

## **COMMENTS AND RESPONSES: DRAFT SCOPING REPORT FOR THE PROPOSED KAREEKLOOF SOLAR PV FACILITY AND BESS ON PORTION 1 OF THE FARM BAS BERG 88, PORTION 2 OF THE FARM KOPPY ALLEEN 83 AND PORTIONS 6, 11, 16 & 17 OF THE FARM KAREE KLOOF 85.**

DFFE Reference Number: 14/12/16/3/3/2/2448

The comments and responses captured in the table below are captured verbatim as per the department's requirements. The comments are furthermore captured in chronological order on the date they were received (most recent comments at the beginning of the table)<sup>1</sup>.

Comment	Response
<b>13 November 2023: Ms Mmatlala Rabothata - Department of Forestry Fisheries and the Environment: Directorate Biodiversity Conservation.</b>	
The Directorate: Biodiversity Conservation reviewed and evaluated the draft report and doesn't have any objections to the scoping report and the Plan of Study.	The Departments statement is noted. The Environmental Impact Reporting activities will be undertaken in accordance with the Plan of Study, once approved by the Department.
However, it has been noted that the project area is situated entirely within the "Platberg-Karoo Conservancy "Important Bird Area". Comments must be obtained from Bird Life Africa	This Statement is correct. Birdlife South Africa did not provide comment on the Draft Scoping Report, but will be provided with a further opportunity to do so as part of the Environmental Impact Reporting phase of the Environmental Process. Furthermore, the Avifaunal specialist will provide an assessment on the potential impact on this IBA.
The PV Facilities must not be placed in such a way that they avoid highly sensitive biodiversity areas. The layout plan overlaid with the biodiversity sensitivities must be included and submitted during the next phase of the EIA	Please refer to sections 2.10 and 2.11 of this report to show how the preferred site and alternative layout has been selected taking into account environmental sensitivities identified by the participating specialists.
The Final Scoping Report must comply with the procedures for the assessment and minimum criteria for reporting on the on identified environmental themes in terms of sections 24(5) (A) and (H) and 44 of the National Environmental Management Act, 1998.	Please refer to section 5.11 where evidence of compliance with sections 24(5) (A) and (H) and 44 of the National Environmental Management Act is provided
All Public Participation Process Documents related to Biodiversity EIA queries must be submitted to the Director: Biodiversity Conservation at Email: BCADMIN@environment.gov.za for Attention Mr Seoka Lekota	Mr Seoka Lekota will remain registered as a key stakeholder for the remainder of this environmental process.
<b>08 November 2023 - Petrus Scheepers - ABO Wind renewable energies (Pty) Ltd.</b>	

<sup>1</sup> In instances where multiple correspondence was exchange in a single email thread, the date reflected is that of the first email received.

Comment	Response
Would you be so kind and register me as I&AP on the Kareekloof PV & BESS project.	Registration confirmed.
<b>06 November 2023 - Lydia Kutu - Integrated Environmental Authorisations: Priority Infrastructure Developments Department of Forestry, Fisheries and the Environment</b>	
<b>(a) Listed Activities</b>	
(i) Please ensure that all relevant listed activities are applied for, are specific, and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed. Furthermore, kindly ensure that the latest listed activities, as amended in 2021, are applied for.	The correct and relevant listed activities including the thresholds and sub activities are included in section 3.1.2 of this report. These activities align with those included in the application form that was submitted with the Draft Scoping Report. Please note, that based on the outcome of the detailed assessments, certain of these activities may be removed from the Environmental Impact Assessment Phase of the Environmental Process. In such a case, the application form will be updated accordingly.
(ii) The project description must be expanded to include thresholds, footprints, and capacities of the associated infrastructure, particularly those that trigger a listed activity.	The project description in section 2 of this report has been updated with the relevant footprints, thresholds and capacities as contained in the technical checklist at the beginning of the report.
(iii) It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process, as the development property falls within geographically designated areas in terms of Listing Notice 3 Activities. Written comments must be obtained from the relevant authorities (or proof of consultation if no comments were received) and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.	Comment was not received from the Provincial Department during the comment period on the Draft Scoping Report. This Department will be provided with a further opportunity to provide comment during the Impact Assessment Phase of the Environmental Process. Proof of consultation with all State Departments and Organs of State are attached in Appendix F4.
(iv) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a> .	The activities in the Application and the Final Scoping Report do not differ. Please note, that based on the outcome of the detailed assessments, certain of these activities may be removed from the Environmental Impact Assessment Phase of the Environmental Process. In such a case, the application form will be updated accordingly.
<b>(b) Layout &amp; Sensitivity Maps</b>	
(i) Please provide a layout map which indicates the following: <ul style="list-style-type: none"> <li>- Positions of the proposed facility, the BESS, as well as all other associated infrastructure;</li> <li>- Permanent and temporary laydown area footprints;</li> <li>- All supporting onsite infrastructure e.g., roads (existing and proposed); and</li> <li>- All existing infrastructure on the site.</li> </ul>	The Site Layout Plan of the currently preferred alternative is attached in Appendix D9. This layout plan will be further refined and additional information provided as part of the Draft Environmental Impact Report.

