

COMMENTS AND RESPONSES REPORT

PROPOSED TABOR SOLAR PV FACILITIES AND INTEGRATED GRID CONNECTION INFRASTRUCTURE IN THE MAKHADO LOCAL MUNICIPALITY IN THE VHEMBE DISTRICT, LIMPOPO PROVINCE

DFFE REFERENCE NUMBER	DFFE CASE OFFICER	PROPONENT
14/12/16/3/3/2/2698	Ms Zamalanga Langa	Bethel Solar PV (Pty) Ltd
14/12/16/3/3/2/2699	Mr Lunga Dlova	Draailoop Solar PV (Pty) Ltd
14/12/16/3/3/2/2700	Ms Makhosazane Yeni	Klipput Solar PV (Pty) Ltd
14/12/16/3/3/2/2701	Ms Thulisile Nyalunga	Makoppa Solar PV (Pty) Ltd

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
COMMENTS RECEIVED ON THE FINAL ENVIRONMENTAL IMPACT REPORT¹		
24/10/2025 Via Email MTN	MTN has conducted an analysis of the project to its network and we advise that there is no related impact. Accordingly, we wish to inform you that your application has been approved.	Noted: No response Required
08/10 2025 Via Email Telkom	Acknowledged receipt of email .	Noted: No Response required.

¹ Please note that these comments were after the submission of the Final EIR's to the competent authority (in response to the EAP notifying I&AP's of the Final EIR submissions. The Final EIR was subsequently withdrawn and Revised Draft Environmental Impact Reports were prepared and additional stakeholder engagement is currently underway.

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<p>09 October 2025 Via email Chatleka CPA.</p> <p>Comment received from Messrs Motshewa Ntimo and was signed by Mr N.A. Maphala (Acting Chairperson, Chatleka Communal Property Association)</p>	<p>1. Acknowledgement of Correspondence</p> <p>1.1 The Chatleka Communal Property Association (hereinafter referred to as "the CPA") hereby acknowledges receipt of your correspondence and accompanying links to the Final Environmental Impact Assessment (EIA) Reports and Environmental Management Programmes (EMPrs) for the above-mentioned proposed developments.</p> <p>1.2 The CPA also notes the summary of engagements outlined in your correspondence between Cape EAPrac, yourself, and our members in their capacity as Interested and Affected Parties (I&APs).</p>	<p>1.2 For the benefit of the competent authority, it is necessary to provide a summary of engagements between various representatives of the CPA and Cape EAPrac (the Environmental Assessment Practitioner) as part of the Environmental Process for the aforementioned projects to date.</p> <table border="1" data-bbox="1265 491 2033 1390"> <thead> <tr> <th data-bbox="1265 491 1391 552">Date</th> <th data-bbox="1391 491 1525 552">Via</th> <th data-bbox="1525 491 1675 552">From</th> <th data-bbox="1675 491 2033 552">Summary</th> </tr> </thead> <tbody> <tr> <td data-bbox="1265 552 1391 635">15 March 2025</td> <td data-bbox="1391 552 1525 635">Website</td> <td data-bbox="1525 552 1675 635">Mr Motshewa Matimolane</td> <td data-bbox="1675 552 2033 635">Registered as an I&AP via the Cape EAPrac Website.</td> </tr> <tr> <td data-bbox="1265 635 1391 740">22 April 2025</td> <td data-bbox="1391 635 1525 740">email</td> <td data-bbox="1525 635 1675 740">Mr Francois Byleveld (Cape EAPrac)</td> <td data-bbox="1675 635 2033 740">Cape EAPrac confirmed registration request from Mr Matimolane (Annexure 1).</td> </tr> <tr> <td data-bbox="1265 740 1391 845">24 April 2025</td> <td data-bbox="1391 740 1525 845">email</td> <td data-bbox="1525 740 1675 845">Mr Dale Holder (Cape EAPrac)</td> <td data-bbox="1675 740 2033 845">All I&AP's including Mr Matimolane notified of availability of Draft Scoping Reports for review and comment.</td> </tr> <tr> <td data-bbox="1265 845 1391 1118">02 May 2025</td> <td data-bbox="1391 845 1525 1118">email</td> <td data-bbox="1525 845 1675 1118">Mr Motshewa Matimolane on behalf of the Chatleka CPA extended EXCO. Numerous other parties were in copy.</td> <td data-bbox="1675 845 2033 1118">Mr Matimolane confirmed that he had downloaded Report for Draailoop PV, Klippot PV and Makoppa PV but was unable to download the Report for Bethel PV. Furthermore requested that the Chatleka CPA and parties in copy be registered as I&AP's.</td> </tr> <tr> <td data-bbox="1265 1118 1391 1224">07 May 2025</td> <td data-bbox="1391 1118 1525 1224">Database</td> <td data-bbox="1525 1118 1675 1224">Mr Francois Byleveld (Cape EAPrac)</td> <td data-bbox="1675 1118 2033 1224">Cape EAPrac registered the Chatleka CPA and all parties in copy in annexure 4 as I&AP's.</td> </tr> <tr> <td data-bbox="1265 1224 1391 1390">03 May 2025</td> <td data-bbox="1391 1224 1525 1390">email</td> <td data-bbox="1525 1224 1675 1390">Mr Motshewa Matimolane in his personal capacity and on behalf of the Chatleka CPA</td> <td data-bbox="1675 1224 2033 1390">Mr Matimolane on Behalf of the CPA extended Exco provided formal comment on the Draft Scoping Report for Draailoop PV.</td> </tr> </tbody> </table>				Date	Via	From	Summary	15 March 2025	Website	Mr Motshewa Matimolane	Registered as an I&AP via the Cape EAPrac Website.	22 April 2025	email	Mr Francois Byleveld (Cape EAPrac)	Cape EAPrac confirmed registration request from Mr Matimolane (Annexure 1).	24 April 2025	email	Mr Dale Holder (Cape EAPrac)	All I&AP's including Mr Matimolane notified of availability of Draft Scoping Reports for review and comment.	02 May 2025	email	Mr Motshewa Matimolane on behalf of the Chatleka CPA extended EXCO. Numerous other parties were in copy.	Mr Matimolane confirmed that he had downloaded Report for Draailoop PV, Klippot PV and Makoppa PV but was unable to download the Report for Bethel PV. Furthermore requested that the Chatleka CPA and parties in copy be registered as I&AP's.	07 May 2025	Database	Mr Francois Byleveld (Cape EAPrac)	Cape EAPrac registered the Chatleka CPA and all parties in copy in annexure 4 as I&AP's.	03 May 2025	email	Mr Motshewa Matimolane in his personal capacity and on behalf of the Chatleka CPA	Mr Matimolane on Behalf of the CPA extended Exco provided formal comment on the Draft Scoping Report for Draailoop PV.
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				extended EXCO. Mr Simon Ramahlare was in copy.	
		03 May 2025	email	Mr Motshewa Matimolane. Mr Simon Ramahlare was in copy.	Mr Matimolane confirmed that the comment submitted on Draailoop PV is applicable to all 4 Projects (i.e. Bethel PV, Draailoop PV, Klipput PV and Makoppa PV).
		05 May 2025	email	Dale Holder (Cape EAPrac)	Cape EAPrac acknowledged receipt of the comment (Annexure 5) and the confirmation that it applies to all projects (Annexure 6).
		05 May 2025	email	Dale Holder Cape EAPrac	Cape EAPrac provided Mr Matimolane and all parties in copy in annexure 4 with copy of Draft Scoping Report, Layout Plan Social Scoping Report for Bethel PV.
		05 May 2025	website	Mr Makgetsi Matimolane on behalf of Chatleka CPA.	Registered as an Interested and Affected Party as part of the Chatleka CPA. This registration was in respect of Draailoop Solar only.
		05 May 2025	website	Mr Matome Malefo	Mr Malefo confirmed that he is opposed to the project on the Chatleka CPA farms. *NOTE – None of the projects are proposed on properties owned by the Chatleka CPA.
		06 May 2025	email	Ms Sylvia Ndaka with various other parties in copy.	Ms Ndaka thanked Cape EAPrac for the information provided (Annexure 8).

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		06 May 2025	email	Mr Motshewa Matimolane with various parties in copy.	Mr Matimolane requested copies of landowner consents as attached in Appendix G2 of the Draft Scoping Reports.
		06 May 2025	email	Dale Holder (Cape EAPrac)	Mr Dale Holder provided Mr Matimolane with copies of all landowner consents.
		06 May 2025	website	Messrs Motz Ntimo	Messrs Ntimo Provided comment on the Draft Scoping Report. In summary. Messrs Ntimo objected to the development, largely based on land claims lodged or in the process of being lodged on the affected properties.
		06 May 2025	email	Mr Dale Holder (Cape EAPrac)	Mr Dale Holder acknowledged receipt of the comment from Messrs Ntimo (Annexure 14) and confirmed that the concerns would be discussed with the project developer and the Social Specialist.
		07 May 2025	email	Mr Francois Byleveld (Cape EAPrac)	Confirmed Mr Matimolane's website registration (Annexure 9).
		09 May 2025	email	Mr Siboniso Khumalo	Mr Khumalo confirmed that he represents a renewable energy developer in Polokwane and that they have a long term lease from the Chatleka CPA to develop similar developments on Farm 429 and Farm 435. *NOTE – These are not portions affected by the current applications.
		22 June 2025	email	Mr Motshewa Matimolane with various parties in copy.	Mr Matimolane addressed an email to the Social Specialist requesting a comprehensive and substantive response to all the issues raised in the

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					letter. The Social Specialist provided this request to the EAP.
		30 June 2025	email	Mr Tony Barbour (Social Specialist)	The Social Specialist responded to Mr Matimolane thanking him for the comments submitted to on the Social Scoping Report (Annexure 5). The social specialist reiterated that the SIA Report will acknowledge the land claim on Draailoop 430 LS by the Chatleka CPA and other project related land claims. The social specialist furthermore confirmed that the SIA Report will also identify potential opportunities for local communities associated with the construction and operation of the proposed solar projects. The social specialist reiterated that the land claim process is separate to the EIA process and that while the EIA and SIA will clearly acknowledge the current land claims, it falls outside the scope of the EIA and SIA to assess and or comment on the land claims.
		13 August 2025	email	Messrs Ngoako Maphala	Objection to proposed Draailoop PV. Messrs Maphala confirmed that the affected land was currently "being claimed".
		22 August 2025	email	Mr Francois Byleveld (Cape EAPrac)	All I&APs, including all parties registered for the Chatleka CPA were notified of the Availability of the Draft Environmental Impact Reports for review and comment for a 30 Day period. These Draft Environmental Impact Reports included the comprehensive responses to all of the comments listed above.

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		06 October 2025		Mr Dale Holder (Cape EAPrac)	Submitted Final Environmental Impact Reports to the competent authority for consideration and decision making.
		06 October 2025	email	Mr Francois Byleveld (Cape EAPrac)	Notified all I&AP's, including all parties registered for the Chatleka CPA, that the Final Environmental Impact Reports have been submitted to the Competent Authority for consideration and decision making.
		07 October 2025	email	Mr Mothewa Matimolane with other parties in copy.	Requested copies of the Final EIR and comments and responses report. Mr Matimolane furthermore confirmed that he had not been invited to a public meeting to ventilate issues.
		08 October 2025	email	Dale Holder (Cape EAPrac)	Provided Mr Matimolane with links to Final EIR's and Final EMPR's for all projects. Mr Holder furthermore summarised all key correspondence with the CPA and confirmed that no comment was received from the CPA on the Draft EIR.
		09 October 2025	email	Messrs Motz Ntimo. *NOTE, the email was received from Messrs Motz Ntimo, but listed Mr Motshewa Matimolanas as member of the Chatleka CPA Extended exco as the author.	Messrs Ntimo provided a comment relating to purposed procedural deficiencies in the environmental process. For the first time since the inception of the environmental process, this comment noted the expectation of in-person consultation. This comment furthermore highlighted the cultural, spiritual and historical importance of the land to the Chatleka CPA.

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		09 October 2025	email	Mr Motshewa Matimolane	Mr Matimolane requested contact details of the case officers handling the application.
		09 October 2025	email	Mr Richard Malefo with various parties in copy.	Noted that EAP should inform the CPA community regarding any activities on Farms owned by the CPA. *NOTE: None of the activities are proposed on properties owned by the Chatleka CPA.
		09 October 2025	email	Motshewa Matimolane on behalf of Mr N.A. Maphala (Acting Chairperson: Chatleka Communal Property Association)	Mr Matimolane provided a formal response to the Final EIR's and EMPR's (i.e. the response that is the subject of this letter.)
		09 October 2025	email	Messrs Motz Ntimo	Messrs Ntimo provided the EAP with a copy of the submission of the comment to DFFE. This was the same comment as per Annexure 28.
		09 October 2025	email	Mr Dale Holder (Cape EAPrac)	Acknowledged receipt of the comment that was submitted to DFFE (Annexure 29)
		09 October 2025	email	Messrs Motz Ntimo with various parties in copy	Messrs Ntimo thanked Cape EAPrac for the acknowledgement and stated that the CPA is awaiting the formal feedback.
		10 October 2025	email	Mr Motshewa Matimolane	Mr Matimolane advised that he was struggling to download the Final EIR via the links provided by Cape EAPrac (Annexure 24). Mr Matimolane requested

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					<p>that the documentation be provided via SharePoint as an alternative.</p> <p>*NOTE – This request for an alternative means to access the Final EIR was submitted after the CPA had already provided a Comment on the Final EIR.</p>
		10 October 2025	email	Mr Dale Holder (Cape EAPrac)	<p>Provided Mr Matimolane with a SharePoint link to the Final EIR's and Final EMPr's</p>
		<p>The blue highlights in the table represent the following key engagements:</p> <ol style="list-style-type: none"> 1. Request by the EAP for the CPA to provide comment on the Draft Scoping Report. 2. Request by the EAP for the CPA to provide comment on the Draft Environmental Impact Report 3. Notification to the CPA, that the Final Environmental Impact Report has been submitted to the Competent Authority for Decision Making. <p>It is noteworthy that the CPA did not engage any further, nor provide any comments on the Draft Environmental Impact Reports where all their concerns raised during the scoping phase were addressed and responded to.</p> <p>The yellow highlights in the table above indicate comments received and engagement that occurred after the submission of the Final Environmental Impact Reports for consideration and Decision Making.</p> <p>Please note that all the correspondence from the CPA was received digitally (either via email or via the Cape EAPrac website) and all correspondence was received in English.</p> <p>2.1. As reflected in the table above, the CPA has only engaged digitally with the EAP via the Cape EAPrac website and email. At no stage during the</p>			

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	<p>2. Limited Access to Electronic Communication</p> <p>2.1 The CPA wishes to place on record that the majority of its beneficiaries are illiterate and reside in rural areas and do not have access to reliable internet, email, or other forms of electronic communication.</p> <p>2.2 Consequently, the method of engagement adopted by Cape EAPrac — relying primarily on electronic communication and online document dissemination, in English — effectively excluded the majority of affected community members from meaningful participation in the EIA process.</p> <p>2.3 This exclusion constitutes a material procedural deficiency, inconsistent with the principles of fair, transparent, and inclusive public participation as contemplated in the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) and the EIA Regulations, 2014 (as amended).</p>	<p>extensive engagement did the CPA raise concern with the utilisation of electronic communication. Notwithstanding the responsibility of the EAP to ensure that public participation is participatory, transparent, and inclusive, the responsibilities of I&AP’s are also clear in the legislation and various guidelines on public participation that have been published in South Africa. In this regard, the following is relevant:</p> <ul style="list-style-type: none"> Representatives of organisations such as the Chatleka CPA are responsible for keeping their membership informed about findings in an EIA Process. Cape EAPrac have engaged with various members of the Chatleka CPA, including the Acting Chairperson and members of the extended Executive Committee. It is the responsibility of these structures within the CPA to inform their members / beneficiaries accordingly. <p>2.2. During the scoping phase of the environmental process, comments, in English, were received on 03 May 2025 by means of electronic communication from Mr Motshewa Matimolane. This electronic communication confirmed that the comments were submitted in Mr Matliomane’s personal capacity and on behalf of the CPA and its extended Executive Committee. The CPA and its extended Executive Committee are responsible for communicating matters that may affect the CPA with their members. The CPA’s comment of 03 May 2025 (which was received electronically in English), did not raise language or digital limitations as a concern.</p> <p>Notwithstanding the above response, a revised Draft Environmental Impact Report has been made available for a further comment period (i.e. the third opportunity to comment). This revised Draft EIR also includes the availability of the document in hardcopy format available at both the Viva Banderlierkop (Fuel Station) and the Bandeleirkop and Munzhedzi post office in Louis Trichardt.</p>
		<p>It is important to note that the CPA provided comment on the Draft Scoping Report, which was responded to in detail by the EAP and such responses were provided to the CPA. CPA did not respond, nor raise any additional concerns.</p>

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	<p>3. Failure to Engage the Community in an Appropriate Manner</p> <p>3.1 It is both prudent and a legal expectation that engagement with the CPA and its members should be conducted in person, in a manner, form, language, and at a venue that is appropriate and accessible to the affected community.</p> <p>3.2 It is deeply regrettable that such in-person engagement did not occur, particularly given the CPA's direct proximity to the proposed project areas and its status as a directly affected landholding community.</p>	<p>At no stage during the EIA process did the CPA request a meeting in person, nor did they raise language barriers as a limitation to the Environmental Process.</p> <p>Notwithstanding the above response, a revised Draft Environmental Impact Report has been made available to registered and potential I&AP's for an additional review and comment period. Additional Site Notices, Newspaper Advertisements and Project summaries translated into TshiVenda form part of this Revised Draft EIR. A public open day / information sharing session has been provided for as part of the comment period on the Revised Draft Environmental Report.</p>
	<p>4. Reasonable Expectation of Direct Consultation</p> <p>4.1 As a neighbouring community to the proposed developments, the CPA had a legitimate and reasonable expectation that Cape EAPrac, as the Environmental Assessment Practitioner (EAP), would undertake special efforts to meet with the CPA and its members in person.</p> <p>4.2 The undersigned and other registered I&APs from the CPA cannot reasonably represent the full breadth of community views, concerns, and perspectives.</p> <p>4.3 Only through a properly constituted public meeting convened within the community could these diverse and affected voices have been adequately</p> <hr/>	<p>The Chatleka CPA, as a neighbouring landowner was notified of both the availability of the Draft Scoping Report and Draft Environmental Impact Report and did provide comment on the Draft Scoping Report.</p> <p>Notwithstanding, the fact that the CPA did provide comment, during the Environmental process, a revised Draft Environmental Impact Report has been provided for an additional comment period. A public open day / information sharing session has been provided for as part of the comment period on the Revised Draft Environmental Report.</p>

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	<p>5. Request for Corrective Action</p> <p>5.1 In view of the deficiencies outlined above, the CPA respectfully requests that Cape EAPrac and the competent authority reconsider the submission of the Final EIA and EMPr reports.</p> <p>5.2 The CPA urges that the process be paused to allow for a proper, meaningful, and accessible public consultation with the Chatleka CPA and other affected CPAs in the surrounding area.</p> <p>5.3 This step is critical to ensure that community concerns, heritage sensitivities, and socio-economic expectations are appropriately reflected in the final environmental record prior to any further review or decision-making.</p>	<p>As outlined in the responses above, it is clear that the public participation undertaken is compliant with the requirements of the regulations as well as the objectives of NEMA.</p> <p>Notwithstanding the appropriate and compliant public participation already undertaken, a revised Draft Environmental Impact Report has been prepared and will be subjected to an additional stakeholder engagement process in order to address the CPA's concerns.</p>
	<p>6. Reservation of Rights</p> <p>6.1 The CPA hereby reserves all rights available to it under NEMA and related legislation to appeal, review, or otherwise challenge any decision that may be made on the basis of the current EIA process.</p> <p>6.2 This reservation is based on grounds of inadequate, procedurally unfair, and exclusionary public participation, particularly as it pertains to a community whose ancestral lands — including burial sites of cultural and spiritual significance — fall within the proposed project footprint.</p>	<p>6.1. The reservation of rights by the CPA is noted. In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), and the associated Environmental Impact Assessment (EIA) Regulations, all Interested and Affected Parties (I&APs), which include the CPA, are entitled to exercise their rights in terms of this legislation.</p> <p>It is further acknowledged that the CPA, as a registered I&AP, may pursue any lawful remedy available to it should it believe that the EIA process or the resultant decision is procedurally flawed, substantively unreasonable, or inconsistent with the principles of environmental justice and sustainable development as enshrined in Section 2 of NEMA.</p> <p>6.2. A Heritage Specialist (CTS Heritage) undertook a Heritage Impact Assessment (HIA) for each of the projects.</p> <p>The Heritage specialist identified, a number of burial grounds and graves within the greater study area (Sites 009, 025, 037 and 038).</p> <p>These burials ranged from historic to recent and are all located outside of municipal cemeteries.</p> <p>Due to their high levels of local social and spiritual significance, these graves and burials were graded by the specialist as grade IIIA sites. These Grade III sites considered to have high local significance (warranting a high level of local protection, even if they do not meet the criteria for Provincial (Grade II) or National (Grade I) sites).</p>

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		<p>Due to their local significance, the specialist recommended that a no development buffer of 100m be implemented around these burials and in order to retain their sense of place (as well as to ensure that no associated unmarked human remains are accidentally impacted by development activities). All of these graves/burials inclusive of the buffers recommended by the specialist were avoided in their entirety by the preferred alternatives for all of the projects.</p> <p>This information was provided to the CPA as part of the Draft Scoping Report as well as the Draft Environmental Impact Report. At no point in any of the communications received from the CPA, did they refute the findings of the HIA, which identified the burial sites within the study area.</p>
	<p>7. Principle of True and Meaningful Engagement</p> <p>7.1 True and meaningful consultation is not a procedural formality; it is a cornerstone of environmental justice, community respect, and ethical project development.</p> <p>7.2 For a project of this magnitude and sensitivity, the least that could have been done was for the EAP and project proponents to meet the affected community face-to-face, to listen, explain, and understand the implications of the development on their ancestral land.</p> <hr/> <p>7.3 The Chatleka CPA community expresses deep disappointment with the conduct of the current process and hereby appeals to Cape EAPrac to take corrective measures in good faith.</p>	<p>As outlined above, during the extensive public participation undertaken as part of the Environmental Process, the CPA did not raise any concerns regarding the inadequacy of consultation and did in fact engage with the EAP on numerous occasions.</p> <p>In order to further address the CPA's concerns, an additional public participation process is being undertaken, inclusive of:</p> <ol style="list-style-type: none"> 1. Public Open Day / Information Sharing Session. 2. Additional Press Advertisements, Site Notices translated into TshiVenda 3. Background information translated into Tshivenda. 4. Provision of additional physical hard copies for review by parties who do not have access to digital platforms.
		<ol style="list-style-type: none"> 1. The CPA and the EAP engaged extensively during the scoping phase of the environmental process. 2. All comments received in the Scoping Phase were addressed and Responded to in detail. 3. The CPA did not raise procedural issues in any of their comments during the Environmental Process.

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	<p>Conclusion</p> <p>The Chatleka CPA urges Cape EAPrac, the project proponents and all relevant authorities to take immediate steps to rectify the procedural shortcomings by engaging the affected communities in a fair, inclusive, and culturally appropriate manner before proceeding further.</p> <p>We trust that this matter will receive your urgent and serious attention, and we look forward to your written response indicating how these concerns will be addressed.</p>	<ol style="list-style-type: none"> 4. The CPA provided all comments in English and did not raise language barriers as a concern in any of their comments during the Environmental Process. 5. The CPA provided all comments via digital platforms (Cape EAPrac Website and email) did not raise the access to digital platforms as a concern in any of their comments during the Environmental Process. 6. The CPA did not participate nor provide any comments during the Environmental Impact Assessment phase of the environmental process (where all comments from the Scoping phase were addressed and responded to in detail). 7. The procedural concerns relating to language and accessibility issues were only raised by the CPA after the submission of the Final EIR to the Competent Authority for decision making. <p>Notwithstanding the above, an additional public participation process as outlined above is being undertaken to further address the concerns of the CPA.</p>
COMMENTS RECEIVED ON THE DRAFT ENVIRONMENTAL IMPACT REPORT		
<p>19/09/2025</p> <p>Via Email</p> <p>Ms Zamalanga Langa - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment:</p> <p>BETHEL SOLAR PV</p>	<p><u>(a) Listed Activities</u></p> <p>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. Also ensure to choose the correct and relevant sub listing. Additionally, note that the onus is on the applicant and the environmental assessment practitioner (EAP) to ensure that all the applicable listed activities are included in the application. Failure to do so may result in unnecessary delays in the processing of the application.</p> <p>If the activities applied for in the application form differ from those mentioned in the final SR and draft EIAr, an amended application form must be submitted. Please note that the Department's application form template has been</p>	<p>These relevant thresholds are included in the description for each of the listed activities as reflected in the revised application form in Appendix J as well as in section 3.1.2.</p> <p>A revised application form is attached in Appendix in Appendix J. The Listed activities outlined in this application form and those reflected in section 3.1.2 of this report (and assessed) are the same.</p>

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	amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms .	
	<u>(b) Draft Environmental Impact Assessment Report (EIAR)</u>	
	i) It has been noted that the associated infrastructure includes water storage tanks and pipelines. The DEIAR provides no assessment of the pipeline's impact. Kindly specify the size and length of the pipeline. Also please ensure that the pipeline impacts are assessed and do not trigger a listed activity.	Kindly note that pipelines and water storage tanks referred to are limited to rainwater storage tanks (typical JoJo type Tanks) and plumbing reticulation at the Operations and Maintenance building. The Pipeline, which is essentially plumbing between the rainwater storage tank and the O&M building will not trigger any Listed Activity and is situated entirely within the area depicted for O&M buildings on the Site Layout Plan in Appendix D1.
	(ii) You have applied for the BESS. You are required to provide the height and capacity of the BESS.	Please refer to the technical details in the tables above. The BESS will have a maximum storage capacity of 3840MWh and a maximum height of 6m.
	(iii) Please provide a technical detail for the proposed facility with the components and descriptions and or dimensions of the project not limited to BESS, onsite switching station, IPP substation, O&M complex, Access road and internal roads, temporary storage, laydown area.	Please refer to the tables above, where all the technical details of the proposed PV development as well as the associated infrastructure have been tabulated.
	(iv) Furthermore, the technical details must indicate the distances of all the assessed powerline alternatives. Currently, only one powerline distance has been provided, and it is unclear whether this relates to the preferred powerline alternative or not.	The technical details of the powerline infrastructure detailed in the tables above are applicable to the preferred powerline alignment. The co-ordinates and the Site Layout Plan in Appendix D1 also reflect the preferred Alternative.
	(v) Please note that Appendix 1(3)(1)(h)(x) of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, requires that "if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such" must be included in the final EIAR.	Please refer to section 2.11 below where the alternatives are discussed in detail.
	(vi) A description of the process followed to reach the preferred alternative within the site as per Appendix 1(3)(1)(h)(i) of the EIA Regulations (2014), as amended, must be incorporated into the final EIAR.	Please refer to section 2.10 (site selection process) and section 2.11.
	(vii) You indicated that no technology alternatives are under consideration in this application. Please investigate BESS technology alternatives. You are	The reference to technology alternatives relates to alternative generation technologies (i.e. that PV is the only generation technology under investigation).

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	requested to explain which technology alternative preferable, and the other alternatives are not viable.	<p>BESS technology alternatives (Solid State, Redox Flow and Liquid metal technologies) were considered and the risk associated with each considered (Please refer to the BESS risk assessment compiled by ISHEcon attached in Appendix E8).</p> <p>The preferred BESS technology was determined to be: Solid State Lithium or Sodium Ion technologies. This will be containerised technology and no assembly of individual components will take place on site.</p>
	(c) Locality, Site Layout and Sensitivity Maps	
	(i) Please ensure that the site layout map to be submitted with the final EIAr must provide the following:	
	A clear description of all associated infrastructure.	All infrastructure reflected on the preferred site layout plan (Appendix D1) is described in the tables above.
	substation;	The substation (IPP side and Eskom side) is depicted on the site layout plan in appendix D1.
	powerline	The powerline is depicted on the site layout plan in Appendix D1.
	The locality map must depict the pipeline	As noted above, the pipelines and water storage tanks referred to are limited to rainwater storage tanks (typical JoJo type Tanks) and plumbing reticulation at the Operations and Maintenance building. The Pipeline, which is essentially plumbing between the rainwater storage tank and the O&M building will not trigger any Listed Activity and is situated entirely within the area depicted for O&M buildings on the Site Layout Plan in Appendix D1.
	Internal roads infrastructure; and;	The internal roads infrastructure is depicted on the site layout plan in Appendix D1.
	All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc.	All supporting infrastructure is depicted on the site layout plan in appendix D1.
	All necessary details regarding all possible locations and sizes of the proposed solar PV infrastructure.	The location and sizes of all infrastructure are shown on the preferred site layout plan in Appendix D1 and are also reflected in the technical description tables above.

