were observed.</p> <div data-bbox="945 472 1865 1157" data-label="Figure"> </div> <p><b>Figure 5: Extract from Screening Tool</b></p> <p>According to the findings from the Screening Tool, the <b>Animal Species</b> theme for the project site is of Medium Sensitivity. This is due to the potential presence of <i>Aves-Aquila rapax</i> and <i>Mammalia-Crocidura maquassiensis</i>. Following the field survey findings, the animal theme may be re-classified as having 'Low' sensitivity. This is because animal activity was low, due to the extent of disturbance in general and cattle grazing the area, as well as the poor habitat condition. The species present are most likely not resident due to the modified state of the area. No SCC were observed during the field survey.</p>

Theme / Specialist Study identified as per 2.1.2	Sensitivity Rating as per the Screening Report	Sensitivity Rating as per Verification Findings	<b>Site Sensitivity Verification</b>
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Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Aves-Aquila rapax
Medium	Mammalia-Crocidura maquassiensis

**Figure 6: Extract from Screening Tool**

According to the findings from the Screening Tool, the **Terrestrial Biodiversity** theme sensitivity for project site is Very High, due to the fact it forms part of Critical Biodiversity Area 2 (CBA2), National Protected Areas Expansion Strategy and falls within an Endangered Ecosystem (Marikana Thornveld). The appointed specialist has verified the Project Area as Low Sensitivity. This habitat is largely limited to areas that have been impacted through effects from agricultural grazing


Theme / Specialist Study identified as per 2.1.2	Sensitivity Rating as per the Screening Report	Sensitivity Rating as per Verification Findings	<b>Site Sensitivity Verification</b>												
			<p>practices and associated impacts, roads, and land use, as well as mismanagement and inadequate rehabilitation procedures. These habitats are not entirely transformed, but exist in a constant disturbed state, as they cannot recover to a more natural state, due to the ongoing disturbances and impacts received. Transformed habitat was present in the form of the existing road, existing infrastructure, or any other areas devoid of vegetation, artificially and any areas constituting bush encroachment by thorny shrubs. Due to the transformed nature of this habitat, it is regarded as having a low sensitivity.</p> <div style="text-align: center;">  </div> <table border="1" data-bbox="1043 1158 1704 1203"> <thead> <tr> <th>Very High sensitivity</th> <th>High sensitivity</th> <th>Medium sensitivity</th> <th>Low sensitivity</th> </tr> </thead> <tbody> <tr> <td>X</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Sensitivity Features:</p> <table border="1" data-bbox="1043 1270 1335 1315"> <thead> <tr> <th>Sensitivity</th> <th>Feature(s)</th> </tr> </thead> <tbody> <tr> <td>Very High</td> <td>EN_Marikana Thornveld</td> </tr> </tbody> </table>	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity	X				Sensitivity	Feature(s)	Very High	EN_Marikana Thornveld
Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity												
X															
Sensitivity	Feature(s)														
Very High	EN_Marikana Thornveld														

Figure 7: Extract from Screening Tool

## 5. Heritage Impact Assessment

Three possible heritage resources were identified within the Lemenong BESF footprint, which comprised the demolished remains of modern/recent structures (LEM-01, LEM-02, LEM-03). The details of the possible heritage resources identified are summarised in the tables below.

**Table 10: Identified Heritage Resources – LEM 01 (Kitto, 2024)**

<b>Site Name</b>	LEM-01
<b>GPS Coordinates</b>	-25.560598° ; 27.188249°
<b>Site Description</b>	Ruins
<b>Approximate Age</b>	Younger than 60 years old
<b>NHRA, No. 25</b>	N/A
<b>Field Grading and Ratings</b>	
<b>Site context and description</b>	The remains of several cement foundations (3-6) were visible. They were very overgrown with tall grass and vegetation
<b>Site Density</b>	Between 3-6 foundations visible. Satellite imagery c2009 shows 16-20 foundation remains
<b>Uniqueness</b>	Low
<b>Heritage Significance</b>	NCW – Not conservation worthy
<b>Mitigation</b>	No mitigation required

**Table 11: Identified Heritage Resources – LEM 02 (Kitto, 2024)**

<b>Site Name</b>	LEM-02
<b>GPS Coordinates</b>	-25.560361° ; 27.186236°
<b>Site Description</b>	Foundation and concrete building rubble
<b>Approximate Age</b>	Younger than 60 years
<b>NHRA, No. 25</b>	N/A
<b>Field Grading and Ratings</b>	
<b>Site context and description</b>	Foundation remains with concrete and asbestos building material
<b>Site Density</b>	N/A
<b>Uniqueness</b>	N/A
<b>Heritage Significance</b>	NCW
<b>Mitigation</b>	No mitigation is required.

