

Dale Holder

From: Devlin Fortuin <Devlin.Fortuin@westerncape.gov.za>
Sent: Monday, 30 October 2023 14:16
To: Dale Holder
Cc: Vanessa Stoffels
Subject: (Job 25208) DRAFT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE...

Good Day

Your email to this Branch dated 15 September 2023 refers.

This Branch offers no objection to the issuing of the environmental authorisation.

Detailed comment in terms of the traffic issues will be provided to the local authority as part of the land use process. The land use application must be accompanied by a TIA address the impact during the construction period.

Kind regards

Devlin Fortuin, PrEng

Production Engineer: Road Use Management
Chief Directorate: Road Planning
Department of Infrastructure
Western Cape Government

3rd Floor, 9 Dorp Street, Cape Town

Tel: +27 21 483 2012

Fax: +27 21 483 2205

Email: devlin.fortuin@westerncape.gov.za

Website: www.westerncape.gov.za



**Western Cape
Government**

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Transport and
Public Works

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If you are not the intended recipient you may not copy or deliver this message to anyone."

Dale Holder

From: Woman Power <womanpower0007@gmail.com>
Sent: Wednesday, 22 November 2023 13:54
To: Dale Holder
Subject: Re: Sunveld Solar PV Facility and Battery Energy Storage System - West Coast

Thank you Dale,

Much appreciated!

Kind Regards

Charlene Brand
064 963 6224

On Wed, 22 Nov 2023, 09:51 Dale Holder, <dale@cape-eaprac.co.za> wrote:

Dear Charlene

Thank you for the email.

I have added the two email addresses below to the I&AP database for Sunveld Energy. We will notify you once the Draft Basic Assessment report is available for review and comment.

Regards,

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

From: Woman Power <womanpower0007@gmail.com>
Sent: Tuesday, November 21, 2023 9:35 PM
To: Dale Holder <dale@cape-eaprac.co.za>
Subject: Fwd: Sunveld Solar PV Facility and Battery Energy Storage System - West Coast

Hi Dale,

Please add my 2 business email addresses to your data base to receive correspondence on the above project.

charlene@lithembasecurity.co.za

wsales1@timberconnection.co.za

Kind Regards

Charlene Brand

064 963 6224

----- Forwarded message -----

From: **Woman Power** <womanpower0007@gmail.com>
Date: Tue, 19 Sept 2023, 17:56
Subject: Sunveld Solar PV Facility and Battery Energy Storage System - West Coast
To: <ddale@cape-eaprac.co.za>

Hi Dale,

Thank you for taking my call today. Please add my email and info@lithembasecurity to the database for correspondence on this project.

--

Kind Regards

Charlene Brand

+2764 963 6224

Dale Holder

From: bergmun@telkomsa.net
Sent: Thursday, 07 March 2024 10:27
To: jouberta@bergmun.org.za
Cc: Dale Holder; wagnerw@bergmun.org.za
Subject: Fwd: **Suspected SPAM**
Attachments: image001.png; image002.png; image003.jpg; BER799.07 Notification of Draft EIR - Sunveld Solar PV BESS.pdf

Good day,

Acknowledge receipt, forwarded to Ms Angila Joubert, Environmental Planning Management Officer.

Kind regards

Hanlie de Beer
Senior Clerk: Records
Directorate Corporate Services
Bergrivier Municipality

----- Forwarded Message -----

From: "Dale Holder" <dale@cape-eaprac.co.za>
To: bergmun@telkomsa.net
Sent: Wednesday, March 6, 2024 4:16:00 PM
Subject: **Suspected SPAM**

Dear Stakeholder

NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

Please find the attached notification of the availability of the Draft Environmental Impact Report for the proposed Sunveld Solar and BESS project.

Digital copies of the Draft Environmental Impact Report and all associated and supplementary information is available at the following locations:

1. On the Cape EAPrac website at: www.cape-eaprac.co.za<<http://www.cape-eaprac.co.za>>.
2. Dedicated Download link on Dropbox at:
<https://www.dropbox.com/scl/fo/ukq6h6f48ok7smqy1u6g7/h?rlkey=7yt3ot6p59axwqyxuj0md3yze&dl=0>
3. Dedicated Download Link on We Transfer at: <https://we.tl/t-3devQ2CysQ>

If you are unable to access these digital platforms provided, kindly contact me and I will arrange to provide a hardcopy of the relevant documentation.

Comments on the Draft Environmental Impact Report should please be submitted to Cape EAPrac in writing on or before 08 April 2024.

Kind regards/Vriendelike groete

Dale Holder
SENIOR ENVIRONMENTAL PRACTITIONER
Cape EAPrac
NDip Nat.Con
EAPASA Reg. 2019/301

From: Dale Holder
Sent: Friday, September 15, 2023 1:41 PM
To: bergmun@telkomsa.net
Subject: Notification of Availability of Draft Scoping Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear Stakeholder

NOTIFICATION OF AVAILABILITY OF DRAFT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

DFFE Reference No. : 2023-06-0016 (Pre Application Reference Number)
DFFE Case Officer : Mr Lunga Dlova

Kindly find the attached notification of the availability of the Draft Scoping Report for the Proposed Sunveld Solar PV and BESS facility.

The Draft Scoping Report is available for review and comment for a 30 day comment period from 15 September 2023 - 16 October 2023.

Digital copies of the Draft Scoping Report and all associated and supplementary information is available at the following locations:

- * On the Cape EAPrac website at: www.cape-eaprac.co.za<<http://www.cape-eaprac.co.za>>.
- * Dedicated Download link on Dropbox at:
<https://www.dropbox.com/scl/fo/ent7ucsye8vc2rlxza8ri/h?rlkey=546kxbwcrjgpwox3cxipfyqnj&dl=0>
- * Dedicated Download Link on We Transfer at: <https://we.tl/t-XDrbSu0Op2>

Should you not be able to access the digital platforms above, please contact Cape EAPrac on the contact details below and we will arrange an alternative method of accessing either hard or digital copies of the Report.

Please contact the undersigned should you have any further queries.

Kind regards/Vriendelike groete

Dale Holder
SENIOR ENVIRONMENTAL PRACTITIONER
Cape EAPrac
NDip Nat.Con
EAPASA Reg. 2019/301

[cid:image002.png@01DA6FE1.930E65D0]T: 044 874 0365
17 Progress Street, George
PO Box 2070, George 6530

[cid:image003.jpg@01DA6FE1.930E65D0]Reduce Reuse Recycle In the interest of resource conservation please reconsider printing this email.

Please Note: When registering as an Interested and Affected Party (I&AP), you consent to the lawful processing of personal information for the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act no. 4 of 2013). Your information will be used for this project, including the initial application as well as subsequent related appeals, amendments or audits, or any future project where you are identified as an I&AP. You also agree that by submitting comment to inform this process, your contact details will, where required by a public body, be reflected in our regulated reports that must be compiled and submitted to the general public, registered stakeholders, organs of state as well as the competent authority for consideration and decision-making. Kindly view our Privacy Statement for more information.

Dale Holder

From: Kliphoek Info <kliphoekinfo@kliphoek.co.za>
Sent: Thursday, 07 March 2024 11:12
To: Dale Holder; jdvdbest@gmail.com; jdvdbest@gmail.com; jdvdbest@gmail.com
Subject: RE: Notification of Availability of Draft Environmental Impact Report for the Proposed Sunveld Solar and BESS

Good day Dale

Thank you for the email.

Kind Regards / Vriendelike Groete

Jurgen Kotzé

082 854 8828

From: Dale Holder <dale@cape-eaprac.co.za>
Sent: Thursday, March 7, 2024 8:54 AM
To: jdvdbest@gmail.com; jdvdbest@gmail.com; jdvdbest@gmail.com; kliphoekinfo@kliphoek.co.za
Subject: Notification of Availability of Draft Environmental Impact Report for the Proposed Sunveld Solar and BESS

Dear Stakeholder

NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

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<https://www.dropbox.com/scl/fo/ukq6h6f48ok7smqy1u6g7/h?rlkey=7yt3ot6p59axwqyxuj0md3yze&dl=0>
3. Dedicated Download Link on We Transfer at: <https://we.tl/t-3devQ2CysQ>

If you are unable to access these digital platforms provided, kindly contact me and I will arrange to provide a hardcopy of the relevant documentation.

Comments on the Draft Environmental Impact Report should please be submitted to Cape EAPrac in writing on or before 08 April 2024.

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

T: 044 874 0365

17 Progress Street, George

PO Box 2070, George 6530



Cape EAPrac



Reduce Reuse Recycle

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Dale Holder

From: Dale Holder
Sent: Friday, 08 March 2024 13:11
To: Angila Joubert
Subject: RE: NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118

Hi Angila

Yes, your comments as well as the responses will be captured in the Comments and Responses report in the Final EIR that will be submitted for decision making.

It will also include the comments that you made during the scoping phase as follows;

Angila Joubert: Environmental Planning Management Officer Berg River Municipality – 19 September 2023	
Please see below my comments on the Draft Scoping report for the Sunveld Solar PV	The Aquatic Features, Jackal Buzzard nest as well as the buffers on the completely avoided by the proposed layout (Layout Alternative 3). The g black harrier habitat has also been avoided by the currently preferred lay
The below sentence from the Draft Scoping report refers,	
The sensitive Avifaunal Areas include, Suitable Black Harrier Habitat, Aquatic Features as well as a Jackal Buzzard Nest and Buffer.	The independent avifaunal specialist is considering the potential impact & detail the required mitigation measures that need to be implemented (the will also be adapted where necessary). The detailed mitigation plan and will be presented in the next phase of the environmental process (The EIR Reporting Phase).
How will this be mitigated and impact upon these species be prevented?	
Thank you Dale for the feedback.	I confirm that I have added you to my I&AP register with your email address contact
Will you also please include myself as contact person within your I&Ps list?	

Kind regards/Vriendelike groete

Dale Holder
SENIOR ENVIRONMENTAL PRACTITIONER
Cape EAPrac
NDip Nat.Con
EAPASA Reg. 2019/301

From: Angila Joubert <JoubertA@Bergmun.org.za>
Sent: Friday, March 8, 2024 1:05 PM
To: Dale Holder <dale@cape-eaprac.co.za>
Subject: RE: NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118

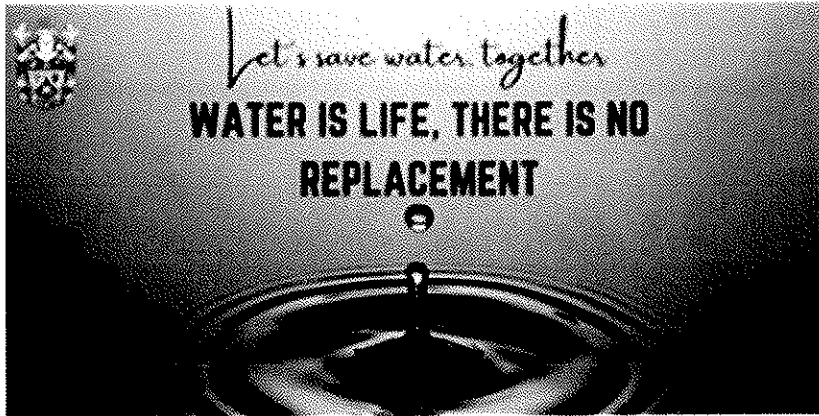
Good afternoon Dale

Thank you for your response.

Will the comments and the response thereto be captured and documented in your official Comments and response report for this project as part of the Environmental approval process?

Kind regards

Angila Joubert
Environmental Planning Management Officer



From: Dale Holder [mailto:dale@cape-eaprac.co.za]

Sent: Friday, 08 March 2024 08:54

To: Angila Joubert <JoubertA@Bergmun.org.za>

Subject: RE: NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118

Dear Angila

Thank you very much for the comprehensive comment. Please see responses in Red text below.

I am happy to discuss further if you would like to.

Kind regards/Vriendelike groete

Dale Holder
SENIOR ENVIRONMENTAL PRACTITIONER
Cape EAPrac
NDip Nat.Con
EAPASA Reg. 2019/301

-----Original Message-----

From: Angila Joubert <JoubertA@Bergmun.org.za>

Sent: Thursday, March 7, 2024 4:20 PM

To: Dale Holder <dale@cape-eaprac.co.za>

Subject: RE: NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118

Good afternoon Dale

EAP for the proposed Sunveld Solar PV and BESS Facility

Please see below comments from the Environmental Planning Management officer for Bergrivier Municipality:

1) As stated in the Draft Environmental Impact Report for Sunveld Solar PV Facility and BESS, dated 5 March 2024:
"5.4.3 Botanical Species of conservation concern.

According to the terrestrial biodiversity specialist, fifty-eight (58) species were recorded within the study site. Of these species, one was listed as Endangered (EN), two as Vulnerable (VU) and one as Near Threatened (NT). These species were present within the near-intact vegetation except for a population of *Leucospermum rodolentum* (VU) which were found to occur within the secondary vegetation, north of the R399.

