

## Dale Holder

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**From:** BC Admin <bcadmin@dffe.gov.za>  
**Sent:** Tuesday, 26 March 2024 13:22  
**To:** Dale Holder  
**Cc:** MMatlala Rabothata; Lindiwe Victoria Dlamini  
**Subject:** RE: NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED KAREEKLOOF SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY

Dear Sir/Madam

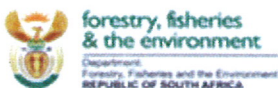
DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs M Rabothata and Ms Lindiwe Dlamini (Copied on this email). In addition, kindly share the 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](mailto: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](mailto:tkgaphola1@dffe.gov.za)  
Website: [www.environment.gov.za](http://www.environment.gov.za)



**From:** Dale Holder <dale@cape-eaprac.co.za>  
**Sent:** Friday, 15 March 2024 13:30  
**To:** BC Admin <bcadmin@dffe.gov.za>; Seoka Lekota <SLEKOTA@dffe.gov.za>  
**Subject:** RE: NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED KAREEKLOOF SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY

Dear DFFE Biodiversity Conservation Directorate.

**NOTIFICATION OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED KAREEKLOOF SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY 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, NEAR DE AAR IN THE NORTHERN CAPE PROVINCE.**

Kindly find the attached notification regarding the availability of the Draft Environmental Impact Report for the proposed Kareekloof Energy PV and BESS Facility on Portion 1 of the farm Bas Berg 88, Portion 2 of the farm Kopy Alleen 83 and Portions 6, 11, 16 & 17 of the Farm Karee Kloof 85 situated near De Aar in the Northern Cape Province.

Digital copies of the Draft Environmental Impact 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/tsgjr567pzrr081ca5aqh/h?rlkey=i7racpjpejsmjsd6ewvy8hjky&dl=0>
- Dedicated Download Link on We Transfer at: <https://we.tl/t-sEp2qqIsvT>

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 submit your full contact details, confirmation of registration and any comments on the Draft Environmental Impact Report to Cape EAPrac (contact details below) on or before **16 April 2024**.

Kind regards/Vriendelike groete

**Dale Holder**

**SENIOR ENVIRONMENTAL PRACTITIONER**

**Cape EAPrac**

NDip Nat.Con

EAPASA Reg. 2019/301

**From:** Dale Holder

**Sent:** Thursday, October 12, 2023 3:58 PM

**To:** BC Admin <[bcadmin@dffe.gov.za](mailto:bcadmin@dffe.gov.za)>; Seoka Lekota <[SLEKOTA@dffe.gov.za](mailto:SLEKOTA@dffe.gov.za)>

**Subject:** NOTIFICATION OF AVAILABILITY OF DRAFT SCOPING REPORT FOR THE PROPOSED KAREEKLOOF SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY

Dear DFFE Biodiversity Conservation Directorate

**RE: NOTIFICATION OF AVAILABILITY OF DRAFT REPORT FOR THE PROPOSED KAREEKLOOF SOLAR PV AND BATTERY ENERGY STORAGE (BESS) FACILITY 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, NEAR DE AAR IN THE NORTHERN CAPE PROVINCE.**

DFFE Reference No. : 2023-05-0021 (Pre Application Reference Number)  
DFFE Case Officer : Ms Mathlodi Mogorosi

Kindly find the attached notification regarding the availability of the Draft Scoping Report for the proposed Kareekloof Solar and BESS Development on the abovementioned properties near De Aar in the Northern Cape Province. The Draft Scoping Report is available for review and comment for a 30 day comment period from 12 October 2023 – 10 November 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/2ttavus6cuvo7b5nkpt3g/h?rlkey=ear88b9ptr8j03982zgws048c&dl=0>

- Dedicated Download Link on We Transfer at: <https://we.tl/t-L6tZKj2IR9>

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.

On completion of this 30-day comment period, comments received will be considered and feedback provided, after which the comments and responses will be included in the Final Scoping Report that will be submitted to the National Department of Forestry, Fisheries and the Environment for consideration. If you require any further assistance, please do not hesitate to contact this office directly.

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**



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.