**Table 12: Identified Heritage Resources – BTK- 03 (Kitto, 2024)**

<b>Site Name</b>	LEM-03
<b>GPS Coordinates</b>	-25.560583° ; 27.186224°
<b>Site Description</b>	Concrete and wooden remains from structure, dumped
<b>Approximate Age</b>	Younger than 60 years
<b>NHRA, No. 25</b>	N/A
<b>Field Grading and Ratings</b>	
<b>Site context and description</b>	Circular concrete features and wooden pole remains from structure, dumped
<b>Site Density</b>	N/A
<b>Uniqueness</b>	N/A
<b>Heritage Significance</b>	NCW
<b>Mitigation</b>	No mitigation is required

## 6. CONSULTATION

### 6.1 Background for initial Public Participation Process

The initial environmental process for the Lemenong BESF triggered various Listed Activities in the National Environmental Management Act (NEMA) Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) requiring Application for Environmental Authorisation (EA) through conducting a Basic Assessment Process. Table 13 presents the public participation conducted for the Basic Assessment Process.

**Table 13: Public Participation Process for the Basic Assessment Process**

Date	Description
March – April 2024	Engagements with the relevant Traditional Authorities (TA) and Ward Councillors. <ul style="list-style-type: none"> <li>• Tuesday, 12/03/2024, 11H00 at Royal Bafokeng Enterprise Development, in attendance : Ward 5- RBN &amp; RLM Cllrs.</li> <li>• Tuesday, 19/03/2024, 10H30 at Kanana Multipurpose Centre, in attendance : LTM Green Energies, RBA Councilors (Central Region) and Nemaï Consulting.</li> <li>• Tuesday, 19/03/2024, 14H30 at Phokeng Civic Centre, in attendance : RBA Environmental Officer , RLM Ward 5 Cllr and Nemaï Consulting.</li> <li>• Wednesday, 20/04/2024, 11H00 at Kanana Multipurpose Centre, in attendance : RBA Environmental Officer and RLM Nemaï Consulting.</li> <li>• Wednesday, 10/03/2024, 15H00 at Mmakokoma, in attendance: LTM Green Energies, Ward 23 Cllr &amp; Community.</li> <li>• Monday, 15/04/2024, 17H00 at Kgotla ya Lemenong, in attendance: LTM Green Energies, RBA Kgosana for Lemenong, Ward 05 RLM Cllr , Lemenong Council Secretary &amp; Community.</li> </ul>
22 March 2024	Placed advertisements in the Rustenburg Herald.
20 March 2024	Site notices were placed on the boundary of the site and in adjacent properties and site photographs of the site was taken in 8 cardinal points.
27 March 2024	An electronic copy was uploaded to the following website, for downloading purposes: <a href="https://nemaï.co.za/downloads/">https://nemaï.co.za/downloads/</a>
27 March 2024	Email notifications sent to Interest and Affected Parties (I&APs).
28 March 2024	A hard copy of the Draft Basic Assessment was placed at the Rustenburg Public Library.



## 6.2 Consultation

In terms of meeting paragraph 5 of the Norms Standard, the Consultation presented in Table 14 has been conducted. The Consultation period for the Site Sensitivity Verification Report (including the specialist studies and Environmental Management Programme) is from 20 May 2024 to 22 May 2024. Comments received during this period will be included into the Final Site Sensitivity Verification Report and submitted to the Department of Forestry, Fisheries and the Environment (DFFE).

**Table 14: Consultation for the Norms Standard (in terms of paragraph 5)**

5	Consultation	Applicability to the Project
5.1	The environmental assessment practitioner or environmental scientist on behalf of the proponent must identify and consult with parties who may be affected by the proposed facility, including as a minimum the following:	
5.1.1	Adjacent landowners and land occupiers;	Email notifications were sent on 17 May 2024 regarding the availability of the Site Sensitivity Verification Report from 20 May 2024 to 22 May 2024.
5.1.2	Relevant conservation and biodiversity entities /agencies;	
5.1.3	Relevant non-governmental organisations involved with ecology including bird preservation;	
5.1.4	Relevant tourist and farmers associations;	
5.1.5	The relevant heritage resources authority; and	
5.1.6	Relevant local government authority	
5.2	The consultation process must as a minimum include the following:	
5.2.1	Notification of the proposed development including	
5.2.1.1	Details of the proponent;	Email notifications sent on 17 May 2024 with the required information.
5.2.1.2	A detailed project description including the need and desirability of the proposed project;	
5.2.1.3	The location of the proposed facility including a map generated at an appropriate scale that displays the extent of the proposed facility in as much details as possible overlaid on the identified environmental sensitivities per theme; and	
5.2.2	Notification of where the site sensitivity verification report and environmental management programme can be assessed; and	
5.2.3	A request for inputs and the timeframe in which input are to be submitted.	Input was requested from 20 May to 22 May 2024.

Refer to Appendix C for a copy of the Comment Sheet. Comments must be provided by 22 May 2024.