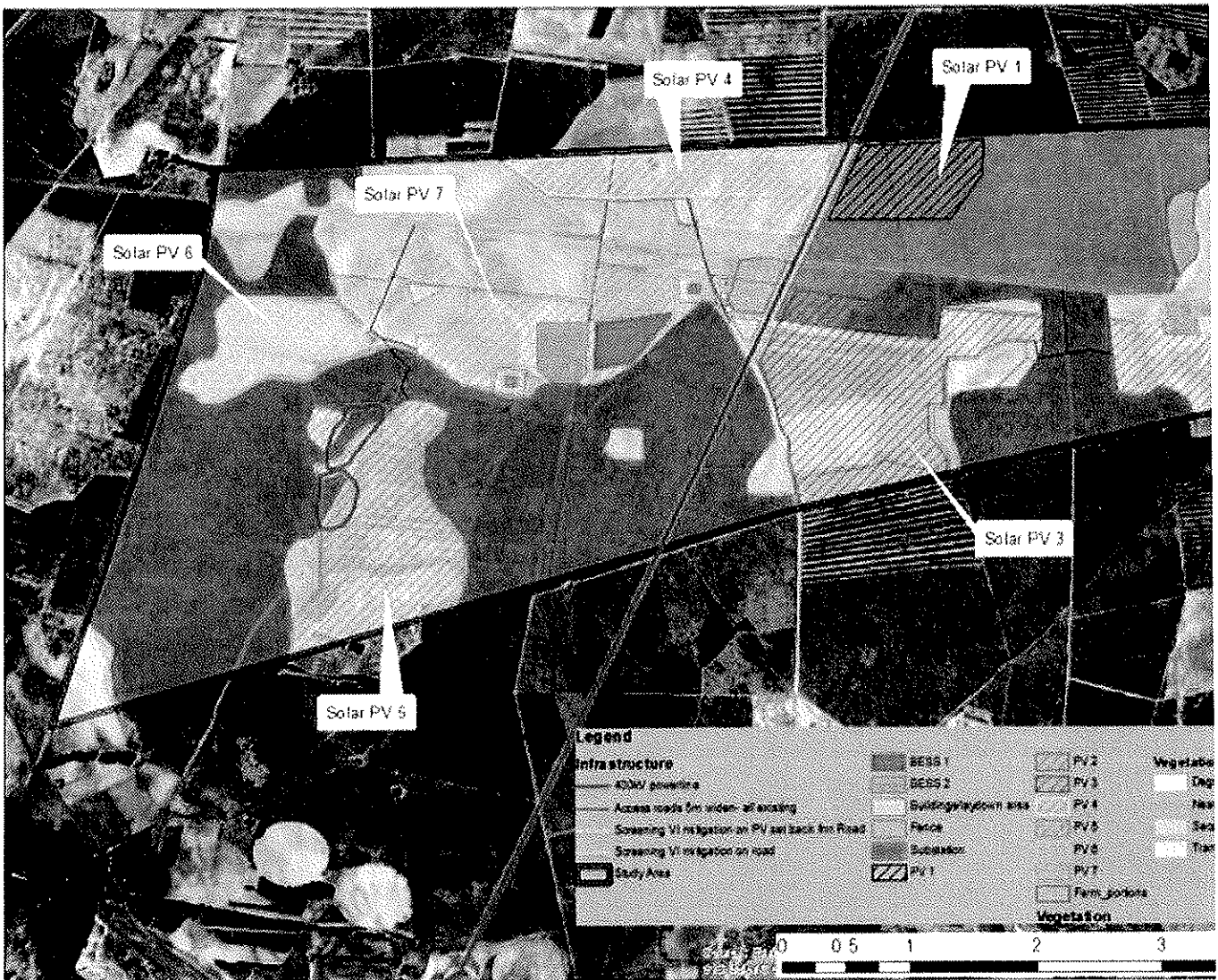
The specialist desktop assessment of the study site identified thirty-seven (37) threatened and near threatened species that could occur within the project area. Based on the results of the field survey, it was determined that of

these thirty-seven (37) species, two (2) were confirmed to occur in the project area, ten (10) have a high likelihood of occurrence based on suitable available habitat being present, three (3) have a moderate likelihood of occurrence and twenty-four (24) have a low likelihood of occurrence.

Table 16: Assessment of the likelihood of occurrence of Species of Conservation Concern identified in literature as possibly occurring within the Study Site (Biodiversity Africa, 2024)."

Comment: Therefore there is a great loss in Saldanha Flat Strandveld, secondary vegetation and loss of plant species of conservation concern due to large extent of indigenous vegetation clearance. How will this be mitigated?

This section in draft BAR related to a discussion on the botanical component of the entire study site which included that affected by the development footprint as well as areas that were avoided due to their sensitivity. The footprint of the development was however designed in such a way as to avoid all of the near intact Saldanha Flats Strandveld with the exception of a small fragmented portions as highlighted in red in the image below.



There is a small area of 9.1ha of near-intact vegetation and 15.8ha of degraded vegetation that will be impacted by project infrastructure which the specialist found this to be of low significance after mitigation. To account for this loss, areas within the study area, that will not be affected by project infrastructure, will need to be rehabilitated (alien vegetation managed) and set aside as conservation areas. The loss of a small subpopulation of *Leucospermum rodolentum* must be mitigated by ensuring that set aside areas include this species and that these subpopulations increase in size over time to account for the loss of the subpopulation to Solar PV 1. This would result in a net gain of Saldanha Flats Strandveld and *Leucospermum rodolentum* over the long term. Protected species that can be easily and successfully translocated, will have to be moved into surrounding undeveloped areas on the same property as part of the rehabilitation efforts.

2) Also stated in the Draft EIR:

"5.5.1 Faunal Species of conservation concern According to the terrestrial biodiversity specialist, faunal species of conservation concern are those listed as threatened, near-threatened and/or are endemic or range restricted. The Western Cape hosts several terrestrial vertebrate species of conservation concern of which four have a distribution which includes the Study. This includes one amphibian species, one reptile species and two mammal species. Table 17: Faunal Species of Conservation Concern that have a distribution which includes the study site (Biodiversity Africa, 2023) In addition to these species, the Screening tool for Sunveld Solar PV also identified the possible occurrence of an invertebrate species of conservation concern, namely *Pachysoma Aesculapius*. Dr Jonothan Colville was appointed to undertake an invertebrate study of the site to determine to potential presence of this species (Appendix E2).

According to the specialist, this species of flightless dung beetle is endemic to South Africa and restricted to low-altitude areas (>300m) of the south-western parts of the Western Cape Province.

A historical collection record from 1973 for P is known from the north-eastern part of the study site.

Historical collection records indicate that this species is associated with several types of Sand Fynbos (Leipoldtville Sand Fynbos, Atlantis Sand Fynbos, and Hopefield Sand Fynbos). It has a limited range, extending from Cape Town northwards to the mouth of the Olifants River The specialist has made certain recommendations regarding the layout to ensure the persistence of this species, which have been considered in the development of Layout Alternative 5 (Mitigated Preferred Alternative)"

Comment: Loss of faunal habitats, loss of faunal species of conservation concern. Disturbance of faunal species and their livelihoods due to construction related noise, dust and obstructions. Mortality of faunal species due to operational related activities How will this be avoided and mitigated?

The following mitigation measures were proposed by the Faunal Specialist and have been incorporated into the EMPr. It is important to note that if the project is authorised, the EMPr will be legally binding on the applicant.

- Should any mammal, reptile or amphibian SCC be encountered during construction, these must be recorded (photographed, gps co-ord) and placed on iNaturalist.
- Should any slow-moving fauna (e.g. tortoises) occur within the construction footprint during construction, these must be moved to adjacent suitable habitat. The ECO should appoint a member of staff to walk ahead of construction machinery directly prior to vegetation clearance. Any faunal species that may die as a result of construction or operational activities must be recorded (photographed, gps co-ord) and these records uploaded to iNaturalist.
- A snake catcher must be on call during construction to remove and relocate snakes out of harm's way. Emergency protocol must be set up should anyone be bitten by a venomous snake.
- External lighting must be down lights, placed as low to the ground as possible and of low UV emitting lights, such as most LEDs. Lighting in open space areas within the development must be minimised.
- The development must consolidate road networks, as far as possible, to minimise the loss of faunal habitat.
- No construction and construction related activities are permitted outside the approved project footprint and a fine system must be put in place for transgressions by the developer and included in contractual agreements with all staff and contractors.
- Speed restrictions must be implemented on all vehicles within the development footprint (40km/h is recommended) to reduced faunal mortalities on the project roads.
- Microhabitats (e.g. rock stacks and logs) within the project footprint where clearing will occur, must be relocated to the same habitat outside of the project footprint but within the project area, preferably immediately adjacent to the removal site. E.g. Rock stacks should be restacked.
- Rehabilitation efforts must provide habitat for faunal species by placing logs and rocks at strategic sites to provide shelter for small mammals and reptiles.
- A clause must be included in contracts for ALL construction personnel (i.e. including contractors) working on site stating that: "unless the relevant permits are obtained, no wild animals will be hunted, killed, poisoned or captured. No wild animals will be imported into, exported from or transported in or

through the province. No wild animals will be sold, bought, donated and no person associated with the development will be in possession of any live wild animal, carcass or anything manufactured from the carcass." A clause relating to fines, possible dismissal and legal prosecution must be included should any of the above transgressions occur for SCC.

- Dust suppression measures must be implemented in the dry and/or windy months.
- All machinery, vehicles and earth moving equipment must be maintained and the noise these create, must meet industry minimum standards. e.g. the sound generated by a machine must be below a certain decibel as prescribed in the relevant noise control regulations. |
- Development must be designed to allow unencumbered movement of faunal species, especially of small faunal species. E.g.
 - Internal and external fences/walls (if any) must allow for the movement of small faunal species, such as rodents and reptiles, through the development. These must have ground level gaps of 10cm x 10cm at 10m intervals. These gaps must be kept free of obstructions, including plant growth and debris.
 - All guttering and kerbstones must be sloped i.e. must be less than 45° on either side or kerbstones should be slanted or lowered (less than 10cm) at 10m intervals to allow for easy movement of toads
 - Steep sided drains, gutters, canals and open pits/trenches must be covered with mesh (5mm x 5mm) to prevent fauna falling in and getting stuck. No unnecessary structures that would act as pitfall traps for animals must be constructed
 - If there are retaining walls, steps should be formed to allow for toads and frogs to move over them. These must be vegetated with plant species that offer cover.

3) Also stated in the Draft EIR:

"5.7 AVIFAUNAL COMPOSITION OF THE SITE

The specialist confirmed that during the site assessments, distribution and abundance of the bird species in and near the Project Site is mostly associated with natural vegetation. There are however some species that were associated with the modified environments, as follows:

High Voltage Power Lines: The 400kV Aurora Juno 1 power line traverses the Project Site. Power lines could provide roosting and nesting habitat for priority species, especially raptors.

Alien Trees: The Project Site contains clumps of alien trees. The trees could attract a variety of bird species for nesting and roosting.

Agriculture: The Project Site contains agricultural fields, mainly canola, wheat, grains, and planted pastures. Some priority species are likely to be associated with the cultivated fields, especially to forage (e.g., raptors and small birds). The Cape Weaver, Large-billed Lark, Blue Crane, and Barn Swallow are some of the priority species that could utilise these areas.

The specialist confirmed that the SABAP2 data indicated that a total of 259 bird species could potentially occur within the Broader Area where the Project Site is located. Of these, 135 species are classified as priority species for solar developments and 20 of these are South African Red Listed species (i.e., Species of Conservation Concern – SCC).

Of the 135 priority species, 85 are likely to occur regularly in or near the Project Site."

Comment: Solar energy may impact avifauna directly by injuring or killing birds that collide with photovoltaic (PV) panels, or with reflective Concentrated Solar Power (CSP) heliostats or parabolic mirrors. Birds may also collide with, or be electrocuted by associated infrastructure.

How will these impacts be avoided as the Berg Estuary is an IBA (Important Birding Area) and these migratory bird species to be protected at all times.

The proposed technology is PV only and will not include reflective heliostats or parabolic mirrors. The avifaunal specialist confirmed that it is unlikely that collisions with the solar panels at the PV facility will be a significant impact. The priority species which would most likely be potentially affected by this impact are mostly small birds which forage between the solar panels, and possibly raptors which prey on them, or forage for insects and reptiles between the PV panels, e.g., Rock Kestrel. The specialist confirmed that due to the absence of large permanent waterbodies at or directly adjacent to the Development Area, it is unlikely that waterbirds will be attracted to the

solar arrays due to the "lake effect". The avifaunal specialist rated the Mortality of priority species due to collisions with the solar panels as having a low significance. It is also important to note, that in the case of the proposed Sunveld PV all of the 33kV powerlines will be placed underground therefore they pose no risk to avifauna in terms of electrocutions or collisions.

Kind regards

Angila Joubert
Environmental Planning Management Officer Bergrivier Municipality
(022) 783 1112

-----Original Message-----

From: bergmun@telkomsa.net [mailto:bergmun@telkomsa.net]
Sent: Thursday, 07 March 2024 10:27
To: Angila Joubert <JoubertA@Bergmun.org.za>
Cc: dale@cape-eaprac.co.za; Werner Wagener <WagenerW@Bergmun.org.za>
Subject: Fwd: ****Suspected SPAM****

Good day,

Acknowledge receipt, forwarded to Ms Angila Joubert, Environmental Planning Management Officer.

Kind regards

Hanlie de Beer
Senior Clerk: Records
Directorate Corporate Services
Bergrivier Municipality

----- Forwarded Message -----

From: "Dale Holder" <dale@cape-eaprac.co.za>
To: bergmun@telkomsa.net
Sent: Wednesday, March 6, 2024 4:16:00 PM
Subject: ****Suspected SPAM****

Dear Stakeholder

NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

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1. On the Cape EAPrac website at: <https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=www.cape%2deaprac.co.za&umid=d7729b88-cc91-4a55-9e66-fb933270cd9f&auth=8a7107a253c4f6f22f6f4e4e99b8ef83f5ea8943-53fee6b11af1c774fe6bbb7e5722129a0a975bed><<https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.cape%2deaprac.co.za&umid=d7729b88->

[cc91-4a55-9e66-fb933270cd9f&auth=8a7107a253c4f6f22f6f4e4e99b8ef83f5ea8943-6e980add5708500a4a55772deb493317f9d5bb0f>](https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.dropbox.com%2fsci%2ffo%2fukg6h6f48ok7smqy1u6g7%2fh%3frlkey%3d7yt3ot6p59axwqyxuj0md3yze%26dl%3d0&umid=d7729b88-cc91-4a55-9e66-fb933270cd9f&auth=8a7107a253c4f6f22f6f4e4e99b8ef83f5ea8943-2bea9895a05664ea8047516e84b6549569b2b254)

2. Dedicated Download link on Dropbox at: <https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.dropbox.com%2fsci%2ffo%2fukg6h6f48ok7smqy1u6g7%2fh%3frlkey%3d7yt3ot6p59axwqyxuj0md3yze%26dl%3d0&umid=d7729b88-cc91-4a55-9e66-fb933270cd9f&auth=8a7107a253c4f6f22f6f4e4e99b8ef83f5ea8943-2bea9895a05664ea8047516e84b6549569b2b254>

3. Dedicated Download Link on We Transfer at: <https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwe.tl%2ft%2d3devQ2CysQ&umid=d7729b88-cc91-4a55-9e66-fb933270cd9f&auth=8a7107a253c4f6f22f6f4e4e99b8ef83f5ea8943-b05fce3017064dd84a50fbbfa4b898a259511b9f>

If you are unable to access these digital platforms provided, kindly contact me and I will arrange to provide a hardcopy of the relevant documentation.