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	A copy of the final preferred layout map. 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:	
	Permanent laydown area footprint;	The laydown area is depicted in the site layout plans attached in appendix D1. Please note that as per the EMPr, a 1ha permanent laydown has been allowed for within the extent of the temporary laydown.
	Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible);	The width of the internal and access roads are depicted in in the site layout plan attached in Appendix D1 and detailed in the technical descriptions above. Incompliance with the EMPr (Appendix I) the Construction phase roads and the operational phase roads will be developed on the same alignment.
	Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used;	All of the delineated water courses and the associated buffers delineated by the aquatic biodiversity specialist have been excluded from the preferred layout alternative. There are instances where access roads and construction tracks need to cross these to cross these delineated watercourses for the purposes of construction and operation of the facility. These crossings form part of the application for water use in terms of the National Water Act(NWA), which has been submitted to the Department of Water and Sanitation. The type of structure for these crossings will most like be a Low level Water Crossing. The final type of structure however will be determined as part of the ongoing process in terms of the NWA.
	The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;	All sensitive environmental features, including no go areas and buffers are depicted on in the site layout plan for the preferred alternative attached in Appendix D1.
	Substation(s) and/or transformer(s) sites, including their entire footprint;	The substation and Transformer sites are depicted in the site layout plan attached in Appendix D1.
	Location of access and service roads;	The location of all roads, including internal roads, perimeter roads and access roads is shown on the site layout plan attached in Appendix D1.
	Connection routes (including pylon positions) to the distribution/transmission network;	The position of pylons cannot be determined until such time as the detailed design is undertaken. The pylon positions are determined by Eskom in consultation with the project engineers after the Budget Quote Process is

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		completed. This budget quote process can only take place once the project receives an environmental authorisation. For the purposes of this environmental application, it should be noted that the pylons will all be within the proposed grid connection corridor and will be situated more than 32m from any of the delineated watercourses.
	All existing infrastructure on the site, especially railway lines and roads;	There is no railway infrastructure present on the proposed footprint for the facility. All other existing infrastructure, most notably roads and Eskom Powerline infrastructure is depicted on the Site Layout Plan attached in Appendix D1.
	Buffer areas;	All buffer areas recommended by the participating specialists (Aquatic Biodiversity, Avifauna and Visual) are included.
	Buildings, including accommodation;	All buildings are reflected in the Site Layout Plan attached in Appendix D1. No accommodation is proposed as part of this application.
	All “no-go” areas; and	All no go areas along with the buffers on the no go areas are depicted in the Site Layout Plan attached in Appendix D1.
	A north arrow and legend/key, to enable the Department to interpret the layout map.	The site layout plan attached in appendix D1 includes a North Arrow.
	An environmental sensitivity map indicating environmentally sensitive areas and features identified during the assessment process.	The site layout plan attached in Appendix D1 includes all sensitive features and buffer areas recommended by the specialists.
	A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.	
	<u>(d) Coordinates</u>	
	(i) The EIAR must include coordinates of the proposed project including all associated infrastructures as shown on the layout map submitted with the draft EIAR. i.e. BESS, IPP substation, onsite substation, laydown area, O&M buildings, Diesel storage, access point and access road.	All the co-ordinates provided in the section above are in WGS-84 projection. The co-ordinates of the PV footprint are included for each bend point in the footprint. Associated infrastructure is reflected as centre points and linear infrastructure is depicted as start, middle and end points. Please note that the co-ordinates reflected depict the infrastructure associated with the preferred alternative only.
	<u>(e) Public Participation Process</u>	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	(i) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR.	Please refer to Appendices F5 and F7.
	(ii) Please ensure that all issues raised, and comments received during the circulation of the draft SR and draft EIAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAR. 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.	Please refer to appendix F5 for all comments received on the Draft Scoping Report and appendix F7 for all comments received on the Draft Environmental Impact Report. The responses to these comments are included in the comments and responses report attached in appendix F2.
	(iii) Copies of comments received must be submitted to the Department. Copies of responses provided to all comments received must also be submitted. In addition, the EIAR must also include proof that responses were sent to Interested and Affected Parties.	Please refer to appendix F5 for all comments received on the Draft Scoping Report and appendix F7 for all comments received on the Draft Environmental Impact Report. The responses to these comments are included in the comments and responses report attached in appendix F2.
	(iv) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to I&AP’s comments. Please ensure that the comments and trail report is in the format provided by the department. This must include all comments received on this application.	A comment and responses report is attached in appendix F2.
	(v) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.	Comments and responses are reflected verbatim per comment received and have not been arranged into categories.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	(vi) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.	Please refer to section 8 of the EIR as well as appendices F1 -F7, which shows how the public participation complies with of Regulations 39, 40, 41, 42, 43 and 44 of the EIA Regulations 2014, as amended.
	(vii) The EAP is requested to contact the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAR.	The EAP did contact the department to arrange a site visit prior to the submission of the Final EIR. A site visit was undertaken with Ms Makhosi Yeni and Olivia Letlalo on Wednesday, 01 October. This site visit was largely applicable to the Klippot PV Project and the preferred grid connection alternative for all 4 of the projects.
	(viii) All evidence of public participation must be included in the final EIR including site notices and newspaper articles	Please refer to Appendix F1 – F7 for all details regarding the public participation that was undertaken.
<u>(f) Cumulative Assessment</u>		
	(i) During the pre-application meeting, it was indicated that the applicant intends to develop three (3) × 240 MW solar PV facilities and one (1) × 75 MW solar PV facility, including the associated grid connections. These applications have already been submitted to the Department and allocated to different officials. However, the draftt EIAR does not make reference to these clustered applications. You are therefore requested to include these projects in the introduction of the EIAR and provide the reference numbers for each. Furthermore, a map showing the location of these projects must also be included. This information must be consistently reflected in all EIARs to be submitted.	The introduction section in all 4 of the reports has been updated to reflect all projects (including the reference numbers) that form part of this cluster.
	(ii) Please ensure that EIR must include cumulative impact assessment for all identified and assessed impacts and must be refined to indicate the following.	
	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.	All specialists have included mitigation measures to address cumulative impacts of the proposed facility. This includes both mitigation measures to address the cumulative effects of the four projects in this cluster as well as those with other projects within the greater area.
	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	

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	assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.	
	The cumulative impacts significance rating must also inform the need and desirability of the proposed development.	The significance of cumulative impacts have been considered and included as part of the need and desirability of the project. Please refer to section 2.9 in the EIR for further details in this regard.
	A cumulative impact environmental statement on whether the proposed development must proceed.	A cumulative impact statement is included in section 6.11.
	A cumulative map that shows all the neighbouring PV Developments.	Please refer to appendix D2.
	(g) Specialists	
	(i) Specialist studies must provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed and are recommending for the authorisation.	The methodology for the specialist studies are included in their respective reports in appendices E1 to E8. The general assessment methodology is outlined in section 6.1
	(ii) The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.	All limitations to the specialist studies are included in their respective reports in appendices E1 to E8 and summarised in section 1.3 of the EIR.
	(iii) 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.	No contradicting recommendations have been suggested by participating specialist and all Environmental Impact Management Outcomes and Actions between specialists are aligned and have been incorporated into the EMPr.
	(iv) It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on 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, except where the applicant provides proof to the competent authority that the specialist assessment affected by these protocols had been	All relevant specialist studies included in Appendices E1 – E8 of the EIR have been prepared in terms of the Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998. Please note that in terms of these studies, the Terrestrial Biodiversity, Plant Species, Animal Species, Aquatic Biodiversity and Agricultural assessments have been undertaken in terms of the relevant protocols. All other studies, namely the Heritage Impact Assessment, Visual Impact Assessment, Social Impact Assessment and BESS Risk Assessment.

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	<p>commissioned before the date on which the protocols came into effect, in which case Appendix 6 of the Environmental impact Assessment Regulations, 2014, as amended, will apply. Please indicate in the EIAr whether or not the protocols were applied or provide the necessary proof where the exception applies. Please note further that the protocols, if applicable, require certain specialists' to be SACNASP registered.</p>	
	<p>v) For ease of reference, please provide a table in the EIAr's, indicating the studies required by the Department's screening tool, a column indicating whether these studies were undertaken or not, a column with the requisite motivation if a study was not undertaken (confirmed by a site sensitivity verification, where the protocols are applicable and require such); a column(s) indicating whether the protocols are applicable and if they were complied with for the relevant study.</p>	<p>Please refer to section 5.11 for the table indicating studies required by the Department's screening tool and whether these studies were undertaken or not.</p>
	<p>(h) Environmental Management Programme</p>	
	<p>(i) The generic EMPs are not signed by the applicant holder of EA. You are required to ensure that the generic EMPs are signed by the applicant.</p>	<p>The generic EMP's for both powerline and substation infrastructure as attached in Appendix I have been signed by the applicant.</p>
	<p>(ii) Please ensure that all recommended mitigation measures recorded in the EIAr and specialist studies are carried through to the site-specific section of the Generic EMPs. The EMPs must also include an environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process, overlaid with the development footprint site map.</p>	<p>The recommendations recorded in the EIR (Section 7) have been incorporated into the EMP as well as the Generic EMP's for powerline and substations as attached in Appendix I.</p>
	<p>(iii) Please also include in the EMP, the recommended frequency for the auditing of compliance with the conditions of the EA and EMP for the construction, post-construction monitoring, and operational (where relevant) phases of the activity, and for the submission of such compliance reports to the competent authority.</p>	<p>The recommended frequency for auditing is included in section 15.2 of the EMP as attached in Appendix I. In terms of this section,</p> <p>In addition to the internal environmental audit (which takes place as part of the monthly environmental control report), the following external audits are required to be undertaken:</p> <ul style="list-style-type: none"> - Annually during the construction phase. - Within 1 month of completion of construction activities.

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		<ul style="list-style-type: none"> - Within 1 year of commencement of operations. - Every 3 years thereafter.
	(iv) The facility EMPr must include measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants	Such measures are included in the EMPr in Appendix I
	(v) You must ensure that the facility EMPr complies with Appendix 4 of the EIA Regulations, 2014, as amended.	A table indicating compliance with Appendix 4 of the EIA regulations is included in the EMPr in Appendix I.
	General	
	Where the proposed activity does not include operational aspects, 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 and the post construction monitoring requirements finalised, as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.	This is included in section 2.12 of the EIR. Due to the uncertainty regarding the timing of the procurement programmes, the competent authority is herewith requested that the validity period of the environmental authorisation (if authorised) be granted as follows: <ul style="list-style-type: none"> - Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation. - Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.
	You are reminded that the final EIAR to be submitted to this Department must comply with Regulation 23 of the NEMA EIA Regulations, 2014, as amended. The EIAR must contain all information set out into the Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a government notice.	The submission of this Final EIR is within the timeframes outlined in Regulation 23(1)(a) of the NEMA EIA Regulations, 2014. All comments received during both of the comment periods have been included.
	Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, 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, and an EMPr, which must have been subjected to a public participation process of at least 30 days and	The submission of this Final EIR is within the timeframes outlined in Regulation 23(1)(a) of the NEMA EIA Regulations, 2014. All comments received during both of the comment periods have been included.

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	<p>which reflects the incorporation of comments received, including any comments of the competent authority.”</p> <p>Should there be significant changes or new information that has been added to the EIAr's 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 reports, and an EMPr, 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 application by the competent authority, as significant changes have been made or significant new information has been added to the environmental impact assessment report or EMPr, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised environmental impact assessment report or EMPr will be subjected to another public participation process of at least 30 days.</p> <p>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.</p> <p>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.</p>	<p>No significant changes or new information is included in the Final EIR. The changes between the Draft and Final EIR are mostly related to incorporation of the comments received on the Draft EIR and inclusion of all the relevant proof of public participation that was undertaken on the Draft EIR.</p> <p>The EAP and the Applicant are aware of the timeframes outlined in regulation 23 and the submission of this Final EIR is within the allowable timeframes.</p> <p>No significant changes or new information is included in the Final EIR. The changes between the Draft and Final EIR are mostly related to incorporation of the comments received on the Draft EIR and inclusion of all the relevant proof of public participation that was undertaken on the Draft EIR.</p>
<p>22/09/2025 Via Email Mr Lunga Dlova - Chief Directorate: Integrated</p>	<p><u>(a) Listed Activities and application form</u></p> <p>(i) You have applied for Listing Notice 1 item 11 the development of facilities or infrastructure, for the transmission and distribution of electricity – outside an urban area or industrial complexes with a capacity of more than 33kV but less</p>	<p>The capacity of the infrastructure for transmission and distribution will be up to 132kV. Please refer to the revised application form attached in appendix J and</p>

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Environmental Authorisations. Department of Forestry, Fisheries and the Environment DRAAILOOP SOLAR PV	than 275kV. Please specify the exact capacity of the electricity to be transmitted and distributed.	section 3.1.2 of this report where the capacity of the transmission and distribution infrastructure is defined.
	(ii) You have applied for Listing Notice 1 item 12 the development of an infrastructure or structures with a physical footprint of 100 metres square or more. Please specify whether this activity will be triggered or not, as the term “may be” shows a concern of being uncertain.	All PV infrastructure and pylons will be set back further than 32m from any of the delineated watercourses. This activity is relevant to instances where the roads / construction tracks and cabling will be required to cross the delineated watercourses. A revised application form is attached in appendix J which provides clarity in this regard.
	(iii) You are requested to provide the details such as vegetation clearance, access road length and width, and development footprint. Please include any relevant thresholds, areas, or footprints for the development where necessary as mentioned above.	Please refer to the tables above, where all the technical details of the proposed PV development as well as the associated infrastructure have been tabulated.
	(iv) If the activities applied for in the application form differ from those mentioned in the final SR and draft 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.environment.gov.za/documents/forms .	A revised application form is attached in Appendix J of the Final Environmental Impact Report. The activities in this revised application and those included and assessed in this EIR are the same.
	<u>(b) Draft Environmental Impact Assessment Report (EIAR)</u>	
	(i) It has been noted that the associated infrastructure includes water storage tanks and pipelines. The DEIAR provides no assessment of the pipeline’s impact. You must specify the size and length of the pipeline. You are required to assess the impacts of the pipeline. Please ensure that the pipeline does not trigger any listed activity as no listed activity for the pipeline you have applied for.	Kindly note that pipelines and water storage tanks referred to are limited to rainwater storage tanks (typical JoJo type Tanks) and plumbing reticulation at the Operations and Maintenance building. The Pipeline, which is essentially plumbing between the rainwater storage tank and the O&M building will not trigger any Listed Activity and is situated entirely within the area depicted for O&M buildings on the Site Layout Plan in Appendix D1.
	(ii) You have applied for the BESS. You are required to provide the height and capacity of the BESS.	As outlined in the EIR, the preferred BESS technology is pre-assembled containerised lithium BESS units. The proposed BESS will have a maximum storage capacity of 3840MWh and a maximum height of 6m.
	(iii) Please provide a technical detail for the proposed facility with the components and descriptions and or dimensions of the project not limited to	The detailed technical descriptions including the dimensions where relevant are included in the tables above.

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	BESS, onsite switching station, IPP substation, O&M complex, access road and internal roads, temporary storage, laydown area.	
	(iv) Please note that Appendix 1(3)(1)(h)(x) of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, requires that "if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such" must be included in the final EIAR.	Please refer to section 2.10 and 2.11 of the EIR for the detailed discussion of alternatives as well as the criteria applied for the selection of the site.
	(v) A description of the process followed to reach the preferred alternative within the site as per Appendix 1(3)(1)(h)(i) of the EIA Regulations (2014), as amended, must be incorporated into the final EIAR.	Please refer to section 2.10 and 2.11 which details the process followed to select the site as well as the process followed to select the preferred layout alternative within the selected site.
	(vi) You indicated that no technology alternatives are under consideration in this application. Please investigate BESS technology alternatives. You are requested to explain which technology alternative preferable, and the other alternatives are not viable.	<p>Technology Alternatives relating to the mounting structures for the PV modules as well as Technology Alternatives for the BESS infrastructure has been considered in this environmental process.</p> <p>Single Axis Tracking Technology has been selected as the preferred technology for the PV mounting structures and Solid State, pre-assembled, containerised Lithium Batteries have been selected as the preferred BESS technology. Please refer to section 2.1 and section 2.5 for further details in this regard.</p>
<u>(c) Locality, Site Layout and Sensitivity Maps</u>		
	(i) The final EIAR must provide the following:	
	<p>This description must include, but is not limited to the following:</p> <ul style="list-style-type: none"> - A clear description of all associated infrastructure. - substation; - powerline - The locality map must depict the pipeline - Internal roads infrastructure; and; - All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc. 	<p>The project description and associated tables detailing the project infrastructure are included in the summary above as well as in section 2 of the EIR.</p> <p>Please note that the pipelines and water storage tanks referred to are limited to rainwater storage tanks (typical JoJo type Tanks) and plumbing reticulation at the Operations and Maintenance building. The Pipeline, which is essentially plumbing between the rainwater storage tank and the O&M building will trigger any Listed Activity.</p> <p>The preferred BESS technology has been selected as containerised solid state lithium technology and as such does not constitute the Storage of Dangerous</p>

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		Goods. A revised application form has been attached in appendix J to remove the listed activities associated with the storage and storage and handling of dangerous goods.
	All necessary details regarding all possible locations and sizes of the proposed solar PV infrastructure.	The sizes of the various components forming part of the project are detailed in the table above and the location of all components are shown in the Site Layout Plans attached in Appendix D1 as well as in the tables depicting the co-ordinates of the PV project and associated infrastructure are included in the tables above.
	A copy of the final preferred layout map. 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:	
	Permanent laydown area footprint;	The laydown area is depicted in the site layout plans attached in appendix D1.
	Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible);	The width of the internal and access roads are depicted in in the site layout plan attached in Appendix D1 and detailed in the technical descriptions above. Incompliance with the EMPr (Appendix I) the Construction phase roads and the operational phase roads will be developed on the same alignment.
	Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used;	All of the delineated water courses and the associated buffers delineated by the aquatic biodiversity specialist have been excluded from the preferred layout alternative. There are instances where access roads and construction tracks need to cross these to cross these delineated watercourses for the purposes of construction and operation of the facility. These crossings form part of the application for water use in terms of the National Water Act(NWA), which has been submitted to the Department of Water and Sanitation. The type of structure for these crossings will most like be a Low level Water Crossing. The final type of structure however will be determined as part of the ongoing process in terms of the NWA.
	The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;	All sensitive environmental features, including no go areas and buffers are depicted on in the site layout plan for the preferred alternative attached in Appendix D1.
	Substation(s) and/or transformer(s) sites, including their entire footprint;	The substation and Transformer sites are depicted in the site layout plan attached in Appendix D1.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	Location of access and service roads;	The location of all roads, including internal roads, perimeter roads and access roads is shown on the site layout plan attached in Appendix D1.
	Connection routes (including pylon positions) to the distribution/transmission network;	The position of pylons cannot be determined until such time as the detailed design is undertaken. The pylon positions are determined by Eskom in consultation with the project engineers after the Budget Quote Process is completed. This budget quote process can only take place once the project receives an environmental authorisation. For the purposes of this environmental application, it should be noted that the pylons will all be within the proposed grid connection corridor and will be situated more than 32m from any of the delineated watercourses.
	All existing infrastructure on the site, especially railway lines and roads;	There is no railway infrastructure present on the proposed footprint for the facility. All other existing infrastructure, most notably roads and Eskom Powerline infrastructure is depicted on the Site Layout Plan attached in Appendix D1.
	Buffer areas;	All buffer areas recommended by the participating specialists (Aquatic Biodiversity, Avifauna and
	Buildings, including accommodation;	All buildings are reflected in the Site Layout Plan attached in Appendix D1. No accommodation is proposed as part of this application.
	All "no-go" areas; and	All no go areas along with the buffers on the no go areas are depicted in the Site Layout Plan attached in Appendix D1.
	A north arrow and legend/key, to enable the Department to interpret the layout map	The site layout plan attached in appendix D1 includes a North Arrow.
	An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.	The environmental sensitivity map is overlaid onto the site layout plan attached in Appendix D1.
	A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.	
	<u>(d) Public Participation</u>	
	(i) The final EIAr must comply with all conditions of the acceptance of the scoping report dated 23 July 2025. Please ensure that the Department's	Please refer to the table above showing how this Final EIR complies with the Departments comments on the acceptance of the Final Scoping Report. The

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>comments are addressed in the report as well as in the comments and response table.</p>	<p>responses to the Departments acceptance of the Final Scoping Report as well as their comments on the Draft Environmental Impact Report are also included in the Comments and Responses Report in Appendix F2.</p>
	<p>(ii) Ensure that the final EIAR includes proof that the key stakeholders received written notification of the proposed activity, 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.</p>	<p>Please refer to appendix F5 for all comments received on the Draft Scoping Report and appendix F7 for all comments received on the Draft Environmental Impact Report. The responses to these comments are included in the comments and responses report attached in appendix F2.</p>
	<p><u>(e) Cumulative Assessment</u></p>	
	<p>(i) You are required to assess each identified potentially significant impact and risk, including—</p>	
	<p>cumulative impacts;</p>	<p>Cumulative impacts have been assessed in section 6.11 of the EIR.</p>
	<ul style="list-style-type: none"> - the nature, significance and consequences of the impact and risk; - the extent and duration of the impact and risk; - the probability of the impact and risk occurring; - the degree to which the impact and risk can be reversed; - the degree to which the impact and risk may cause irreplaceable loss of resources; and - the degree to which the impact and risk can be mitigated. 	<p>The Impact Assessment Tables in section 6.2 – 6.10 include a detailed assessment of all identified impacts in alignment with the criteria identified by the Department. Please also refer to section 6.1 for the methodology applied for the assessment of impacts.</p>
	<p>(ii) There are other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p>	
	<p>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.</p>	<p>The quantification of cumulative impacts, including the size of the identified impacts is outlined in Table 58. This table includes details regarding the hectares of cumulatively transformed land.</p>
<p>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.</p>	<p>All specialists have included mitigation measures to address cumulative impacts of the proposed facility. This includes both mitigation measures to address the cumulative effects of the four projects in this cluster as well as those with other projects within the greater area.</p>	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	The cumulative impacts significance rating must also inform the need and desirability of the proposed development.	The significance of cumulative impacts have been considered and included as part of the need and desirability of the project. Please refer to section 2.9 in the EIR for further details in this regard.
	A cumulative impact environmental statement on whether the proposed development must proceed.	The cumulative impact Statement is included in section 6.11 and Section 6.13.
	(f) Specialists	
	(i) Please include a table in the BAR summarising the specialist studies required by the Screening Tool, a column indicating whether these studies were conducted or not, and a column with motivation for any studies not conducted.	Please refer to Table 15 in section 3.1.4.7 which outlines the specialist studies identified in the screening tool as well as confirmation of which studies were undertake and which were not undertaken, including motivation for studies that were not undertaken. Please also note that the specialist studies undertaken align with the plan of study for EIA which was accepted by the Department as part of the acceptance of the Final Scoping Report.
	(ii) It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on 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, except where the applicant provides proof to the competent authority that the specialist assessment affected by these protocols had been commissioned before the date on which the protocols came into effect, in which case Appendix 6 of the Environmental impact Assessment Regulations, 2014, as amended, will apply. Please indicate in the EIAR whether or not the protocols were applied or provide the necessary proof where the exception applies. Please note further that the protocols, if applicable, require certain specialists' to be SACNASP registered.	All relevant specialist studies included in Appendices E1 – E8 of the EIR have been prepared in terms of the Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998. Please not that in terms of these studies, the Terrestrial Biodiversity, Plant Species, Animal Species, Aquatic Biodiversity and Agricultural assessments have been undertaken in terms of the relevant protocols. All other studies, namely the Heritage Impact Assessment, Visual Impact Assessment, Social Impact Assessment and BESS Risk Assessment have been undertaken in terms of Appendix 6 of the EIA applications as amended.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>(iii) For ease of reference, please provide a table in the EIAr's, indicating the studies required by the Department's screening tool, a column indicating whether these studies were undertaken or not, a column with the requisite motivation if a study was not undertaken (confirmed by a site sensitivity verification, where the protocols are applicable and require such); a column(s) indicating whether the protocols are applicable and if they were complied with for the relevant study.</p>	<p>Please refer to Table 58 in section 3.4.17.</p>
	<p><u>(g) Environmental Management Programme</u></p>	
	<p>(i) The generic EMPs are not signed by the applicant holder of EA. You are required to ensure that the generic EMPs are signed by the applicant.</p>	<p>The generic EMPs for both powerline and substation infrastructure as attached in Appendix I have been signed by the applicant.</p>
	<p>(ii) Please ensure that all recommended mitigation measures recorded in the EIAr and specialist studies are carried through to the site-specific section of the Generic EMPs. The EMPs must also include an environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process, overlaid with the development footprint site map.</p>	<p>The recommendations recorded in the EIR (Section 7) have been incorporated into the EMP as well as the Generic EMPs for powerline and substations as attached in Appendix I.</p>
	<p>(iii) Please also include in the EMP, the recommended frequency for the auditing of compliance with the conditions of the EA and EMP for the construction, post-construction monitoring, and operational (where relevant) phases of the activity, and for the submission of such compliance reports to the competent authority.</p>	<p>The recommended frequency for auditing is included in section 15.2 of the EMP as attached in Appendix I. In terms of this section,</p> <p>In addition to the internal environmental audit (which takes place as part of the monthly environmental control report), the following external audits are required to be undertaken:</p> <ul style="list-style-type: none"> - Annually during the construction phase. - Within 1 month of completion of construction activities. - Within 1 year of commencement of operations. - Every 3 years thereafter.
<p>19/09/2025</p>	<p><u>(a) Project description and Listed Activities</u></p>	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
<p>Via Email</p> <p>Ms Makhosazane Yeni - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment</p> <p>KLIPPUT SOLAR PV</p>	<p>The draft EIAr indicated that a revised application form will be submitted with the final EIAr to reflect the updated descriptions. Please note that the activities applied for in the application form must be the same as those in the EIAr.</p>	<p>A revised application form is attached in Appendix in Appendix J. The Listed activities outlined in this application form and those reflected in section 3.1.2 of this report (and assessed) are the same.</p>
	<p>It has been noted that activity 14 of Listing Notice (LN) 1 has been applied for because of the BESS, however, it remains unclear if the BESS will be assembled on site or not. Furthermore, you are advised to assess the risk in relation to dangerous goods and the best practical environment option be selected.</p>	<p>The preferred technology for the BESS includes pre assembled, solid state, containerised Battery Storage. Activity 14 in Listing Notice 1 is no longer relevant and has been removed from the Revised Application (Appendix H) and this Final EIR.</p>
	<p>The size or the capacity of triggering project infrastructure applied for are estimated. You are reminded to ensure that all the dimensions/sizes of associated infrastructure (i.e. roads, pipelines, etc) as detailed on page iii, iv, v, vi, 8, 9, 40, 41, and 42 of the draft EIAr are included in the amended application form and final EIAr.</p>	<p>These details have been included in the Final EIR and Revised Application Form.</p> <p>Kindly note that pipelines and water storage tanks referred to are limited to rainwater storage tanks (typical JoJo type Tanks) and plumbing reticulation at the Operations and Maintenance building. The Pipeline, which is essentially plumbing between the rainwater storage tank and the O&M building will trigger any Listed Activity.</p>
	<p>For activity 24 of LN1, it is not clear whether the road will have a reserve or not. This must be clear in the amended application form and the final EIAr.</p>	<p>The descriptions in activity 24 in the revised application form (Appendix J) have been amended to confirm that the internal road network will not have a road reserve as it falls within the PV operational area.</p>
	<p>For activity 14 and 18 of LN3 the use of word “may be” and “and/or” is hereby noted. However, kindly be advised that listed activities are not based on a precautionary approach. Please ensure that all the listed activities in the amended application form and EIAr are clear, are the same and final for decision making purposes. Should it not be clear that listed activity is triggered, such activity will not be considered in the decision-making process.</p>	<p>The revised application form in Appendix J has been amended to remove an ambiguity in the project descriptions.</p>
	<p>Please ensure that all relevant activities listed are applied for are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. In addition, the onus is on the applicant and the Environmental Assessment Practitioner (“EAP”) to ensure that all the applicable listed activities are included in the application form and the EIAr.</p>	<p>These relevant thresholds are included in the description for each of the listed activities as reflected in the revised application form in Appendix J as well as in section 3.1.2.</p>

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	Failure to do so may result in unnecessary delays in the processing of the application.	
	If the activities applied for in the application form differ from those mentioned in the EIAr an amended application form must be submitted with the EIAr. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms .	A revised application form is attached in Appendix J of the Final Environmental Impact Report. The activities in this revised application and those included and assessed in this EIR are the same.
	<u>(b) Coordinates</u>	
	Please provide coordinate points for the proposed development site (note that if the site has numerous turning points, each turning point coordinates must be provided) as well as the start, middle and end point of all linear activities (indicate the position of the proposed activity with the latitude and longitude and the centre point for each alternative site). The co-ordinates should be in degrees and decimal minutes. The minutes should be to at least three decimal places. The projection that must be used in all cases is the WGS-84 spheroid in a national or local projection).	All the co-ordinates provided in the section above are in WGS-84 projection. The co-ordinates of the PV footprint are included for each bend point in the footprint. Associated infrastructure is reflected as centre points and linear infrastructure is depicted as start, middle and end points. Please note that the co-ordinates reflected depict the infrastructure associated with the preferred alternative only.
	<u>(c) Alternatives</u>	
	Alternatives as included on page 30 to 37 of the draft EIAr are hereby noted. However, it has been indicated that no technology alternatives are under consideration in this application. For BESS, the preferred technology alternatives must be investigated and it must be clear if the BESS will be assembled on site or not.	The reference to technology alternatives relates to alternative generation technologies (i.e. that PV is the only generation technology under investigation). BESS technology alternatives (Solid State, Redox Flow and Liquid metal technologies) were considered and the risk associated with each considered (Please refer to the BESS risk assessment compiled by ISHEcon attached in Appendix E8). The preferred BESS technology was determined to be: Solid State Lithium or Sodium Ion technologies. This will be containerised technology and no assembly of individual components will take place on site.
	You are required to provide all the alternatives considered for this development as per Appendix 2 (2) (1) (g) (i) (v) (vi) of the NEMA EIA Regulations, 2014 as	Please refer to section 2.11 of the EIR report for a discussion on alternatives considered as well as the preferred alternative determined as part of this

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	amended in the final EIAr. Furthermore, the preferred options for all assessed alternatives must be determined and be clear throughout the final EIA report.	environmental process. Please note that the project description and co-ordinates depicted at the beginning of the EIR and in section 2, are those associated with the preferred alternative. The site layout plan attached in Appendix D1 also depicts the preferred alternative for both the PV facility and associated infrastructure as well as the preferred Grid connection alignment.
	Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2. However, note that no development will be allowed within sensitive areas, mitigation hierarchy should be considered to avoid impacts on sensitive environment.	Alternatives, particularly layout alternatives for the PV and alignment alternatives for the Grid Connection infrastructure were considered as part of this environmental process (section 2.11). The preferred alternative was determined following a risk adverse approach to take into account all the sensitivities identified during the Site Sensitivity Verification Phase of the Project.
	The preferred alternative must be aligned with the specialist's recommendations.	The specialist findings were explicitly utilised to determine the preferred layout alternative. All no go areas and buffers identified by the specialists have been avoided by the preferred layout alternative.
	<u>(d) Layout and Sensitivity Maps</u>	
	Figure 26: Alternative 3- Preferred layout is hereby noted. However, the following is not clear: <ul style="list-style-type: none"> - The site boundary as said to be depicted in green is not clear. - The two green sites opposite the PV areas are not specified on the legend. 	Kindly note that Figure 26 has been replaced with a higher resolution map. A full scale version of this Preferred Site Layout Plan is attached in Appendix D1. Kindly note that the Green polygons (inclusive of the green on either side of the PV footprint) represent the property boundary and not the development footprint.
	The final layout map must include the following:	
	The PV development area;	The PV development Area is depicted in the blue polygons in Appendix D1.
	Preferred EGI alternative.	The preferred EGI alternative is Shown in Appendix D1.
	Position of all associated infrastructure e.g., panels, BESS, on-site substations, powerline route, etc.	PV panels, BESS, on-site substations and powerline route is all depicted on the Preferred Site Layout plan in Appendix D1
	All supporting onsite infrastructure such as permanent laydown area and auxiliary buildings including accommodation, dangerous goods facility etc.	All supporting on site infrastructure is depicted on the Preferred Site Layout plan in Appendix D1.
	All existing infrastructure on the site, especially railway lines and roads.	There are no railways within the footprint of the facility. Existing road infrastructure is depicted on the topographical plan which underlays the Layout components.