Comment	Response
<p>(ii) The above map must be overlain with a sensitivity map which indicates the following:</p> <ul style="list-style-type: none"> <li>- The location of sensitive environmental features on-site e.g., CBAs, NPEAS focus areas, heritage sites, wetlands, drainage lines, etc. that will be affected;</li> <li>- Buffer areas; and,</li> <li>- All “no-go” areas.</li> </ul>	<p>Please refer to the overlays in section 5.11 of this report. As mentioned above, once the final preferred layout alternative is determined (based on the outcome of the specialist impact assessments), an updated SLP overlay onto all sensitive features will</p>
<p>(iii) A cumulative map showing the proposed development in relation to similar neighbouring renewable energy developments and existing grid infrastructure must also be provided.</p>	<p>This Cumulative map is attached in Appendix D1.</p>
<p>(iv) Please note that Google Maps will not be accepted.</p>	<p>The maps attached in appendices B, C and D are all GIS based Maps.</p>
<p><b>(c) Public Participation Process</b></p>	
<p>(i) Please ensure that all issues raised, and comments received during the circulation of the SR from registered I&amp;APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the Final SR.</p>	<p>All comments received are attached in Appendix F5. The comments and responses report, where all comments have been addressed is attached in Appendix F2.</p>
<p>(ii) Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts made to obtain comments.</p>	<p>Please refer to appendix F4 for copies of all correspondence with stakeholders.</p>
<p>iii) The final Scoping Report must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development.</p>	<p>Please refer to Appendix F4 which shows that all relevant competent authorities (most notably, the Department of Water and Sanitation and South African Heritage Resources Authority) have been provided with an opportunity to comment.</p>
<p>(iv) The Public Participation Process must be conducted in terms of the approved public participation plan and Regulations 39, 40 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</p>	<p>Please refer to section 7 of this report, read in conjunction with Annexures F1 – F5. Table 22 in section 7 provides evidence of compliance with Regulations 39, 40 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</p>
<p>(v) Proof of the newspaper advertisement must be included in the final SR.</p>	<p>A copy of the newspaper advertisement is included in Appendix F3.</p>

Comment	Response
<p>(vi) A comments and response trail report (C&amp;R) must be submitted with the final SR. The C&amp;R report must incorporate all comments received (pre- (if any) and post-submission of draft SR) for this development. The C&amp;R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&amp;APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&amp;APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully. Please note that a response such as “Noted” is not regarded as an adequate response to I&amp;AP’s comments.</p>	<p>The comment and Responses Report in the format outlined by the Department is attached in Appendix F2.</p>
<p><b>d) Specialist Assessments</b></p>	
<p>(i) Please note that the protocols require certain specialists to be SACNASP registered. 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.</p>	<p>Please Refer to Appendix G4. The Terrestrial Biodiversity, Avifaunal, Aquatic Biodiversity and Agricultural Specialist are all SACNASP registered.</p>
<p>(ii) It is noted that Site Sensitivity Verification (SSV) reports were included for only the themes that were rated as High – Very High by the screening tool report. Please note that site sensitivity verification must be undertaken by the specialist or EAP for all the themes. As such, you are requested to ensure that the final SR includes detailed SSV (these can also be consolidated into one report) for all the Medium to Low-rated themes as well. The SSV must categorically state whether or not the EAP or specialist confirms or disputes the finding of the screening tool and on what basis. The findings of the site sensitivity verification reports will assist the department in the review of the final SR and also will aid the department when deciding on whether or not the final SR can be accepted.</p>	<p>The specialist site sensitivity verification reports are attached in appendices E1 to E7. The consolidated site sensitivity verification report (compiled by the EAP) is attached in appendix H and is summarised in section 5.11 of this Final Scoping Report.</p>
<p>(iii) In addition, you are required to include, as part of the final SR, a table summarising the specialist studies required by the Screening Tool and the sensitivity rating of the Screening Tool (very high, high, medium, low), a column indicating the sensitivity of the site after the EAP/Specialist conducted the Site Sensitivity Verification Assessment (a dispute or</p>	<p>The confirmation or dispute of the sensitivities identified in the screening tool is included in section 5.11.3 of the report. As requested by the Department, a Table summarising the outcomes has also been included in section 5.11.3.</p>