Comments on the Draft Environmental Impact Report should please be submitted to Cape EAPrac in writing on or before 08 April 2024.

Kind regards/Vriendelike groete

Dale Holder
SENIOR ENVIRONMENTAL PRACTITIONER
Cape EAPrac
NDip Nat.Con
EAPASA Reg. 2019/301

From: Dale Holder
Sent: Friday, September 15, 2023 1:41 PM
To: bergmun@telkomsa.net
Subject: Notification of Availability of Draft Scoping Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear Stakeholder

NOTIFICATION OF AVAILABILITY OF DRAFT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

DFFE Reference No. : 2023-06-0016 (Pre Application Reference Number)
DFFE Case Officer : Mr Lunga Dlova

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The Draft Scoping Report is available for review and comment for a 30 day comment period from 15 September 2023 - 16 October 2023.

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ctp.trendmicro.com:443/wis/clicktime/v1/query?url=http%3a%2f%2fwww.cape%2deaprac.co.za&umid=d7729b88-cc91-4a55-9e66-fb933270cd9f&auth=8a7107a253c4f6f22f6f4e4e99b8ef83f5ea8943-6e980add5708500a4a55772deb493317f9d5bb0f>.

* Dedicated Download link on Dropbox at: <https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.dropbox.com%2fsccl%2ffo%2fent7ucsye8vc2rlxza8ri%2fh%3frlkey%3d546kxbwcrjgpwox3cxipfyqj%26dl%3d0&umid=d7729b88-cc91-4a55-9e66-fb933270cd9f&auth=8a7107a253c4f6f22f6f4e4e99b8ef83f5ea8943-02f263a1fbdff290d0f841b893f2bae35b7a80bf>

* Dedicated Download Link on We Transfer at: <https://smex-ctp.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwe.tl%2ft%2dXDrbSuO0p2&umid=d7729b88-cc91-4a55-9e66-fb933270cd9f&auth=8a7107a253c4f6f22f6f4e4e99b8ef83f5ea8943-f96eb7a91f04f3de11d2b79c51de1e20616ae9bc>

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Please contact the undersigned should you have any further queries.

Kind regards/Vriendelike groete

Dale Holder
SENIOR ENVIRONMENTAL PRACTITIONER
Cape EAPrac
NDip Nat.Con
EAPASA Reg. 2019/301

[cid:image002.png@01DA6FE1.930E65D0]T: 044 874 0365
17 Progress Street, George
PO Box 2070, George 6530

[cid:image003.jpg@01DA6FE1.930E65D0]Reduce Reuse Recycle In the interest of resource conservation please reconsider printing this email.

Please Note: When registering as an Interested and Affected Party (I&AP), you consent to the lawful processing of personal information for the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act no. 4 of 2013). Your information will be used for this project, including the initial application as well as subsequent related appeals, amendments or audits, or any future project where you are identified as an I&AP. You also agree that by submitting comment to inform this process, your contact details will, where required by a public body, be reflected in our regulated reports that must be compiled and submitted to the general public, registered stakeholders, organs of state as well as the competent authority for consideration and decision-making.

Kindly view our Privacy Statement for more information.

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Dale Holder

From: Vanessa Stoffels <Vanessa.Stoffels@westerncape.gov.za>
Sent: Friday, 08 March 2024 07:58
To: Dale Holder
Subject: RE: Notification of Availability of Draft Environmental Impact Report for proposed Sunveld Solar PV and Battery Energy Storage System

Thank you for your confirmation.

From: Dale Holder <dale@cape-eaprac.co.za>
Sent: Friday, March 8, 2024 7:48 AM
To: Vanessa Stoffels <Vanessa.Stoffels@westerncape.gov.za>
Cc: Evan Burger <Evan.Burger@westerncape.gov.za>; Devlin Fortuin <Devlin.Fortuin@westerncape.gov.za>
Subject: RE: Notification of Availability of Draft Environmental Impact Report for proposed Sunveld Solar PV and Battery Energy Storage System

Good Morning Vanessa.

Thank you for the confirmation.

Kind regards/Vriendelike groete

Dale Holder
SENIOR ENVIRONMENTAL PRACTITIONER
Cape EAPrac
NDip Nat.Con
EAPASA Reg. 2019/301

From: Vanessa Stoffels <Vanessa.Stoffels@westerncape.gov.za>
Sent: Thursday, March 7, 2024 11:07 PM
To: Dale Holder <dale@cape-eaprac.co.za>
Cc: Evan Burger <Evan.Burger@westerncape.gov.za>; Devlin Fortuin <Devlin.Fortuin@westerncape.gov.za>
Subject: RE: Notification of Availability of Draft Environmental Impact Report for proposed Sunveld Solar PV and Battery Energy Storage System

Good Day

Your email to this Branch dated 6 March 2024 refers.

This Branch's comments dated 30 October 2023 (attached) are still applicable.

Kind Regards

Vanessa Stoffels
Road Use Management
Chief Directorate Road Planning, Roads Branch
Department of Infrastructure
Western Cape Government
Tel: 021 483 4669

The Box 24th Floor, 9 Lower Burg Street, Cape Town: PO Box 2603, Cape Town 8000

Email: vanessa.stoffels@westerncape.gov.za

Website: www.westerncape.gov.za

Road Network Information System: <http://rnis.westerncape.gov.za>

Be 110% Green. Read from the screen.

From: Dale Holder <dale@cape-eaprac.co.za>

Sent: Wednesday, March 6, 2024 4:34 PM

To: Evan Burger <Evan.Burger@westerncape.gov.za>; Vanessa Stoffels <Vanessa.Stoffels@westerncape.gov.za>;
malcolm.watters@westerncape.gov.za

Subject: RE: Notification of Availability of Draft Environmental Impact Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear Stakeholder

NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

Please find the attached notification of the availability of the Draft Environmental Impact Report for the proposed Sunveld Solar and BESS project.

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1. On the Cape EAPrac website at: www.cape-eaprac.co.za.
2. Dedicated Download link on Dropbox at:
<https://www.dropbox.com/scl/fo/ukq6h6f48ok7smqy1u6g7/h?rlkey=7yt3ot6p59axwqyxuj0md3yze&dl=0>
3. Dedicated Download Link on We Transfer at: <https://we.tl/t-3devQ2CysQ>

If you are unable to access these digital platforms provided, kindly contact me and I will arrange to provide a hardcopy of the relevant documentation.

Comments on the Draft Environmental Impact Report should please be submitted to Cape EAPrac in writing on or before 08 April 2024.

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

From: Dale Holder

Sent: Friday, September 15, 2023 1:11 PM

To: Evan.Burger@westerncape.gov.za; Vanessa Stoffels <Vanessa.Stoffels@westerncape.gov.za>
malcolm.watters@westerncape.gov.za

Subject: Notification of Availability of Draft Scoping Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear Department of Transport Colleagues

NOTIFICATION OF AVAILABILITY OF DRAFT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

DFFE Reference No. : 2023-06-0016 (Pre Application Reference Number)
DFFE Case Officer : Mr Lunga Dlova

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- Dedicated Download Link on We Transfer at: <https://we.tl/t-XDrbSuOOp2>

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Please contact the undersigned should you have any further queries.

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

T: 044 874 0365
17 Progress Street, George
PO Box 2070, George 6530



Cape EAPrac



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Please Note: When registering as an Interested and Affected Party (i&AP), you consent to the lawful processing of personal information for the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act no. 4 of 2013). Your information will be used for this project, including the initial application as well as subsequent related appeals,

amendments or audits, or any future project where you are identified as an I&AP. You also agree that by submitting comment to inform this process, your contact details will, where required by a public body, be reflected in our regulated reports that must be compiled and submitted to the general public, registered stakeholders, organs of state as well as the competent authority for consideration and decision-making.

Kindly view our Privacy Statement for more information.

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If you are not the intended recipient you may not copy or deliver this message to anyone."

Dale Holder

From: Dale Holder
Sent: Friday, 08 March 2024 12:18
To: BC Admin
Cc: MMatlala Rabothata; Lindiwe Victoria Dlamini
Subject: RE: Notification of Availability of Draft Environmental Impact Report for proposed Sunveld Solar PV and Battery Energy Storage System
Attachments: SUNVELD Layout Detail V5-1_A_3Mar24.kmz

Dear Tebego

Thank you for the email.

Kindly find attached KMZ of the preferred Layout (Layout Alternative 5)

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat. Con

EAPASA Reg. 2019/301

From: BC Admin <bcadmin@dffe.gov.za>
Sent: Friday, March 8, 2024 12:11 PM
To: Dale Holder <dale@cape-eaprac.co.za>
Cc: MMatlala Rabothata <MRABOTHATA@dffe.gov.za>; Lindiwe Victoria Dlamini <LVDlamini@dffe.gov.za>
Subject: RE: Notification of Availability of Draft Environmental Impact Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear Sir/Madam

DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs M Rabothata and Ms Lindiwe Dlamini (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers.

Please note: 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@dffe.gov.za for attention of Mr Seoka Lekota

Regards 

Tebego Kgaphola

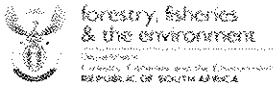
Directorate: Biodiversity Mainstreaming and EIA

Branch: Biodiversity and Conservation

473 Steve Biko Road | Private Bag X477 | Pretoria | 001

Cell: 0608408195 | Email: tkgaphola1@dffe.gov.za

Website: www.environment.gov.za



From: Dale Holder <dale@cape-eaprac.co.za>

Sent: Wednesday, 06 March 2024 16:20

To: BC Admin <bcadmin@dffe.gov.za>

Subject: RE: Notification of Availability of Draft Environmental Impact Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear DFFE Biodiversity Conservation

NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

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Kind regards/Vriendelike groete

Dale Holder
SENIOR ENVIRONMENTAL PRACTITIONER
Cape EAPrac
NDip Nat.Con
EAPASA Reg. 2019/301

From: Dale Holder

Sent: Friday, September 15, 2023 1:46 PM

To: BC Admin <bcadmin@dffe.gov.za>

Subject: Notification of Availability of Draft Scoping Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear Stakeholder

NOTIFICATION OF AVAILABILITY OF DRAFT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

DFFE Reference No. : 2023-06-0016 (Pre Application Reference Number)
DFFE Case Officer : Mr Lunga Dlova

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<https://www.dropbox.com/scl/fo/ent7ucsy8vc2rlxza8ri/h?rlkey=546kxbwcrjgpwox3cxipfyqnj&dl=0>
- Dedicated Download Link on We Transfer at: <https://we.tl/t-XDrbSuOOp2>

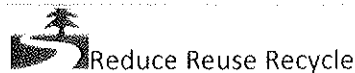
Should you not be able to access the digital platforms above, please contact Cape EAPrac on the contact details below and we will arrange an alternative method of accessing either hard or digital copies of the Report.

Please contact the undersigned should you have any further queries.

Kind regards/Vriendelike groete

Dale Holder
SENIOR ENVIRONMENTAL PRACTITIONER
Cape EAPrac
NDip Nat.Con
EAPASA Reg. 2019/301

T: 044 874 0365
17 Progress Street, George
PO Box 2070, George 6530



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Kindly view our Privacy Statement for more information.

Dale Holder

From: Lunga Dlova <LDlova@dffe.gov.za>
Sent: Monday, 08 April 2024 12:51
To: Dale Holder
Cc: marshall@merchant.energy; EIA Applications; Lydia Kutu; Salome Mambane
Subject: 14/12/16/3/3/2/2436
Attachments: 02 Comments on Draft EIAr_SUNVELD SOLAR PV BESS FACILITY 2436_.pdf

Dear Mr Holder

Please find attached draft EIAr comments for your consideration.

Kind Regards

Mr Lunga Dlova

Directorate: Integrated Environmental Authorisation
473 Steve Biko Road | Arcadia | Pretoria | 0001
Cell: 072 762 6691 / 012 399 8524 | E-mail: LDlova@dffe.gov.za
Call Centre: 086 111 2468 | Website: www.dffe.gov.za



**forestry, fisheries
& the environment**

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA



forestry, fisheries
& the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA 0001· Environment House 473 Steve Biko Road, Arcadia,· PRETORIA

DFFE Reference: 14/12/16/3/3/2/2436
Enquiries: Mr Lunga Dlova
Telephone: (012) 399 8524 E-mail: LDlova@dfpe.gov.za

Mr Dale Holder
Cape Environmental Assessment Practitioners (Pty) Ltd
PO Box 2070
GEORGE
6530

Telephone Number: 044 874 0365
Email Address: dale@cape-eaprac.co.za

PER E-MAIL

Dear Mr Holder

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE SUNVELD SOLAR PV & BESS FACILITY AND ASSOCIATED INFRASTRUCTURE ON FARM KRUISPAD 120 AND FARM DOORNFONTEIN 118, SITUATED IN THE BERG RIVER LOCAL MUNICIPALITY OF THE WEST COAST DISTRICT IN THE WESTERN CAPE PROVINCE

The Application for Environmental Authorisation and Draft Environmental Impact Assessment Report (EIAr) dated 05 March 2024 and received by the Department on 06 March 2024, refer.