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	Internal roads indicating width (construction period width and operation period width).	Access Roads (8m wide) as well as internal and perimeter roads (6m wide) are depicted on the preferred Site Layout plan attached in Appendix D1.
	The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure.	All no go areas and Buffers are depicted in the Site Layout Plans attached in Appendix D1.
	Buffer areas.	All buffer areas and no-go areas are depicted on the Preferred Site Layout Plans attached in Appendix D1.
	All “no-go” areas.	
	A north arrow and legend/ key, to enable the Department to interpret the layout map.	A North Arrow and detailed legend is shown on the site layout plans in Appendix D1.
	All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible.	All no go areas and buffers identified by the specialists were considered and incorporated into the preferred layout alternative that is depicted in Appendix D1.
	The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments.	The preferred layout plan attached in Appendix D1 includes the sensitive features and buffers identified by the participating specialists.
	A combined map showing all the Cluster Projects (Bethel Solar PV, Draailoop Solar PV, Klipput Solar PV and Makoppa Solar PV).	The cluster Map showing Bethel Solar PV, Draailoop Solar PV, Klipput Solar PV and Makoppa Solar PV is included in Appendix D2.
	Ensure that similar colours are not used to differentiate between infrastructure. i.e., items must be easily distinguishable on the legend.	The Site Layout Plan is does utilise distinctive colours and shading to ensure the different components are easily distinguishable from one another. Additional labels have been included to differentiated between infrastructure.
	Google maps will not be accepted for decision-making purposes.	Google Maps are not included in the Site Layout Plan and are only utilised in text.
	<u>(e) Public Participation Process (PPP)</u>	
	Page 53 of the Terrestrial Biodiversity Assessment mentions that “although the project area is not located within a protected area, it is located within a conservation area – the Vhembe Biosphere Reserve (VBR)”. You are reminded to seek input from DFFE’s Protected Areas Section and Vhembe Biosphere Reserve (VBR) NPC- info@vhembecosphere.org. Their comments must be addressed, responded to and incorporated in the EIAr. Should it be that Section	The Vhembe Biosphere Reserve were registered as an interested and affected party on this environmental process and were provided with an opportunity to comment on both the Draft Scoping Report and Draft Environmental Impact Report.

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	50(5) in terms of NEM:BA is required, you are advised to obtain such and include it in the final EIAr.	At the time of submission of the Final Environmental Impact Report, no comment had been received from the Vhembe Biosphere Reserve. Please note that NEMBA does not include a Section 50(5) in the regulations, nor the act itself.																									
	The issue raised on 06 May 2025 by Motz Ntimo regarding land claims affecting multiple farms identified, including Portion 1 of Farm 425, Remainder of Farm 466, and Portion 1 of Farm 466 must be addressed and responded to. Proof thereon must be incorporated to the EIAr.	<p>Applicant Response: Thank you for your comment. The proposed Tabor Cluster consists of the 4 individual proposed Solar PV facilities, impacting on the following properties:</p> <table border="1" data-bbox="1267 624 1856 1391"> <thead> <tr> <th data-bbox="1267 624 1424 1134">Farm Description</th> <th data-bbox="1429 624 1532 1134">Proposed Bethel Solar PV Facility (14/12/16/3/3/2/2698)</th> <th data-bbox="1536 624 1639 1134">Proposed Draailoop Solar PV Facility (14/12/16/3/3/2/2699)</th> <th data-bbox="1644 624 1747 1134">Proposed Klipput Solar PV Facility (14/12/16/3/3/2/2700)</th> <th data-bbox="1751 624 1856 1134">Proposed Makoppa Solar PV Facility (14/12/16/3/3/2/2701)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1267 1137 1424 1169">Farm 431</td> <td data-bbox="1429 1137 1532 1169">X</td> <td data-bbox="1536 1137 1639 1169">X</td> <td data-bbox="1644 1137 1747 1169"></td> <td data-bbox="1751 1137 1856 1169"></td> </tr> <tr> <td data-bbox="1267 1173 1424 1241">Remainder of 466</td> <td data-bbox="1429 1173 1532 1241">X</td> <td data-bbox="1536 1173 1639 1241"></td> <td data-bbox="1644 1173 1747 1241">X</td> <td data-bbox="1751 1173 1856 1241"></td> </tr> <tr> <td data-bbox="1267 1244 1424 1313">Portion 1 of 425</td> <td data-bbox="1429 1244 1532 1313"></td> <td data-bbox="1536 1244 1639 1313">X</td> <td data-bbox="1644 1244 1747 1313">X</td> <td data-bbox="1751 1244 1856 1313"></td> </tr> <tr> <td data-bbox="1267 1316 1424 1391">Remainder 430</td> <td data-bbox="1429 1316 1532 1391"></td> <td data-bbox="1536 1316 1639 1391">X</td> <td data-bbox="1644 1316 1747 1391"></td> <td data-bbox="1751 1316 1856 1391"></td> </tr> </tbody> </table>	Farm Description	Proposed Bethel Solar PV Facility (14/12/16/3/3/2/2698)	Proposed Draailoop Solar PV Facility (14/12/16/3/3/2/2699)	Proposed Klipput Solar PV Facility (14/12/16/3/3/2/2700)	Proposed Makoppa Solar PV Facility (14/12/16/3/3/2/2701)	Farm 431	X	X			Remainder of 466	X		X		Portion 1 of 425		X	X		Remainder 430		X		
Farm Description	Proposed Bethel Solar PV Facility (14/12/16/3/3/2/2698)	Proposed Draailoop Solar PV Facility (14/12/16/3/3/2/2699)	Proposed Klipput Solar PV Facility (14/12/16/3/3/2/2700)	Proposed Makoppa Solar PV Facility (14/12/16/3/3/2/2701)																							
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		<p>The Applicant confirms engagement with The Commission on Restitution of Land Claims (Office of the Regional Land Claims Commissioner: Limpopo) – further referred to as the Commission, are the decision making authority on the land claims matter. The following communications were noted:</p> <ul style="list-style-type: none"> Appendix G1b - on the 19th of September 2024, the Commission indicated that there are restitution land claims lodged prior to 1998. The land claim on Draailoop RE/430 was dismissed. <table border="1" data-bbox="1285 772 1928 994"> <thead> <tr> <th>Property/ Farm Name</th> <th>Claimant(s)</th> <th>KRP(s)</th> <th>Claim Status</th> </tr> </thead> <tbody> <tr> <td>Portion 1 of Klippuit 425 LS</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Remainder and Portion 1 of Makoppa 466 LS</td> <td>Dithakone Community</td> <td>5564</td> <td>Research Report Approved</td> </tr> <tr> <td>Portion 0 of Bethel 431 LS</td> <td>Matjuda Family</td> <td>536</td> <td></td> </tr> <tr> <td>Portion 1 of Kaffernek 465 LS</td> <td>Mokororwane Community</td> <td>690/9342</td> <td>Settled</td> </tr> <tr> <td>Remainder of Draailoop 430 LS</td> <td>Batlokwa Tribe</td> <td>2336</td> <td>Dismissed</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Appendix G1c - on the 9th of October 2024, the Commission indicated that there are no land claims against the properties in question and confirm that they have no objection to the proposed development. Appendix G1d - on the 10th of June 2025, the Commission indicated that that there are restitution land claims lodged prior to 1998. 				Property/ Farm Name	Claimant(s)	KRP(s)	Claim Status	Portion 1 of Klippuit 425 LS				Remainder and Portion 1 of Makoppa 466 LS	Dithakone Community	5564	Research Report Approved	Portion 0 of Bethel 431 LS	Matjuda Family	536		Portion 1 of Kaffernek 465 LS	Mokororwane Community	690/9342	Settled	Remainder of Draailoop 430 LS	Batlokwa Tribe	2336	Dismissed
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Portion 1 of the farm Klipput 425 LS																																

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		<p><i>The Department's primary concern is that such engagement could create an expectation that the claim will be finalized soon and in the claimants' favour. They emphasized that the process is extensive and can often take several years to conclude. To avoid misunderstandings and potential disputes if the claim is not successful, the Department recommended that we refrain from direct engagement with the claimants for now."</i></p> <p>Despite attempts at contacting the Land Claims Department to receive this correspondence in writing, no response has been received.</p> <p>Considering the above and the comment received:</p> <ul style="list-style-type: none"> • The Claimant as identified have been contacted to the EAPs and Applicants best ability. • The Applicant confirms that the decision maker on the land claims matter is The Commission on Restitution of Land Claims (Office of the Regional Land Claims Commissioner: Limpopo), all measures have been taken to engage with this decision maker. • It is understood that the matter is being addressed by this the Commission in line with the Restitution of Land Rights Act, 1994 (Act 22 of 1994), furthermore, the decision maker has indicated that there has been no formal issue of success of the land claim, to the Claimant, and the decision can take years. Further to this the decision maker/Commission has not objected to the development, but have instructed the applicant to not directly contact the Claimant/s. • Mr Ntimo comment indicates that the way forward is <i>"Our communities do not oppose solar development in principle; we oppose the notion that it can be planned and implemented without our participation and prior consent. We resist the assumption that empowerment means leasing ancestral land to outside developers while remaining</i>

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		<p><i>peripheral to the long-term benefits.</i>” Claimants have been provided with equal opportunity as all I&AP’s to provide comment, and did not comment in the DEIA public participation. Prior consent is not required from the Claimants, as the Commission has yet to finalize the decision on the land claim, therefore the current landowner and title deed holder, remains the landowner. Permission has been granted from the landowner (Appendix G2).</p> <ul style="list-style-type: none"> • This comment was received during the Scoping Phase. The Final Scoping CRR and the Draft EIAr was shared with the Claimant, however no further comments have been received from the Claimant. <p>The awarding of an Environmental Authorisation does not constitute the right to construct and must meet other land permit requirements at which point this matter will be properly addressed and formalized. The land claims letters include the following:</p> <p><i>Note that the property in question must not be disposed of, sold, or leased without express permission from the Office of the Regional Land Claims Commissioner: Limpopo.</i></p> <p>Considering this, the Applicant agrees to the following condition: “Should the Claimant be awarded a successful Land Claim by The Commission on Restitution of Land Claims (Office of the Regional Land Claims Commissioner: Limpopo), (decision making authority), and should:</p> <ul style="list-style-type: none"> • this decision not be subjected to a valid appeal; • and an EA awarded for the affected properties, in terms of this application. <p>the Applicant will undertake to engage with the successful Claimant as a valid landowner and negotiate an option to lease.”</p> <p>Notwithstanding the above, it is also important to note that in terms of Regulation 39(2)(c) of the 2014 EIA Regulations as amended, landowner consent is not required for strategic integrated projects as contemplated in the Infrastructure Development Act, 2014. Kindly note that this project has been classified as a</p>

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	<p>The letter dated 14 November 2024 from the Office of the Land Claims Commissioner: Limpopo is hereby noted. However, the CA advises that meeting be convened with the representatives of the affected communities and the representatives from Office of the Land Claims Commissioner: Limpopo.</p> <p>The Department submits that should the final EIAR be submitted without the outcome of consultation or proof that the abovementioned affected parties were consulted, it would be considered as non-compliance with the requirements of this letter and the EIA Regulation, 2024 as amended.</p>	<p>strategic integrated project. Please refer to Appendix G1f for a letter from Infrastructure SA confirming the project as a SIP.</p> <p><u>Applicant Response:</u> As per the response provided above, Appendix F2 . Despite attempts at contacting The Commission on Restitution of Land Claims (Office of the Regional Land Claims Commissioner: Limpopo) to receive this correspondence in writing, no written response has been received.</p> <p>However, in none of the correspondences (Appendix G1b – G1e) did The Commission on Restitution of Land Claims (Office of the Regional Land Claims Commissioner: Limpopo) object to the proposed development, but did verbally instruct the applicant to not directly contact the Claimants. Notwithstanding this advice from the Commission on Restitution of Land Claims’ Limpopo Regional Office, in an abundance of caution and in order to ensure legally defensible procedural fairness, the Applicant’s EAP engaged with the CPA at all material stages of the environmental assessment process. Notwithstanding those engagements, the CPA saw fit not to provide any comments during the EIA phase. That omission by the CPA cannot be directly or indirectly attributed to the EAP or to the Applicant.</p> <p>As an instruction has been given by the decision maker on this matter, to not engage, the Applicant could not arrange this meeting, but did ensure that to comply with the EIA Regulations, 2017 (as amended), the CPA was included as an I&AP. Further to this, the matter has been raised and addressed in the EIAR, and measures put in place should the claim be formally approved by the decision maker.</p> <p><u>Applicant Response:</u> As discussed above, The Commission on Restitution of Land Claims (Office of the Regional Land Claims Commissioner: Limpopo) has acknowledged that the claim is being dealt with under a process in line with the Restitution of Land</p>

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		<p>Rights Act, 1994 (Act 22 of 1994), which is beyond the mandate of the DFFE. Further to this it has been acknowledged that the Claimant has not been awarded the land claim, formally, and this decision may take years to conclude and have instructed the applicant to not directly contact the Claimants.</p> <p>However, consideration has been taken in this EIA, in compliance with Chapter 1, Section 2 of the National Environmental Management Act, 1998 (Act 107 of 1998) (as amended). The Principles of NEMA have been adhered to, as follows:</p> <ul style="list-style-type: none"> - The matter has been acknowledged as a key consideration. - Every attempt has been made to contact the Claimants' representative organisation (including the CPA) and to engage with the decision-making authority with jurisdiction over land claims. Including all parties in the I&AP process and allowing for opportunity for all parties to have input in the process. - Measures have been put in place, should the Land Claim be successful. <p>The EIA Regulations require that that social and environmental matters be consider and addressed, as is the case here. However, the resolution of the matter is to be dealt with under the Restitution of Land Rights Act, 1994 (Act 22 of 1994), in a separate process. This process has been recognized, the Claimant and decision making authority notified and informed of the EIA Process, and should the Land Claim be successful (and not subjected to a valid appeal), and an EA awarded, the Applicant will undertake to engage with the successful Claimant as a valid landowner.</p> <p>This application cannot be prejudiced by the outcome of this matter, as it falls under the purview of a separate decision-making authority and is already involved in a separate application process. Until the land claim is resolved by the relevant decision maker (which is not the DFFE), the Claimant cannot be granted or recognized as having landowner rights by the applicant, this EIA Process or</p>

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		<p>the DFFE. However, the Claimants' specifically (the CPA) has been included in all notifications pertaining to this process, and the CPA's failure to deliver any comments, notwithstanding formal notification to it of its right to do so on its members' behalf, does not amount (and cannot be taken) to constitute a procedurally unfair public participation process. The EAP and the Applicant ensured a procedurally fair public participation process at all material stages of the environmental assessment. In addition, the final EIR considered, addressed, and sets out a condition recommended to be included in the Environmental Authorisation, if awarded, ensuring that if Applicant must follow through with landowner engagement should the Land Claim be formally approved.</p>
	<p>Please ensure that all comments from all identified and relevant competent authorities as well as stakeholders have been responded to, addressed and incorporated to the EIAr. The identified stakeholders must include but are not limited to the Vhembe Biosphere Reserve (VBR) NPC-info@vhembecosphere.org, Department of Forestry, Fisheries and the Environment (DFFE): Protected Areas Planning and Management Effectiveness and Biodiversity Conservation Directorates (BCAdmin@dffe.gov.za), Makhado Local Municipality, Vhembe District Municipality, Limpopo: Department of Economic Development, Environment and Tourism (LEDET) EIA and Biodiversity Sections, Limpopo Department of Agriculture and Rural Development, Department of Mineral Resources, Department of Water and Sanitation (DWS), Wildlife and Environment Society of South Africa (WESSA), Birdlife South Africa, Vulpro, South African Civil Aviation Authority (SACAA), South African Radio Astronomy Observatory (SARAO), Square Kilometer Array (SKA), Air Traffic and Navigation Services (ATNS), Endangered Wildlife Trust (EWT), Eskom, SA National Defence Force and the relevant heritage authorities.</p>	<p>All parties listed by the Department in this section as well as those listed in the Departments comment and acceptance of scoping report were registered as I&AP's and provided with an opportunity to comment on both the Draft Scoping Report and Draft Environmental Impact Report.</p> <p>Please note that in terms of regulations, should an I&AP not provide comment during the allowable comment period, then they would be deemed to not have any comment.</p>
	<p>Ensure that all languages used in the area are considered during PPP.</p>	<p>In terms of the language policy of NEMA, English was utilised as the primary language for communications. During the comment period, no limitations were identified by I&AP's nor the competent authority.</p>

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	<p>The PPP must be conducted in terms of Regulations 39, 40, 41, 42, 43 and 44 of the EIA Regulations 2014, as amended.</p> <p>A Comments and Responses trail report (C&RR) must be compiled, continuously updated throughout the EIA process for this proposed development starting with the draft SR. The C&RR must be a separate document from the main report and must be in the table format, which reflects the details of Interested and Affected Parties (I&APs), the date comments were received (actual comments received) and responses provided.</p>	<p>Please refer to section 8 of the EIR as well as appendices F1 -F7, which shows how the public participation complies with of Regulations 39, 40, 41, 42, 43 and 44 of the EIA Regulations 2014, as amended.</p>
	<p>Comments made by I&APs must be 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&AP’s comments.</p>	<p>All comments received by I&AP’s are included in Appendices F5 and F7. All comments are also captured verbatim and responded to in detail in the Comments and Responses report in appendix F2.</p>
	<p>Proof of correspondence with the various stakeholders must be included in the EIAr. Should you be unable to obtain comments, proof must be submitted to the CA of the attempts that were made to obtain comments.</p>	<p>Proof of correspondence with stakeholders including the attempts to obtain comments are included in Appendices F4 and F6</p>
	<p>Please ensure that the EIAr indicates when and where the draft SR and EIAr were made available for a 30-day review and comment period.</p>	<p>These details are included in section 8 of this report.</p>
<p>(f) Specialist Assessments</p>		
	<p>The findings of the Terrestrial Biodiversity Assessment, Aquatic Biodiversity Assessment, and Avifaunal Specialist assessment are hereby noted. However, these reports must be submitted to DFFE’ s Biodiversity Mainstreaming-BCAdmin@dffe.gov.za, LEDET – EIA and Biodiversity Sections, Birdlife SA, Vulpro for comments. Their comments must be addressed, responded to and be incorporated in the final EIAr.</p>	<p>The Departments Biodiversity Mainstreaming Directorate were provided with an opportunity to comment on both the Draft Scoping Report as well as the Draft Environmental Impact Report. The Biodiversity mainstreaming directorate did acknowledge receipt of the invitation to provide comment, but at the time of submission of this Final Environmental Impact Report, no comment was received.</p> <p>Should such a comment be received during the decision making period, this will be provided to the Case Officer.</p>
	<p>The Heritage Impact Assessment report must be submitted to SAHRA for comments. Their comments must be addressed, responded to and incorporated in the EIAr.</p>	<p>The Heritage Impact Assessment was submitted to SAHRA on 13 September 2025 (Case ID 25894). Please refer to section 3.1.8 for proof that this documentation was submitted to SAHRA.</p>

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		At the time of submission of this Final EIR, final comment had not been received from SAHRA.
	<u>(g) Environmental Management Programme</u>	
	Part B: Section 2 of the generic EMPs for the powerline and substation must be completed, and a copy of an originally signed generic EMPs must be submitted with the EIAr. Please ensure that Point 7.1.1 in Part B: Section 2 match the details of the Applicant as contained in the amended application form and EIAr.	The Generic EMP's attached to the EMP in Appendix I, are signed by the applicant, and the name and contact details depicted match those in the revised application form in Appendix J.
	If any specific environmental sensitivities/attributes are present on site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMP template, to manage such impacts, those impact management outcomes and actions must be included in Section C of the generic EMPs.	All specific Environmental Management Outcomes and Actions suggested by the specialists as summarised in section 7 below have been included in the EMP in appendix H as well as the Generic EMP's for substation and powerline infrastructure appended to the Main EMP.
	The EMP for the facility must comply with the requirements of Appendix 4 in the EIA Regulation, as amended.	The introduction section in the EMP in Appendix H includes a table which details compliance with Appendix 4 of the EIA regulations as amended.
	<u>(h) Cumulative Assessment</u>	
	Noting that this project is part of the cluster and there may 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:	
	The cumulative impacts assessment must consider the existing, authorised but not yet developed, the proposed similar development and powerline in the area.	The cumulative impact assessments consider: <ol style="list-style-type: none"> 1. The proposed project in conjunction will the other 3 projects forming part of the cluster. 2. The proposed project in conjunction with all other projects within a 30km radius.
	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.	All specialists have included mitigation measures to address cumulative impacts of the proposed facility. This includes both mitigation measures to address the cumulative effects of the four projects in this cluster as well as those with other projects within the greater area.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	The cumulative impacts significance rating must also inform the need and desirability of the proposed development.	The significance of cumulative impacts have been considered and included as part of the need and desirability of the project. Please refer to section 2.9 in the EIR for further details in this regard.
	A cumulative impact environmental statement on whether the proposed development must proceed.	The cumulative impact Statement is included in section 6.11 and Section 6.13.
	General	
	Where the proposed activity does not include operational aspects, please ensure that the final EIAR includes the period for which the Environmental Authorisation (EA) is required, the date on which the activity will be concluded, and the post-construction monitoring requirements finalised, as per Appendix 3(3)(1)(r) of the NEMA EIA Regulations, 2014, as amended.	This is included in section 2.12 of the EIR. Due to the uncertainty regarding the timing of the procurement programmes, the competent authority is herewith requested that the validity period of the environmental authorisation (if authorised) be granted as follows: <ul style="list-style-type: none"> - Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation. - Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.
	You are reminded that the final EIAR to be submitted to this Department must comply with Regulation 23 of the NEMA EIA Regulations, 2014, as amended. The EIAR must contain all information set out into the Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a government notice.	The submission of this Final EIR is within the timeframes outlined in Regulation 23(1)(a) of the NEMA EIA Regulations, 2014. All comments received during both of the comment periods have been included.
	Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, 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, and an EMPr, 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."	No significant changes or new information is included in the Final EIR. The changes between the Draft and Final EIR are mostly related to incorporation of the comments received on the Draft EIR and inclusion of all the relevant proof of public participation that was undertaken on the Draft EIR.
	Should there be significant changes or new information that has been added to the EIAR's or EMPr which changes or information was not contained in the	No significant changes or new information is included in the Final EIR. The changes between the Draft and Final EIR are mostly related to incorporation of

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>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 reports, and an EMPr, 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 application by the competent authority, as significant changes have been made or significant new information has been added to the environmental impact assessment report or EMPr, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised environmental impact assessment report or EMPr will be subjected to another public participation process of at least 30 days.</p>	<p>the comments received on the Draft EIR and inclusion of all the relevant proof of public participation that was undertaken on the Draft EIR.</p>
	<p>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.</p>	<p>The EAP and the Applicant are aware of the timeframes outlined in regulation 23 and the submission of this Final EIR is within the allowable timeframes.</p>
	<p>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.</p>	<p>The applicant and EAP are aware of this requirement.</p>
<p>19/09/2025 Via Email Ms Thulisile Nyalunga - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry,</p>	<p><u>(a) Listed Activities and application form</u> (i) Please expand the description of each of the listed activities applied for and relate their relevance to the proposed development. This description, which must also be provided in the EIAR, must be detailed in indicating what is being proposed, with the proposed thresholds and capacities. This must be done for all listed activities applied for.</p>	<p>The relevant thresholds and detailed descriptions are included in the description for each of the listed activities as reflected in the revised application form in Appendix J as well as in section 3.1.2.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
Fisheries and the Environment MAKOPPA SOLAR PV	(ii) Activity 56 of Listing Notice 1 and Activity 12 of Listing Notice 3 have been removed from the draft EIAR. Please update the application form to reflect this change. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms .	Activity 56 of Listing Notice 1 and Activity 12 of Listing Notice 3 are no longer applicable to the preferred layout and technology alternative. These activities have been removed from the revised application form in Appendix J as well as the
	(iii) The relevant authorities must be 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.	Please refer to appendices F4 and F6.
	<u>(b) Specific Comments</u>	
	i) The nearest protected area i.e. Blijdschap Private Nature Reserve is located approximately 8,5km north of the proposed development site. You are required to obtain comments from the Blijdschap Private Nature Reserve.	The protected areas directorate at DFFE was provided with an opportunity to comment on the proximity of the project to the Blijdschap Private Nature reserve. At the time of submission of this Final EIR, comment had not yet been received from this directorate. The Terrestrial Biodiversity specialist did however confirm that the proposed project would not impact this protected area in any way.
	(ii) It has been noted that the proposed associated infrastructure includes water storage tanks and pipelines. However, the draft EIAR provides no assessment of the impacts of the proposed pipeline. You are required to assess the impacts of the proposed pipeline, specify the size and length of the proposed pipeline and ensure that the pipeline does not trigger any listed activity as no listed activity related to a pipeline has been applied for.	Kindly note that pipelines and water storage tanks referred to are limited to rainwater storage tanks (typical JoJo type Tanks) and plumbing reticulation at the Operations and Maintenance building. The Pipeline, which is essentially plumbing between the rainwater storage tank and the O&M building will not trigger any Listed Activity and is situated entirely within the area depicted for O&M buildings on the Site Layout Plan in Appendix D1.
(iii) A BESS has been applied for as part of this application. You are required to provide the height and capacity of the proposed BESS.	The proposed BESS will have a storage capacity of up to 1200MWh and a maximum height of 6m.	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	(iv) Please provide technical details for the proposed facility with the components and descriptions and or dimensions of the project not limited to the BESS, onsite switching station, IPP substation, O&M complex, access road and internal roads, temporary storage, laydown area, etc.	Please refer to the tables above.
	(v) On pages 26-27, a series of questions and answers to demonstrate the need and desirability were provided. You are requested to summarize the need and desirability and present it in a paragraph form.	The need and desirability outlined in section 2.9 has been summarised in a single paragraph.
	(vi) It is indicated in the report that Grid connection alternative 1 is the preferred option at this stage and that this could change depending on the outcome of the environmental procedure. You are requested to demonstrate why alternative 1 is preferable and the other alternatives are not viable. Please note Appendix 1(3)(1)(h)(x) of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, which requires that "if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such must be included in the final EIAR", in this regard.	As outlined in section 2.11.2, the Alternative 1 powerline was selected as the preferred alternative, as it is the shortest (i.e. will result in less disturbance) and is aligned adjacent to existing powerline infrastructure, thus reducing landscape fragmentation.
	(vii) A description of the process followed to reach the preferred alternative within the site as per Appendix 1(3)(1)(h)(i) of the EIA Regulations (2014), as amended, must be incorporated into the final EIAR.	Please refer to section 2.10 and 2.11.
	(viii) It is indicated in the report that no technology alternatives are under consideration in this application. Please investigate the BESS technology alternatives. The same approach as alluded to in (vi) above must be followed.	<p>The reference to technology alternatives relates to alternative generation technologies (i.e. that PV is the only generation technology under investigation). BESS technology alternatives (Solid State, Redox Flow and Liquid metal technologies) were considered and the risk associated with each considered (Please refer to the BESS risk assessment compiled by ISHEcon attached in Appendix E8).</p> <p>The preferred BESS technology was determined to be: Solid State Lithium or Sodium Ion technologies. This will be containerised technology and no assembly of individual components will take place on site.</p>
	(c) Screening Tool Report	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	(i) The screening tool report (page 1 of 15) requires a compiler signature. Please submit the signed screening report along with the final EIAr.	The screening tool attached in Appendix H includes the EAPs signature.
	<u>(d) Coordinates</u>	
	(i) Only the centre point coordinates for the BESS were provided in the report. Please provide four corner coordinate points for the proposed BESS, IPP substation, Eskom switching station, temporary laydown areas and all other structures that may be the subject of this application process.	Please refer to the co-ordinate tables above.
	(ii) Please ensure that the coordinates provided also include the start, middle and end points (and bend points if there are any) of the proposed pipeline and access and internal roads. All coordinates must be in degrees and decimal minutes.	Start, middle and end points of all linear infrastructure are included in the table above.
	<u>(e) Locality, Site Layout and Sensitivity Maps</u>	
	The final EIAr must provide the following:	
	(i) A clear description of all associated infrastructure. This description must include, but is not limited to the following:	
	The proposed PV facility, Battery Energy Storage System (BESS), pipeline, PV Inverter, including their entire footprint;	All infrastructure is depicted on the site layout plan attached in appendix D1.
	Internal roads; and	Internal roads are depicted on the site layout plan attached in appendix D1.
	All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc.	All supporting infrastructure is depicted on the site layout plan attached in appendix D1.
	(ii) A copy of the final preferred layout map. 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:	
	Permanent laydown area footprint;	The laydown area is depicted in the site layout plans attached in appendix D1. Please note that as per the EMP, a 1ha permanent laydown has been allowed for within the extent of the temporary laydown.
	Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible);	The width of the internal and access roads are depicted in in the site layout plan attached in Appendix D1 and detailed in the technical descriptions above.