## 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:** 14/12/16/3/3/2/2448

**Enquiries:** Ms M Rabothata

**Telephone:** (012) 399 9174 **E-mail:** [MRabothata@environment.gov.za](mailto: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](mailto:dale@cape-eaprac.co.za)

Dear Mr Holder

### **COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR 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**

The Directorate: Biodiversity Conservation reviewed and evaluated the draft report. It has been noted that the proposed Kareekloof Solar PV and BESS is located within three vegetation types, all listed as Least Threatened but poorly protected. None of the infrastructure is located in a threatened ecosystem or national protected expansion area. The project is located in an Ecological Support Area (ESA) and no plant Species of Conservation Concern (SCC) are expected to occur on site. The ESAs are mainly due to watercourses on site which have been avoided. The project area is situated entirely within the "Platberg-Karoo Conservancy" Important Bird Area (IBA).

The Terrestrial Biodiversity theme of the screening tool report was rated as Very High sensitivity. However, based on the Site Sensitivity Verification (SSV), this could not be confirmed and is rather considered to be of low-medium sensitivity in relation to the proposed development. There are no specific terrestrial features that are linked to the ESA (e.g. specific habitat types or fauna populations), and the vast majority of the ESA encompassed ecosystems that are considered to be of Least Concern.

The Avifauna sensitivity theme of the screening tool was rated as "Low" for the entire study site. The Avifauna Specialist has disputed the low sensitivity classification in the screening tool to high due to the possible (and confirmed) presence of 5 Species of Conservation concern.

Most of the project is located in grasslands on flat plains and gently sloping hills that are considered to be moderately sensitive. The drainage areas, wetlands and rocky ridges with associated steep slopes are considered to be sensitive and have been avoided for placement of PV arrays, laydown areas and associated infrastructure.



**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR 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**

Given the above, the Directorate Biodiversity Conservation does not have objections to the proposed development. However, to minimize possible loss to biodiversity it is recommended that the comments must be obtained from SA Birdlife and all the prescribed mitigation measures in the report and studies are adhered to and implemented throughout the phases.

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](mailto: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: 15/04/2024**

## Dale Holder

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**From:** Lindiwe Victoria Dlamini <LVDlamini@dffe.gov.za>  
**Sent:** Thursday, 18 April 2024 14:02  
**To:** Dale Holder  
**Cc:** MMatlala Rabothata  
**Subject:** DBAR Comments For The Proposed Kareekloof Solar PV and Battery Energy Storage (Bess) Facility On Of The Farm Karee Kloof 85, Near De Aar In The Northern Cape Province.  
**Attachments:** COMMENTS ON THE KAREEKLOOF SOLAR PV FACILITY BESS.pdf

Dear Mr. Holder

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

Regards  
Lindiwe( Intern)





## Dale Holder

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**From:** Matlhodi Mogorosi <MMOGOROSI@dffe.gov.za>  
**Sent:** Friday, 19 April 2024 09:24  
**To:** Dale Holder  
**Cc:** marshall@merchant.energy; Lydia Kutu  
**Subject:** 14/12/16/3/3/2/2448 - Signed Draft EIAr Comments  
**Attachments:** 03 Comments on Draft SR\_2.2448.pdf

Dear Dale,

Please find the attached for your attention.

Regards

Matlhodi Mogorosi  
Department of Forestry, Fisheries and the Environment  
Designation: Environmental Officer: Specialised Production  
Directorate: National Infrastructure Development  
Tel: (012) 399 9388





# 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:** 14/12/16/3/3/2/2448

**Enquiries:** Ms. Matlhodi Mogorosi

**Telephone:** (012) 399 9388 **E-mail:** MMogorosi@dffe.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](mailto:dale@cape-eaprac.co.za)

## PER MAIL / E-MAIL

Dear Mr Holder

### **COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF THE UP TO 900MW KAREEKLOOF SOLAR PHOTOVOLTAIC FACILITY AND A BATTERY ENERGY STORAGE SYSTEM (BESS), AND OTHER ASSOCIATED INFRASTRUCTURE LOCATED 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 NEAR DE AAR, WITHIN THE EMTHANJENI LOCAL MUNICIPALITY IN THE NORTHERN CAPE PROVINCE**

The Application for Environmental Authorisation and Draft Environmental Impact Assessment Report (EIAR) received by the Department on 09 October 2023 and 15 March 2024, respectively, refer.