This letter serves to inform you that the following information must be included in the final EIAr:

(a) Specific comments

- (i) Comments from all other developers surrounding the development must be obtained and included in the final EIAr.
- (ii) The recommendations provided by the specialist reports must be considered and used to inform the preferred layout alternative.
- (iii) Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.
- (iv) You are further reminded that the final EIAr to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of the EIAr in accordance with Appendix 3 of the EIA Regulations, 2014 as amended.
- (v) Please provide a concise, but complete, summary and bullet list of the project description and associated infrastructure (or project scope) to be included in the decision (or as it should appear in the decision), should a positive Environmental Authorisation be granted. This must include a list of all development components and associated infrastructure.
- (vi) The final EIAr must comply with all the conditions of the acceptance of the SR signed on 08 December 2023 and must address all comments contained in the final SR, the draft EIAr and this letter.
- (vii) The final EIAr must clearly provide a detailed section which addresses the site sensitivity verification requirements where a specialist assessment is required but no specific assessment protocol has been

MEM

prescribed as well as the site sensitivity verification and minimum report content requirements for all specialist assessments undertaken which was included in the screening tool report.

(b) Listed Activities

- (i) 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.
- (ii) The EAP must clearly identify and provide a final list of all applicable listed activities. If any activities are to be removed, motivation for their removal must be included in the final EIAr.
- (i) Please ensure that all relevant listed activities and sub-activities are correctly numbered as per the relevant listing notices.
- (ii) If the activities applied for in the application form differ from those mentioned in the final EIAr, 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.dffe.gov.za/documents/forms>.
- (iii) It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.
- (iv) The final EIAr must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.

(c) Public Participation Process

- (i) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA Regulations, 2014, as amended.
- (ii) Comments must be obtained from this Department's Biodiversity Conservation Directorate.
- (iii) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr. This includes but is not limited to the National and Western Cape Department of Agriculture, the Department of Agriculture, the Department of Water and Sanitation (DWS), Berg River Local Municipality, Heritage Western Cape (HWC), the Southern Africa Large Telescope (SALT), Meerkat and Square Kilometre Array (SKA), Department of Minerals and Energy, Endangered Wildlife Trust., Cape Nature, Birdlife South Africa., SANParks – West Coast National Park, Department of Environmental Affairs and Development Planning (Western Cape), South African Heritage Resources Agency, the Department of Forestry, Fisheries and the Environment: Directorate Biodiversity and Conservation at BCAdmin@dffe.gov.za, and the Directorate Protected Areas at Tnethononda@dffe.gov.za.
- (iv) Please ensure that all issues raised and comments received during the circulation of the draft SR and draft EIAr from registered Interested and Affected Parties (I&APs) and organs of state (including this Department's Biodiversity and Protected Area Sections), as listed in your I&APs Database, and others that have jurisdiction in respect of the proposed activity are adequately addressed and included in the final EIAr and are incorporated into a Comments and Response Report (CRR).
- (v) Copies of original comments received from I&APs and organs of state, which have jurisdiction in respect of the proposed activity are submitted to the Department with the final EIAr.
- (vi) Proof of correspondence with the various stakeholders must be included in the final EIAr. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. In terms of Regulation 41(2)(b) of the EIA Regulations, 2014, as amended, please provide proof of written notice for the availability of the EIAr for comment.
- (vii) The CRR report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter.

- (viii) 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.
- (ix) Minutes and attendance registers (where applicable) of any physical/virtual meetings held by the Environmental Assessment Practitioner (EAP) with Interested and Affected Parties (I&APs) and other role players must be included in the final EIAr.

(d) Layout & Sensitivity Maps

- (i) The final EIAr must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.
- (ii) A copy of the final layout map must be submitted with the final EIAr. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible, e.g. roads. The layout map must indicate the following:
 - a) The envisioned area for the infrastructure, i.e. placing of infrastructure and all associated infrastructure should be mapped at an appropriate scale.
 - b) Location of panels and inverters;
 - c) All supporting onsite infrastructure required such as laydown areas, roads etc. (existing and proposed);
 - d) Substation(s) and/or transformer(s) sites including their entire footprint;
 - e) Connection routes (including pylon positions) to the distribution/transmission network; and
 - f) All necessary details regarding all possible locations and sizes of the infrastructure.
 - g) All existing infrastructure on the site, especially internal road infrastructure.
- (iii) Please provide an environmental sensitivity map which indicates the following:
 - a) The location of sensitive environmental features on site, e.g. CBAs, protected areas, heritage sites, wetlands, drainage lines, nest and roosting sites, etc. that will be affected by the facility and its associated infrastructure;
 - b) Buffer areas; and
 - c) All "no-go" areas.
- (iv) The above layout map must be overlain with the sensitivity map and a cumulative map which shows neighbouring energy developments and existing grid infrastructure.
- (v) Google maps will not be accepted.

(e) Cumulative Assessment

- (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:
 - 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.

(f) Specialist Assessments

- (i) The EAP must ensure that the terms of reference for all the identified specialist studies must include the following:
 - a) A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisation.
 - b) Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.
 - c) Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.
 - d) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.
 - e) **All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.**
 - f) Should a specialist recommend specific mitigation measures, these must be clearly indicated.
- (ii) 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.
- (iii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting in identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols") and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. **Please note that specialist assessments must be conducted in accordance with these protocols.**
- (iv) Please also ensure that the final EIAR includes the **Site Verification Report and Compliance Statements** (where applicable) as required by the relevant themes.
- (v) Please note further that the protocols, if applicable, require certain specialists' to be SACNASP registered. Please ensure that the relevant specialist certificates are attached to the relevant reports.
- (vi) As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.

(g) Specialist Declaration of Interest

- (i) Specialist Declaration of Interest forms must be attached to the final EIAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Department's website (please use the Department's template).

(h) Undertaking of an Oath

- (i) Please note that the final EIAR must have an undertaking under oath/ affirmation by the EAP.
- (ii) Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended, which states that the EIAR must include:

"an undertaking under oath or affirmation by the EAP in relation to:

 - (i) the correctness of the information provided in the reports;*
 - (ii) the inclusion of comments and inputs from stakeholders and I&APs;*
 - (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and*

- (iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties”.

(i) Details and Expertise of the EAP

- (i) You are required to include the details and expertise of the EAP in the EIAr, including a curriculum vitae, in order to comply with the requirements of Appendix 3 of the NEMA EIA Regulations, 2014, as amended.

(j) Environmental Management Programme

- (i) Please ensure that all the sections of the generic Environmental Management Programme (EMPr), contemplated in Regulations 19(4) are adequately completed, is **signed and dated** on submission of the final report over and above the EMPr for the facility.
- (ii) The EMPr must also include the following:
- a) All recommendations and mitigation measures recorded in the EIAr and the specialist studies conducted.
 - b) An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.
- (iii) In addition to the above, the EMPr must comply with Appendix 4 of the EIA Regulations, 2014, as amended.

(k) Environmental Impact Statement

- (i) An environmental impact statement must form part of the final EIAr and contain the following –
- a) a summary of the key findings of the environmental impact assessment;
 - b) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and
 - c) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.

(l) General

The EIAr must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions (Annexure 2).

Please also ensure that the final EIAr includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *“The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority -*

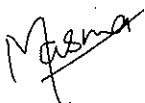
(a) an environmental impact assessment report inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which must have been 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.”

Should there be significant changes or new information that has been added to the EIA 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 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: *"The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority – (b) a notification in writing that the documents contemplated in subregulation 1(a) will be submitted within 156 days of acceptance of the scoping report by the competent authority or where regulation 21(2) applies, within 156 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents, which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in subregulation (1)(a), and that the revised documents contemplated in subregulation 1(a) will be subjected to another public participation process of at least 30 days"*.

Should you fail to meet any of the timeframes stipulated in Regulation 23 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

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.

Yours sincerely



Mr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Signed by: Ms Masina Morudu

Designation: Control Environmental Officer: National Integrated Authorisation Projects

Date: 08/04/2024.

cc:	Mr Marshall Mabin	Sunveld Energy (Pty) Ltd	E-mail: marshall@merchant.energy
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Annexure 1: Format for Comments and Response Trail Report

Date of comment, format of comment name of organisation/I&AP	Comment	Response from EAP/Applicant/Specialist
27/01/2016 Email Department of Forestry, Fisheries and the Environment: Prioritised Infrastructure Projects (John Doe)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted)The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form

Annexure 2: Sample of technical details for the proposed facility

Component	Description / dimensions
Height of PV panels	
Area of PV Array	
Number of inverters required	
Area occupied by inverter / transformer stations / substations	
Capacity of on-site substation	
Area occupied by both permanent and construction laydown areas	
Area occupied by buildings	
Length of internal roads	
Width of internal roads	
Proximity to grid connection	
Height of fencing	
Type of fencing	

Dale Holder

From: Thea Jordan <Thea.Jordan@westerncape.gov.za>
Sent: Monday, 08 April 2024 16:50
To: Dale Holder
Cc: Adri La Meyer; EIAAdmin; LDlova@dffe.gov.za
Subject: RE: Comments on the Draft EIA Report for the proposed 600MW Sunveld solar PV facility and Battery Energy Storage System near Velddrif
Attachments: 2024 Apr 8 - Draft EIA Report for the proposed 600MW Sunveld solar PV facility and Battery Energy Storage System near Velddrif.pdf

Dear EAP,

Your request for comment refers.

Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan
Pr. Pl. (A/1237/2002)
Director: Development Facilitation
Department of Environmental Affairs and Development Planning
Western Cape Government

11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 4093
Email: Thea.Jordan@westerncape.gov.za
Website: www.westerncape.gov.za/eadp



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Government**
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Due to COVID-19 restrictions, we are still operating on a "work-from-home" basis. Should you not be able to contact the numbers above, please call +27 (0)21 483 4091 between 07:30-16:00.

From: Dale Holder <dale@cape-eaprac.co.za>
Sent: Wednesday, March 6, 2024 16:14
To: Adri La Meyer <Adri.LaMeyer@westerncape.gov.za>
Subject: RE: Notification of Availability of Draft Scoping Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear Adri

NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON

THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

I hope you are well.

Please find the attached notification of the availability of the Draft Environmental Impact Report for the proposed Sunveld Solar and BESS project. We are also shortly commencing with comment on the Basic Assessment for the Grid connection for this facility – This Grid connection process is being administered by DEA&DP. Would you also comment on this considering it is a DEA&DP application?

Digital copies of the Draft Environmental Impact Report and all associated and supplementary information is available at the following locations:

1. On the Cape EAPrac website at: www.cape-eaprac.co.za.
2. Dedicated Download link on Dropbox at:
<https://www.dropbox.com/scl/fo/ukq6h6f48ok7smqy1u6g7/h?rlkey=7yt3ot6p59axwqyxuj0md3yze&dl=0>
3. Dedicated Download Link on We Transfer at: <https://we.tl/t-3devQ2CysQ>

If you are unable to access these digital platforms provided, kindly contact me and I will arrange to provide a hardcopy of the relevant documentation.

Comments on the Draft Environmental Impact Report should please be submitted to Cape EAPrac in writing on or before 08 April 2024.

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

From: Dale Holder

Sent: Friday, September 15, 2023 1:38 PM

To: 'Adri La Meyer (Adri.LaMeyer@westerncape.gov.za)' <Adri.LaMeyer@westerncape.gov.za>

Subject: Notification of Availability of Draft Scoping Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear Adri

I hope you are well.

Kindly find the attached notification of the availability of the Draft Scoping Report for the Proposed Sunveld Solar PV and BESS facility (it is on the west coast near Velddrif). The project is a National DFFE application, so I understand that you will provide consolidated comments on behalf of the various DE&DP directorates?

Please note that the project does include quite extensive Battery Energy Storage Systems, so it will be pertinent to get comment from the pollution and chemicals management directorate.

Please also let me know if I should also notify all the relevant DEA&DP directorates directly?

The Draft Scoping Report is available for review and comment for a 30 day comment period from 15 September 2023 – 16 October 2023.

Digital copies of the Draft Scoping Report and all associated and supplementary information is available at the following locations:

- On the Cape EAPrac website at: www.cape-eaprac.co.za.
- Dedicated Download link on Dropbox at:
<https://www.dropbox.com/scl/fo/ent7ucsye8vc2rixza8ri/h?rlkey=546kxbwcrigpwox3cxipfyqni&dl=0>
- Dedicated Download Link on We Transfer at: <https://we.tl/t-XDrbSuO0p2>

Should you not be able to access the digital platforms above, please contact Cape EAPrac on the contact details below and we will arrange an alternative method of accessing either hard or digital copies of the Report.

Please contact the undersigned should you have any further queries.

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

T: 044 874 0365

17 Progress Street, George

PO Box 2070, George 6530



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In the interest of resource conservation please reconsider printing this email.

Please Note: When registering as an Interested and Affected Party (I&AP), you consent to the lawful processing of personal information for the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act no. 4 of 2013). Your information will be used for this project, including the initial application as well as subsequent related appeals, amendments or audits, or any future project where you are identified as an I&AP. You also agree that by submitting comment to inform this process, your contact details will, where required by a public body, be reflected in our regulated reports that must be compiled and submitted to the general public, registered stakeholders, organs of state as well as the competent authority for consideration and decision-making.

Kindly view our Privacy Statement for more information.