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		Incompliance with the EMPr (Appendix I) the Construction phase roads and the operational phase roads will be developed on the same alignment.
	Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used;	All of the delineated water courses and the associated buffers delineated by the aquatic biodiversity specialist have been excluded from the preferred layout alternative. There are instances where access roads and construction tracks need to cross these to cross these delineated watercourses for the purposes of construction and operation of the facility. These crossings form part of the application for water use in terms of the National Water Act(NWA), which has been submitted to the Department of Water and Sanitation. The type of structure for these crossings will most like be a Low level Water Crossing. The final type of structure however will be determined as part of the ongoing process in terms of the NWA.
	The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure;	All sensitive environmental features, including no go areas and buffers are depicted on in the site layout plan for the preferred alternative attached in Appendix D1.
	Substation(s) and/or transformer(s) sites, including their entire footprint;	The substation and Transformer sites are depicted in the site layout plan attached in Appendix D1.
	Location of access and service roads;	The location of all roads, including internal roads, perimeter roads and access roads is shown on the site layout plan attached in Appendix D1.
	Connection routes (including pylon positions) to the distribution/transmission network;	The position of pylons cannot be determined until such time as the detailed design is undertaken. The pylon positions are determined by Eskom in consultation with the project engineers after the Budget Quote Process is completed. This budget quote process can only take place once the project receives an environmental authorisation. For the purposes of this environmental application, it should be noted that the pylons will all be within the proposed grid connection corridor and will be situated more than 32m from any of the delineated watercourses.
	All existing infrastructure on the site, especially railway lines and roads;	There is no railway infrastructure present on the proposed footprint for the facility. All other existing infrastructure, most notably roads and Eskom

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		Powerline infrastructure is depicted on the Site Layout Plan attached in Appendix D1.
	Buffer areas;	All buffer areas recommended by the participating specialists (Aquatic Biodiversity, Avifauna and Visual) are included.
	Buildings, including accommodation;	All buildings are reflected in the Site Layout Plan attached in Appendix D1. No accommodation is proposed as part of this application.
	All "no-go" areas; and	All no go areas along with the buffers on the no go areas are depicted in the Site Layout Plan attached in Appendix D1.
	A north arrow and legend/key, to enable the Department to interpret the layout map.	The site layout plan attached in appendix D1 includes a North Arrow.
	(iii) An environmental sensitivity map indicating sensitive areas and features identified during the assessment process.	The site layout plan attached in Appendix D1 includes all sensitive features and buffer areas recommended by the specialists.
	(iv) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.	
	<u>(f) Public Participation Process</u>	
	(i) The final EIAr must comply with all conditions of the acceptance of the scoping report dated 21 July 2025. Please ensure that the Department's comments are addressed in the report as well as in the comments and response table.	Please refer to the table above demonstrating compliance with the Departments Acceptance Letter.
	<u>(g) Cumulative Assessment</u>	
	(ii) Please ensure that the final EIAr includes proof that the key stakeholders received written notification of the proposed activity, 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.	Please refer to Appendices F4 and F6.
	(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:	Cumulative impacts have been assessed in section 6.11. A cumulative map showing all projects within a 30km radius is included in appendix D2.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>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.</p>	<p>All specialists have included mitigation measures to address cumulative impacts of the proposed facility. This includes both mitigation measures to address the cumulative effects of the four projects in this cluster as well as those with other projects within the greater area.</p>
	<p>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.</p>	
	<p>The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</p>	<p>The significance of cumulative impacts have been considered and included as part of the need and desirability of the project. Please refer to section 2.9 in the EIR for further details in this regard.</p>
	<p>A cumulative impact environmental statement on whether the proposed development must proceed.</p>	<p>A cumulative impact statement is included in section 6.11.</p>
	<p>(h) Specialist Studies</p>	
	<p>(i) It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on 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, except where the applicant provides proof to the competent authority that the specialist assessment affected by these protocols had been commissioned before the date on which the protocols came into effect, in which case Appendix 6 of the Environmental impact Assessment Regulations, 2014, as amended, will apply. Please indicate in the EIAr whether or not the protocols were applied or provide the necessary proof where the exception applies. Please note further that the protocols, if applicable, require certain specialists to be SACNASP registered.</p>	<p>All relevant specialist studies included in Appendices E1 – E8 of the EIR have been prepared in terms of the Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998. Please note that in terms of these studies, the Terrestrial Biodiversity, Plant Species, Animal Species, Aquatic Biodiversity and Agricultural assessments have been undertaken in terms of the relevant protocols. All other studies, namely the Heritage Impact Assessment, Visual Impact Assessment, Social Impact Assessment and BESS Risk Assessment.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	(ii) For ease of reference, please provide a table in the EIAr, indicating the studies required by the Department's screening tool, a column indicating whether these studies were undertaken or not, a column with the requisite motivation if a study was not undertaken (confirmed by a site sensitivity verification, where the protocols are applicable and require such); a column(s) indicating whether the protocols are applicable and if they were complied with for the relevant study.	Please refer to section 5.11 for the table indicating studies required by the Department's screening tool and whether these studies were undertaken or not.
	<u>(i) Environmental Management Programme</u>	
	(i) The generic EMPs are not signed by the applicant. The signed generic EMPs must form part of the final EIAr.	The generic EMPs for both powerline and substation infrastructure as attached in Appendix I have been signed by the applicant.
	(ii) Please ensure that all recommended mitigation measures recorded in the EIAr and specialist studies are carried through to the site-specific section of the Generic EMPs. The EMPs must also include an environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process, overlaid with the development footprint site map.	The recommendations recorded in the EIR (Section 7) have been incorporated into the EMP as well as the Generic EMPs for powerline and substations as attached in Appendix I.
	(iii) Please also include in the EMP, the recommended frequency for the auditing of compliance with the conditions of the EA and EMP for the construction, post-construction monitoring, and operational (where relevant) phases of the activity, and for the submission of such compliance reports to the competent authority.	The recommended frequency for auditing is included in section 15.2 of the EMP as attached in Appendix I. In terms of this section, In addition to the internal environmental audit (which takes place as part of the monthly environmental control report), the following external audits are required to be undertaken: <ul style="list-style-type: none"> - Annually during the construction phase. - Within 1 month of completion of construction activities. - Within 1 year of commencement of operations. - Every 3 years thereafter.
	<u>(j) Undertaking of an Oath</u>	
	(i) Please ensure that the final EIAr includes 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.	This is included in the Revised Application form in Appendix J.
	<u>General</u>	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	Where the proposed activity does not include operational aspects, 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 and the post construction monitoring requirements finalised, as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.	This is included in section 2.12 of the EIR. Due to the uncertainty regarding the timing of the procurement programmes, the competent authority is herewith requested that the validity period of the environmental authorisation (if authorised) be granted as follows: <ul style="list-style-type: none"> - Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation. - Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.
	You are reminded that the final EIAr to be submitted to this Department must comply with Regulation 23 of the NEMA EIA Regulations, 2014, as amended. The EIAr must contain all information set out into the Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a government notice.	The submission of this Final EIR is within the timeframes outlined in Regulation 23(1)(a) of the NEMA EIA Regulations, 2014. All comments received during both of the comment periods have been included.
	Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, 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, and an EMPr, 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."	The submission of this Final EIR is within the timeframes outlined in Regulation 23(1)(a) of the NEMA EIA Regulations, 2014. All comments received during both of the comment periods have been included.
	Should there be significant changes or new information that has been added to the EIAr's 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 reports, and an EMPr, will be submitted within 156 days of acceptance of the scoping report by the competent authority, or where	No significant changes or new information is included in the Final EIR. The changes between the Draft and Final EIR are mostly related to incorporation of the comments received on the Draft EIR and inclusion of all the relevant proof of public participation that was undertaken on the Draft EIR.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>regulation 21(2) applies, within 156 days of receipt of application by the competent authority, as significant changes have been made or significant new information has been added to the environmental impact assessment report or EMPr, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised environmental impact assessment report or EMPr will be subjected to another public participation process of at least 30 days.</p> <p>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.</p> <p>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.</p>	<p>The EAP and the Applicant are aware of the timeframes outlined in regulation 23 and the submission of this Final EIR is within the allowable timeframes.</p> <p>The EAP and the Applicant are aware of the timeframes outlined in regulation 23 and the submission of this Final EIR is within the allowable timeframes.</p>
<p>12/09/2025 Via Email Nompumelelo Lekalakala – DFFE Directorate: Biodiversity Conservation</p>	<p>DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation on the 22nd of August 2025 to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms Nompumelelo Lekalakala (Copied on this email).</p> <p>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@dAe.gov.za for attention of Mr Seoka Lekota.</p>	<p>Duly noted.</p>
<p>04/09/2025 Via Email Shirley Hlabisa – MTN South Africa: Way-Leave Co-ordinator</p>	<p>Please send a KML file.</p>	<p>Please see attached a KML file for the proposed Bethel Solar PV, Draailoop Solar PV, Klippot Solar PV and Makoppa Solar PV as requested.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
<p>22/08/2025 Via Email Rochel Naidoo – Bluecrane Environmental</p>	<p>Can I kindly request a kmz indicating the project locations below? We are happy to accept a kmz that just indicates the boundary of the projects below.</p>	<p>Please see attached a KMZ file for the proposed Bethel Solar PV, Draailoop Solar PV, Klippot Solar PV and Makoppa Solar PV as requested.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
COMMENTS RECEIVED ON THE FINAL SCOPING REPORT		
<p>23/07/2025 Via Email Ms Zamalanga Langa - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment: BETHEL SOLAR PV</p>	<p>(a) Listed Activities</p> <p>(i) For activities listed under Listing Notice 3, please ensure that the specific name of the protected area in proximity to the proposed project is clearly indicated in the activity description.</p> <p>(ii) 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. Also ensure to choose the correct and relevant sub listing. Additionally, note that the onus is on the applicant and the environmental assessment practitioner (EAP) to ensure that all the applicable listed activities are included in the application. Failure to do so may result in unnecessary delays in the processing of the application.</p> <p>(iii) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.</p>	<p>The activity descriptions for the activities applied for under Listing Notice 3 have been amended to indicated the specific name of the protected area in proximity to the proposed project. The nearest protected area is the Blijdschap Private Nature Reserve located approximately 8,5km north of the proposed development site.</p> <p>Kindly refer to Section 3.12 of the Draft Environmental Impact Report which includes a table of all the listed activities associated with the proposed development, as stipulated under 2014 Regulations 327, 325 and 324.</p> <p>Kindly refer to Section 6 and Section 7 of the Draft Environmental Impact Report which includes the Assessment of Impacts as well as the Management and Mitigation of Impacts for the listed activities applied for.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	(iv) 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.environment.gov.za/documents/forms .	An amended Application Form will be submitted with the Final Environmental Impact Report to include the complete list of Listed Activities applied for.
	(v) 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 affected Critical Biodiversity Areas and protected areas are fully assessed in the EIAr.	Kindly refer to Appendix F1 of the Draft Environmental Impact Report for the Stakeholder Register for this project. All comments received thus far are included as Appendix 5 as well as in the Comments & Responses Report (Appendix F2). All correspondence with the Competent Authority are included in Appendix G1. Please also refer to Appendix D1 – Site Layout Plans, which includes a graphical representation of the proposed development within a provincial as well as national context. The potential impacts of Critical Biodiversity Areas as well as Protected Areas have been assessed and included in the specialist studies attached as Appendix E.
	<u>(b) Public Participation</u>	
	(i) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr.	Kindly refer to Appendix F2 of the Draft Environmental Impact Report for the most up to date Comments & Responses Report, as well as Appendix F5 for all the comments received on the Draft Scoping Report. All comments and correspondence received on the Draft Environmental Impact Report will be included as Appendix F7 in the Final Environmental Impact Report.
	(ii) Please ensure that all issues raised, and comments received during the circulation of the draft SR and draft EIAr from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAr. 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.	Kindly refer to Appendix F2 of the Draft Environmental Impact Report for the most up to date Comments & Responses Report, as well as Appendix F5 for all the comments received on the Draft Scoping Report. All comments and correspondence received on the Draft Environmental Impact Report will be included as Appendix F7 in the Final Environmental Impact Report. Proof of notification of the availability of the Draft Scoping Report and the Draft Environmental Impact Report will be include as Appendix F4

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		and F6 respectively with the submission of the Final Environmental Impact Report.
	(iii) Copies of comments received must be submitted to the Department. Copies of responses provided to all comments received must also be submitted. In addition, the EIAR must also include proof that responses were sent to Interested and Affected Parties.	Kindly refer to Appendix F2 of the Draft Environmental Impact Report for the most up to date Comments & Responses Report, as well as Appendix F5 for all the copies of the comments received on the Draft Scoping Report along with copies of the responses sent to I&APs . All comments and correspondence received on the Draft Environmental Impact Report will be included as Appendix F7 in the Final Environmental Impact Report.
	(iv) A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as “noted” is not regarded as an adequate response to I&AP’s comments. Please ensure that the comments and trail report is in the format provided by the department. This must include all comments received on this application.	The comments and responses report attached in Appendix F2 responds to each comment individually in detail in the format requested by the Department. Response to the Departments acceptance of the Final Scoping Report is included in this comment and responses report. This comments ant responses report will be updated to include any comments received on the Draft Environmental Impact Report.
	(v) Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.	Duly noted. Comments from I&APs are arranged by date received in the Comments & Responses Report attached as Appendix F2 to the Draft Environmental Impact Report.
	(vi) The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.	Section 41 in Chapter 6 of regulation 982 details the public participation process that has to take place as part of an environmental process. The table provided in Section 8 of the Draft Environmental Impact Report provides a quick reference to show how this environmental process has or intends to comply with these legislated requirements relating to public participation. Please also refer to Appendix F , where all evidence of public participation is included.

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	(vii) The EAP is requested to contact the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAr.	The EAP will engage with the Department during the comment period on the Draft Environmental Impact Report to arrange a suitable date and time for the site inspection.
	(viii) All evidence of public participation must be included in the final EIR including site notices and newspaper articles.	Duly noted. All evidence of public participation undertaken thus far are included as Appendix F to the Draft Environmental Impact Report.
	<u>(c) Cumulative Assessment</u>	
	<p>(i) The EIR must include cumulative impact assessment for all identified and assessed impacts and must be refined to indicate the following.</p> <ul style="list-style-type: none"> > Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land. > Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. > The cumulative impacts significance rating must also inform the need and desirability of the proposed development. > A cumulative impact environmental statement on whether the proposed development must proceed. 	Kindly refer to Section 6.11 of the Draft Environmental Impact Report for the assessment of Cumulative Impacts.
	<u>(d) Specialist assessments</u>	
	<p>(i) The specialist studies must include the following:</p> <ul style="list-style-type: none"> > 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 authorisations. 	<p>Kindly refer to Appendix E1 – E8 for all the specialist studies undertaken for the proposed development. Please also refer to the following sections in the Draft Environmental Impact Report:</p> <ul style="list-style-type: none"> • Section 1.3 – Assumptions & Limitations; • Section 2.11.4 – The no-go Alternative; • Section 7 – Management and Mitigation of Impacts; • Section 6.11 – Cumulative Impacts.

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	<ul style="list-style-type: none"> ➤ 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. ➤ 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. ➤ Should the specialist definition of 'no-go' area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable. ➤ 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. ➤ Should a specialist recommend specific mitigation measures, these must be clearly indicated. ➤ Regarding cumulative impacts: Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land. A detailed process flow 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. Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process. The significance rating must also inform the need and desirability of the proposed development. 	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	A cumulative impact environmental statement on whether the proposed development must proceed.	
	(ii) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and were necessary, include further expertise advice.	No contradicting recommendations were made by the appointed specialists.
	(iii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on 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.	All specialist studies were undertaken in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998.
	(iv) The screening tool output: > The screening tool and the gazetted protocols (GN R320 of 20 March 2020 and GN R 1150 of 30 October 2020) require a site sensitivity verification to be completed to either confirm or dispute the findings and sensitivity ratings of the screening tool. > It is the responsibility of the EAP to confirm the list of specialist assessments and to motivate in the assessment report, the reason for not including any of the identified specialist studies including the provision of photographic evidence of the site situation.	Kindly refer to Section 5.11 of the Draft Environmental Impact Report for the Site Sensitivity Verification. Please also refer to Appendix H for the Screening Tool Reports for the proposed development.
	(v) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g.an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatics sciences.	Kindly refer to Appendix G6 for the Specialist CVs that undertook the specialist studies for the proposed development.
	(vi) Please be reminded that section 2(3) of NEMA requires developments to be socially, environmentally and economically sustainable, while section 2(4)(i) of NEMA requires the social,	

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	economic and environmental impacts of activities, including disadvantages and benefits, to be considered, assessed and evaluated.	Kindly refer to Section 5 of the Draft Environmental Impact Report for the Site Description and Attributes separated per discipline as well as Section 6 for the Assessment of Impacts also separated per discipline.
	(vii) Specialist findings and recommendations must be separated per project.	Please refer to Section 7 for the Management and Mitigation of Impacts as recommended by each specialist study undertaken for the proposed development.
	<p>(viii) The following Specialist Assessments will form part of the EIA:</p> <p>Specialist Study</p> <p>Agricultural Compliance Statement</p> <p>Landscape/Visual Impact Assessment</p> <p>Archaeological and Heritage Impact Assessment</p> <p>Palaeontology Impact Assessment</p> <p>Terrestrial Biodiversity Impact Assessment</p> <p>Aquatic Biodiversity Impact Assessment</p> <p>Avian Impact Assessment</p> <p>Civil Aviation Compliance Statement</p> <p>Defence Compliance Statement</p> <p>Geotechnical Assessment</p> <p>Socio-Economic Impact Assessment</p> <p>Plant Species Compliance Statement</p> <p>Animal Species Impact Assessment</p>	<p>Kindly refer to the following appendices to the Draft Environmental Impact Report:</p> <p>Appendix E5: Agricultural Compliance Statement;</p> <p>Appendix E6: Landscape/Visual Impact Assessment;</p> <p>Appendix E4: Archaeological and Heritage Impact Assessment;</p> <p>Appendix E4: Palaeontology Impact Assessment;</p> <p>Appendix E1: Terrestrial Biodiversity Impact Assessment (inclusive of botanical and faunal assessments);</p> <p>Appendix E3: Aquatic Biodiversity Impact Assessment;</p> <p>Appendix E2: Avian Impact Assessment;</p> <p>Appendix E7: Socio-Economic Impact Assessment.</p> <p>The applicant has submitted an obstacles investigation to the South African Civil Aviation Authority (SACAA). At the time of submission of this Draft Environmental Impact Report, a response on this application had not yet been received from the SACAA. This will be included in the Final Environmental Impact Report should it be received prior to the final submission.</p> <p>The EAP will continue to actively engage with the Department of Defence regarding the Defence Theme.</p>

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		A detailed geotechnical assessment can only be undertaken once the final equipment suppliers have been selected and the detailed designs completed.
	<p><u>(e) Locality, Site Layout and Sensitivity Maps</u></p> <p>The draft EIA must provide the following maps that includes:</p>	
	<p>(i) A clear description of all associated infrastructure. This description must include, but is not limited to the following:</p> <ul style="list-style-type: none"> > PV facility and all associated infrastructures such as, substation, access road etc; > Internal road infrastructure; and; > All supporting onsite infrastructure such as laydown area and auxiliary buildings, etc. 	<p>The clear description of the infrastructure is included in the technical checklist at the beginning of this report.</p> <p>Internal roads infrastructure; and all supporting onsite infrastructure are depicted in the solar facility layout plans for the preferred alternative attached in appendix D1.</p>
	<p>(ii) All necessary details regarding all possible locations and sizes of the proposed project infrastructure.</p>	<p>The co-ordinates of all infrastructure proposed as part of this project are included in the tables at the beginning of this report. The details regarding the relevant sizes of the proposed solar PV infrastructure is included in Technical details checklist at the beginning of the report and in section 2. Please also note, that an additional table detailing the technical details in the format requested by the competent authority is also included on page 9 of the report.</p>
	<p>(iii) A copy of the final preferred layout map. 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:</p> <ul style="list-style-type: none"> > Permanent laydown area footprint; > Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); 	<p>The Copy of the final preferred layout as well as the preferred layout overlaid onto a sensitivity map is attached in Appendix D1. All proposed infrastructure as well as relevant existing infrastructure on the properties is shown in these layout plans. Please note, that should the outcome of the public participation process require the need for this preferred layout plan to be revised, such a revised plan will be included in the Final EIR.</p>

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	<ul style="list-style-type: none"> ➤ Wetlands, drainage lines, rivers, streams, and water crossings of roads and cables indicating the type of bridging structures that will be used; ➤ The location of sensitive environmental features on-site e.g. CBAs, ESA, heritage sites, wetlands, drainage lines, etc. that will be affected by the facility and its associated infrastructure; ➤ Substation(s) and/or transformer(s) sites, including their entire footprint; ➤ Location of access and service roads; ➤ All existing infrastructure on the site, especially railway lines and roads; ➤ Buffer areas; ➤ Buildings, ; ➤ All “no-go” areas; and ➤ A north arrow and legend/key, to enable the Department to interpret the layout map. 	
	(iv) An environmental sensitivity map indicating environmentally sensitive areas and features identified during the assessment process.	The environmental sensitivity map, which includes all no-go areas and buffers identified by the specialists overlain onto the final preferred layout map is attached in Appendix D1.
	(v) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.	
	<u>(f) Environmental Management Programme (EMPr)</u>	
	(i) It is drawn to your attention that for the overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 of the EIA Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programmes (EMPr), contemplated in Regulations 19(4) must be used over and above the EMPr for the facility.	Kindly refer to Appendix I of the Draft Environmental Impact Report which includes the EMPr for the PV facility, a generic EMPr for the on-site substation as well as a generic EMPr for the overhead powerline. The Applicant will sign the generic EMPr upon submission of the Final Environmental Impact Report as there may still be amendments required based on the outcome of the public participation period of the Draft Environmental Impact Report.

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	Accordingly, there needs to be a generic EMPr for the substation, powerline and separate EMPr for the facility.	
	(ii) Please ensure that the mitigation measures specified in the EIAR and specialist reports are also incorporated into the EMPr.	All mitigation measures identified in the Draft Environmental Impact Report as well as the specialist studies have been incorporated into the EMPrs attached as Appendix I of the Draft Environmental Impact Report. Please refer to Section 3 of the EMPr outlined the compliance of the EMPr with Section 24N of NEMA.
	(iii) In addition, ensure that the EMPr complies with the content of the EMPr in terms of Appendix 4 of the EIA Regulations, 2014, as amended.	
	(iv) Please also include in the EMPr, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr, and for the submission of such compliance reports to the competent authority.	Please refer to Section 2.14 of the EMPr attached as Appendix I to the Draft Environmental Impact Report for Environmental Audit Frequencies.
	(v) EMPr must include an environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.	Kindly refer to the Site Layout Plans appended to the EMPr as Appendix A which include Environmental Sensitivity Maps superimposed on the site layout.
	(vi) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.	
	(vii) EMPr must include measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.	All the Management and Mitigation measures/recommendations provided in the Aquatic Impact Assessment (Appendix E3) are included in the draft EMPr (Appendix I).
	<u>(g) General</u>	
	(i) The EIAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions. A sample for the minimum information required is listed under Annexure 2 below.	Kindly refer to the Technical Checklist in the beginning of the report providing the technical details of the proposed development in the table format as requested.
	(ii) Recommendations of conditions to be included in the EA, must be done per project.	Duly noted.
	(iii) Details of the future plans for the site and infrastructure after decommissioning in 20-30 years and the possibility of upgrading the proposed infrastructure to more advanced technologies must be indicated.	Two possible scenarios for the decommissioning are addressed in the EMPr attached in Appendix I.