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

#### **(a) Specific comments**

- (i) Recommendations provided by specialist reports must be considered and used to inform the layout.
- (ii) Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.
- (iii) Please ensure that the final EIAR complies with the requirements of Appendix 3 of the NEMA EIA Regulations, 2014, as amended.
- (iv) A copy of the final preferred layout map must be submitted with the final EIAR, and 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.

#### **(b) Listed Activities**

- (i) The relevant authorities with jurisdiction in respect of geographically designated areas in terms of GN R. 985 (Listing Notice 3) Activities must be continuously involved throughout the environmental impact assessment process. Written comments (or proof of consultation) 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. Please also ensure that the potential impacts on the Critical Biodiversity Areas that may be affected are fully assessed in the EIAR.

S/S

- (ii) It is noted that in the description provided in the application form and the draft EIAr, for the triggers of Listed Activity 11 of Listing Notice 1, there are three (3) on-site substations with a capacity of up to 300MVA each. This must also be reflected in the project description in which the associated infrastructure is listed, in both the application form and the EIAr. Further to this, a determination must be made if the proposed on-site substations do not trigger Listed Activity 9 of Listing Notice 2. If they do trigger, the application form and the EIAr must be amended accordingly.
- (iii) In the description for Listed Activity 12 that you have applied for, it is stated that "*Some of the project infrastructure, such as internal cabling may be routed within 32m of the Aquatic features identified by the aquatic specialist. The relevance of this activity will be determined in the Environmental Impact Reporting phase after layouts are finalised and assessments completed.*" Kindly ensure that the relevance of this activity is reflected in the final EIAr. Furthermore, the type of infrastructure together with the threshold/footprint to be developed with the overall project must be included in the description in both the application form and final EIAr. The same information is required for Listed Activity 48 of Listing Notice 1 of the EIA Regulations, 2014, as amended.
- (iv) Kindly expand the description provided of the trigger for Listed Activity 14 of Listing Notice 1 to include the threshold/capacity of the BESS proposed. The same applies to Activity 4 of Listing Notice 2.
- (v) The activity description provided for Listed Activity 18 of Listing Notice 3 must be expanded to include the length and width of the main and internal access roads.
- (vi) The application form must be amended accordingly to reflect the changes mentioned in the above paragraphs and must be signed by the applicant.

**(c) Public Participation Process**

- (i) The final EIAr must comply with all conditions of the acceptance of the scoping report dated 13 December 2023. Please ensure that the Department's comments are addressed in the report as well as in the comments and response table.
- (ii) Please ensure that the final EIAr includes proof that the key stakeholders received written notification of the proposed activity, as well as of the resubmission of the application and the draft EIAr. Comments made by interested and affected parties (I&APs) must be comprehensively captured and responded to clearly and fully in the comments and response report.

**(d) Environmental Management Programme**

- (i) There are three on-site substations proposed for the up to 900MW PV solar facility. However, only one Generic EMPr has been attached as part of the draft EIAr. It is unclear if the single generic EMPr is intended to include all three on-site substations.
- (ii) Kindly ensure that the Generic EMPr(s) for the three 300MVA on-site substations are **signed** (subsection 3) and **dated**.
- (iii) It is further noted that under **Part B: Section 2** of the Generic EMPr which requires "*site-specific information and declaration*" has not been completed. Kindly note that this section must be completed and included in the final EIAr. Furthermore, should the site contain no specific environmental sensitivities or attributes required under Part C of the Generic EMPr, kindly ensure to make note of such in the completed Generic EMPr. It is imperative that the requirements of the Generic EMPr are fully complied with.
- (iv) Please also include in the Generic EMPr, the recommended frequency for the auditing of compliance with the conditions of the EA and Generic EMPr (for the construction and post-construction monitoring phases), as well as the frequency for the submission of such compliance reports to the competent authority.
- (v) Further to the above, you are required to comply with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.

**General**

Please 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 EIAR 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 before an Environmental Authorisation is granted by the Department.

Yours sincerely



**Mr. Vusi Skosana**

**Acting Chief Director: Integrated Environmental Authorisations**

**Department of Forestry, Fisheries, and the Environment**

**Signed by: Ms. Sindiswa Dlomo**

**Designation: Deputy Director: National Integrated Authorisation Projects**

**Date: 2024/04/19**

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|-----|----------------|-----------------------------|---|
| cc: | Marshall Mabin | Kareekloof Energy (Pty) Ltd | Email: <a href="mailto:marshall@merchant.energy">marshall@merchant.energy</a> |
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