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References:

16/3/3/6/4/2/2/F1/11/2179/23 (Development Management)

18/2/3/2024-2025 (Development Facilitation)

19/3/2/4/82/32/DDF052/23 (Pollution and Chemicals Management)

Attention: Mr Dale Holder

Cape EA Prac
P.O. Box 2070
GEORGE
6530

dale@cape-eaprac.co.za

Dear Sir

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF THE 600MW SUNVELD SOLAR PHOTOVOLTAIC ENERGY FACILITY, BATTERY ENERGY STORAGE SYSTEM, AND ASSOCIATED INFRASTRUCTURE ON THE REMAINING EXTENT OF FARM KRUISPAD NO. 120 AND THE REMAINING EXTENT OF FARM DOORNFONTEIN A NO. 118, VELDDRIF (DFFE REF NO: 14/12/16/3/3/2/2436)

1. The Draft Scoping Report ("DSR") dated 15 September 2023, the Department's comments thereto dated 17 October 2023, the Comment and Response Report on the DSR received via email on 20 October 2023, and the email notification of 06 March 2024 regarding the availability of the Draft Environmental Impact Assessment ("EIA") Report, refer.
2. Please find consolidated comments from various directorates within the Department on the Draft EIA Report dated 05 March 2024 that was available for download from various online platforms provided by the environmental assessment practitioner ("EAP").

Directorate: Development Management (Region 1) – Mr Kraigen Govindasamy (Email: Kraigen.Govindasamy@westerncape.gov.za; Tel.: (021) 483 2804);

3. This Directorate's comments on the DSR with respect to the applicable listed activities must be addressed and included in the Final EIA Report. (In this regard, please also refer to paragraph 19 below.)

www.westerncape.gov.za

Department of Environmental Affairs and Development Planning
Cape Town Office: Utilitas Building, 1 Dorp Street Cape Town, 8001
George Office: York Park Building, 93 York Street, George, 6529



4. The recommended buffer areas proposed in the Aquatic Site Sensitivity Analysis Report prepared by Ms Toni Belcher dated September 2023 must be incorporated in the final site layout plan and the environmental sensitivities map. The recommended buffers and no-go areas (i.e., wetlands) must further be included in the activity description and as required mitigation measures in the Environmental Management Programme ("EMPr").
5. The recommended no-go areas proposed in the Visual Impact Assessment ("VIA") prepared by Visual Resource Management Africa cc dated 15 February 2023 must be incorporated in the final site layout of the proposed development. This should also be demarcated on the proposed development areas of the preferred layout alternative and included in the activity description and EMPr.
6. This Directorate's comment on the DSR with respect to the consideration of the Greater Saldanha Area Environmental Management Framework must be addressed and included in the Final EIA Report.
7. It is noted that a Site Sensitivity Verification Report ("SSVR") has been included as Appendix I of the Draft EIA Report. However, the SSVR is undated and the details of the author of the SSVR are not provided. The SSVR must be updated accordingly and provided with the Final EIA Report.
8. The potential cumulative impacts associated with similar renewable energy development proposals located within a 30km radius of the proposed site, including, *inter alia*, the Dwarskersbos solar photovoltaic ("PV") facility (on Portion 3 and the Remaining Extent of Farm Groeneveld No. 108, and Portion 11 of Farm Weglooperheuwel No. 116, Dwarskersbos) and the Velddrif solar PV facility (on Portion 2 of the Farm No. 90, Portion 4 of the Farm No. 91, Farm Cloeteskraal No. 92, Remaining Extent of Farm No. 1196, Portion 1 of Farm No. 1051, and Portion 1 of Farm No. 1052, Velddrif) must be considered and reported on in the Final EIA Report.
9. Heritage Western Cape's response to the Heritage Impact Assessment ("HIA") compiled by ASHA Consulting (Pty) Ltd dated 16 February 2024 and the VIA must be included in the Final EIA Report.
10. Comment from the Western Cape Government Department of Agriculture with respect to the Site Sensitivity Verification and Agricultural Compliance Statement compiled by Mr Johann Lanz dated 14 September 2023 must be obtained and included in the Final EIA Report to be submitted to the competent authority.
11. Comment from CapeNature with respect to the Terrestrial Biodiversity, Plant and Animal Species Theme Impact Assessment prepared by Biodiversity Africa dated February 2024, and the Faunal Compliance Statement compiled by Terrestrial Ecologist & Faunal Surveys and Birding Africa dated September 2023 must be obtained and included in the Final EIA Report to be submitted to the competent authority. Please further note that comments from BirdLife South Africa must be obtained on the adequacy of the Avifaunal Impact Assessment compiled by AfriAvian dated February 2024.
12. Proof of the public participation process undertaken must be included in the Final EIA Report. The proof must include comments received from the commenting authorities and from other interested and affected parties, together with the EAP's responses made to the comments.

Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.Lameyer@westerncape.gov.za; Tel.: (021) 483 2887);

13. This Directorate's comments on the DSR requested that the specialists' assessments and the Draft EIA Report provide a map and an assessment of cumulative impacts for all renewable energy projects within a 30km radius of the proposed site. It is however noted that not all the specialists' assessments included a map of renewable energy projects, and/or an assessment of cumulative impacts. For example, the Faunal Compliance Statement did not include a map or cumulative impact assessment; and the VIA and Agricultural Compliance Statement included a description of cumulative impacts but no maps. Figure 55 of the Draft EIA Report (renewable energy facilities within proximity of the proposed Sunveld solar PV) matches Figure 13 of the Avifaunal Impact Assessment, but it is difficult to determine if it corresponds to Figure 8.1 of the Terrestrial Biodiversity, Plant and Animal Species Theme Impact Assessment. In the absence of all specialists employing the same map or description of renewable energy facilities within a 30km radius of the proposed site, the cumulative impact assessment ratings for all the themes as provided in the Draft EIA Report remain inconclusive.
14. Please indicate the size (in ha) for each of the proposed 7 solar PV development areas. The Avifaunal Impact Assessment noted that the "solar PV 1 area has been reduced from 241 ha initially, to 51 ha to reduce the impact on Black Harrier habitat". The size of the other 6 solar PV development areas has however not been indicated elsewhere in the Draft EIA Report or other specialists' assessments.
15. Further to the above, the Draft EIA Report failed to indicate in the section dealing with the consideration of alternatives, how the solar PV development areas have changed since the initial layout (layout alternative 3) presented in the DSR, to the preferred layout alternative (layout alternative 5) in the Draft EIA Report. Reference is merely made to "As discussed above the scoping phase preferred layout went through a further two iterations and the final mitigated preferred layout (Layout Alternative 5) was developed. The key differences between the Layout alternative 3 (Scoping Preferred) and Layout Alternative 5 (Mitigated Preferred) is the exclusion of some further areas to address visual concerns as well as the addition of some visual screening that was recommended by both the Heritage and the Visual Specialists." No mention is made of the avifaunal specialist's recommendation to reduce solar PV development area 1 to reduce the impact on the Black Harrier habitat.
16. It is not apparent from the Draft EMPr that all the recommendations and mitigation measures of the various specialists have been included. For example, the mitigation measures of the HIA: "Paint structures in earthy tones where technically feasible to minimise contrast" and "pre-construction survey of the PV footprint should be carried out to check for newly exposed archaeological sites" have not been included in the EMPr. Low berms of 2.5m to be constructed and vegetated with local Strandveld vegetation are recommendations of both the HIA and VIA that must be clearly specified in the EMPr. It is crucial that all the required recommendations and mitigation measures of the various specialists be included in the EMPr as they affect the impact significance post-mitigation, and not simply be indicated as refer to specialist impact assessment as is currently indicated.
17. Please indicate if the recommendation of the avifaunal specialist that "a 100m Solar Panel Exclusion Zone should be implemented and maintained around the Jackal Buzzard nest located within the Project Site to reduce the risk of species displacement due to disturbance and to reduce the risk of possible collisions with the solar panels" has been incorporated in the preferred site layout.

18. In terms of provincial legislation (section 3.2 of the Draft EIA Report), please include reference to the Western Cape Climate Change Response Strategy: Vision 2050 (2022) that can be found at the following link https://www.westerncape.gov.za/assets/departments/environmentalaffairs-development/planning/wcccrs_vision_2050_march_2022.pdf.
19. It is noted that the Draft EIA Report still includes Activity 14 of Listing Notice ("LN") 1, Activity 4 of LN 2, and Activity 10 of LN 3 of the EIA Regulations, 2014 (as amended) in relation to the development of facilities for the storage and/or handling of dangerous goods in containers. It is again reiterated that not all the mentioned listed activities will be applicable, depending on the volume of dangerous goods that will be stored and/or handled in containers. The correct listed activity must be identified in the Final EIA Report and an amended application form must be submitted to the competent authority.
20. The Draft EIA Report indicates that Activity 11 of LN 1 of the EIA Regulations, 2014 (as amended) is triggered due to "two on site substations will have a capacity of up to 300MVA each" and the development of two 132kV powerlines from the on-site substations to the grid. It is unknown whether 300MVA is less than 275kV, as the electricity measuring units differ. Please be advised to consider the applicability of Activity 9 of LN 2 of the EIA Regulations, 2014 (as amended) for the two on-site substations.
21. General comments:
 - 21.1. Correct the numerical error on page 2 of the Draft EIA Report stating that "twenty-eight (24) of the 64 projects (38%) have individually exceeded their P50 projections."
 - 21.2. Correct reference to the Berg River Local Municipality Spatial Development Framework (2091-2024).

Directorate: Pollution and Chemicals Management – Ms Shehaam Brinkhuis (Email: Shehaam.Brinkhuis@westerncape.gov.za; Tel.: (021) 483 8309):

22. All surface infrastructure, such as solar PV arrays, substations, battery energy storage systems ("BESS") and construction camps, should be located outside of the designated buffer areas, most notably sensitive watercourses.
23. The utilisation of cleaning chemicals on solar PV panels may pose a risk of contamination and pollution to water resources. Care should be taken to implement mitigation measures to reduce this. It is recommended that all cleaning products used on the site must be environmentally friendly and biodegradable.
24. The following recommendations are provided with respect to the proposed 2 BESS's, to prevent and manage potential contamination of water resources, including groundwater, emanating from the site during the construction, operational and decommissioning phases:
 - 24.1. Compilation and adherence to a procedure for the safe handling of battery cells.
 - 24.2. Lithium-ion batteries must have battery management systems (containment, automatic alarms and shut-off systems) to monitor and protect cells from overcharging or damaging conditions.
 - 24.3. Compilation of an emergency response plan for implementation in the event of a spill or leakage.
 - 24.4. Provision of spill kits on-site for clean-up of spills and leaks.
 - 24.5. Immediate clean-up of spills and disposal of contaminated absorbents and materials or soil at a licensed hazardous waste disposal facility.

- 24.6. Recording and reporting of all electrolyte spills or leaks so that appropriate clean-up measures can be implemented. A copy of these records must be made available to authorities on request throughout the project lifecycle.
 - 24.7. Frequent and appropriate disposal of both general and hazardous waste to prevent pollution of soil and groundwater.
 - 24.8. On-site battery maintenance should only be undertaken on impermeable surfaces with secondary containment measures. Any resulting hazardous substances must be disposed of appropriately.
 - 24.9. Provision of suitable emergency and safety signage on-site, and demarcation of any areas which may pose a safety risk (including hazardous substances). Emergency numbers for the local police, fire department, Eskom and the local municipality must be placed in a prominent, clearly visible area on-site.
25. Please amend the EMPr to include reference to section 30 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ["NEMA"] pertaining to the control of incidents. In the event of a significant spill or leak of hazardous substances (e.g. petrol, diesel, etc.) used during the proposed activities, such an incident(s) must be reported to the relevant authorities, including this Directorate, in accordance with section 30 of the NEMA, 1998.
26. Please note that the comments and recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made by officials should in any way be regarded as an indication or confirmation that additional information or documents will not be requested; or of the outcome of the application submitted to the competent authority.
27. The applicant is reminded of its "general duty of care towards the environment" as prescribed in section 28 of the NEMA, 1998 which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment".
28. The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

Thea Jordan
Digitally signed by Thea Jordan
Date: 2024.04.08 16:50:00
+02'00'

pp **HEAD OF DEPARTMENT**

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Letter signed by:

Thea Jordan

Director: Development Facilitation

Date: 8 April 2024

CC: Mf Lunga Dlova (DFFE)

Email: LDlova@dffe.gov.za

Dale Holder

From: Lunga Dlova <LDlova@dffe.gov.za>
Sent: Tuesday, 09 April 2024 12:45
To: Dale Holder
Cc: Marshall Mabin
Subject: Re: 14/12/16/3/3/2/2436

Dear Dale

I trust you are keeping well.

Yes, site inspection usually take place during the decision phase. However, I am in doubt if there will be a site inspection for the proposed project.

This is due to cost contamination and we no longer attend site visits for all applications.

Kind Regards

Mr Lunga Dlova

Directorate: Integrated Environmental Authorisation
473 Steve Biko Road | Arcadia | Pretoria | 0001
Cell: 072 762 6691 / 012 399 8524 | E-mail: LDlova@dffe.gov.za
Call Centre: 086 111 2468 | Website: www.dffe.gov.za



**forestry, fisheries
& the environment**

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

From: Dale Holder <dale@cape-eaprac.co.za>
Sent: Tuesday, 09 April 2024 12:24
To: Lunga Dlova <LDlova@dffe.gov.za>
Cc: Marshall Mabin <marshall@merchant.energy>
Subject: RE: 14/12/16/3/3/2/2436

Dear Lunga

Thank you very much for the Departments comments on the Draft EIR for Sunveld Solar PV and BESS.

As part of the acceptance of the Final Scoping Report, the Department noted that they would like to undertake a site inspection and that the EAP should facilitate this.

I assume that such a site assessment will take place during the Decision making period. We are happy to avail ourselves for a site visit at any time that is suitable to the Department, please let us know if and when you would like to undertake a site inspection and we will make the necessary arrangements.