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	<p>(iv) The EAP must provide landowner consent for all farm portions affected by the proposed project, whether the project component is linear or not, i.e. all farm portions where the access road, solar panels and associated infrastructure is to be located.</p>	<p>Kindly refer to Appendix G2 for the signed Landowner Consent for the Solar PV properties.</p> <p>According to Regulation 39 (1) of the EIA Regulations 2014 [published in Government Notice No. R326 under Section 24(5) and 44 of the National Environmental Management Act (Act No. 107 of 1998)], <i>“If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for an environmental authorisation in respect of such activity, obtain the written consent of the landowner or person in control of the land to undertake such activity on that land.</i></p> <p><i>(2) Subregulation (1) does not apply in respect of—</i></p> <p><i>(a) linear activities;”</i></p> <p>Since only linear activities are being proposed on the grid connection infrastructure, written consent of the landowners are not required as part of the Environmental Process.</p>
	<p>(v) Please also ensure that the 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.</p>	<p>Kindly refer to Section 2.12 of the Draft Environmental Impact Report for the Project Programme and Timelines.</p> <p>Due to the uncertainty regarding the timing of the procurement programmes, the competent authority is herewith requested that the validity period of the environmental authorisation (if authorised) be granted as follows:</p> <ul style="list-style-type: none"> • Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation. • Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.
	<p>(vi) Kindly ensure that, the appendices of the EIAR are properly packed and grouped. For example, you must create a folder that relate to public participation process and all information regarding the public participation process must all be included in that folder. The same must be done also to Specialist report, maps, EMP(s) and other files.</p>	<p>Duly noted.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as amendment, with regard to the time period allowed for complying with the requirements of the Regulations.	Duly noted.
	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.	Duly noted.
	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.	Duly noted.
<p align="center">23/07/2025 Via Email Mr Lunga Dlova - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment</p> <p align="center">DRAA LOOP SOLAR PV</p>	<p><u>(a) Coordinates</u></p>	
	<p>(i) Please provide coordinate points for the proposed development site (note that if the site has numerous turning points, at each turning point coordinates must be provided) as well as the start, middle and end point of all linear activities (Indicate the position of the proposed activity with the latitude and longitude at the centre point for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should be to at least three decimal places. The projection that must be used in all cases is the WGS-84 spheroid in a national or local projection).</p>	<p>The co-ordinates with all bend points for the preferred PV footprint (layout alternative 3), Centrepoint's for associated infrastructure and bend points for the preferred grid connection (Grid Connection Alternative 1) is included in the tables above.</p>
	<p><u>(b) Alternatives</u></p> <p>(i) Please note that Appendix 1(3)(1)(h)(x) of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, requires that "if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such" must be included in the draft EIAr. You are therefore required to provide a motivation should other alternative sites, routes, layouts, and technologies not be considered.</p>	<p>Technology Alternatives for the PV and BESS, Layout Alternatives for the PV and route alternatives for the Grid connection Infrastructure have been considered in this environmental process. Please refer to the discussion on alternatives as included in section 2.11 of this Draft EIR.</p>
<p><u>(c) Locality, Site Layout and Sensitivity Maps</u></p>		

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>(i) The draft EIA must provide the following:</p> <ul style="list-style-type: none"> -A clear description of all associated infrastructure. This description must include, but is not limited to the following: <ul style="list-style-type: none"> > Internal roads infrastructure; and; > All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc. -All necessary details regarding all possible locations and sizes of the proposed solar PV infrastructure. <p>- A copy of the final preferred layout map. 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:</p> <ul style="list-style-type: none"> > Permanent laydown area footprint; > Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); > Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used; > The location of sensitive environmental features on site e.g. CBAs, ESA, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure; > Location of access and service roads; 	<p>The clear description of the infrastructure is included in the technical checklist at the beginning of this report.</p> <p>Internal roads infrastructure; and all supporting onsite infrastructure are depicted in the solar facility layout plans for the preferred alternative attached in appendix D1.</p> <p>The co-ordinates of all infrastructure proposed as part of this project are included in the tables at the beginning of this report. The details regarding the relevant sizes of the proposed solar PV infrastructure is included in Technical details checklist at the beginning of the report and in section 2. Please also note, that an additional table detailing the technical details in the format requested by the competent authority is also included on page 9 of the report.</p> <p>The Copy of the final preferred layout as well as the preferred layout overlaid onto a sensitivity map is attached in Appendix D1. All proposed infrastructure as well as relevant existing infrastructure on the properties is shown in these layout plans. Please note, that should the outcome of the public participation process require the need for this preferred layout plan to be revised, such a revised plan will be included in the Final EIR.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<ul style="list-style-type: none"> ➤ All existing infrastructure on the site, especially railway lines and roads; ➤ Buffer areas; ➤ Buildings, including accommodation; ➤ All “no-go” areas; and ➤ A north arrow and legend/key, to enable the Department to interpret the layout map. 	
	- An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.	The environmental sensitivity map, which includes all no-go areas and buffers identified by the specialists overlain onto the final preferred layout map is attached in Appendix D1.
	-A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.	
	<u>(d) Public Participation</u>	
	(i) On the comments and response table, you must respond to each issue raised by interested and affected parties and use a clear and readable font. It is preferable to compile a table with three columns for the date of comment, name of organization/I&AP, issue or comment raised, and response from EAP/Applicant/Specialist.	The comments and responses report attached in Appendix F2 responds to each comment individually in detail in the format requested by the Department. Response to the Departments acceptance of the Final Scoping Report is included in this comment and responses report. This comments ant responses report will be updated to include any comments received on the Draft Environmental Impact Report.
	(ii) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR. This includes but is not limited to the Department of Economic Development, Environment & Tourism (DEDET), Department of Water and Sanitation (DWS), the South African Heritage Resource Agency (SAHRA), Limpopo Province Department of Agriculture and Rural Development, Birdlife South Africa, Limpopo Provincial Heritage Resources Agency, Endangered Wildlife Trust, Eskom Holdings (Pty) Ltd, Makhado Local Municipality, Vhembe District Municipality and the Department of Environment, Forestry and Fisheries: Directorate Biodiversity and Conservation, Interested and Affected Parties (I&APs).	All of these Departments are included in the I&AP register for this project and were given an opportunity to comment on the Draft Scoping Report (Please refer to appendix F4). These Departments will be provided with a further opportunity to comment on the Draft Environmental Impact Report and proof notifications will be included in Appendix F6 of the Final EIR.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	(iii) Please ensure that all issues raised, and comments received on the draft SR and draft EIAr from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: BCAdmin@environment.gov.za) in respect of the proposed activity are adequately addressed in the Final SR. Proof of correspondence with the various stakeholders must be included in the Final EIAr. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.	Kindly refer to appendix F5 which includes all comments that have been submitted up until the point of submission of this Draft Environmental Impact Report. Any comments received during the comment period on the Draft Environmental Impact Report will be included in Appendix F7 of the Final Environmental Impact Report.
	(iv) A comments and response trail report (C&R) must be submitted with the final EIAr. The C&R report must incorporate all comments (pre- and post-submission of the draft EIAr) received for this development. The C&R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&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&APs comments.	A comment and responses report in the format outlined by the Department is included in Appendix F2. This will be updated on completion of the public participation process on the Draft Environmental Impact Report.
	(v) Please ensure that the EIAr indicates when and where the draft SR and EIAr were made available for a 30-day review and comment period.	Please refer to Section 8.2 of the Draft Environmental Impact Report for the exact dates that the Draft Scoping Report was available for a 30-day review and comment period. The Draft Environmental Impact Report will be available from 22 August – 22 September 2025 for a 30-day review and comment period. Proof of availability if the Draft Environmental Impact Report will be included as Appendix F3 and F6 in the Final Environmental Impact Report.
	(vi) The Public Participation Process must be conducted in terms of the approved public participation plan and Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.	Section 41 in Chapter 6 of regulation 982 details the public participation process that has to take place as part of an environmental process. The table provided in Section 8 of the Draft Environmental

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		Impact Report provides a quick reference to show how this environmental process has or intends to comply with these legislated requirements relating to public participation. Please also refer to Appendix F , where all evidence of public participation is included.
	(e) Specialist assessments	
	(i) 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.	All specialist studies included in appendices E1 – E8 are final. These studies may however be revised to respond to any comments that may be received during the comment period on the Draft Environmental Impact Report.
	(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 expert advice.	No contradicting recommendations were made by the appointed specialists.
	(iii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on 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), are in effect. Please note that specialist assessments must be conducted in accordance with these protocols.	All specialist studies were undertaken in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998.
	(f) Environmental Management Programme	
	(i) It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the EIA Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programmes (EMPr), contemplated in	Kindly refer to Appendix I of the Draft Environmental Impact Report which includes the EMPr for the PV facility, a generic EMPr for the on-site substation as well as a generic EMPr for the overhead powerline. The Applicant will sign the generic EMPr upon submission of the Final Environmental Impact Report as there may still be amendments

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	Regulations 19(4) must be used over and above the EMPr for the PV facility. Accordingly, there needs to be a generic EMPr for the on-site substation, a generic EMPr for the overhead powerline, and a third, separate EMPr for the PV facility.	required based on the outcome of the public participation period of the Draft Environmental Impact Report.
	(ii) Please ensure that any specific mitigation measures identified in the EIAr and specialist reports for the on-site substation and powerline are incorporated into the site-specific section of the generic EMPrs.	All mitigation measures identified in the Draft Environmental Impact Report as well as the specialist studies have been incorporated into the EMPrs attached as Appendix I of the Draft Environmental Impact Report.
	(iii) Please ensure that the mitigation measures specified in the EIAr and specialist reports for the PV facility are also incorporated into the EMPr for the PV facility. In addition, please ensure that the EMPr complies with the content of the EMPr in terms of Appendix 4 of the EIA Regulations, 2014, as amended.	All mitigation measures identified in the Draft Environmental Impact Report as well as the specialist studies have been incorporated into the EMPrs attached as Appendix I of the Draft Environmental Impact Report. Please refer to Section 3 of the EMPr outlined the compliance of the EMPr with Section 24N of NEMA.
	(iv) Please also include in the EMPrs, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr, and the submission of such compliance reports to the competent authority.	Please refer to Section 2.14 of the EMPr attached as Appendix I to the Draft Environmental Impact Report for Environmental Audit Frequencies.
	<u>(g) General</u>	
	(ii) Please ensure that the final EIAr includes the period for which the Environmental Authorisation (EA) is required, the date on which the activity will be concluded, and the post-construction monitoring requirements finalised, as per Appendix 3(3)(1)(r) of the NEMA EIA Regulations, 2014, as amended.	<p>Kindly refer to Section 2.12 of the Draft Environmental Impact Report for the Project Programme and Timelines.</p> <p>Due to the uncertainty regarding the timing of the procurement programmes, the competent authority is herewith requested that the validity period of the environmental authorisation (if authorised) be granted as follows:</p> <ul style="list-style-type: none"> • Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation. • Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.

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	(iii) Confirmation of the availability of services (e.g., sewage, water, etc. if required) must be included in the EIAR.	Water required for the construction and operation of Solar PV facility is to be sourced from the Makhado Local Municipality (who will be engaged with to provide confirmation of availability). Should the applicant in the future, wish to utilise groundwater for the purposes of construction or operation of the facility, such use will require a licence in terms of Section 21(a) of the NWA.
	(iv) Should a Water Use License be required, proof of application for a license needs to be submitted.	The freshwater specialist has identified a number of surface water resources within the study site. The Preferred Layout Alternative avoids these features along with the buffer areas identified by the specialist. The proposal does however include infrastructure within the regulated zone of these features and as such will require a Water Use Licence / General Authorisation in terms of the NWA. Envizio Group have been appointed to apply for authorization in terms of Section 21(a) of the National Water Act.
	The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as an amendment, with regard to the time period allowed for complying with the requirements of the Regulations.	Duly noted.
	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.	Duly noted.
<p align="center">17/07/2025</p> <p align="center">Via Email</p> <p>Ms Makhosazane Yeni - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment</p> <p align="center">KLIPPUT SOLAR PV</p>	<p><u>(a)Project description and Listed Activities</u></p> <p>The project infrastructure as presented on page v to vi and page 7 to 8 of the final SR is hereby noted. You are reminded to ensure that all the dimensions/sizes of associated infrastructure (i.e. roads, pipelines, etc) are presented.</p>	<p>The co-ordinates of all infrastructure proposed as part of this project are included in the tables at the beginning of this report. The details regarding the relevant sizes of the proposed solar PV infrastructure is included in Technical details checklist at the beginning of the report and in section 2. Please also note, that an additional table detailing the technical details in the format requested by the competent authority is also included on page 9 of the report.</p>

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	<p>The final SR indicated that a revised application form will also be submitted with the draft EIAr to reflect the updated descriptions as per the comments on draft SR. Please note that the comments regarding the listed activities on draft SR still stands.</p> <p>It has been noted that activity 11 of Listing Notice (LN) 1 has been applied for, however, the length of the proposed grid connection infrastructure is not specified. You are advised to provide the length of the proposed grid connection.</p>	<p>An amended Application Form will be submitted with the Final Environmental Impact Report to include the complete list of Listed Activities applied for.</p> <p>Kindly refer to the Technical Checklist in the beginning of the report providing the technical details of the proposed development in the table format. The length of the proposed grid connection is up to 16km.</p>
	<p>Activities 12 of LN1 have been applied for, however the physical footprint of the infrastructure or structures is not specified. Please ensure the details are provided in the amended application form and draft EIAr.</p>	<p>An amended Application Form will be submitted with the Final Environmental Impact Report.</p> <p>Kindly refer to the Technical Checklist in the beginning of the report providing the technical details of the proposed development in the table format, including sizes of the physical footprint of the infrastructure.</p>
	<p>For activity 24 and 56 of LN1 it is not clear whether the road will have a reserve or not. In addition, the use of the word “may” in the description does not confirm that these activities are applicable to the proposed development. Therefore, you are advised to refrain from using the word may.</p>	<p>An amended Application Form will be submitted with the Final Environmental Impact Report.</p> <p>The description of Listing Notice 1 Activity 24 have been amended in the Draft Environmental Impact Report. Please note that Listing Notice 1 Activity 56 is considered to no longer be applicable to the proposed development and will therefore not be applied for in the Amended Application form to be submitted with the Final Environmental Impact Report.</p>
	<p>It has been noted on page 50 of the final SR that “the project development will not impact on any CBAs and falls entirely in an ONA (Other Natural Area)”. It is also noted that activities 4, 12, 14, and 18 of LN3 have been applied for. However, the relevant site sensitivities as per sub activities are not specified. As such, you are requested to specify the applicable sensitivities/geographical areas, and this information must be clear in the EIAr.</p>	<p>Duly noted. The listed activities along with the description of the proposed development associated with the relevant activity have been updated and included under Section 3.1.2 of the Draft Environmental Impact Report.</p> <p>Kindly note that the no aspect of the proposed development is located in any Critically Biodiversity Areas. Activity 4, 14 and 18 of Listing Notice 3 are considered applicable due to the proposed development site being located approximately 8,5km from the Blijdschap Private Nature Reserve.</p>

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	<p>The use of words such as “may be” and statements such as “the relevance of this activity will be determined in the impact assessment phase” is hereby noted. However, kindly be advised that listed activities are not based on a precautionary approach. Please ensure that all the listed activities in the amended application form and EIAR are clear, are the same and final for decision making purposes. Should it not be clear that listed activity is triggered, such activity will not be considered in the decision-making process.</p>	<p>Duly noted. The listed activities along with the description of the proposed development associated with the relevant activity have been updated and included under Section 3.1.2 of the Draft Environmental Impact Report. An amended Application Form will be submitted with the Final Environmental Impact Report.</p>
	<p>Please ensure that all relevant activities listed are applied for are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. In addition, the onus is on the applicant and the Environmental Assessment Practitioner (“EAP”) to ensure that all the applicable listed activities are included in the application form and the EIAR. Failure to do so may result in unnecessary delays in the processing of the application.</p>	<p>Duly noted. The listed activities along with the description of the proposed development associated with the relevant activity have been updated and included under Section 3.1.2 of the Draft Environmental Impact Report. An amended Application Form will be submitted with the Final Environmental Impact Report.</p>
	<p>If the activities applied for in the application form differ from those mentioned in the SR, an amended application form must be submitted with the EIAR. Please note that the Department’s application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms.</p>	<p>Duly noted. An amended Application Form will be submitted with the Final Environmental Impact Report.</p>
	<p><u>(b) Coordinates</u></p> <p>Please provide coordinate points for the proposed development site (note that if the site has numerous turning points, at each turning point coordinates must be provided) as well as the start, middle and end point of all linear activities (indicate the position of the proposed activity with the latitude and longitude at the centre point for each alternative site). The co-ordinates should be in degrees and decimal minutes. The minutes should be to at least three decimal places. The projection that must be used in all cases is the WGS-84 spheroid in a national or local projection).</p>	<p>The co-ordinates with all bend points for the preferred PV footprint (layout alternative 3), Centrepoint’s for associated infrastructure and bend points for the preferred grid connection (Grid Connection Alternative 1) is included in the tables above.</p>

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	<p><u>(c) Alternatives</u></p> <p>Alternatives as included on page 29 to 36 of the final SR are hereby noted. You are required to provide all the alternatives considered for this development as per Appendix 2 (2) (1) (g) (i) (v) (vi) of the NEMA EIA Regulations, 2014 as amended in the EIAR. Furthermore, the preferred options for all assessed alternatives must be determined and be clear throughout the EIA report.</p> <p>Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2. However, note that no development will be allowed within sensitive area, mitigation hierarchy should be considered to avoid impacts on sensitive environment.</p>	<p>Technology Alternatives for the PV and BESS, Layout Alternatives for the PV and route alternatives for the Grid connection Infrastructure have been considered in this environmental process. Please refer to the discussion on alternatives as included in section 2.11 of this Draft EIR.</p>
	<p><u>(d) Layout and Sensitivity Maps</u></p> <p>The layout map included as Appendix D of the final SR must be amended to include the following:</p> <ul style="list-style-type: none"> ➤ The PV development area. ➤ Position of all associated infrastructure e.g., panels, BESS, on-site substations, powerline, etc. ➤ All supporting onsite infrastructure such as permanent laydown area and auxiliary buildings, dangerous goods facility etc. ➤ All existing infrastructure on the site, especially railway lines and roads; ➤ Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); ➤ The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure. ➤ Buffer areas; 	<p>The Copy of the final preferred layout as well as the preferred layout overlaid onto a sensitivity map is attached in Appendix D1. All proposed infrastructure as well as relevant existing infrastructure on the properties is shown in these layout plans. Please note, that should the outcome of the public participation process require the need for this preferred layout plan to be revised, such a revised plan will be included in the Final EIR.</p>

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	<p>➤ All “no-go” areas.</p> <p>➤ A north arrow and legend/ key, to enable the Department to interpret the layout map.</p>	
	<p>All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible.</p>	<p>The environmental sensitivity map, which includes all no-go areas and buffers identified by the specialists overlain onto the final preferred layout map is attached in Appendix D1.</p>
	<p>The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments.</p>	
	<p>A combined map showing all the Cluster Projects (Bethel Solar PV, Draailoop Solar PV, Klippot Solar PV and Makoppa Solar PV).</p>	<p>Kindly refer to Appendix D2 of the Draft Environmental Impact Report.</p>
	<p>Ensure that similar colours are not used to differentiate between infrastructure. i.e., items must be easily distinguishable on the legend.</p>	<p>Duly noted.</p>
	<p>Google maps will not be accepted for decision-making purposes</p>	<p>Duly noted.</p>
<p><u>(e) Public Participation Process (PPP)</u></p>		
	<p>Please ensure that all comments from all identified and relevant competent authorities as well as stakeholders have been responded to, addressed and incorporated to the EIA. The identified stakeholders must include but are not limited to the Makhado Local Municipality, Vhembe District Municipality, Limpopo: Department of Economic Development, Environment and Tourism (LEDET), Limpopo Department of Agriculture and Rural Development, Department of Mineral Resources, Department of Water and Sanitation (DWS), Wildlife and Environment Society of South Africa (WESSA), Birdlife South Africa, South African Civil Aviation Authority (SACAA), South African Radio Astronomy Observatory (SARAO), Square Kilometer Array (SKA), Air Traffic and Navigation Services (ATNS), Endangered Wildlife Trust (EWT), Eskom, SA National Defence Force and the Department of Forestry, Fisheries and the Environment (DFFE): Protected Areas Planning and Management</p>	<p>All of these Departments are included in the I&AP register for this project and were given an opportunity to comment on the Draft Scoping Report (Please refer to appendix F4). These Departments will be provided with a further opportunity to comment on the Draft Environmental Impact Report and proof notifications will be included in Appendix F6 of the Final EIR.</p>

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	Effectiveness and Biodiversity Conservation Directorates (BCAdmin@dffe.gov.za), and the relevant heritage authorities.	
	The PPP must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.	Section 41 in Chapter 6 of regulation 982 details the public participation process that has to take place as part of an environmental process. The table provided in Section 8 of the Draft Environmental Impact Report provides a quick reference to show how this environmental process has or intends to comply with these legislated requirements relating to public participation. Please also refer to Appendix F, where all evidence of public participation is included.
	A Comments and Responses trail report (C&RR) must be compiled, continuously updated throughout the EIA process for this proposed development starting with the draft SR. The C&RR must be a separate document from the main report and must be in the table format, which reflects the details of Interested and Affected Parties (I&APs), the date comments were received (actual comments received) and responses provided.	The comments and responses report attached in Appendix F2 responds to each comment individually in detail in the format requested by the Department. Response to the Departments acceptance of the Final Scoping Report is included in this comment and responses report. This comments ant responses report will be updated to include any comments received on the Draft Environmental Impact Report.
	Comments made by I&APs must be 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&AP’s comments.	A comment and responses report in the format outlined by the Department is included in Appendix F2. This will be updated on completion of the public participation process on the Draft Environmental Impact Report.
	Proof of correspondence with the various stakeholders must be included in the EIAR. Should you be unable to obtain comments, proof must be submitted to the CA of the attempts that were made to obtain comments.	Kindly refer to appendix F5 which includes all comments that have been submitted up until the point of submission of this Draft Environmental Impact Report. Any comments received during the comment period on the Draft Environmental Impact Report will be included in Appendix F7 of the Final Environmental Impact Report.
	Please ensure that the EIAR indicates when and where the draft SR and EIAR were made available for a 30-day review and comment period.	Please refer to Section 8.2 of the Draft Environmental Impact Report for the exact dates that the Draft Scoping Report was available for a 30-day review and comment period. The Draft Environmental Impact Report will be available from 22 August – 22 September 2025 for a 30-day review and comment

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		period. Proof of availability if the Draft Environmental Impact Report will be included as Appendix F3 and F6 in the Final Environmental Impact Report.
	(f) Screening Tool Report	
	It has been noted that the screening tool reports dated 13 March 2025 for Klipput Solar PV and powerline alternatives 1, 2 and 3 submitted with the application form and the final SR are not signed by the compiler. You are advised to ensure that all signed screening tool reports are submitted with the amended application form and the EIAr.	Duly noted. Signed screening tool reports will be submitted with the amended Application Form to be submitted with the Final Environmental Impact Report.
	<u>(g) Specialist Assessments</u>	
	According to page 5 of 15 of the screening tool report dated 13 March 2025 for Klipput Solar PV, the defence theme is rated as very high in terms of sensitivity, while the agriculture and civil aviation themes are rated high in terms of sensitivity. The animal species and palaeontology themes have medium sensitivity. The aquatic biodiversity, archaeology and cultural heritage, plant species, and terrestrial biodiversity themes are rated low in terms of sensitivity. In addition, you are advised to ensure that themes for all powerline alternatives are considered, site sensitivity reports and studies are undertaken accordingly.	Kindly refer to Appendix E1 – E8 of the Draft Environmental Impact Report for all specialist studies undertaken for the proposed development.
	Site sensitivity verification reports that have been submitted are hereby noted. According to the SSVr and page 113 of the final SR, the following specialist assessments will be undertaken and included in the EIAr: <ul style="list-style-type: none"> > Agricultural Compliance Statement > Aquatic Biodiversity Impact Assessment. > Terrestrial Biodiversity Impact Assessment. > Plant Species Impact Assessment. > Animal Species Impact Assessment. > Avifaunal Impact Assessment 	Kindly refer to the following appendices to the Draft Environmental Impact Report: Appendix E5: Agricultural Compliance Statement; Appendix E6: Landscape/Visual Impact Assessment; Appendix E4: Archaeological and Heritage Impact Assessment; Appendix E4: Palaeontology Impact Assessment; Appendix E1: Terrestrial Biodiversity Impact Assessment (inclusive of botanical and faunal assessments); Appendix E3: Aquatic Biodiversity Impact Assessment;

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<ul style="list-style-type: none"> ➤ Heritage Impact Assessment (including Cultural Heritage, Archaeology and Palaeontology) ➤ Landscape and Visual Impact Assessment ➤ Agricultural Compliance Statement. ➤ Socio-Economic Impact Assessment. ➤ Geotechnical Assessment. 	<p>Appendix E2: Avian Impact Assessment;</p> <p>Appendix E7: Socio-Economic Impact Assessment.</p>
	<p>The following Compliance Statements will be undertaken by the EAP:</p> <ul style="list-style-type: none"> ➤ Defence Compliance Statement ➤ Civil Aviation Compliance Statement. 	<p>The applicant has submitted an obstacles investigation to the South African Civil Aviation Authority (SACAA). At the time of submission of this Draft Environmental Impact Report, a response on this application had not yet been received from the SACAA. This will be included in the Final Environmental Impact Report should it be received prior to the final submission.</p> <p>The EAP will continue to actively engage with the Department of Defence regarding the Defence Theme.</p>
	<p>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.</p>	<p>All specialist studies included in appendices E1 – E8 are final. These studies may however be revised to respond to any comments that may be received during the comment period on the Draft Environmental Impact Report.</p>
	<p>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 expert advice.</p>	<p>No contradicting recommendations were made by the appointed specialists.</p>
	<p>It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on 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), are in effect. Please note that</p>	<p>All specialist studies were undertaken in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	specialist assessments must be conducted in accordance with these protocols.	
	<u>(h) Environmental Management Programme</u>	
	It is noted that activity 11 of Listing Notice 1 has been applied for. Please ensure that the generic EMPr that complies with the GN 435 of March 2022 is used for the management of impacts of the substation and power line that will be constructed for this development are submitted to the CA.	Kindly refer to Appendix I of the Draft Environmental Impact Report which includes the EMPr for the PV facility, a generic EMPr for the on-site substation as well as a generic EMPr for the overhead powerline. The Applicant will sign the generic EMPr upon submission of the Final Environmental Impact Report as there may still be amendments required based on the outcome of the public participation period of the Draft Environmental Impact Report.
	Part B: Section 2 of the generic EMPr must be completed, and a copy of an originally signed generic EMPr must be submitted with the EIAR. Please ensure that Point 7.1.1 in Part B: Section 2 match the details of the Applicant as contained in the amended application form and EIAR.	
	If any specific environmental sensitivities/attributes are present on site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr template, to manage such impacts, those impact management outcomes and actions must be included in Section C of the generic EMPr.	All mitigation measures identified in the Draft Environmental Impact Report as well as the specialist studies have been incorporated into the EMPrs attached as Appendix I of the Draft Environmental Impact Report.
	The EMPr for the facility must comply with the requirements of Appendix 4 in the EIA Regulation, as amended.	Please refer to Section 3 of the EMPr outlined the compliance of the EMPr with Section 24N of NEMA.
	<u>(i) Cumulative Assessment</u>	
	Noting that this project is part of the cluster and there may 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: >The cumulative impacts assessment must consider the existing, authorised but not yet developed, the proposed similar development and powerline in the area. >Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and	Kindly refer to Section 6.11 of the Draft Environmental Impact Report for the assessment of Cumulative Impacts.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response																												
	<p>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.</p> <p>> The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</p> <p>> A cumulative impact environmental statement on whether the proposed development must proceed.</p>																													
	<p>(j) General</p> <p>The technical checklist included in the final SR must be amended to provide the technical details for the proposed facility as per the sample below.</p> <table border="1" data-bbox="665 707 1319 1098"> <thead> <tr> <th colspan="2">Sample of minimum technical details required for the proposed facility.</th> </tr> <tr> <th>Component</th> <th>Description/dimensions</th> </tr> </thead> <tbody> <tr> <td>Height of PV structures</td> <td></td> </tr> <tr> <td>Capacity of the PV facility</td> <td></td> </tr> <tr> <td>Surface area to be covered by the facility (i.e., the area occupied by both permanent and construction laydown areas, including PV array area and associated infrastructure such as roads)</td> <td></td> </tr> <tr> <td>Proximity to grid connection</td> <td></td> </tr> <tr> <td>Number of overhead power lines required and voltage of overhead power lines</td> <td></td> </tr> <tr> <td>Height of the Power Line</td> <td></td> </tr> <tr> <td>Number of substations required and voltage of substations</td> <td></td> </tr> <tr> <td>Area occupied by inverter/transformer stations/substations</td> <td></td> </tr> <tr> <td>Area occupied by buildings</td> <td></td> </tr> <tr> <td>Number of access roads, including length and width</td> <td></td> </tr> <tr> <td>Length and width of internal roads</td> <td></td> </tr> <tr> <td>Additional Infrastructure</td> <td></td> </tr> </tbody> </table>	Sample of minimum technical details required for the proposed facility.		Component	Description/dimensions	Height of PV structures		Capacity of the PV facility		Surface area to be covered by the facility (i.e., the area occupied by both permanent and construction laydown areas, including PV array area and associated infrastructure such as roads)		Proximity to grid connection		Number of overhead power lines required and voltage of overhead power lines		Height of the Power Line		Number of substations required and voltage of substations		Area occupied by inverter/transformer stations/substations		Area occupied by buildings		Number of access roads, including length and width		Length and width of internal roads		Additional Infrastructure		<p>Kindly refer to the Technical Checklist in the beginning of the report providing the technical details of the proposed development in the table format as requested.</p>
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	<p>Please ensure that the final EIAR includes the period for which the Environmental Authorisation (EA) is required, the date on which the activity will be concluded, and the post-construction monitoring requirements finalised, as per Appendix 3(3)(1)(r) of the NEMA EIA Regulations, 2014, as amended.</p>	<p>Kindly refer to Section 2.12 of the Draft Environmental Impact Report for the Project Programme and Timelines.</p> <p>Due to the uncertainty regarding the timing of the procurement programmes, the competent authority is herewith requested that the validity period of the environmental authorisation (if authorised) be granted as follows:</p> <ul style="list-style-type: none"> • Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation. 																												