Comment	Response
<p>confirmation of the finding by the Screening Tool), and a column indicating whether these studies will be conducted or if a compliance statement or motivation will be submitted during the EIA phase, as per the requirements of the protocols.</p>	
<p><b>(e) Cumulative Assessment</b></p>	
<p>(i) Should there be any other similar developments proposed within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> <li>- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</li> <li>- A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul>	<p>The plan of Study for Environmental Impact Assessment in Section 6 of this report has been updated to include these requirements in the Environmental Impact Reporting stage of the Environmental Process.</p>
<p><b>General</b></p>	
<p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: "If S&amp;EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority".</p>	<p>This Final Scoping Report has been submitted within the 44 day allowable period outlined in Regulation 21(1) and has been subjected to a comment period of more than 30 Days.</p>

Comment	Response
You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.	Please refer to the table at the beginning of this report, where evidence of compliance with Appendix 2 and Regulation 21(1) of the EIA Regulations is provided.
Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations unless an extension has been granted in terms of Regulation 3(7).	This Final Scoping Report is submitted within the allowable timeframes as per Regulation 45.
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.	The applicant and EAP are aware of this requirement. No physical actions in furtherance of activities in this environmental application process have taken place on site.
<b>20 October 2023: Pierre vd Berg - TAFELKOP TRUST</b>	
Hallo Dale, could you please send me the scoping report registration forms for VREDE/LOUISVILLE project.	<p>Thank you for your email.</p> <p>I have attached the main report to the email.</p> <p>All additional appendices are available for download at either our website (<a href="http://www.cape-eaprac.co.za">www.cape-eaprac.co.za</a>) or via a dropbox download link (<a href="https://www.dropbox.com/scl/fo/2ttavus6cuvo7b5nkpt3g/h?rlkey=ear88b9ptr8j03982zgwso48c&amp;dl=0">https://www.dropbox.com/scl/fo/2ttavus6cuvo7b5nkpt3g/h?rlkey=ear88b9ptr8j03982zgwso48c&amp;dl=0</a>)</p> <p>I confirm that I have added you to our database and registered you as an interested and affected party for this process.</p> <p>You are more than welcome to send any comment through via email and there is no need to complete a specific registration form.</p>
<b>18 October 2023: Stephan Menne- Neighbouring Property Owner</b>	
I am a neighbour. Has problem because more than 10% of land is developed.	This concern has been submitted to the agricultural specialist for consideration and comment in terms of the Subdivision of Agricultural Land Act. The terms of reference of the agricultural specialist is to consider the impact on agricultural resources and includes assessment of the impact of transforming more than 10 percent of the agricultural land portions. Input from the specialist will be provided in the impact assessment phase of the environmental process.
<b>18 October 2023: Ludwig Menne – Neighbouring Property Owner</b>	

Comment	Response
<p>As an I&amp;AP who is a direct neighbour I unfortunately must say that the format of this development will impact negative on the socio economics of this area.</p>	<p>A Social Specialist has been appointed to consider the potential economic impact of the facility on the area. The terms of reference for the social impact assessment have been updated to ensure that the social specialist engages with adjacent landowners and considers socio-economic impacts on the surrounding area. Input from the specialist will be provided in the impact assessment phase of the environmental process.</p>
<p><b>13 October 2023: Natalie Uys - Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAERL)</b></p>	
<p>Please send the kmz/ shapefile</p>	<p>KMZ and Shapefile provided.</p>
<p><b>12 October 2023: Janine Bryden – Leads to Business</b></p>	
<p>I came across a Environmental Assessment notice for "Kareekloof Solar PV Facility and Battery Energy Storage System"  I do not have any objections but would like to please be registered as an interested party. Please use the email address projects@l2b.co.za for registration.  I follow building and construction related projects from conceptual / feasibility up until completion.</p>	<p>Registration confirmed.</p>