Kind regards/Vriendelike groete

Dale Holder
SENIOR ENVIRONMENTAL PRACTITIONER
Cape EAPrac
NDip Nat.Con
EAPASA Reg. 2019/301

From: Lunga Dlova <LDlova@dffe.gov.za>
Sent: Monday, April 8, 2024 12:51 PM
To: Dale Holder <dale@cape-eaprac.co.za>
Cc: marshall@merchant.energy; EIA Applications <EIAApplications@dffe.gov.za>; Lydia Kutu <LKutu@dffe.gov.za>; Salome Mambane <SMAMBANE@dffe.gov.za>
Subject: 14/12/16/3/3/2/2436

Dear Mr Holder

Please find attached draft EIAR comments for your consideration.

Kind Regards

Mr Lunga Dlova

Directorate: Integrated Environmental Authorisation
473 Steve Biko Road | Arcadia | Pretoria | 0001
Cell: 072 762 6691 / 012 399 8524 | E-mail: LDlova@dffe.gov.za
Call Centre: 086 111 2468 | Website: www.dffe.gov.za



**forestry, fisheries
& the environment**

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Dale Holder

From: Mashudu Mudau <MaMudau@dffe.gov.za>
Sent: Tuesday, 09 April 2024 15:03
To: Dale Holder
Cc: Thivhulawi Nethononda
Subject: RE: Request for Guidance as when to approach the DFFE protected areas directorate as part of EIA processes.

Good day Dale,

Your understanding is correct, the EAP is required to approach our directorate if the proposed development falls within or is adjacent to a protected area in terms of NEM:PAA (i.e. 10km from National Parks and 5km from Nature Reserves).

However, if the proposed development is for a Wind Energy Facility within 50km of a National Park or IBA, the EAP is also required to approach the Directorate.

Regards,

Mashudu Mudau

Protected Areas Planning and Management Effectiveness
Department of Forestry, Fisheries and the Environment
Environment House
473 Steve Biko and Soutpansberg Streets
PRETORIA
Tel: (012) 399 9945
Cell: 076 166 8307
E-mail: mamudau@dffe.gov.za



forestry, fisheries
and the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

From: Dale Holder <dale@cape-eaprac.co.za>
Sent: Tuesday, April 9, 2024 2:15 PM
To: Mashudu Mudau <MaMudau@dffe.gov.za>
Cc: Thivhulawi Nethononda <TNETHONONDA@dffe.gov.za>
Subject: Request for Guidance as when to approach the DFFE protected areas directorate as part of EIA processes.

Dear Mashudu and Thivhulawi

I hope you are both well.

I am seeking guidance as to when an EAP should approach the protected areas directorate for comment on an EIA process.

My understanding is that if the proposed development falls within or is adjacent to a protected area in terms of NEM:PAA, then we should request comment from the protected areas directorate.

Please could you confirm whether my understanding is correct in this regard?

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

Dale Holder

From: MMatlala Rabothata <MRABOTHATA@dfe.gov.za>
Sent: Thursday, 11 April 2024 09:31
To: Dale Holder
Subject: DEIR COMMENTS FOR SUNVELD SOLAR PV IN WC PROVINCE
Attachments: SIGNED COMMENTS ON THE SUNVELD SOLAR PV.pdf

Dear Mr. Holder,

Please find attached the Directorate Biodiversity Conservation comments for consideration and implementation.

Regards

Ms Mmatlala Rabothata

Department of Forestry Fisheries and the Environment

Environment House

473 Steve Biko Road

Arcadia

PRETORIA

0083

Tel: 012 399 9174

Job 19: "But as for me, I know that my Redeemer lives



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

Reference: 14/12/16/3/3/2/2436

Enquiries: Ms M Rabothata

Telephone: (012) 399 9174 **E-mail:** MRabothata@environment.gov.za

Mr Dale Holder
Cape EAPrac
PO Box 2070
GEORGE
6530

Telephone Number: (+27) 44 874 0365
Email Address: dale@cape-eaprac.co.za

Dear Mr Holder

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR SUNVELD SOLAR PV FACILITY AND BESS ON REMAINING EXTENT OF THE FARM KRUISPAD 120 AND REMAINING EXTENT OF THE FARM DOORNFONTEIN A 118, WESTERN CAPE PROVINCE

The Directorate: Biodiversity Conservation reviewed and evaluated the draft report

Based on the information provided in the report, the layout largely avoids Critical Biodiversity Area (CBA 1) and CBA 2 areas. Project infrastructure has been designed to largely avoid sensitive features such as near-intact and degraded Saldanha Flats Strandveld. The current land use is predominantly agriculture or secondary vegetation, and the associated impacts caused by this to the terrestrial ecology is considered to be low.

The specialist confirmed that the study site is located within an area that is mostly considered of Low Aquatic Biodiversity Combined Sensitivity as it does not lie within a Freshwater Ecosystem Priority Area) River Sub catchment or has any Aquatic Critical Biodiversity Areas mapped. The site is also not located within Strategic Water Source. The aquatic features occurring within the site comprise some disturbed depression wetlands within cultivated areas on the site and the floodplain of the Berg River Estuary in the south-western corner of the site. The depression wetlands as well as the floodplain wetland are in largely to seriously modified ecological condition within the site as they are all in cultivated areas.

It is recommended that areas rated as High sensitivity in proximity to the development areas, be declared as 'No-Go' areas during the life of the project. Clearing of vegetation must be minimized and avoided where possible. 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.



COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED ORIBI PHOTOVOLTAIC SOLAR POWER PLANT NEAR PIENAARSRIVER, LIMPOPO PROVINCE

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**.

Yours faithfully



Mr. Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Date: 08/04/2024

Dale Holder

From: Dale Holder
Sent: Thursday, 11 April 2024 12:38
To: MMatlala Rabothata
Subject: RE: DEIR COMMENTS FOR SUNVELD SOLAR PV IN WC PROVINCE

Dear Mmatlala

Thank you very much for the comments on the Draft Environmental Impact Report for the proposed Sunveld Solar PV and BESS Development.

Please see the responses to the Departments comments below.

Comment	Response
<p>Based on the information provided in the report, the layout largely avoids Critical Biodiversity (CBA1) and CBA 2 areas. Project infrastructure has been designed to largely avoid sensitive features such as near-intact and degraded Saldanha Flats Strandveld. The current land use is predominantly agriculture or secondary vegetation, and the associated impacts caused by this to the terrestrial ecology is considered to be low.</p>	<p>The EAP confirms that the departments understanding in this regard is correct.</p>
<p>The specialist confirmed that the study site is located within an area that is mostly considered of Low Aquatic Biodiversity Combined sensitivity as it does not lie within a Freshwater Ecosystem Priority Area, river sub catchment of has any Aquatic Critical Biodiversity Areas mapped. The site is also not located within a strategic water source. The aquatic features occurring within the site comprise of some disturbed depression wetlands within the cultivated areas on site as well as the floodplain of the Berg River Estuary in the South Western Corner of the Site. The Depression Wetlands as well as the floodplain wetlands are in a largely to seriously modified ecological condition in the site as they are all in cultivated areas.</p>	<p>The EAP confirms that the departments understanding in this regard is correct. Notwithstanding the largely to seriously modified ecological condition of the depression wetlands on site, it is confirmed that the Mitigated Preferred Layout, Layout Alternative 5 completely avoids all of these features as well as the buffers identified by the freshwater biodiversity specialist.</p> <p>It is also noteworthy that the BESS has been positioned in such a way that it remains further than 400m from these features.</p>
<p>It is recommended that areas rated as high sensitivity in proximity to the development areas, be declared as "no-go" areas during the lifecycle of the project. Clearing of vegetation must be minimised and avoided where possible. An Alien Invasive Plant Species Management Plan and Rehabilitation Plan must be developed and submitted as part of the final report to mitigate habitat degradation due to erosion and alien plant invasion.</p>	<p>In terms of the EMPr, all areas outside of the development areas and access road are considered no go areas for all construction activities. In terms of section 5.7 of the EMPr, vegetation clearing must be kept to a minimum and restricted to the following areas:</p> <ul style="list-style-type: none"> - Internal Road Network - Perimeter Road, - Inverter / Transformer Stations, - Laydown Area, - BESS Area - Site Camp and - Building Footprints <p>For the PV Array, the grass / scrub layer should be left intact (albeit trampled by construction activities) and only the larger woody plants cleared or trimmed where necessary.</p>

Comment	Response
	<p>An Alien Invasive Management Plan is included in Section 7 of the EMPr attached in appendix H.</p> <p>A rehabilitation and habitat restoration plan is included in section 5.20 of the EMPr attached in appendix H.</p> <p>In terms of this plan, all areas not forming part of the development's hard surfaces must be rehabilitated and restored on completion of construction. These include:</p> <ul style="list-style-type: none"> - The temporary laydown area (a maximum laydown of less than 2ha may for operational requirements); - The contract site camp; - Temporary water storage ponds; - Overburden spoil sites; - Temporary haul roads; - Batching areas; and - All other areas within the PV array and adjacent to buildings that have been compacted or impacted by any of the construction activities.

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

From: MMatlala Rabothata <MRABOTHATA@dffe.gov.za>

Sent: Thursday, April 11, 2024 9:31 AM

To: Dale Holder <dale@cape-eaprac.co.za>

Subject: DEIR COMMENTS FOR SUNVELD SOLAR PV IN WC PROVINCE

Dear Mr. Holder,

Please find attached the Directorate Biodiversity Conservation comments for consideration and implementation.

Regards

Ms Mmatlala Rabothata

Department of Forestry Fisheries and the Environment

Environment House

473 Steve Biko Road

Arcadia

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0083

Tel: 012 399 9174

Job 19: "But as for me, I know that my Redeemer lives

Dale Holder

From: Adri La Meyer <Adri.LaMeyer@westerncape.gov.za>
Sent: Friday, 12 April 2024 10:08
To: Dale Holder; Thea Jordan
Cc: EIAAdmin; LDlova@dffe.gov.za
Subject: RE: Comments on the Draft EIA Report for the proposed 600MW Sunveld solar PV facility and Battery Energy Storage System near Velddrif

Dear Dale,

I hope you are well.

Thank you very much for the responses to the Department's comments on the Draft EIAR. We note that the relevant buffers have been incorporated in the layout presented during the EIR phase and that where relevant, specialists' recommendations have been updated in the EMPr.

Kindly note that we cannot confirm that reference to sections 3.4.18 and 3.4.19 has been included as we commented on the Draft EIAR, but we trust that the Final EIAR does include these sections.

We note the footprint of each PV area and appreciate your clarification regarding the renewable energy facilities within 30km of the site.

Lastly, we just want to again remind the DFFE to ensure that comments from HWC is obtained before a decision is made on the application.

Your responses are appreciated and valued.

Kind regards,
Adri

From: Dale Holder <dale@cape-eaprac.co.za>
Sent: Friday, April 12, 2024 9:51
To: Thea Jordan <Thea.Jordan@westerncape.gov.za>
Cc: Adri La Meyer <Adri.LaMeyer@westerncape.gov.za>; EIAAdmin <EIAAdmin@dffe.gov.za>; LDlova@dffe.gov.za
Subject: RE: Comments on the Draft EIA Report for the proposed 600MW Sunveld solar PV facility and Battery Energy Storage System near Velddrif

Dear Thea and Adri.

Thank you once again for the consolidated comments from DEA&DP on the Sunveld Solar PV and BESS project.

The responses as included in the submission to the Decision-making authority are as follows:

Comment	Response
	Directorate: Development Management (Region 1) – Mr Kraigen Govindasamy (Email: Kraigen.Govindasamy@westerncape.gov.za ; Tel.: (021) 483 2804);

Comment	Response
<p>3. This Directorate's comments on the DSR with respect to the applicable listed activities must be addressed and included in the Final EIA Report. (In this regard, please also refer to paragraph 19 below.)</p>	<p>Please refer to the response under paragraph 19 below with regards to justification of the listed activities associated with the Storage and Storage and Handling of Dangerous goods.</p>
<p>4. The recommended buffer areas proposed in the Aquatic Site Sensitivity Analysis Report prepared by Ms Toni Belcher dated September 2023 must be incorporated in the final site layout plan and the environmental sensitivities map. The recommended buffers and no-go areas (i.e., wetlands) must further be included in the activity description and as required mitigation measures in the Environmental Management Programme ("EMPr").</p>	<p>The proposed PV Footprint, BESS and all associated infrastructure associated with the preferred mitigated alternative (Layout Alternative 5) completely avoids the aquatic features and their associated buffers. The legend on the site layout plan has been amended to include the buffer distance.</p> <p>The project description on page v has been updated to confirm that no activities may take place within 50m from the delineated edge of the depression wetlands and the floodplain of the Berg River Estuary.</p> <p>This requirement is also included as a recommended condition of authorisation in section 7 of the EIR.</p>
<p>5. The recommended no-go areas proposed in the Visual Impact Assessment ("VIA") prepared by Visual Resource Management Africa cc dated 15 February 2023 must be incorporated in the final site layout of the proposed development. This should also be demarcated on the proposed development areas of the preferred layout alternative and included in the activity description and EMPr.</p>	<p>The Visual buffers are included on the site layout plan in appendix D. It is important to note that the visual specialist has defined two buffers from the R399. The first is a 200m buffer from where no infrastructure (with the exception of an access road is allowed). The second is a 500m buffer where PV infrastructure only is allowed and subject to a maximum height of 2.5m and screening (in the form of a berm or windrows) mitigation. The visual setback lines and the windrow and berm screening are reflected on the site layout plan in Appendix D.</p> <p>The project description on page v has been updated to confirm that all PV infrastructure within 500m of the R399 must have a maximum height of 2.5m and must be screened with berms and windrows as identified in the Site Layout Plan.</p> <p>This requirement is also included as a recommended condition of authorisation in section 7 of the EIR.</p>
<p>6. This Directorate's comment on the DSR with respect to the consideration of the Greater Saldanha Area Environmental Management Framework must be addressed and included in the Final EIA Report.</p>	<p>This is discussed in section 3.4.18 of this EIR. According to the Screening Tool Report, the proposed Sunveld Solar PV and BESS does not intersect with the EMF for the Greater Saldanha Area.</p>
<p>7. It is noted that a Site Sensitivity Verification Report ("SSVR") has been included as Appendix I of the Draft EIA Report. However, the SSVR is undated and the details of the author of the SSVR are not provided. The SSVR must be updated accordingly and provided with the Final EIA Report.</p>	<p>The SSVR in Appendix I of the EIR has been updated to indicate the Author and has been signed.</p>