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		<ul style="list-style-type: none"> Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.
	Confirmation of the availability of services (e.g., sewage, water, etc. if required) must be included in the EIAR.	Water required for the construction and operation of Solar PV facility is to be sourced from the Makhado Local Municipality (who will be engaged with to provide confirmation of availability). Should the applicant in the future, wish to utilise groundwater for the purposes of construction or operation of the facility, such use will require a licence in terms of Section 21(a) of the NWA.
	Should a Water Use License be required, proof of application for a license needs to be submitted.	The freshwater specialist has identified a number of surface water resources within the study site. The Preferred Layout Alternative avoids these features along with the buffer areas identified by the specialist. The proposal does however include infrastructure within the regulated zone of these features and as such will require a Water Use Licence / General Authorisation in terms of the NWA. Envizio Group have been appointed to apply for authorization in terms of Section 21(a) of the National Water Act.
	The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as an amendment, with regard to the time period allowed for complying with the requirements of the Regulations.	Duly noted.
	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.	Duly noted.
<p>17/07/2025 Via Email Ms Thulisile Nyalunga - Chief Directorate: Integrated Environmental Authorisations.</p>	<p><u>(a) Coordinates</u></p>	
	<p>(i) Please provide coordinate points for the proposed development site (note that if the site has numerous turning points, at each turning point coordinates must be provided) as well as the start, middle and end point of all linear activities. Please indicate the position of the</p>	<p>The co-ordinates with all bend points for the preferred PV footprint (layout alternative 3), Centrepoint's for associated infrastructure and bend points for the preferred grid connection (Grid Connection Alternative 1) is included in the tables above.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
Department of Forestry, Fisheries and the Environment MAKOPPA SOLAR PV	proposed activity with the latitude and longitude at the centre point for each alternative site. The co-ordinates must be in degrees and decimal minutes. The minutes should be to at least three decimal places. The projection that must be used in all cases is the WGS-84 spheroid in a national or local projection.	
	<u>(b) Alternatives</u>	
	(i) Please note that Appendix 1(3)(1)(h)(x) of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, requires that “if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such” must be included in the draft EIAr. You are therefore required to provide a motivation should other alternative sites, routes, layouts, and technologies not be considered.	Technology Alternatives for the PV and BESS, Layout Alternatives for the PV and route alternatives for the Grid connection Infrastructure have been considered in this environmental process. Please refer to the discussion on alternatives as included in section 2.11 of this Draft EIR.
	<u>(c) Locality, Site Layout and Sensitivity Maps</u>	
	The draft EIAr must provide the following:	
	(i) A clear description of all associated infrastructure. This description must include, but is not limited to the following: > Internal roads infrastructure; and; > All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc.	The clear description of the infrastructure is included in the technical checklist at the beginning of this report. Internal roads infrastructure; and all supporting onsite infrastructure are depicted in the solar facility layout plans for the preferred alternative attached in appendix D1.
	(ii) All necessary details regarding all possible locations and sizes of the proposed solar PV infrastructure.	The co-ordinates of all infrastructure proposed as part of this project are included in the tables at the beginning of this report. The details regarding the relevant sizes of the proposed solar PV infrastructure is included in Technical details checklist at the beginning of the report and in section 2. Please also note, that an additional table detailing the technical details in the format requested by the competent authority is also included on page 9 of the report.
	(iii) A copy of the final preferred layout map. 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:	The Copy of the final preferred layout as well as the preferred layout overlaid onto a sensitivity map is attached in Appendix D1. All proposed infrastructure as well as relevant existing infrastructure on the properties is shown in these layout plans. Please note, that should

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<ul style="list-style-type: none"> > Permanent laydown area footprint; > Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); > Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used; > The location of sensitive environmental features on site e.g. CBAs, ESA, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure; > Location of access and service roads; > All existing infrastructure on the site, especially railway lines and roads; > Buffer areas; > Buildings, including accommodation; > All “no-go” areas; and > A north arrow and legend/key, to enable the Department to interpret the layout map. 	<p>the outcome of the public participation process require the need for this preferred layout plan to be revised, such a revised plan will be included in the Final EIR.</p>
	<p>(iv) An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.</p>	<p>The environmental sensitivity map, which includes all no-go areas and buffers identified by the specialists overlain onto the final preferred layout map is attached in Appendix D1.</p>
	<p>(v) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.</p>	
<p><u>(d) Public Participation</u></p>		
	<p>(i) On the comments and response table, please respond to each issue raised by interested and affected parties and use a clear and readable font. It is preferable to compile a table with three columns for the date of comment, name of organization/I&AP, issue or comment raised, and response from EAP/Applicant/Specialist.</p>	<p>The comments and responses report attached in Appendix F2 responds to each comment individually in detail in the format requested by the Department. Response to the Departments acceptance of the Final Scoping Report is included in this comment and responses report. This comments ant responses report will be</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		updated to include any comments received on the Draft Environmental Impact Report.
	(ii) Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAr. This includes but is not limited to the Department of Economic Development, Environment & Tourism (DEDET), Makhado Local Municipality, and the Department of Environment, Forestry and Fisheries: Directorate Biodiversity and Conservation.	All of these Departments are included in the I&AP register for this project and were given an opportunity to comment on the Draft Scoping Report (Please refer to appendix F4). These Departments will be provided with a further opportunity to comment on the Draft Environmental Impact Report and proof notifications will be included in Appendix F6 of the Final EIR.
	(iii) Please ensure that all issues raised, and comments received on the draft SR and draft EIAr from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: BCAdmin@environment.gov.za) in respect of the proposed activity are adequately addressed in the Final SR. Proof of correspondence with the various stakeholders must be included in the Final EIAr. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.	Kindly refer to appendix F5 which includes all comments that have been submitted up until the point of submission of this Draft Environmental Impact Report. Any comments received during the comment period on the Draft Environmental Impact Report will be included in Appendix F7 of the Final Environmental Impact Report.
	(iv) A comments and response trail report (C&R) must be submitted with the final EIAr. The C&R report must incorporate all comments (pre and post-submission of the draft EIAr) received for this development. The C&R report must be a separate document from the main report and the format must be in the table format which reflects the details of the I&APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&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&APs comments.	A comment and responses report in the format outlined by the Department is included in Appendix F2. This will be updated on completion of the public participation process on the Draft Environmental Impact Report.
	(v) Please ensure that the EIAr indicates when and where the draft SR and EIAr were made available for a 30-day review and comment period.	Please refer to Section 8.2 of the Draft Environmental Impact Report for the exact dates that the Draft Scoping Report was available for a 30-day review and comment period.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		<p>The Draft Environmental Impact Report will be available from 22 August – 22 September 2025 for a 30-day review and comment period. Proof of availability if the Draft Environmental Impact Report will be included as Appendix F3 and F6 in the Final Environmental Impact Report.</p>
	(vi) The Public Participation Process must be conducted in terms of the approved public participation plan and Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.	<p>Section 41 in Chapter 6 of regulation 982 details the public participation process that has to take place as part of an environmental process. The table provided in Section 8 of the Draft Environmental Impact Report provides a quick reference to show how this environmental process has or intends to comply with these legislated requirements relating to public participation. Please also refer to Appendix F, where all evidence of public participation is included.</p>
	<u>(e) Specialist Assessments</u>	
	(i) 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.	<p>All specialist studies included in appendices E1 – E8 are final. These studies may however be revised to respond to any comments that may be received during the comment period on the Draft Environmental Impact Report.</p>
	(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 expert advice.	<p>No contradicting recommendations were made by the appointed specialists.</p>
	(iii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on 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), are in effect. Please note that	<p>All specialist studies were undertaken in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	specialist assessments must be conducted in accordance with these protocols.	
	<u>(f) Environmental Management Programme</u>	
	(i) It is drawn to your attention that for substation and overhead electricity transmission and distribution infrastructure, when such facilities trigger activity 11 or 47 of the EIA Regulations Listing Notice 1 of 2014, as amended, and any other listed and specified activities necessary for the realisation of such facilities, the generic Environmental Management Programmes (EMPr), contemplated in Regulations 19(4) must be used over and above the EMPr for the PV facility. Accordingly, there needs to be a generic EMPr for the on-site substation, a generic EMPr for the overhead powerline, and a third, separate EMPr for the PV facility.	Kindly refer to Appendix I of the Draft Environmental Impact Report which includes the EMPr for the PV facility, a generic EMPr for the on-site substation as well as a generic EMPr for the overhead powerline. The Applicant will sign the generic EMPr upon submission of the Final Environmental Impact Report as there may still be amendments required based on the outcome of the public participation period of the Draft Environmental Impact Report.
	(ii) Please ensure that any specific mitigation measures identified in the EIAR and specialist reports for the on-site substation and powerline are incorporated into the site-specific section of the generic EMPrs.	All mitigation measures identified in the Draft Environmental Impact Report as well as the specialist studies have been incorporated into the EMPrs attached as Appendix I of the Draft Environmental Impact Report.
	iii) Please ensure that the mitigation measures specified in the EIAR and specialist reports for the PV facility are also incorporated into the EMPr for the PV facility. In addition, please ensure that the EMPr complies with the content of the EMPr in terms of Appendix 4 of the EIA Regulations, 2014, as amended.	All mitigation measures identified in the Draft Environmental Impact Report as well as the specialist studies have been incorporated into the EMPrs attached as Appendix I of the Draft Environmental Impact Report. Please refer to Section 3 of the EMPr outlined the compliance of the EMPr with Section 24N of NEMA.
	(iv) Please also include in the EMPrs, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr, and the submission of such compliance reports to the competent authority.	Please refer to Section 2.14 of the EMPr attached as Appendix I to the Draft Environmental Impact Report for Environmental Audit Frequencies.
	<u>(g) General</u>	
	(i) The EIAR must provide the technical details for the proposed facility in a table format, as well as their description and/or dimensions.	Kindly refer to the Technical Checklist in the beginning of the report providing the technical details of the proposed development in the table format.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	(ii) Please ensure that the final EIAR includes the period for which the Environmental Authorisation (EA) is required, the date on which the activity will be concluded, and the post-construction monitoring requirements finalised, as per Appendix 3(3)(1)(r) of the NEMA EIA Regulations, 2014, as amended.	<p>Kindly refer to Section 2.12 of the Draft Environmental Impact Report for the Project Programme and Timelines.</p> <p>Due to the uncertainty regarding the timing of the procurement programmes, the competent authority is herewith requested that the validity period of the environmental authorisation (if authorised) be granted as follows:</p> <ul style="list-style-type: none"> • Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation. • Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.
	(iii) Confirmation of the availability of services (e.g., sewage, water, etc. if required) must be included in the EIAR.	Water required for the construction and operation of Solar PV facility is to be sourced from the Makhado Local Municipality (who will be engaged with to provide confirmation of availability). Should the applicant in the future, wish to utilise groundwater for the purposes of construction or operation of the facility, such use will require a licence in terms of Section 21(a) of the NWA.
	iv) Should a Water Use License be required, proof of application for a license needs to be submitted.	<p>The freshwater specialist has identified a number of surface water resources within the study site. The Preferred Layout Alternative avoids these features along with the buffer areas identified by the specialist. The proposal does however include infrastructure within the regulated zone of these features and as such will require a Water Use Licence / General Authorisation in terms of the NWA.</p> <p>Envizio Group have been appointed to apply for authorization in terms of Section 21(a) of the National Water Act.</p>
	The applicant is hereby reminded to comply with the requirements of Regulation 45 of GN R982 of 04 December 2014, as an amendment, with regard to the time period allowed for complying with the requirements of the Regulations.	Duly noted.
	You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended,	Duly noted.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	that no activity may commence prior to an environmental authorisation being granted by the Department.	
<p align="center">19/08/2025 Via Online Website Registration Sphokasi Mbatha</p>	Registration only.	Thank you very much for your online registration for the Tabor Solar PV projects. Your contact details have been added to the stakeholder register and we will be sure to keep you informed throughout the remainder of the environmental process.
<p align="center">13/08/2025 Via Email Ngoako Maphala – Chatleka CPA</p>	Kindly be advised that an objection and strong opposition to any future Solar Power Project on the Draailoop LS, is being registered. The Draailoop land is currently being claimed and we as, Chatleka CPA, are awaiting government response regarding this matter. So, any of your proposed plans to have Solar Projects on that land, is opposed.	The Commission on Restitution of Land Claims (Office of the Reginal Land Claims Commissioner: Limpopo), does not list the Chatleka CPA as a claimant on any of the affected Farms (Appendix F5). To the extent Chatleka CPA believes that there has been an oversight, the CPA is advised to approach the Office of the Reginal Land Claims Commissioner: Limpopo.
<p align="center">28/07/2025 Via Email Malibongwe Nqai – Mainstream Renewable Energies</p>	I am writing to formally request registration as an Interested and Affected Party (I&AP) for the Proposed Tabor Solar PV Facilities and Integrated Grid Connection Infrastructure in the Makhado Local Municipality in the Vhembe District, Limpopo Province currently under the Full Scoping and EIA Process. Our project, located in close proximity to the proposed site, may be directly or indirectly impacted by the activities associated with your development. Kindly include us in all future correspondence, notifications, and stakeholder engagement processes related to the Environmental Authorisation process.	Thank you very much for your email. I hereby confirm that your contact details have been added to the stakeholder register for this project and we will be sure to keep you informed throughout the remainder of the Environmental Authorisation application process.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
COMMENTS RECEIVED ON THE DRAFT SCOPING REPORT		
<p style="text-align: center;">21/05/2025 Via Email Ms Zamalanga Langa - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment:</p> <p style="text-align: center;">BETHEL SOLAR PV</p>	<p>(a) Listed activities</p> <p>The project descriptions provided for some of the listed activities applied for cannot be directly linked to the respective listed activities, as the required thresholds or capacities have not been included. You are required to amend the project descriptions for Activities 11, 12, and 28 of Listing Notice 1 to include the capacity/threshold of the proposed infrastructure that triggers each listed activity. For example, for Activity 11, you must specify the infrastructure that triggers this listed activity, such as a substation or powerline, and indicate their capacity in kilovolts (kV).</p>	<p>The activity descriptions in Table 11 of the Final Scoping report have been updated to reflect the specific thresholds and capacities.</p>
	<p>For the listed activities applied for under Listing Notice 3 (Activities 4, 12, 14, and 18), you must select the applicable geographical sensitivity area triggered by the proposed project, as you have not selected the relevant sub-listed activity.</p>	<p>The descriptions of the activities under listing notice 3 in Table 11 of the Final Scoping report have been revised to reflect the specific geographical sensitivity triggered. Kindly note that the Preferred Layout alternative will be developed after completion of the initial public participation process (taking into account, the specialist sensitivities as well as the comments received). Should any descriptions or relevant activities change as a result of this preferred alternative, a revised application form will be submitted with the Draft Environmental Impact Report.</p>
	<p>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.</p>	<p>The activity descriptions of the listed activities applied for, have been revised to clarify the link to the project description. These descriptions will be further refined, once the preferred layout alternative has been developed (taking into account the specialist sensitivities and initial public comments). A revised application form will be submitted with the Draft Environmental Impact Report to reflect these refined descriptions.</p>
	<p>Furthermore, kindly ensure that the latest listed activities, as amended in 2021, are applied for.</p>	<p>The activities reflected utilise the latest amendments of 11 June 2021 as contained in Government Gazette 44701.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>It is imperative that the relevant authorities are continuously involved throughout the Scoping and EIA 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. Please also the potential impacts on the affected respective geographical areas (such as Critical Biodiversity Areas, and Protected Areas) indicated in Listing Notice 3 must assessed.</p>	<p>The provincial environmental department has been engaged during the initial public participation process and will continue to be engaged throughout the remainder of the Environmental Process. Please refer to the I&AP register attached in Appendix F1 for the list of state departments and organs of state whom were consulted. Copies of all notifications are included in Appendix F4.</p> <p>The terms of reference for the relevant biodiversity specialists (Terrestrial Biodiversity, Animal Species, Plant Species, Avifauna and Aquatic Biodiversity) include a requirement for these specialists to specifically assess the impact on the respective geographic areas.</p>
	<p><u>(b) Screen tool report</u></p>	
	<p>It has been noted that the screening tool report on page 1 requires a compiler signature. Please submit the signed screening tool report with the final SR.</p>	<p>The Screening Tool Report attached in Appendix H of the Final Scoping report has been updated to include the compiler's signature. The compiler in this regard is the EAP.</p>
	<p><u>(c) Public Participation Process</u></p>	
	<p>Please ensure that all issues raised, and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the Final SR.</p>	<p>All comments received during the circulation of the Draft Scoping report are included in Appendix F5. The responses to each of these comments are included in the comments and responses report (this report) as attached in Appendix F2 of the Final Scoping Report. It must be noted that this comments and responses report also includes details as to how the Final Scoping Report has been updated to address comments received.</p>
	<p>Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</p>	<p>Proof of correspondence with all stakeholders (as well as attempts to obtain comments), including the Competent Authority and State Departments are included in Appendix F4 of the Final Scoping Report. All comments received are included in Appendix F5 and all responses to the comments received are included in Appendix F2.</p>
	<p>Proof of the newspaper advertisement must be included in the final SR.</p>	<p>A copy of the Newspaper advert is included in Appendix F3 of the Final Scoping Report.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p>	<p>Please refer to section 7 of the final Scoping report for details of compliance with regulations 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p>
	<p>A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format. 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.</p>	<p>A Comments and Responses Report (this report) is attached in Appendix F2 of the Final Scoping Report. This is attached as a separate document appended to the Final Scoping Report. All I&AP comments have been reflected verbatim and responded to in detail. This Comment and Responses Report also indicates where the Final Scoping Report has been updated to address comments where necessary.</p>
	<p>The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development.</p>	<p>The National Department of Forestry, Fisheries and the Environment has been identified as the Competent Authority in Respect of this application. Section 24C(2) of the Act provides for the determination of the competent authority insofar it relates to the environmental authorisation of listed and specified activities. Section 24C(3) specifically provides for the Minister, the Minister responsible for mineral resources and the MEC responsible for environmental affairs in a province may come to an agreement on who will deal with applications for environmental authorisations for any activity, or class of activity.</p> <p>The provincial competent authorities have agreed to the following, at a session of the Implementation Workshop –</p> <p>The Minister will be competent authority for the following –</p> <ol style="list-style-type: none"> 1. a generation facility to be bid in the DMRE bidding round which includes all associated infrastructure; 2. an application for EA for private off-taking agreements for more than 100MW; <p>Notwithstanding this, the provincial environmental authority was also provided with an opportunity to comment on the Draft Scoping Report. Please refer to the I&AP register attached in Appendix F1.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<u>(d) Specialist Assessments</u>	
	Please kindly ensure that the terms of reference for all specialist studies to be conducted includes the following requirements:	
	A detailed description of their methodology, as well as indicating the locations and descriptions of PV positions, and all other associated infrastructures that they have assessed and are recommending for authorisations.	As noted in the Draft Scoping Report, the terms of reference provided to the specialists was to consider and assess, the full extent of the affected properties as well as all grid connection alternatives under considerations. The outcome of the specialists site sensitivity verification along with the outcome of the initial public participation process will be utilised by the applicant to inform the scale and positioning of the preferred layout alternative (including the position of the PV arrays and all associated infrastructure). The methodology utilised by the respective specialists is outlined in the SSVR's attached in Appendices E1 – E7. The Terms of reference for the specialist impact assessments is included in section 6 of the Final Scoping Report.
	a detailed description of all limitations to their studies. Please ensure that all specialist studies that are conducted have been commissioned in the right season, and providing that as a limitation will not be accepted.	The limitations of each of the specialist studies are included in their respective reports and are summarised in section 1.3 of the Final Scoping Report. None of the specialists identified seasonality as a limitation to their studies.
	If the appointed specialists specify contradicting recommendations, the EAP must indicate the most reasonable recommendation and substantiate this with defensible reasons and where necessary, include further expertise advice.	None of the participating specialists specified any contradicting recommendations at this stage of the environmental process. During the Environmental Impact Assessment Phase of the Environmental Process, the EAP will review the detailed specialist mitigations as well as the environmental impact management outcomes and actions to determine whether or not there are any conflicting recommendations.
	Regarding cumulative impacts: - Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.	The Plan of study for Impact Assessment as outlined in section 6 of the Final Scoping Report includes the requirements for both the EAP and participating specialists to comply with these requirements when assessing the cumulative impacts of this project. Please note that

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<ul style="list-style-type: none"> - A detailed process flow 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. - Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process. - The significance rating must also inform the need and desirability of the proposed development. 	<p>the assessment of cumulative impacts will firstly assess the cumulative impact of the 4 projects forming part of this cluster of PV projects, and secondly to assess the cumulative impacts of these four projects along with other similarly authorised projects within a 30km radius.</p>
	<p>It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on 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 ensure that specialist assessments are conducted in accordance with these protocols, except where the applicant provides proof to the competent authority that the specialist assessment affected by these protocols had been commissioned before the date on which the protocols came into effect, in which case Appendix 6 of the Environmental impact Assessment Regulations, 2014, as amended, will apply to such applications. Please indicate in the report whether the protocols were applied.</p>	<p>All specialists related to the themes where Procedures for the Assessment and Minimum Criteria for Reporting has been determined in the regulations have complied with these themes. These themes include:</p> <ol style="list-style-type: none"> 1. Terrestrial Biodiversity, 2. Animal Species, 3. Plant Species, 4. Aquatic Biodiversity, and 5. Agriculture. <p>Please note that in terms of the Animal Species theme, a separate SSVR has been undertaken for avifaunal species (a separate avifaunal impact assessment will also be undertaken).</p> <p>Each of the specialists responsible for the themes above have included tables detailing how their report complies with these themes in Appendices E1-E3 and Appendix E5.</p>
	<p>Please note that the protocols require certain specialist's to be SACNASP registered. As such, the Specialist Declaration of Interest forms must also indicate the scientific organization registration/member number and status of registration/membership for each specialist.</p>	<p>All specialists identified in terms of the protocols (Terrestrial Biodiversity, Animal Species, Avifauna, Plant Species and Agriculture) are appropriately registered with SACNASP as follows:</p> <ul style="list-style-type: none"> - Tarryn Martin (Plant Species) - Pri. Sci. Nat 008745.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		<ul style="list-style-type: none"> - Nicole Dealtry (Terrestrial Biodiversity and Animal Species) - Pri. Sci. Nat. 130289. - Dr Lindi Steyn (Avifauna) – Pri.Sci.Nat. 119992. - Prasheen Singh (Aquatic Biodiversity) – Pri. Sci. Nat 116822. - Mariné Pienaar (Agricultural) – Pri. Sci. Nat. 00274/10. <p>Please refer to the CV's of the specialists are attached in Appendix G6 and the Specialist Declarations are attached in Appendix G4.</p>
	<p>Please take note that for the themes that have been identified as medium and low, after having conducted the site verification the protocols requires that compliance statements be submitted together with the EIR. please ensure that these specialists must be identified as specialist to be conducted who compliance statements are to be included in the EIAR.</p>	<p>Section 6 of the Final Scoping Report (Plan of Study for EIR) identifies the specialists that will be undertaking assessments in the Environmental Impact Reporting phase of the Environmental Process. It furthermore identifies which of these will be full impact assessments and which will be compliance statements (based on the verified site sensitivity).</p>
<p>(e) Layout & Sensitivity Maps</p>		
	<p>The layout map included in the SR must be amended to include the following:</p> <ul style="list-style-type: none"> - The PV development area. - Position of all infrastructure e.g., panels, BESS, on-site substations, powerline etc. - laydown area footprint Connection routes to the distribution/transmission network; and - The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected. - Buffer areas; and - All “no-go” areas. - All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible. 	<p>As outlined in the Draft and Final Scoping Report, the total extent of the affected properties as well as all grid connection alternatives are considered at the scoping phase of the environmental process. During this scoping phase, specialists have determined and spatially mapped the sensitivity of the receiving environment. The environmental sensitivity (including the mapping of no-go areas and buffers that took place during the scoping phase) along with the outcome of the initial public participation process will be used to prepare the site layout plan. This detailed site layout plan will indicate the position of the PV facility as well all associated infrastructure in relation to sensitive features identified by specialists and by I&AP's during the initial public participation process. This detailed layout plan will also include any additional requirements identified by the competent authority in their acceptance of the Final Scoping Report (should it be accepted)/ the layout and sensitivity maps will be presented to the Department as part of the Draft</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<ul style="list-style-type: none"> - The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments. All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible - A combined map showing all the Cluster Projects (Bethel Solar PV, Draailoop Solar PV, Klipput Solar PV and Makoppa Solar PV) - Ensure that similar colours are not used to differentiate between infrastructure. i.e., items must be easily distinguishable in the Legend. - Google maps will not be accepted for decision-making purposes. 	<p>Environmental Impact Report and will be assessed by participating specialists. Registered I&AP's and State Departments will be provided with an opportunity to comment on this layout plan as part of the second phase of public participation.</p>
	<p><u>(f) Cumulative Impacts</u></p> <p>As this proposed project (Bethel Solar) forms part of a cluster of similar projects (Draailoop Solar PV, Klipput Solar PV and Makoppa Solar PV) situated in farm portions located next to each other, the assessment of cumulative impacts must include all the other proposed facilities linked or related to this proposed cluster development in this project area. Further, should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> - Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land. - Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of 	<p>The Plan of study for Impact Assessment as outlined in section 6 of the Final Scoping Report includes the requirements for both the EAP and participating specialists to comply with these requirements when assessing the cumulative impacts of this project. Please note that the assessment of cumulative impacts will firstly assess the cumulative impact of the 4 projects forming part of this cluster of PV projects, and secondly to assess the cumulative impacts of these four projects along with other similarly authorised projects within a 30km radius.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</p> <ul style="list-style-type: none"> - The cumulative impacts significance rating must also inform the need and desirability of the proposed development. - A cumulative impact environmental statement on whether the proposed development must proceed. 	
	General	
	<p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: “If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”.</p>	<p>The Draft Scoping report was subjected to a public participation period of 30 days extending from 25 April 2025 – 27 May 2025 and this final scoping report is herewith submitted to the competent authority within 44 days of the receipt of the application form as required in regulation 21(1) of the NEMA EIA Regulations 2014, as amended.</p>
	<p>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p>	<p>Please refer to the table on page 9 of the Final Scoping report, which details how the report has complied with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p>
	<p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p>	<p>This final scoping report is submitted within the timeframes allowable in terms of the regulations.</p>
	<p>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.</p>	<p>The applicant and the EAP are aware of this requirement.</p>
21/05/2025	(a) Listed Activities and application form	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
<p>Via Email</p> <p>Mr Lunga Dlova - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment</p> <p>DRAAILOOP SOLAR PV</p>	<p>Please update the application form with details such as vegetation clearance, access road length and width, and development footprint. Please include any relevant thresholds, areas, or footprints for the development where necessary.</p>	<p>The activity descriptions in Table 11 of the Final Scoping report have been updated to reflect the specific thresholds and capacities. The descriptions of the activities under listing notice 3 in Table 11 of the Final Scoping report have been also revised to reflect the specific geographical sensitivity triggered.</p>
	<p>If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link: https://www.environment.gov.za/documents/forms.</p>	<p>Kindly note that the Preferred Layout alternative will be developed after completion of the initial public participation process (taking into account, the specialist sensitivities as well as the comments received). Should any descriptions or relevant activities change as a result of this preferred alternative, a revised application form will be submitted with the Draft Environmental Impact Report.</p>
	<p><u>(b) Screen tool report</u></p>	
	<p>It has been noted that the screening tool report on page 1 of 15 requires a compiler signature. Please submit the signed screening report with the final SR.</p>	<p>The Screening Tool Report attached in Appendix H of the Final Scoping report has been updated to include the compiler's signature. The compiler in this regard is the EAP.</p>
	<p><u>(c) Locality, Site Layout and Sensitivity Maps</u></p>	
	<p>The report must provide the following: A clear description of all associated infrastructure. This description must include, but is not limited to the following:</p> <ul style="list-style-type: none"> - Powerlines and substation; - Internal roads infrastructure; and; - All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc. - All necessary details regarding all possible locations and sizes of the proposed solar PV infrastructure. 	<p>The description in the Final Scoping Report has been updated to reflect components as currently available. Please note that the Final Preferred layout will only be presented in the Draft Environmental Impact Report, taking into account the site sensitivities and the outcome of the initial public participation process. Once this preferred layout alternative is determined, all project descriptions will be updated accordingly.</p>
<p>A copy of the final preferred layout map. 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:</p> <ul style="list-style-type: none"> - Permanent laydown area footprint; 	<p>As outlined in the Draft and Final Scoping Report, the total extent of the affected properties as well as all grid connection alternatives are considered at the scoping phase of the environmental process. During this scoping phase, specialists have determined and spatially mapped the sensitivity of the receiving environment. The environmental sensitivity (including the mapping of no-go areas and</p>	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<ul style="list-style-type: none"> - Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); - Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used; - The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure; - Substation(s) and/or transformer(s) sites, including their entire footprint; - Location of access and service roads; - Connection routes (including pylon positions) to the distribution/transmission network; - All existing infrastructure on the site, especially railway lines and roads; - Buffer areas; - Buildings, including accommodation; - All “no-go” areas; and - A north arrow and legend/key, to enable the Department to interpret the layout map. - An environmental sensitivity map indicating environmentally sensitive areas and features identified during the assessment process. - A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. 	<p>buffers that took place during the scoping phase) along with the outcome of the initial public participation process will be used to prepare the site layout plan. This detailed site layout plan will indicate the position of the PV facility as well all associated infrastructure in relation to sensitive features identified by specialists and by I&AP's during the initial public participation process. This detailed layout plan will also include any additional requirements identified by the competent authority in their acceptance of the Final Scoping Report (should it be accepted)/ the layout and sensitivity maps will be presented to the Department as part of the Draft Environmental Impact Report and will be assessed by participating specialists. Registered I&AP's and State Departments will be provided with an opportunity to comment on this layout plan as part of the second phase of public participation.</p>
	<p><u>(d)Draft SR comments</u> Please update the Technical Details of the proposed development with specific descriptions and dimensions of the components to be determined.</p>	<p>The technical details in the Final Scoping report have been updated to reflect as much information as currently available. As outlined in the Draft and Final Scoping Reports the final preferred layout alternative (inclusive of all associated infrastructure) will be</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		presented in the Draft Environmental Impact Report (as this layout needs to be informed by the site sensitivity and outcome of the initial public participation). The technical details of the proposed development with specific descriptions and dimensions will be updated in the Draft Environmental Impact Report (based on the final site layout plan).
	Please note that Appendix 1(3)(1)(h)(x) of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, requires that “if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such” must be included in the report. You are therefore required to provide a motivation should other alternative sites, routes, layouts, and technologies not be considered.	Layout and Technology Alternatives have been considered as part of the Scoping phase of this environmental process (Please Refer to section 2.11). The preferred layout alternative will be presented during the Impact Assessment Phase of the environmental process taking into account the site sensitivities as well as the outcome of the initial public participation process.
	<p><u>(e) Specialists' declaration form</u></p> <p>Please ensure that details of the specialists that prepared the specialist reports, including their curriculum vitae and specialist declarations of independence, are included in the Report. You are referred to Appendix 6 (1) (1) (a)-(b) of the EIA Regulations, 2014, as amended).</p>	<p>All specialists identified in terms of the protocols (Terrestrial Biodiversity, Animal Species, Avifauna, Plant Species and Agriculture) are appropriately registered with SACNASP as follows:</p> <ul style="list-style-type: none"> - Tarryn Martin (Plant Species) - Pri. Sci. Nat 008745. - Nicole Dealtry (Terrestrial Biodiversity and Animal Species) - Pri. Sci. Nat. 130289. - Dr Lindi Steyn (Avifauna) – Pri.Sci.Nat. 119992. - Prasheen Singh (Aquatic Biodiversity) – Pri. Sci. Nat 116822. - Mariné Pienaar (Agricultural) – Pri. Sci. Nat. 00274/10. <p>The curriculum vitae's for all specialists are included in Appendix G6 and the Specialist declarations of Independence are included in Appendix G5 of both the Draft and Final Scoping Reports.</p>
	<p><u>(f) Public Participation Process</u></p> <p>You are required to include the following</p>	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	Proof of fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the site and corridor;	Please refer to Appendix F3 of the Final Scoping Report
	Proof of the newspaper advertisement;	Please refer to Appendix F3 of the Final Scoping Report
	Proof of a notice, notice board or advertisement	Please refer to Appendix F3 of the Final Scoping Report
	Proof of the written notification to the interested and affected parties.	Please refer to Appendix F4 of the Final Scoping Report
	The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development, including but not limited to the Department of Economic Development, Environment & Tourism (DEDET), Makhado Local Municipality, Vembe District Municipality, Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Conservation (BCAdmin@environment.gov.za), the Department of Water and Sanitation, the relevant heritage authorities.	The Department of Economic Development, Environment & Tourism, Makhado Local Municipality, Vembe District Municipality, Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Conservation, the Department of Water and Sanitation and the South African Heritage Resources Agency were all provided with an opportunity to comment on the Draft Scoping Report. Please refer to Appendix F4 for evidence in this regard. The I&AP register listing all State Departments and Organs of State consulted is attached in Appendix F1.
	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 that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended and the approved Public Participation Plan.	Proof of correspondence with all stakeholders (as well as attempts to obtain comments), including the Competent Authority and State Departments are included in Appendix F4 of the Final Scoping Report. All comments received are included in Appendix F5 and all responses to the comments received are included in Appendix F2. Please refer to section 7 of the final Scoping report for details of compliance with regulations 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended. Kindly note that the regulations requiring submission of a Public Participation Plan have been repealed.(i.e. GNR660 published on 05 June 2020 in terms of the Disaster Management Act has been repealed)
	A comments and response trail report (C&R) must be submitted with the final SR. The C&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 interested and affected parties (I&APs) and the date comments were received, actual comments received, and responses	A Comments and Responses Report (this report) is attached in Appendix F2 of the Final Scoping Report. This is attached as a separate document appended to the Final Scoping Report. All I&AP comments have been reflected verbatim and responded to in detail. This Comment and Responses Report also indicates where the