Comment	Response
<p>8. The potential cumulative impacts associated with similar renewable energy development proposals located within a 30km radius of the proposed site, including, inter alia, the Dwarskersbos solar photovoltaic ("PV") facility (on Portion 3 and the Remaining Extent of Farm Groeneveld No. 108, and Portion 11 of Farm Weglooperheuwel No. 116, Dwarskersbos) and the Velddrif solar PV facility (on Portion 2 of the Farm No. 90, Portion 4 of the Farm No. 91, Farm Cloeteskraal No. 92, Remaining Extent of Farm No. 1196, Portion 1 of Farm No. 1051, and Portion 1 of Farm No. 1052, Velddrif) must be considered and reported on in the Final EIA Report.</p>	<p>The cumulative impact has been considered for all other renewable energy developments within a 30km radius of the proposed Sunveid Solar and BESS as per the Map in appendix D1. The following other projects have been considered as part of the cumulative assessment:</p> <ol style="list-style-type: none"> 1. Aurora Rietvlei Solar Power 2. Dwarskersbos Solar Salika 3. Velddrif Solar Salika 4. Renfields Solar 5. Vredenberg Wind Farm 6. Aurora Wind Power 7. Noitgedacht PV 8. Karpowership SA 9. Soventix Power 10. Electrawinds Seeland 11. Clifton Dunes 12. Exxaro Resources. <p>Please refer to section 6.10 of the EIR for the assessment of cumulative impacts.</p>
<p>9. Heritage Western Cape's response to the Heritage Impact Assessment ("HIA") compiled by ASHA Consulting (Pty) Ltd dated 16 February 2024 and the VIA must be included in the Final EIA Report.</p>	<p>The Heritage Specialist Dr Jayson Orton, confirmed that the Final HIA is only submitted to HWC after the consultation period on the Draft EIR. The reason being, is that the consultation on the Draft BAR provided stakeholders identified by HWC (West Coast Fossil Park and Heritage Officer at the Berg River Municipality) with an opportunity for comment on the EIR, including the Heritage Impact Assessment. The HIA with details of this stakeholder engagement process has now been submitted by the Heritage Specialist to HWC for comment in terms of Section 38(8) of the National Heritage Resources Act.</p>
<p>10. Comment from the Western Cape Government Department of Agriculture with respect to the Site Sensitivity Verification and Agricultural Compliance Statement compiled by Mr Johann Lanz dated 14 September 2023 must be obtained and included in the Final EIA Report to be submitted to the competent authority.</p>	<p>The Western Cape Department of Agriculture were provided with an opportunity to comment on both the Draft Scoping Report as well as the Draft Environmental Impact Report.</p> <p>At the time of submission of the Final EIR, comment had not been received from the Department of Agriculture.</p> <p>The Department of Agriculture will have a further opportunity to provide comment and input to the proposed development as part of the Land Use Planning Application.</p>
<p>11. Comment from CapeNature with respect to the Terrestrial Biodiversity, Plant and Animal Species Theme Impact Assessment prepared by Biodiversity Africa dated February 2024, and the Faunal Compliance Statement compiled by Terrestrial Ecologist & Faunal Surveys and Birding Africa dated September 2023 must be obtained and included in the Final EIA Report to be submitted to the competent authority. Please further note that comments from BirdLife South Africa must be obtained on the adequacy of the Avifaunal Impact Assessment compiled by AfriAvian dated February 2024.</p>	<p>Cape Nature was provided with an opportunity to comment on both the Draft Scoping Report as well as the Draft Environmental Impact Report.</p> <p>At the time of submission of the Final EIR, comment had not been received from Cape Nature. The DFFE Biodiversity Conservation Directorate did however comment on the Draft Scoping Report.</p> <p>Two separate officials from BirdLife Africa were provided with an opportunity to comment on both the Draft Scoping Report as well as the Draft Environmental Impact Report. At the time of submission of the Final EIR, comment had not been received from Birdlife Africa.</p>

Comment	Response
12. Proof of the public participation process undertaken must be included in the Final EIA Report. The proof must include comments received from the commenting authorities and from other interested and affected parties, together with the EAP's responses made to the comments.	A summary of the public participation is included in section 8 of this report. Proof of comments received from commenting authorities as well as other I&AP's is included in Appendices F5 and F7 and the EAP's responses thereto are included in the comments and Responses report in Appendix F2.

Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.Lameyer@westerncape.gov.za; Tel.: (021) 483 2887):

<p>13. This Directorate's comments on the DSR requested that the specialists' assessments and the Draft EIA Report provide a map and an assessment of cumulative impacts for all renewable energy projects within a 30km radius of the proposed site. It is however noted that not all the specialists' assessments included a map of renewable energy projects, and/or an assessment of cumulative impacts. For example, the Faunal Compliance Statement did not include a map or cumulative impact assessment; and the VIA and Agricultural Compliance Statement included a description of cumulative impacts but no maps. Figure 55 of the Draft EIA Report (renewable energy facilities within proximity of the proposed Sunveld solar PV) matches Figure 13 of the Avifaunal Impact Assessment, but it is difficult to determine if it corresponds to Figure 8.1 of the Terrestrial Biodiversity, Plant and Animal Species Theme Impact Assessment. In the absence of all specialists employing the same map or description of renewable energy facilities within a 30km radius of the proposed site, the cumulative impact assessment ratings for all the themes as provided in the Draft EIA Report remain inconclusive. 14. Please indicate the size (in ha) for each of the proposed 7 solar PV development areas. The Avifaunal Impact Assessment noted that the "solar PV 1 area has been reduced from 241 ha initially, to 51 ha to reduce the impact on Black Harrier habitat". The size of the other 6 solar PV development areas has however not been indicated elsewhere in the Draft EIA Report or other specialists' assessments.</p>	<p>Please note that the protocol for the specialist assessment and minimum report content requirements for Environmental impacts on terrestrial animal species in GN 1150 does not require a cumulative impact assessment to form part of an Animal Species Compliance Statement. The same applies to the protocol for the assessment and reporting of environmental impacts on agricultural resources, which does not require that a cumulative impact assessment form part of a compliance statement (in this instance however, the specialist did consider cumulative impacts). The Visual and Terrestrial Biodiversity specialists have updated the cumulative maps to align with those depicted in Figure 55 of the Draft EIR.</p> <p>The size of the 7 PV Areas are as follows.</p> <ul style="list-style-type: none"> - PV1 51.13ha - PV2 53.64ha - PV3 166.1ha - PV4 85.83ha - PV5 153.95ha - PV6 88.92ha - PV7 102.1ah <p>The reduction in footprint PV1 area represented the largest reduction undertaken to avoid Black Harrier Habitat. There were smaller reductions in other PV areas (to avoid the Black Harrier habitat) as well as increase in footprint of others where black harrier habitat was not a concern. Please refer to the table below for a summary of these changes:</p> <table border="1" data-bbox="600 1496 1386 2078"> <thead> <tr> <th data-bbox="600 1496 743 1599">PV Areas</th> <th data-bbox="743 1496 999 1599">Preferred Mitigated Footprints</th> <th data-bbox="999 1496 1187 1599">Alternative 2 Footprints</th> <th data-bbox="1187 1496 1386 1599">Areas excluded to Avoid Sensitivities</th> </tr> </thead> <tbody> <tr> <td data-bbox="600 1599 743 1644">PV1</td> <td data-bbox="743 1599 999 1644">51.13</td> <td data-bbox="999 1599 1187 1644">240.71</td> <td data-bbox="1187 1599 1386 1644">189.58</td> </tr> <tr> <td data-bbox="600 1644 743 1688">PV2</td> <td data-bbox="743 1644 999 1688">53.64</td> <td data-bbox="999 1644 1187 1688">78.56</td> <td data-bbox="1187 1644 1386 1688">24.92</td> </tr> <tr> <td data-bbox="600 1688 743 1733">PV3</td> <td data-bbox="743 1688 999 1733">166.1</td> <td data-bbox="999 1688 1187 1733">232.74</td> <td data-bbox="1187 1688 1386 1733">66.64</td> </tr> <tr> <td data-bbox="600 1733 743 1778">PV4</td> <td data-bbox="743 1733 999 1778">85.83</td> <td data-bbox="999 1733 1187 1778">52.33</td> <td data-bbox="1187 1733 1386 1778">-33.5</td> </tr> <tr> <td data-bbox="600 1778 743 1823">PV5</td> <td data-bbox="743 1778 999 1823">153.95</td> <td data-bbox="999 1778 1187 1823">113.77</td> <td data-bbox="1187 1778 1386 1823">-40.18</td> </tr> <tr> <td data-bbox="600 1823 743 1868">PV6</td> <td data-bbox="743 1823 999 1868">88.92</td> <td data-bbox="999 1823 1187 1868">65.79</td> <td data-bbox="1187 1823 1386 1868">-23.13</td> </tr> <tr> <td data-bbox="600 1868 743 1912">PV7</td> <td data-bbox="743 1868 999 1912">102.1</td> <td data-bbox="999 1868 1187 1912">139.88</td> <td data-bbox="1187 1868 1386 1912">37.78</td> </tr> <tr> <td data-bbox="600 1912 743 1980">PV8 (added to PV4)</td> <td data-bbox="743 1912 999 1980">0</td> <td data-bbox="999 1912 1187 1980">49.72</td> <td data-bbox="1187 1912 1386 1980">49.72</td> </tr> <tr> <td data-bbox="600 1980 743 2047">PV9 (abandoned)</td> <td data-bbox="743 1980 999 2047">0</td> <td data-bbox="999 1980 1187 2047">187.69</td> <td data-bbox="1187 1980 1386 2047">187.69</td> </tr> <tr> <td data-bbox="600 2047 743 2078">TOTALS</td> <td data-bbox="743 2047 999 2078">701.67</td> <td data-bbox="999 2047 1187 2078">1161.19</td> <td data-bbox="1187 2047 1386 2078">459.52</td> </tr> </tbody> </table>	PV Areas	Preferred Mitigated Footprints	Alternative 2 Footprints	Areas excluded to Avoid Sensitivities	PV1	51.13	240.71	189.58	PV2	53.64	78.56	24.92	PV3	166.1	232.74	66.64	PV4	85.83	52.33	-33.5	PV5	153.95	113.77	-40.18	PV6	88.92	65.79	-23.13	PV7	102.1	139.88	37.78	PV8 (added to PV4)	0	49.72	49.72	PV9 (abandoned)	0	187.69	187.69	TOTALS	701.67	1161.19	459.52
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Comment	Response
	<p>As can be seen in the table above, the original proposed footprint was reduced by approximately 459 ha in order to avoid sensitivities.</p>
<p>15. Further to the above, the Draft EIA Report failed to indicate in the section dealing with the consideration of alternatives, how the solar PV development areas have changed since the initial layout (layout alternative 3) presented in the DSR, to the preferred layout alternative (layout alternative 5) in the Draft EIA Report. Reference is merely made to "As discussed above the scoping phase preferred layout went through a further two iterations and the final mitigated preferred layout (Layout Alternative 5) was developed. The key differences between the Layout alternative 3 (Scoping Preferred) and Layout Alternative 5 (Mitigated Preferred) is the exclusion of some further areas to address visual concerns as well as the addition of some visual screening that was recommended by both the Heritage and the Visual Specialists." No mention is made of the avifaunal specialist's recommendation to reduce solar PV development area 1 to reduce the impact on the Black Harrier habitat.</p>	<p>Please refer to section 2.11.1 of the EIR, which outlines how the proposed development footprint has changed from the initial development area to the preferred mitigated Alternative (Layout Alternative 5).</p> <p>Table 6 in section 2.11.5 details exactly how layout alternative 5 was adapted to avoid sensitivities, inter alia the reduction of development area to reduce the impact on Black Harrier Habitat.</p> <p>As outlined in the table above, the Scoping Level Layout was reduced by approximately 459ha to avoid various environmental sensitivities, the most notable was the black harrier habitat.</p>
<p>16. It is not apparent from the Draft EMPr that all the recommendations and mitigation measures of the various specialists have been included. For example, the mitigation measures of the HIA: "Paint structures in earthy tones where technically feasible to minimise contrast" and "pre-construction survey of the PV footprint should be carried out to check for newly exposed archaeological sites" have not been included in the EMPr. Low berms of 2.5m to be constructed and vegetated with local Strandveld vegetation are recommendations of both the HIA and VIA that must be clearly specified in the EMPr.</p> <p>It is crucial that all the required recommendations and mitigation measures of the various specialists be included in the EMPr as they affect the impact significance post-mitigation, and not simply be indicated as refer to specialist impact assessment as is currently indicated.</p>	<p>These are included in section 7 of the EIR. The EMPr has been updated to include the Environmental Impact management outcomes and actions as well as mitigation measures identified in section 7 of this report. The EMPr has been updated to include these outcomes, actions and mitigation measures in sections 5.25(construction phase), 6.7 (operational phase) and 14.4 (decommissioning).</p>