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>provided. Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction (including this Department's comments) in respect of the proposed activity are adequately addressed. Comments made by I&APs must be 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&AP's comments.</p>	<p>Final Scoping Report has been updated to address comments where necessary.</p>
	<p>(g) Specialist Assessments to be conducted in the EIA phase</p>	
	<p>Please note that the Procedures for the Assessment and Minimum Criteria for Reporting on 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 per these protocols.</p>	<p>All specialists related to the themes where Procedures for the Assessment and Minimum Criteria for Reporting has been determined in the regulations have complied with these themes. These themes include:</p> <ol style="list-style-type: none"> 6. Terrestrial Biodiversity, 7. Animal Species, 8. Plant Species, 9. Aquatic Biodiversity, and 10. Agriculture. <p>Please note that in terms of the Animal Species theme, a separate SSVR has been undertaken for avifaunal species (a separate avifaunal impact assessment will also be undertaken). Each of the specialists responsible for the themes above have included tables detailing how their report complies with these themes in Appendices E1-E3 and Appendix E5.</p>
	<p>(h) Cumulative Assessment to be conducted in the EIA phase</p>	
	<p>Within a 30km radius, there are many similar projects 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"> - Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be 	<p>The Plan of study for Impact Assessment as outlined in section 6 of the Final Scoping Report includes the requirements for both the EAP and participating specialists to comply with these requirements when assessing the cumulative impacts of this project. Please note that the assessment of cumulative impacts will firstly assess the cumulative impact of the 4 projects forming part of this cluster of PV</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>quantified and indicated, i.e. hectares of cumulatively transformed land.</p> <ul style="list-style-type: none"> - Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. - The cumulative impacts significance rating must also inform the need and desirability of the proposed development. - A cumulative impact environmental statement on whether the proposed development must proceed. 	<p>projects, and secondly to assess the cumulative impacts of these four projects along with other similarly authorised projects within a 30km radius.</p>
	<p>General</p> <p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: "If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority"</p> <p>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p> <p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p>	<p>The Draft Scoping report was subjected to a public participation period of 30 days and this final scoping report is herewith submitted to the competent authority within 44 days of the receipt of the application form as required in regulation 21(1) of the NEMA EIA Regulations 2014, as amended.</p> <p>Please refer to the table on page 9 of the Final Scoping report, which details how the report has complied with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p> <p>This final scoping report is submitted within the timeframes allowable in terms of the regulations.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	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 the EAP are aware of this requirement.
Date of Comment, format of comment, name of organization/I&AP	Comment	Response
<p data-bbox="360 488 477 507">23/05/2025</p> <p data-bbox="371 523 465 542">Via Email</p> <p data-bbox="215 558 622 686">Ms Makhosazane Yeni - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment</p> <p data-bbox="315 730 521 750">KLIPPUT SOLAR PV</p>	<u>Project description and Listed Activities</u>	
	The project infrastructure as presented on page 8 to 9 of 53 of the application form is hereby noted. You are reminded to ensure that all the sizes of associated infrastructure (i.e. roads, pipelines, etc) are presented.	The technical details in the Final Scoping report have been updated to reflect as much information as currently available. As outlined in the Draft and Final Scoping Reports the final preferred layout alternative (inclusive of all associated infrastructure) will be presented in the Draft Environmental Impact Report (as this layout needs to be informed by the site sensitivity and outcome of the initial public participation). The technical details of the proposed development with specific descriptions and dimensions will be updated in the Draft Environmental Impact Report (based on the final site layout plan).
	It has been noted that activity 11 of Listing Notice ("LN") 1 has been applied for, however, the length and capacity of the proposed grid connection infrastructure is not specified. You are advised to provide the abovementioned details.	This has been updated in the tables detailing the affected listed activities. Please note that once the final site layout plan is determined during the EIA phase of the environmental process, the activity description will be updated further to include relevant dimensions and thresholds. A revised application form will also be submitted to the Department.
	Activities 12 of LN1 have been applied for, however the physical footprint of the infrastructure or structures is not specified. Please ensure the details are provided in the amended application form and final scoping report.	The activity descriptions in Table 11 of the Final Scoping report have been updated to reflect the specific thresholds and capacities. Please note that these activity descriptions will be updated again in the Draft Environmental Impact Report once the final preferred layout is determined. A revised application form will also be submitted at this stage to reflect the updated descriptions.
For activity 24 and 56 of LN1 it is not clear whether the road will have a reserve or not. In addition, the use of the word "may" in the description does not confirm that these activities are applicable to the proposed		

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	development. Therefore, you are advised to refrain from using the word may.	
	It has been noted on page 51 of the draft SR that “the project development will not impact on any CBAs and falls entirely in an ONA (Other Natural Area)”. It is also noted that activities 4, 12, 14, and 18 of LN3 have been applied for. However, the relevant site sensitivities as per sub activities are not specified. As such, you are requested to specify the applicable sensitivities/geographical areas, and this information must be clear in the final SR.	The descriptions of the activities under listing notice 3 in Table 11 of the Final Scoping report have been revised to reflect the specific geographical sensitivity triggered. Kindly note that the Preferred Layout alternative will be developed after completion of the initial public participation process (taking into account, the specialist sensitivities as well as the comments received). Should any descriptions or relevant activities change as a result of this preferred alternative, a revised application form will be submitted with the Draft Environmental Impact Report.
	The use of words such as “may be”, and statements such as “the relevance of this activity will be determined in the impact assessment phase” is hereby noted. However, kindly be advised that listed activities are not based on a precautionary approach. Please ensure that all the listed activities in the amended application form and final SR are clear, are the same and final for decision making purposes. Should it not be clear that listed activity is triggered, such activity will not be considered in the decision-making process.	The listed activities and descriptions reflected as in the Draft and Final Environmental Impact Report depict those that are potentially triggered by development of the initial study site. Once the Final Site Layout Plan is determined during the Impact Assessment Phase of the Environmental Process, these activities and descriptions will be revised to be specific to the preferred layout. A revised application form will also be submitted to reflect this.
	If the activities applied for in the application form differ from those mentioned in the draft SR, an amended application form must be submitted with the final SR. Please note that the Department’s application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms .	A revised application form will be submitted with the Draft Environmental Impact Report once the Final Preferred Layout is determined.
	<u>Alternatives</u>	
	Alternatives as included on page 29 to 35 of the draft SR are hereby noted. You are required to provide all the alternatives considered for this development as per Appendix 2 (2) (1) (g) (i) (v) (vi) of the NEMA EIA Regulations, 2014 as amended in the final report. Furthermore, the	The current technology and layout alternatives in Section 2.11 of the Draft and Final Scoping Report. The preferred layout alternative will be presented and assessed in the Impact Assessment Phase of the Environmental Process.

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	<p>preferred options for all assessed alternatives must be determined and be clear throughout the EIA report.</p>	
	<p>Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2. However, note that no development will be allowed within sensitive area, mitigation hierarchy should be considered to avoid impacts on sensitive environment.</p>	<p>The preferred alternative presented in the in the Draft Environmental Impact Report will demonstrate how the mitigation hierarchy has been followed to avoid impacts on sensitive environments.</p>
	<p><u>Layout and Sensitivity Maps.</u></p> <p>The layout map included as Appendix D of the SR must be amended to include the following:</p> <ul style="list-style-type: none"> - The PV development area. - Position of all infrastructure e.g., panels, BESS, on-site substations, powerline etc. - Existing roads and other associated infrastructure. - Laydown area; and - The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected. - Buffer areas; and - All “no-go” areas. - All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible. - The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments. - A combined map showing all the Cluster Projects (Bethel Solar PV, Draailoop Solar PV, Klipput Solar PV and Makoppa Solar PV). 	<p>As outlined in the Draft and Final Scoping Report, the total extent of the affected properties as well as all grid connection alternatives are considered at the scoping phase of the environmental process. During this scoping phase, specialists have determined and spatially mapped the sensitivity of the receiving environment. The environmental sensitivity (including the mapping of no-go areas and buffers that took place during the scoping phase) along with the outcome of the initial public participation process will be used to prepare the site layout plan. This detailed site layout plan will indicate the position of the PV facility as well all associated infrastructure in relation to sensitive features identified by specialists and by I&AP’s during the initial public participation process. This detailed layout plan will also include any additional requirements identified by the competent authority in their acceptance of the Final Scoping Report (should it be accepted)/ the layout and sensitivity maps will be presented to the Department as part of the Draft Environmental Impact Report and will be assessed by participating specialists. Registered I&AP’s and State Departments will be provided with an opportunity to comment on this layout plan as part of the second phase of public participation.</p>

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	<ul style="list-style-type: none"> - Ensure that similar colours are not used to differentiate between infrastructure. i.e., items must be easily distinguishable on the legend. - Google maps will not be accepted for decision-making purposes. 	
	<p>Public Participation Process (“PPP”).</p> <p>Please ensure that all comments from all identified and relevant competent authorities as well as stakeholders have been responded to, addressed and incorporated to the final report. The identified stakeholders must include but are not limited to the Makhado Local Municipality, Vhembe District Municipality, Limpopo: Department of Economic Development, Environment & Tourism (“LEDET”), Limpopo Department of Agriculture and Rural Development, Department of Mineral Resources, Department of Water and Sanitation (“DWS”), Wildlife and Environment Society of South Africa (“WESSA”), Birdlife South Africa, South African Civil Aviation Authority (“SACAA”), South African Radio Astronomy Observatory (“SARAO”), Square Kilometer Array (“SKA”), Air Traffic and Navigation Services (“ATNS”), Endangered Wildlife Trust (“EWT”), Eskom, SA National Defence Force and the Department of Forestry, Fisheries and the Environment (“DFFE”): Protected Areas Planning and Management Effectiveness and Biodiversity Conservation Directorates (BCAdmin@dffe.gov.za), and the relevant heritage authorities.</p> <p>The PPP must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p> <p>A Comments and Responses trail report (“C&RR”) must be compiled, continuously updated throughout the EIA process for this proposed development starting with the final SR. The C&RR must be a separate document from the main report and must be in the table format, which reflects the details of Interested and Affected Parties (I&APs), the date</p>	<p>The Makhado Local Municipality, Vhembe District Municipality, Department of Economic Development, Environment & Tourism, Department of Agriculture and Rural Development, Department of Mineral Resources, Department of Water and Sanitation, Birdlife South Africa, South African Civil Aviation Authority, South African Radio Astronomy Observatory, Square Kilometer Array, Air Traffic and Navigation Services, Eskom, SA National Defence Force and the Department of Forestry, Fisheries and the Biodiversity Conservation Directorates were provided with an opportunity to comment on the Draft Scoping Report. Please refer to appendix F4 for copies of the notifications to these parties. These parties will be provided with a further opportunity to provide comment on the Draft Environmental Impact Report.</p> <p>The South African Heritage Resources Agency will be provided with a copy of the Heritage Impact Assessment once completed, in order to provide comment in terms of Section 38(8) of the National Heritage Resources Act.</p> <p>Please refer to the table in section 7 of the Final Scoping Report which tabulates how the report complies with of Regulations 39, 40, 41, 42, 43 & 44.</p> <p>A Comments and Responses Report (this report) is attached in Appendix F2 of the Final Scoping Report. This is attached as a separate document appended to the Final Scoping Report. All I&AP comments have been reflected verbatim and responded to in detail. This Comment and Responses Report also indicates where the</p>

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	<p>comments were received (actual comments received) and responses provided.</p>	<p>Final Scoping Report has been updated to address comments where necessary.</p>
	<p>Please ensure that all issues raised, and comments received during the circulation of the draft SR from registered I&APs and organs of state which have jurisdiction (including this Department's comments) in respect of the proposed activity are adequately addressed. Comments made by I&APs must be 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&AP's comments.</p>	<p>All comments received during the circulation of the Draft Scoping report are included in Appendix F5. The responses to each of these comments are included in the comments and responses report (this report) as attached in Appendix F2 of the Final Scoping Report. It must be noted that this comments and responses report also includes details as to how the Final Scoping Report has been updated to address comments received.</p>
	<p>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 CA of the attempts that were made to obtain comments.</p>	<p>Proof of correspondence with all stakeholders (as well as attempts to obtain comments), including the Competent Authority and State Departments are included in Appendix F4 of the Final Scoping Report. All comments received are included in Appendix F5 and all responses to the comments received are included in Appendix F2. Please refer to section 7 of the final Scoping report for details of compliance with regulations 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p>
	<p><u>Screening Tool Report</u></p>	
	<p>It has been noted that the screening tool reports dated 13 March 2025 for Klippot Solar PV and powerline alternatives 1, 2 and 3 submitted with the application form and the draft SR are not signed by the compiler. You are advised to ensure that all signed screening tool reports are submitted with the amended application form and the final SR.</p>	<p>The Screening Tool Reports attached in Appendix H of the Final Scoping report has been updated to include the compiler's signature. The compiler in this regard is the EAP.</p>
	<p><u>Specialist Assessments</u></p>	
	<p>According to page 5 of 15 of the screening tool report dated 13 March 2025 for Klippot Solar PV, the defence theme is rated as very high in terms of sensitivity, while the agriculture and civil aviation themes are rated high in terms of sensitivity. The animal species and palaeontology themes have medium sensitivity. The aquatic biodiversity, archaeology and cultural heritage, plant species, and terrestrial biodiversity themes</p>	<p>A separate screening tool was generated for each of the Grid connection alternatives in addition to that of the PV side. The sensitivities identified in the screening tool for the Grid connection Alternatives aligned with those for the PV site. All specialist SSVR's included verification of the sensitivities for both the PV Facility as well as the Grid Connection Alternatives.</p>

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	are rated low in terms of sensitivity. In addition, you are advised to ensure that themes for all powerline alternatives are considered, site sensitivity reports and studies are undertaken accordingly.	The Plan of study for EIR has been adapted to ensure the sensitivity of the defence theme is assessed as part of the EIA phase of the Environmental Process.
	Site sensitivity verification reports that have been submitted are hereby noted. These must comply with requirements of the relevant protocols.	The Terrestrial Biodiversity (inclusive of Plants and Animal Species), Aquatic Biodiversity, Avifauna and Agricultural SSVR's were prepared specifically in terms of the relevant protocols. Each of these specialists have provided a checklist in the report detailing how the report complies with the protocols.
	You are advised to specify in the Plan of Study for the EIA, all the specialist studies to be conducted.	Section 6 of the Final Scoping Report (Plan of Study for EIR) identifies the specialists that will be undertaking assessments in the Environmental Impact Reporting phase of the Environmental Process. It furthermore identifies which of these will be full impact assessments and which will be compliance statements (based on the verified site sensitivity).
	Specialist Declaration of interest forms must be attached for all specialist studies to be conducted in the final SR. The forms are available on Department's website (please use the Department's template).	Please refer to Appendix G4.
	Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of proposed rehabilitation.	The detailed methodology of each specialist is described in their reports attached in Appendices E1 – E7. The locations and description any proposed rehabilitation interventions will only be presented in the Impact Assessment Reports, once the preferred layout alternative is determined.
	The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.	The limitations of all specialists are included in their respective reports and summarised in sections 1.3.1 to 1.3.6 of the Draft and Final Scoping Reports. Seasonality was not identified as a limitation of any of the specialists.
	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 expert advice.	None of the participating specialists specified any contradicting recommendations at this stage of the environmental process. During the Environmental Impact Assessment Phase of the Environmental Process, the EAP will review the detailed specialist

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		mitigations as well as the environmental impact management outcomes and actions to determine whether or not there are any conflicting recommendations.
	Ensure that specialist studies as identified in the screening tool, comply with the requirements of GN 320 of 20 March 2020 and GN 1150 of 30 October 2020, unless proof is provided that indicates that the specialist study was commissioned within 50 days after the date of gazetting of the notice i.e., 20 March 2020 and was commissioned prior to 30 October 2020 respectively. Failure to comply with the above-mentioned notice presents a risk to this application.	<p>All specialists related to the themes where Procedures for the Assessment and Minimum Criteria for Reporting has been determined in the regulations have complied with these themes. These themes include:</p> <ol style="list-style-type: none"> 11. Terrestrial Biodiversity, 12. Animal Species, 13. Plant Species, 14. Aquatic Biodiversity, and 15. Agriculture. <p>Please note that in terms of the Animal Species theme, a separate SSVR has been undertaken for avifaunal species (a separate avifaunal impact assessment will also be undertaken).</p> <p>Each of the specialists responsible for the themes above have included tables detailing how their report complies with these themes in Appendices E1-E3 and Appendix E5.</p>
	Please note further that the protocols require certain specialists' to be registered with SACNASP. Refer to the relevant protocols in this regard.	<p>All specialists identified in terms of the protocols (Terrestrial Biodiversity, Animal Species, Avifauna, Plant Species and Agriculture) are appropriately registered with SACNASP as follows:</p> <ul style="list-style-type: none"> - Tarryn Martin (Plant Species) - Pri. Sci. Nat 008745. - Nicole Dealtry (Terrestrial Biodiversity and Animal Species) - Pri. Sci. Nat. 130289. - Dr Lindi Steyn (Avifauna) – Pri.Sci.Nat. 119992. - Prasheen Singh (Aquatic Biodiversity) – Pri. Sci. Nat 116822. - Mariné Pienaar (Agricultural) – Pri. Sci. Nat. 00274/10.

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	<p>Please include a table in the final SR summarising the specialist studies required by the Screening Tool, a column indicating whether these studies will be conducted or not, and a column with motivation for any studies that will not be undertaken. Please note that if any of the specialists' studies and requirements recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report, as per the requirements of the Protocols. The specialist input must be supported by comments from relevant provincial authorities, relevant directorates within DFFE, and Non-Governmental Organisations (NGO's) which have jurisdiction in respect of the proposed activity.</p>	<p>A list of specialist and the level of reports (i.e. Compliance Statement or Impact Assessment) has been tabulated in section 6.3 of the Draft and Final Scoping Report.</p>
	<p>Should it be determined that there is a need for additional specialist studies to be undertaken based on the outcome of public participation, these must be commissioned and be included in the draft EIA reports for public comment</p>	<p>The outcome of the initial public participation process (25 April 2025 – 27 May 2025) has not identified any additional specialist studies (other than those already listed in the Plan of Study for EIR). Should the Department identify any additional studies in their acceptance of the Final Scoping Report, these will be considered.</p>
	<p><u>Environmental Management Programme</u></p>	
	<p>It is noted that activity 11 of Listing Notice 1 has been applied for. Please ensure that the generic EMPr that complies with the GN 435 of March 2022 is used for the management of impacts of the substation and power line that will be constructed for this development are submitted to the CA.</p>	<p>These requirements will be included in the EMPr (including Generic EMPr for Substation and Powerline Infrastructure) which will be presented in the Draft Environmental Impact Report.</p>
	<p>Part B: Section 2 of the generic EMPr must be completed, and a copy of an originally signed generic EMPr must be submitted with the amended BAR. Please ensure that Point 7.1.1 in Part B: Section 2 match the details of the Applicant as contained in the amended application form and final BAR.</p>	
	<p>If any specific environmental sensitivities/attributes are present on site which require more specific impact management outcomes and impact management actions, not included in the pre-approved generic EMPr template, to manage such impacts, those impact management</p>	

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	outcomes and actions must be included in Section C of the generic EMPr.	
	The EMPr for the facility must comply with the requirements of Appendix 4 in the EIA Regulation, as amended.	
	Cumulative Assessment	
	<p>Noting that this project is part of the cluster and there may be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> - The cumulative impacts assessment must consider the existing, authorised but not yet developed, the proposed similar development and powerline in the area. - Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. - The cumulative impacts significance rating must also inform the need and desirability of the proposed development. - A cumulative impact environmental statement on whether the proposed development must proceed. 	<p>The Plan of study for Impact Assessment as outlined in section 6 of the Final Scoping Report includes the requirements for both the EAP and participating specialists to comply with these requirements when assessing the cumulative impacts of this project. Please note that the assessment of cumulative impacts will firstly assess the cumulative impact of the 4 projects forming part of this cluster of PV projects, and secondly to assess the cumulative impacts of these four projects along with other similarly authorised projects within a 30km radius.</p>
	General	
	<p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that: "If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority".</p>	<p>The Draft Scoping report was subjected to a public participation period of 30 days and this final scoping report is herewith submitted to the competent authority within 44 days of the receipt of the application form as required in regulation 21(1) of the NEMA EIA Regulations 2014, as amended.</p>

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	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 on page 9 of the Final Scoping report, which details how the report has complied with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.
	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 timeframes allowable in terms of the regulations.
	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 the EAP are aware of this requirement.
<p style="text-align: center;">28/05/2025 Via Email Ms Thulisile Nyalunga - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment</p> <p style="text-align: center;">MAKOPPA SOLAR PV</p>	<u>(a) Listed Activities and Application Form</u>	
	(i) Please update the application form with details such as vegetation clearance, access road length and width, and development footprint. Any relevant thresholds or footprints for the development must be included where necessary.	The activity descriptions in Table 11 of the Final Scoping report have been updated to reflect the specific thresholds and capacities. The descriptions of the activities under listing notice 3 in Table 11 of the Final Scoping report have been revised to reflect the specific geographical sensitivity triggered.
	(ii) If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link: https://www.environment.gov.za/documents/forms .	Kindly note that the Preferred Layout alternative will be developed after completion of the initial public participation process (taking into account, the specialist sensitivities as well as the comments received). Should any descriptions or relevant activities change as a result of this preferred alternative, a revised application form will be submitted with the Draft Environmental Impact Report.
	<u>(b) Screen Tool Report</u>	
(i) It has been noted that the screening tool report on page 1 of 17 requires a compiler signature. Please submit the signed screening report with the final SR.	The Screening Tool Report attached in Appendix H of the Final Scoping report has been updated to include the compiler's signature. The compiler in this regard is the EAP.	
<u>(c) Locality, Site Layout and Sensitivity Maps</u>		

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	<p>The report must provide the following:</p> <p>(i) A clear description of all associated infrastructure. This description must include, but is not limited to the following:</p> <ul style="list-style-type: none"> - Powerlines and substation; - Internal roads infrastructure; and; - All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc. <p>(ii) All necessary details regarding all possible locations and sizes of the proposed solar PV infrastructure.</p> <p>(iii) A copy of the final preferred layout map. 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:</p> <ul style="list-style-type: none"> - Permanent laydown area footprint; - Internal roads indicating width (construction period width and operation period width) and with numbered sections between the other site elements which they serve (to make commenting on sections possible); - Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used; - The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected by the facility and its associated infrastructure; - Substation(s) and/or transformer(s) sites, including their entire footprint; - Location of access and service roads; - Connection routes (including pylon positions) to the distribution/transmission network; - All existing infrastructure on the site, especially railway lines and roads; 	<p>The description in the Final Scoping Report has been updated to reflect components as currently available. Please note that the Final Preferred layout will only be presented in the Draft Environmental Impact Report, taking into account the site sensitivities and the outcome of the initial public participation process. Once this preferred layout alternative is determined, all project descriptions will be updated accordingly.</p> <p>As outlined in the Draft and Final Scoping Report, the total extent of the affected properties as well as all grid connection alternatives are considered at the scoping phase of the environmental process. During this scoping phase, specialists have determined and spatially mapped the sensitivity of the receiving environment. The environmental sensitivity (including the mapping of no-go areas and buffers that took place during the scoping phase) along with the outcome of the initial public participation process will be used to prepare the site layout plan. This detailed site layout plan will indicate the position of the PV facility as well all associated infrastructure in relation to sensitive features identified by specialists and by I&AP's during the initial public participation process. This detailed layout plan will also include any additional requirements identified by the competent authority in their acceptance of the Final Scoping Report (should it be accepted)/ the layout and sensitivity maps will be presented to the Department as part of the Draft Environmental Impact Report and will be assessed by participating specialists. Registered I&AP's and State Departments will be provided with an opportunity to comment on this layout plan as part of the second phase of public participation.</p>

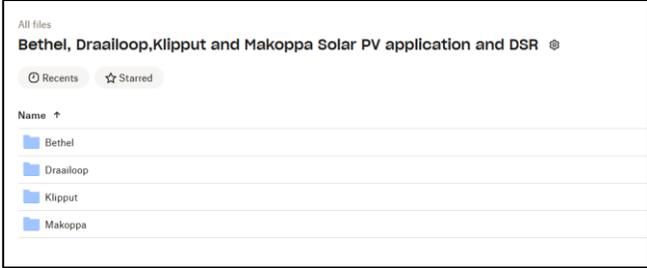
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	<ul style="list-style-type: none"> - Buffer areas; - Buildings, including accommodation; - All “no-go” areas; and - A north arrow and legend/key, to enable the Department to interpret the layout map. 	
	(iv) An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.	This will be included with the final Site Layout Map of the preferred alternative which will be presented and assessed in the Environmental Impact Assessment Phase of the Environmental Process.
	(v) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.	This will be included with the final Site Layout Map of the preferred alternative which will be presented and assessed in the Environmental Impact Assessment Phase of the Environmental Process.
	<u>(d) Draft SR Comments</u>	
	(i) Please update the Technical Details of the proposed development with specific descriptions and dimensions of the components to be determined.	The technical details in the Final Scoping report have been updated to reflect as much information as currently available. As outlined in the Draft and Final Scoping Reports the final preferred layout alternative (inclusive of all associated infrastructure) will be presented in the Draft Environmental Impact Report (as this layout needs to be informed by the site sensitivity and outcome of the initial public participation). The technical details of the proposed development with specific descriptions and dimensions will be updated in the Draft Environmental Impact Report (based on the final site layout plan).
	(ii) Please note that Appendix 1(3)(1)(h)(x) of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, requires that “if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such” must be included in the report. You are therefore required to provide a motivation should other alternative sites, routes, layouts, and technologies not be considered.	The description of alternatives is included in sections 2.1.1 to 2.1.5 of the Draft and Final Scoping Reports. The preferred layout alternative will be presented and assessed as part of the Draft Environmental Impact Report.