Comment	Response
<p>17. Please indicate if the recommendation of the avifaunal specialist that "a 100m Solar Panel Exclusion Zone should be implemented and maintained around the Jackal Buzzard nest located within the Project Site to reduce the risk of species displacement due to disturbance and to reduce the risk of possible collisions with the solar panels" has been incorporated in the preferred site layout.</p>	<p>The 100m Jackal Buzzard nest buffer is included on the site layout plan in appendix D (no PV infrastructure is within this buffer area).</p> <p>The project description on page v has been updated to confirm that no PV infrastructure may be constructed within 100m of the identified Jackal Buzzard Nest.</p> <p>This requirement is also included as a recommended condition of authorisation in section 7 of the EIR.</p>
<p>18. In terms of provincial legislation (section 3.2 of the Draft EIA Report), please include reference to the Western Cape Climate Change Response Strategy: Vision 2050 (2022)</p>	<p>The Western Cape Climate Change Response Strategy: Vision 2050 (2022) has been considered and included in section 3.4.19 of the Final EIR. The proposed Sunveld Solar PV and BESS will assist in the achievement of Key objective 2 of the Strategy, which proposes a massive shift from fossil fuel-based energy to renewable energy sources.</p>
<p>19. It is noted that the Draft EIA Report still includes Activity 14 of Listing Notice ("LN") 1, Activity 4 of LN 2, and Activity 10 of LN 3 of the EIA Regulations, 2014 (as amended) in relation to the development of facilities for the storage and/or handling of dangerous goods in containers. It is again reiterated that not all the mentioned listed activities will be applicable, depending on the volume of dangerous goods that will be stored and/or handled in containers. The correct listed activity must be identified in the Final EIA Report and an amended application form must be submitted to the competent authority.</p>	<p>The EIR proposes three different BESS Technologies that could be deployed as part of the project, these are:</p> <ol style="list-style-type: none"> 1. Solid State Technologies.(e.g. Lithium Ion technologies) 2. Redox Flow Technologies (e.g. Vanadium Redox Flow – VRB) 3. Liquid Metal Technologies (e.g. Ambri). <p>All three technologies have been found to be acceptable, subject to the implementation of certain setbacks (already incorporated into the Preferred Layout) and the implementation of certain Management and Mitigation measures (as outlined in the BESS Risk Assessment in Appendix EA).</p> <p>The applicant intends deploying either one, or a combination of the technologies.</p> <p>Depending on the final configuration of the Battery Technologies deployed, Activity 14 of Listing Notice ("LN") 1, Activity 4 of LN 2, and Activity 10 of LN 3 of the EIA Regulations, 2014 could all be triggered.</p> <p>For example (worst case) – If ALL batteries deployed are non-containerised Vanadium Redox Flow Technologies then Activity 4 in listing notice 2 will be triggered (as the total electrolyte for all 2.4GWh of batteries would be approximately 192000 cubic meters – which exceeds the 500 cubic metres in Activity 4 in listing notice 2). If a combination of technologies are deployed (i.e. some constituting the Storage and Handling of Dangerous Goods and others not) then volumes could either trigger Activity 14 of Listing Notice 1, or Activity 10 of LN 3 of the EIA Regulations – depending on the final configuration of technologies.</p> <p>Furthermore, please note that the Activities associated with the development of infrastructure within 32m of a watercourse have been removed from the application (this was done, as the Preferred Layout, Layout Alternative 5, does not propose any infrastructure within 32m of the watercourse)</p>
<p>20. The Draft EIA Report indicates that Activity 11 of LN 1 of the EIA Regulations, 2014 (as amended) is triggered due to "two on site substations will have a capacity of up to 300MVA each" and the development</p>	<p>This activity is applicable. Electricity will be transmitted from the PV arrays via 33kV underground powerlines, to the two On-Site / Facility Substations. At the On-Site / Facility Substations the 33kV electricity will be transformed to 132kV. There will be no infrastructure for the</p>

Comment	Response
<p>of two 132kV powerlines from the on-site substations to the grid. It is unknown whether 300MVA is less than 275kV, as the electricity measuring units differ. Please be advised to consider the applicability of Activity 9 of LN 2 of the EIA Regulations, 2014 (as amended) for the two on-site substations.</p>	<p>Transmission and Distribution of Electricity that will exceed 275kV and as such Activity 9 in Listing Notice 2 is not applicable.</p> <p>Thank you for notifying us of this uncertainty.</p>
<p>21. General comments:</p>	
<p>21.1. Correct the numerical error on page 2 of the Draft EIA Report stating that "twenty-eight (24) of the 64 projects (38%) have individually exceeded their P50 projections."</p>	<p>Thank you for notifying the EAP of the numerical error. This numerical error in section 1.2 on page 2 has been corrected.</p>
<p>21.2. Correct reference to the Berg River Local Municipality Spatial Development Framework (2091-2024).</p>	<p>Thank you for notifying the EAP of the error with the reference. This reference error in section 3.3.2 has been corrected.</p>
<p>Directorate: Pollution and Chemicals Management – Ms Shehaam Brinkhuis (Email: Shehaam.Brinkhuis@westerncape.gov.za; Tel.: (021) 483 8309):</p>	
<p>22. All surface infrastructure, such as solar PV arrays, substations, battery energy storage systems ("BESS") and construction camps, should be located outside of the designated buffer areas, most notably sensitive watercourses.</p>	<p>As indicated in the BESS Risk Assessment (appendix E8), the BESS infrastructure has been positioned in such a way that it is not within 400m of a surface water resource.</p>
<p>23. The utilisation of cleaning chemicals on solar PV panels may pose a risk of contamination and pollution to water resources. Care should be taken to implement mitigation measures to reduce this. It is recommended that all cleaning products used on the site must be environmentally friendly and biodegradable.</p>	<p>In compliance with the EMPr 6.1 of the EMPr, cleaning of PV panels must take place using either biodegradable soaps, water only or waterless methods.</p>
<p>24. The following recommendations are provided with respect to the proposed 2 BESS's, to prevent and manage potential contamination of water resources, including groundwater, emanating from the site during the construction, operational and decommissioning phases:</p> <p>24.1. Compilation and adherence to a procedure for the safe handling of battery cells.</p> <p>24.2. Lithium-ion batteries must have battery management systems (containment, automatic alarms and shut-</p>	<p>All these recommendations by the Department (as well as technology specific impact management actions and mitigations) are included in the BESS Risk Assessment compiled by ISHEcon. This risk assessment forms part of the EMPr for the facility and as such, the applicant will be legally mandated to comply with these.</p>

Comment	Response
<p>off systems) to monitor and protect cells from overcharging or damaging conditions.</p> <p>24.3. Compilation of an emergency response plan for implementation in the event of a spill or leakage.</p> <p>24.4. Provision of spill kits on-site for clean-up of spills and leaks.</p> <p>24.5. Immediate clean-up of spills and disposal of contaminated absorbents and materials or soil at a licensed hazardous waste disposal facility.</p> <p>24.6. Recording and reporting of all electrolyte spills or leaks so that appropriate clean-up measures can be implemented. A copy of these records must be made available to authorities on request throughout the project lifecycle.</p> <p>24.7. Frequent and appropriate disposal of both general and hazardous waste to prevent pollution of soil and groundwater.</p> <p>24.8. On-site battery maintenance should only be undertaken on impermeable surfaces with secondary containment measures. Any resulting hazardous substances must be disposed of appropriately.</p> <p>24.9. Provision of suitable emergency and safety signage on-site, and demarcation of any areas which may pose a safety risk (including hazardous substances). Emergency numbers for the local police, fire department, Eskom and the local municipality must be placed in a prominent, clearly visible area onsite.</p>	
<p>25. Please amend the EMPr to include reference to section 30 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") pertaining to the control of incidents. In the event of a significant spill or leak of hazardous substances (e.g. petrol, diesel, etc.) used during the proposed activities, such an incident(s) must be reported to the relevant authorities, including this Directorate, in accordance with section 30 of the NEMA, 1998.</p>	<p>The EMPr has been amended to include the Departments Guidelines on the administration of incidents, As described in section 30 of the National Environmental Management Act, 107 of 1998. Please refer to G of the EMPr attached in Appendix H of the FEIR.</p>
<p>26. Please note that the comments and recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or</p>	<p>The EAP and applicant are aware of this assumption and are aware that no activities may take place until such time as an environmental authorisation is granted by the competent authority.</p>

Comment	Response
<p>comments made by officials should in any way be regarded as an indication or confirmation that additional information or documents will not be requested; or of the outcome of the application submitted to the competent authority.</p>	
<p>27. The applicant is reminded of its "general duty of care towards the environment" as prescribed in section 28 of the NEMA, 1998 which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment".</p>	<p>This is understood by the EAP and Applicant. The general duty of care as outlined in section 28 of NEMA forms the basis of the Environmental Impact Management Outcomes and Actions defined in the EMP (Appendix 8).</p>
<p>28. The Department reserves the right to revise initial comments and request further information based on any or new information received.</p>	<p>The Final EIR has been submitted to the competent authority for decision making. Should DEA&DP provide additional comments during the decision making process, the EAP commits to submit these to the competent authority in order to inform the decision making process.</p>

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

From: Dale Holder

Sent: Tuesday, April 9, 2024 12:06 PM

To: Thea Jordan <Thea.Jordan@westerncape.gov.za>

Cc: Adri La Meyer <Adri.LaMeyer@westerncape.gov.za>; EIAAdmin <EIAAdmin@dffe.gov.za>; LDlova@dffe.gov.za

Subject: RE: Comments on the Draft EIA Report for the proposed 600MW Sunveld solar PV facility and Battery Energy Storage System near Velddrif

Dear Thea and Adri

Thank you very much for DEA&DP's consolidated comments. The project team and I are busy going through the comments and will respond in detail and update the Final EIR where necessary.

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

From: Thea Jordan <Thea.Jordan@westerncape.gov.za>

Sent: Monday, April 8, 2024 4:50 PM

To: Dale Holder <dale@cape-eaprac.co.za>

Cc: Adri La Meyer <Adri.LaMeyer@westerncape.gov.za>; EIAAdmin <EIAAdmin@dfpe.gov.za>; LDlova@dfpe.gov.za

Subject: RE: Comments on the Draft EIA Report for the proposed 600MW Sunveld solar PV facility and Battery Energy Storage System near Velddrif

Dear EAP,

Your request for comment refers.

Please find attached this Department's comment in the above regard.

Yours faithfully

Thea Jordan

Pr. Pl. (A/1237/2002)

Director: Development Facilitation

Department of Environmental Affairs and Development Planning

Western Cape Government

11th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 4093

Email: Thea.Jordan@westerncape.gov.za

Website: www.westerncape.gov.za/eapdp



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Should you not be able to contact the numbers above, please call +27 (0)21 483 4091 between 07:30-16:00.

From: Dale Holder <dale@cape-eaprac.co.za>

Sent: Wednesday, March 6, 2024 16:14

To: Adri La Meyer <Adri.LaMeyer@westerncape.gov.za>

Subject: RE: Notification of Availability of Draft Scoping Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear Adri

NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SUNVELD SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY ON FARM KRUISPAD 120 AND ON

THE FARM DOORNFONTEIN A 118 SITUATED APPROXIMATELY 7.5 KM EAST VELDDRIF IN THE BERG RIVER MUNICIPALITY OF THE WESTERN CAPE PROVINCE.

I hope you are well.

Please find the attached notification of the availability of the Draft Environmental Impact Report for the proposed Sunveld Solar and BESS project. We are also shortly commencing with comment on the Basic Assessment for the Grid connection for this facility – This Grid connection process is being administered by DEA&DP. Would you also comment on this considering it is a DEA&DP application?

Digital copies of the Draft Environmental Impact Report and all associated and supplementary information is available at the following locations:

1. On the Cape EAPrac website at: www.cape-eaprac.co.za.
2. Dedicated Download link on Dropbox at:
<https://www.dropbox.com/scl/fo/ukq6h6f48ok7smqy1u6g7/h?rlkey=7yt3ot6p59axwqyxuj0md3yze&dl=0>
3. Dedicated Download Link on We Transfer at: <https://we.tl/t-3devQ2CysQ>

If you are unable to access these digital platforms provided, kindly contact me and I will arrange to provide a hardcopy of the relevant documentation.

Comments on the Draft Environmental Impact Report should please be submitted to Cape EAPrac in writing on or before 08 April 2024.

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

EAPASA Reg. 2019/301

From: Dale Holder

Sent: Friday, September 15, 2023 1:38 PM

To: 'Adri La Meyer (Adri.LaMeyer@westerncape.gov.za)' <Adri.LaMeyer@westerncape.gov.za>

Subject: Notification of Availability of Draft Scoping Report for proposed Sunveld Solar PV and Battery Energy Storage System

Dear Adri

I hope you are well.

Kindly find the attached notification of the availability of the Draft Scoping Report for the Proposed Sunveld Solar PV and BESS facility (it is on the west coast near Velddrif). The project is a National DFFE application, so I understand that you will provide consolidated comments on behalf of the various DE&DP directorates?

Please note that the project does include quite extensive Battery Energy Storage Systems, so it will be pertinent to get comment from the pollution and chemicals management directorate.

Please also let me know if I should also notify all the relevant DEA&DP directorates directly?

The Draft Scoping Report is available for review and comment for a 30 day comment period from 15 September 2023 – 16 October 2023.

Digital copies of the Draft Scoping Report and all associated and supplementary information is available at the following locations:

- On the Cape EAPrac website at: www.cape-eaprac.co.za.
- Dedicated Download link on Dropbox at:
<https://www.dropbox.com/scl/fo/ent7ucsye8vc2rlxza8ri/h?rlkey=546kxbwcrjgpwox3cxipfyqni&dl=0>
- Dedicated Download Link on We Transfer at: <https://we.tl/t-XDrbSu00p2>

Should you not be able to access the digital platforms above, please contact Cape EAPrac on the contact details below and we will arrange an alternative method of accessing either hard or digital copies of the Report.

Please contact the undersigned should you have any further queries.

Kind regards/Vriendelike groete

Dale Holder

SENIOR ENVIRONMENTAL PRACTITIONER

Cape EAPrac

NDip Nat.Con

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17 Progress Street, George

PO Box 2070, George 6530



Cape EAPrac



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