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	<p><u>(e) Specialist Declaration Forms</u></p> <p>(i) Please ensure that details of the specialists that prepared the specialist reports, including their curriculum vitae and specialist declarations of independence, are included in the Report. You are referred to Appendix 6 (1) (1) (a)-(b) of the EIA Regulations, 2014, as amended).</p>	<p>All specialists identified in terms of the protocols (Terrestrial Biodiversity, Animal Species, Avifauna, Plant Species and Agriculture) are appropriately registered with SACNASP as follows:</p> <ul style="list-style-type: none"> - Tarryn Martin (Plant Species) - Pri. Sci. Nat 008745. - Nicole Dealtry (Terrestrial Biodiversity and Animal Species) - Pri. Sci. Nat. 130289. - Dr Lindi Steyn (Avifauna) – Pri.Sci.Nat. 119992. - Prasheen Singh (Aquatic Biodiversity) – Pri. Sci. Nat 116822. - Mariné Pienaar (Agricultural) – Pri. Sci. Nat. 00274/10. <p>Copies of the Specialist CV's are attached in Appendix G6 and Copies of the Specialist Declarations of Independence are included in Appendix G4.</p>
	<p><u>(f) Public Participation Process</u></p> <p>(i) The public participation process must include the following:</p>	
	<ul style="list-style-type: none"> - Proof of fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the site and corridor; 	<p>Please refer to Appendix F3 of the Final Scoping Report.</p>
	<ul style="list-style-type: none"> - Proof of the newspaper advertisement; 	<p>Please refer to Appendix F3 of the Final Scoping Report.</p>
	<ul style="list-style-type: none"> - Proof of a notice, notice board or advertisement 	<p>Please refer to Appendix F3 of the Final Scoping Report.</p>
	<ul style="list-style-type: none"> - Proof of the written notification to the interested and affected parties. 	<p>Please refer to Appendix F4 of the Final Scoping Report.</p>
	<p>(ii) The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development, including but not limited to the Department of Economic Development, Environment & Tourism (DEDET), Makhado Local Municipality, Vembe District Municipality, Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Conservation</p>	<p>The Department of Economic Development, Environment & Tourism, Makhado Local Municipality, Vhembe District Municipality, Department of Forestry, Fisheries and the Environment (DFFE): Biodiversity Conservation, the Department of Water and Sanitation and SAHRA (along with other relevant authorities) were provided</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	(BCAdmin@environment.gov.za), the Department of Water and Sanitation, the relevant heritage authorities.	with an opportunity to comment on the Draft Scoping Report. Please refer to Appendix F4 for evidence in this regard.
	(iii) 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 that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.	Proof of correspondence with all stakeholders (as well as attempts to obtain comments), including the Competent Authority and State Departments are included in Appendix F4 of the Final Scoping Report. All comments received are included in Appendix F5 and all responses to the comments received are included in Appendix F2. Please refer to section 7 of the final Scoping report for details of compliance with regulations 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
	(iv) A comments and response trail report (C&R) must be submitted with the final SR. The C&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 interested and affected parties (I&APs) and the date comments were received, actual comments received, and responses provided. Please ensure that all issues raised and comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction (including this Department's comments) in respect of the proposed activity are adequately addressed. Comments made by I&APs must be 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&AP's comments.	A Comments and Responses Report (this report) is attached in Appendix F2 of the Final Scoping Report. This is attached as a separate document appended to the Final Scoping Report. All I&AP comments have been reflected verbatim and responded to in detail. This Comment and Responses Report also indicates where the Final Scoping Report has been updated to address comments where necessary.
<u>(g) Specialist Assessments to be conducted in the EIA phase</u>		
	(i) Please note that the Procedures for the Assessment and Minimum Criteria for Reporting on 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),	All specialists related to the themes where Procedures for the Assessment and Minimum Criteria for Reporting has been determined in the regulations have complied with these themes. These themes include: 16. Terrestrial Biodiversity, 17. Animal Species, 18. Plant Species,

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	<p>have come into effect. Please note that specialist assessments must be conducted per these protocols.</p>	<p>19. Aquatic Biodiversity, and 20. Agriculture.</p> <p>Please note that in terms of the Animal Species theme, a separate SSVR has been undertaken for avifaunal species (a separate avifaunal impact assessment will also be undertaken). Each of the specialists responsible for the themes above have included tables detailing how their report complies with these themes in Appendices E1-E3 and Appendix E5.</p>
<p><u>(h) Cumulative Assessment to be conducted in the EIA phase</u></p>		
	<p>Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> - Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land. - Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. - The cumulative impacts significance rating must also inform the need and desirability of the proposed development. - A cumulative impact environmental statement on whether the proposed development must proceed. 	<p>The Plan of study for Impact Assessment as outlined in section 6 of the Final Scoping Report includes the requirements for both the EAP and participating specialists to comply with these requirements when assessing the cumulative impacts of this project. Please note that the assessment of cumulative impacts will firstly assess the cumulative impact of the 4 projects forming part of this cluster of PV projects, and secondly to assess the cumulative impacts of these four projects along with other similarly authorised projects within a 30km radius.</p>
<p><u>General</u></p>		
	<p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:</p>	<p>The Draft Scoping report was subjected to a public participation period of 30 days and this final scoping report is herewith submitted to the competent authority within 44 days of the receipt of the</p>

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	<p>“If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”</p>	<p>application form as required in regulation 21(1) of the NEMA EIA Regulations 2014, as amended.</p>
	<p>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p>	<p>Please refer to the table on page 9 of the Final Scoping report, which details how the report has complied with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p>
	<p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p>	<p>This final scoping report is submitted within the timeframes allowable in terms of the regulations.</p>
	<p>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.</p>	<p>The applicant and the EAP are aware of this requirement.</p>

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<p>26/05/2025 Via Email Megan Bromfeild - Renewable Energy Consultation Associate - Vulpro</p>	<p>Thank you for giving Vulpro the opportunity to comment on the Bethel Solar PV, Draailoop Solar PV, Klipput Solar PV, and Makoppa Solar PV Draft Scoping Reports.</p> <p>We note that the avifaunal specialists have appropriately identified the vultures present in the area. However, we would like to highlight that Cape Vultures have been recorded roosting overnight just south of the Eskom Tabor Substation on the transmission TABOR-WITKOP 1 and 2 Lines, as well as the SPENCER-TABOR 1 Line. We suggest that the avifaunal specialists take this into account when conducting their environmental assessment. In addition, all appropriate mitigation measures to address both power line electrocution and collision risks must be thoroughly considered.</p> <p>We will review the Environmental Impact Assessments (EIA) once they become available and provide further input if necessary.</p>	<p>Thank you for your comment on the Draft Scoping Reports for the proposed Bethel, Draailoop, Klipput and Makoppa PV projects and their associated grid connections.</p> <p>Thank you for highlighting the presence of overnight roosting of Cape Vulture on the existing Tabor/Witkop and Spencer/Tabor lines. This Information has been provided to the Avifaunal Specialist for consideration as part of the EIA Phase of the Environmental Process.</p>
<p>20/05/2025 Via Email Emma Campbell - Atlantic Renewable Energy Partners</p>	<p>The Dropbox link isn't working, do you mind resending. Thanks in advance.</p>	<p>The link was checked by Cape EAPrac and has confirmed to be working. The report was provided to the I&AP via an alternative download link. https://we.tl/t-GXbThSZYh5</p> 
	<p>Confirmed receipt of documentation.</p>	<p>This is noted.</p>

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<p>20/05/2025 Via Email Siboniso Khumalo</p>	<p>Online Registration via Cape EAPrac website received.</p>	<p>Registration confirmed. This party has been added to the I&AP register – Please refer to Appendix F1 of the Final Scoping Report.</p>
	<p>Thank you for your email and acknowledgement of our registration. Just to advise on our interest in the planned development. We are a Renewable energy project developer based in Polokwane. We have a long term lease on farm 429 and 435 from The Chatleka CPA for similar developments.</p>	<p>Registration confirmed. Farm 429 and Farm 435 are situated to the North of the Bethel, Draailoop, Makoppa and Klipput solar PV projects and will not be affected by any of the PV projects nor associated grid connection infrastructure under the current applications.</p>
<p>07/05/2025 Via Email John Geeringh - Senior Consultant Environmental Management, National Transmission Company South Africa</p>	<p>Please send me KMZ files of the proposed development. Please find attached Eskom requirements and a setbacks guideline for RE Development that must be read in conjunction with GN R 4143.</p>	<p>The KMZ's of each of the 4 projects was provided to Mr Geeringh. The Eskom Requirements and Setback Guidelines will be incorporated into the Environmental Management Programme, which will form part of the Draft Environmental Impact Report. These requirements will also be considered and implemented by the applicant during the final design stages of the projects</p>
<p>07/05/2025 Via Online Website Registration M Lephoswe</p>	<p>Online Registration via Cape EAPrac website received.</p>	<p>Registration confirmed. This party has been added to the I&AP register – Please refer to Appendix F1 of the Final Scoping Report.</p>
<p>02/05/2025 – 06/05/2025 Via Email Motshewa Matimolane - Chatleka Community Property Association</p>	<p>Thank you for the notice. I have manage to download the Makoppa, Draailoop and the Klipput reports. I'm struggling with the Bethuel report. Could you please send it to me. I'm part of the Chatleka CPA, and I seat on their extended EXCO. Could you please register the CPA as an interested and affected party and the people copied in this email. It is critical to ensure that these projects are not on farms that are subject to our claims. That will invite serious objections from us.</p>	<p>Bethel Report Provided via email on 02 May 2025. Registration confirmed. This party has been added to the I&AP register – Please refer to Appendix F1 of the Final Scoping Report.</p>

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	<p>Could you kindly please forward us copies of landowner consent for all 4 projects - appendix G2 of the scoping reports.</p>	<p>Landowner consents were provided on 06 May 2025. Please refer to appendix F5.</p>
	<p>1.Failure to Acknowledge Ongoing Land Claims</p> <p>The report fails to acknowledge that the Remaining Portion of Farm Draailoop 430 LS, which is earmarked for development, is currently subject to a land claim by the Chatleka CPA. This represents a fundamental oversight and raises serious questions about the due diligence undertaken in preparing this report. The omission disregards the legal and historical claims of the Chatleka CPA and its members, many of whom were dispossessed under past discriminatory laws. Proceeding with development on this land prior to the resolution of the land claim risks undermining the legitimacy and outcomes of the restitution process.</p>	<p>A letter was received by the applicant from the Commission on Restitution of Land Claims (Office of the Regional Land Claims Commissioner: Limpopo) on 19 September 2024. This letter confirmed that there was a land claim on the Remainder of the Farm Draailoop 430 by the Batlokwa Tribe. This letter furthermore confirms that this claim from the Batlokwa Tribe has subsequently been dismissed.</p> <p>As confirmed in the abovementioned letter from the regional Land Claims Commissioner (Refer to Appendix F5), the Chatleka CPA is not listed as a claimant on any of the affected portions. If there is further concern, this matter needs to be dealt with between Chatleka CPA and the Office of Regional Land Claims Commissioner.</p>
	<p>2. Inadequate Treatment of Ancestral and Indigenous Rights</p> <p>The report makes only passing reference to the ancestral ties of indigenous communities to the broader project area, which includes Bethel, Makkoppa, and Klipput. Statements such as, "The development and growth of the urban core is limited because of ongoing land claims," and, "The land restitution process restricts investment and the development of land," are reductive and do not adequately engage with the full socio-historical context. These remarks frame land claims as obstacles rather than recognizing them as legitimate rights protected under South African law and the Constitution. The lack of detail on how these matters will be addressed suggests a dismissive attitude toward the rights of indigenous communities</p>	<p>Thank you for identifying this aspect as a concern. Kindly note that this report constitutes a Scoping Report, which is the first stage of the environmental process. The main purpose of this scoping report is to provide local communities with an opportunity to raise issues of concern in respect of environmental matters. The Chatleka CPA's concern regarding the ancestral ties of indigenous communities to the broader project area will be provided to the Social and Heritage Specialists for consideration in the Environmental Impact Reporting phase of this environmental process. It should be noted that the EAP, Developer and Specialists have no authority to legitimize any land claim, the Developer requested confirmation from the Regional Land Claims Commissioner (refer to response above) to confirm the status of all valid land claims so as to ensure that any valid claimants can be engaged in the environmental process.</p>
	<p>3. Lack of Meaningful Empowerment and Ownership for Affected Communities</p>	<p>Further engagement from the EAP and Social specialist will take place during the Impact Assessment Phase of the Environmental Process. The applicant has also expressed a willingness to meet</p>

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	<p>The report does not sufficiently explore real empowerment for historically dispossessed communities. The model of leasing land to developers without affording affected communities meaningful ownership stakes in the project does not meet the threshold of economic justice or transformation. The CPA and other rightsholders should not be relegated to passive recipients of rental income while others derive long-term economic benefit and control from their ancestral land.</p>	<p>and engage with your CPA, should a valid land claim be pending on the Project property.</p> <p>It must be noted that detailed stakeholder engagement on specific Local Economic Development Projects only takes place once the project is awarded as a Preferred Bidder or enters the financial close process, at which stage, a stakeholder engagement specialist will engage directly with affected communities.</p>
	<p>The Social Scoping Report, as it currently stands, fails to meet its mandate to provide a comprehensive and socially just assessment of the project's impacts.</p>	<p>This current report provides a baseline as required in appendix 2 of the EIA regulations. This gives affected or potentially affected parties an opportunity to provide comment and or raise concerns that need to be addressed in the Impact Assessment Phase of the Environmental Process. The Chatleka CPA's comments have been provided to the social specialist for consideration in the next phase of the study.</p>
	<p>It does not account for material land rights, nor does it propose any framework for fair participation, restitution, or empowerment of the communities most directly affected. I strongly urge that this report be revised to include: A full acknowledgement of the land claim on Draailoop 430 LS by Chatleka CPA (and other land claims in the area).</p>	<p>As mentioned under point 1 of this response, the Commission on Restitution of Land Claims (Office of the Reginal Land Claims Commissioner: Limpopo), does not list the Chatleka CPA as a claimant on the Remainder of farm Draailoop 430 (Appendix F5). To the extent Chatleka CPA believes that there has been an oversight, the CPA is advised to approach the Office of the Reginal Land Claims Commissioner: Limpopo.</p>
	<p>A detailed examination of the historical and cultural significance of the area to indigenous communities.</p>	<p>The Heritage specialist will be requested to consider this aspect as part of the Heritage Impact Assessment. This Heritage Impact Assessment will be provided to all I&APs during the public participation process associated with the Draft Environmental Impact Assessment phase of the Environmental process. We confirm that the Chatleka CPA has been added to the I&AP register for this project.</p>
	<p>Clear commitments to community ownership and fair distribution of benefits should the project go ahead.</p>	<p>The concern is noted and will be given due consideration based on the findings of this assessment and other initial feasibility studies.</p>

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		We look forward to further engagement with the Chatleka CPA as part of this environmental process.
<p>06/05/2025 Via Online Website Registration Motz Ntimo</p>	<p>This letter serves as a formal objection to all four proposed solar projects on the fundamental basis that the Draft Scoping Report fails to acknowledge, address, or meaningfully engage with the current land claim processes affecting the farms in question, and that the Communal Property Associations (CPAs) in the area—the rightful claimants to portions of this land—have been systematically excluded from meaningful consultation.</p> <p>The Silenced Heritage of Our Land The land upon which these solar projects are proposed is not merely vacant space awaiting development. It is land steeped in history, memory, and unresolved justice. Our CPAs have become vessels for hope and justice—organized frameworks through which our communities assert their rights within South Africa’s post-apartheid legal system. Their purpose remains clear: to restore our communities’ legal title to the ancestral lands of our forebears and to steward that land responsibly for future generations.</p> <p>Yet the journey toward restitution has been long, arduous, and frequently obstructed by bureaucratic inertia, corporate interests, and institutional neglect. Now, these ancestral lands stand at the center of yet another contestation where our rights risk being overlooked in the name of development.</p>	<p>According to a letter received from the Commission on Restitution of Land Claims (Office of the Reginal Land Claims Commissioner: Limpopo) on 19 September 2024, none of the CPA’s are registered as claimants on any of the affected farm portions. To the extent any of the CPA’s believes that there has been an oversight, the CPA is advised to approach the Office of the Reginal Land Claims Commissioner: Limpopo.</p> <p>The intent was never to exclude meaningful consultation with any party and the purpose of the scoping phase of the environmental process is to allow parties (such as CPA’s) an opportunity to raise concerns, so that they may be considered in the in the next phase of the environmental process, where further engagement can take place.</p> <p>Thank you for identifying this aspect as a concern. Kindly note that this report constitutes a Scoping Report, which is the first stage of the environmental process. The main purpose of this scoping report is to provide local communities with an opportunity to raise issues of concern in respect of environmental matters. The CPA’s concerns in the broader project area will be provided to the Social and Heritage Specialists for consideration in the Environmental Impact Reporting phase of this environmental process. It should be noted that the EAP, Developer and Specialists have no authority to legitimize any land claim, the Developer requested confirmation from the Regional Land Claims Commissioner (See Appendix F5) to confirm the status of all valid land claims so as to ensure that any valid claimants can be engaged in the environmental process</p>

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	<p>The Gravity of This Omission</p> <p>Your Draft Scoping Report makes no meaningful mention of the ongoing land claims affecting multiple farms identified in your proposal, including:</p> <ul style="list-style-type: none"> • Farm 431 • Remainder of Farm 466 • Portion 1 of Farm 425 • Remainder of Farm 430 • Portion 1 of Farm 466 <p>This omission is not merely a technical flaw—it represents a profound moral failure. It perpetuates a deeper pattern of marginalization where dispossessed communities are again rendered invisible in the name of progress. To understand the gravity of this oversight, one must comprehend what land means in the African context. Land is not simply property—it is the anchor of identity, the site of cultural rituals, the keeper of history. When we speak of ancestral land, we speak not with nostalgia alone, but with a sense of sacred duty.</p> <p>Development Cannot Be Built on Erasure</p> <p>What lies beneath the surface of these farms is not only geological potential or solar yield—it is centuries of human connection. Development cannot be sustainable when it is built on the erasure of memory and the silencing of rightful claimants. Any project that seeks to harvest the sun on this soil must first account for the shadow of history that lies across it.</p> <p>We do not stand against renewable energy or South Africa’s necessary energy transition. But we insist that development must be just, inclusive, and historically conscious. Land restitution is not a bureaucratic formality—it is a constitutional imperative. It is about restoring dignity, correcting historical wrongs, and enabling communities to determine their own futures.</p>	<p>As outlined above, based on Correspondence from the Regional Land Claims Commission, the EAP does not believe this to be an omission.</p> <p>As noted, the purpose of the scoping phase of the environmental process is to allow affected parties and communities to identify their concerns so that further engagement can take place.</p> <p>It should be noted that the EAP, Developer and Specialists have no authority to legitimize any land claim, the Developer requested confirmation from the Regional Land Claims Commissioner (See Appendix F5) to confirm the status of all valid land claims so as to ensure that any valid claimants can be engaged in the environmental process. We can now confirm that you have been registered as a key stakeholder and that further engagement can take place during the environmental impact assessment phase of the environmental process.</p>

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	<p>Specific Objections to the Draft Scoping Report</p> <ol style="list-style-type: none"> 1. Failure to Identify Affected CPAs: The report fails to identify and acknowledge the CPAs that have lodged claims on the affected properties or are in the process of doing so. 2. Absence of Meaningful Consultation: The CPAs with legitimate interests in these lands have not been included in the stakeholder engagement process in any meaningful way. 3. Procedural Irregularity: By not addressing existing land claims, the report violates Section 2(4)(f) of NEMA, which requires the participation of all interested and affected parties in environmental governance. 4. Social Impact Assessment Deficiency: The social baseline and impact assessment fails to consider how these developments would affect the land rights and future livelihood options of community members with pending land claims. 5. Economic Transformation Failure: The proposed projects offer no meaningful role for land claimant communities in ownership, participation, or control of the developments on their ancestral lands. <p>Our Position and Way Forward</p> <p>Our communities do not oppose solar development in principle; we oppose the notion that it can be planned and implemented without our participation and prior consent. We resist the assumption that empowerment means leasing ancestral land to outside developers while remaining peripheral to the long-term benefits.</p> <p>We therefore demand:</p> <ol style="list-style-type: none"> 1. Immediate suspension of the environmental authorization process until all affected CPAs have been properly identified and meaningfully consulted. 2. Revision of the Draft Scoping Report to include comprehensive information about existing land claims on all affected properties. 3. Development of a framework for meaningful participation of CPAs in decision-making regarding the proposed developments. 	<p>The purpose of the Scoping Report is to provide a mechanism for affected parties or communities to raise such concerns, so that they may be considered and addressed in the next phase of the environmental process. We look forward to further engagement in this regard, should the competent authority allow this project to proceed to the next stage of the environmental process.</p> <p>As noted above, the CPA's concern and proposed concerns and position has been noted and recorded in the scoping report. These concerns will be considered further with inputs from relevant specialists and further engagement during the Impact Assessment Phase of the Environmental Process.</p>

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	<p>4. Consideration of benefit-sharing mechanisms that recognize the rights and interests of land claimants, including potential ownership stakes in the projects.</p> <p>5. Acknowledgment that the current process has failed to meet the constitutional and legal standards for consultation with affected communities.</p> <p>The roots of our communities run deep—beneath the surface of policies, reports, and projects. To ignore them is to risk building progress on shaky ground. But to honor them is to lay the foundation for a future that is not only bright, but just.</p> <p>We await your urgent response to these concerns</p>	
<p>06/05/2025 Via Online Website Registration Solomon Mongalo</p>	<p>Registration only.</p>	<p>Your contact details have been added to the stakeholder register and we will be sure to keep you informed throughout the remainder of the environmental process.</p>
<p>05/05/2025 Via Online Website Registration Sinkie Nkosi</p>	<p>Registration only.</p>	<p>Your contact details have been added to the stakeholder register and we will be sure to keep you informed throughout the remainder of the environmental process.</p>
<p>05/05/2025 Via Online Website Registration Siboniso Khumalo</p>	<p>Interested Party and would like to know more about these developments.</p>	<p>Your contact details have been added to the stakeholder register and we will be sure to keep you informed throughout the remainder of the environmental process.</p>
<p>05/05/2025 Via Online Website Registration Matome Richard Malefo</p>	<p>Against the project on our Chatleka CPA farms. Hands off.</p>	<p>The Commission on Restitution of Land Claims (Office of the Regional Land Claims Commissioner: Limpopo), does not list the Chatleka CPA as a claimant on any of the affected Farms (Appendix F5). To the extent Chatleka CPA believes that there has been an oversight, the CPA is advised to approach the Office of the Regional Land Claims Commissioner: Limpopo.</p>

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<p>05/05/2025 Via Online Website Registration Makgetsi Matimolane</p>	<p>Affected beneficiary from Chatleka CPA, restitution land claimant</p>	<p>The Commission on Restitution of Land Claims (Office of the Regional Land Claims Commissioner: Limpopo), does not list the Chatleka CPA as a claimant on any of the affected Farms (Appendix F5). To the extent Chatleka CPA believes that there has been an oversight, the CPA is advised to approach the Office of the Regional Land Claims Commissioner: Limpopo.</p>
<p>25/04/2025 Via Email Canny Mosebjadi Mothapo: South African Civil Aviation Authority:</p>	<p>Thank you for the EIA notification, may you kindly resend the attachments to environment@caa.co.za and delist all other SACAA email addresses on your database. Kindly save and send your environmental impact analysis reports/meeting requests and request for comments to environment@caa.co.za, going forward please.</p>	<p>environment@caa.co.za has been registered as an I&AP for this environmental process. All other CAA email addresses have been deregistered.</p>
<p>COMMENTS RECEIVED PRIOR TO SUBMISSION OF THE DRAFT SCOPING REPORT</p>		
<p>06/04/2025 Via Online Website Registration Justine Wtngaardt – JUWI Renewable Energies</p>	<p>Kindly Register myself as an I&AP OBO JUWI Renewable Energies.</p>	<p>Your contact details have been added to the stakeholder register and we will be sure to keep you informed throughout the remainder of the environmental process.</p>
<p>07/03/2025 Via Online Website Registration Stephan Jacobs – WKN Windcurrent</p>	<p>Registration only.</p>	<p>Your contact details have been added to the stakeholder register and we will be sure to keep you informed throughout the remainder of the environmental process.</p>
<p>18/02/2025 Via Email Johann Killian – ABO Energy South Africa (Pty) Ltd</p>	<p>Please register me as an I&AP for the Proposed Tabor Solar PV Facilities and Integrated Grid Connection Infrastructure project.</p>	<p>I confirm that we have registered you as an I&AP for the Proposed Tabor Solar PV Facilities and Integrated Grid Connection Infrastructure project. We will notify you once the Draft Scoping Report is available for review and comment.</p>

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<p>07/02/2025 Via Email Atlantic Energy Partners</p>	<p>May I kindly ask that you please register the Developer of the Belle Projects, Atlantic Energy Partners, as I&APs for the proposed Tabor Solar PV Facilities as well?</p>	<p>We hereby confirm that your contact details have been added to the stakeholder register for the above mentioned project and we will be sure to keep you informed throughout the remainder of the environmental application process.</p>
<p>07/03/2025 Via Online Website Registration Zakiya Abrahams - WKN Windcurrent</p>	<p>Registration only.</p>	<p>Your contact details have been added to the stakeholder register and we will be sure to keep you informed throughout the remainder of the environmental process.</p>
<p>05/02/2025 Via Online Website Registration Lusani Madali</p>	<p>Request for registration as I&AP.</p>	<p>Your contact details have been added to the stakeholder register and we will be sure to keep you informed throughout the remainder of the environmental process.</p>
<p>04/02/2025 Via Email Bluecrane Environmental</p>	<p>Request for registration as I&AP.</p>	<p>We hereby confirm that your contact details have been added to the stakeholder register for the above mentioned project and we will be sure to keep you informed throughout the remainder of the environmental application process.</p>
<p>31/01/2025 Via Online Website Registration David Nunez</p>	<p>Registration only.</p>	<p>Your contact details have been added to the stakeholder register and we will be sure to keep you informed throughout the remainder of the environmental process.</p>