

# 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
<b>COMMENTS RECEIVED ON THE FINAL SCOPING REPORT</b>		
<b>23/07/2025</b> Via Email Ms Zamalanga Langa - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment:  <b>BETHEL SOLAR PV</b>	<b>(a) Listed Activities</b>	
	(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.	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.
	(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.	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.
	(iii) The EIAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.	Kindly refer to Section 6 and Section 7 of the Draft Environmental Impact Report which includes the Assessment of Impacts as well as

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		the Management and Mitigation of Impacts for the listed activities applied for.
	(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 <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a> .	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.
	<b><u>(b) Public Participation</u></b>	
	(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	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.

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	submitted to the Department of the attempts that were made to obtain comments.	Proof of notification of the availability of the Draft Scoping Report and the Draft Environmental Impact Report will be include as Appendix F4 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.

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		Please also refer to <b>Appendix F</b> , where all evidence of public participation is included.
	(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.
	<b><u>(c) Cumulative Assessment</u></b>	
	(i) The 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. ➤ 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.
	<b><u>(d) Specialist assessments</u></b>	
	(i) The specialist studies must include the following: ➤ 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.	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: <ul style="list-style-type: none"> <li>• Section 1.3 – Assumptions &amp; Limitations;</li> <li>• Section 2.11.4 – The no-go Alternative;</li> </ul>

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	<p>➤ 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.</p> <p>➤ 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.</p> <p>➤ Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.</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>➤ Should a specialist recommend specific mitigation measures, these must be clearly indicated.</p> <p>➤ 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.</p> <p>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.</p> <p>Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.</p> <p>The significance rating must also inform the need and desirability of the proposed development.</p>	<ul style="list-style-type: none"> <li>• Section 7 – Management and Mitigation of Impacts;</li> <li>• Section 6.11 – Cumulative Impacts.</li> </ul>

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	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 where 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 aquatic 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 EIAR:</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.
	<b><u>(e) Locality, Site Layout and Sensitivity Maps</u></b> The draft EIAr must provide the following maps that includes:	
	(i) A clear description of all associated infrastructure. This description must include, but is not limited to the following: > 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.	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 project 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: > 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);	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.



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	<ul style="list-style-type: none"> <li>➤ Wetlands, drainage lines, rivers, streams, and water crossings of roads and cables indicating the type of bridging structures that will be used;</li> <li>➤ 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;</li> <li>➤ Substation(s) and/or transformer(s) sites, including their entire footprint;</li> <li>➤ Location of access and service roads;</li> <li>➤ All existing infrastructure on the site, especially railway lines and roads;</li> <li>➤ Buffer areas;</li> <li>➤ Buildings, ;</li> <li>➤ All “no-go” areas; and</li> <li>➤ A north arrow and legend/key, to enable the Department to interpret the layout map.</li> </ul>	
	<p>(iv) An environmental sensitivity map indicating environmentally sensitive areas and features identified during the assessment process.</p> <p>(v) A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.</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>
	<b><u>(f) Environmental Management Programme (EMPr)</u></b>	
	<p>(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.</p>	<p>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.</p>

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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).
	<b><u>(g) General</u></b>	
	(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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	(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>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>
	(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>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"> <li>• Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation.</li> <li>• Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.</li> </ul>
	(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.	Duly noted.

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	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><b>23/07/2025</b> Via Email Mr Lunga Dlova - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment</p> <p><b>DRAAILOOP SOLAR PV</b></p>	<b><u>(a) Coordinates</u></b>	
	(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).	The co-ordinates with all bend points for the preferred PV footprint (layout alternative 3), Centrepont's for associated infrastructure and bend points for the preferred grid connection (Grid Connection Alternative 1) is included in the tables above.
	<b><u>(b) Alternatives</u></b>	
	(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.
<b><u>(c) Locality, Site Layout and Sensitivity Maps</u></b>		

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	(i) The draft EIA must provide the following:	
	<p>-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"> <li>➤ Internal roads infrastructure; and;</li> <li>➤ All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc.</li> </ul>	<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>-All necessary details regarding all possible locations and sizes of the proposed solar PV 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>- 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"> <li>➤ Permanent laydown area footprint;</li> <li>➤ 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);</li> <li>➤ Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used;</li> <li>➤ 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;</li> <li>➤ Location of access and service roads;</li> </ul>	<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"><li>➤ All existing infrastructure on the site, especially railway lines and roads;</li><li>➤ Buffer areas;</li><li>➤ Buildings, including accommodation;</li><li>➤ All “no-go” areas; and</li><li>➤ A north arrow and legend/key, to enable the Department to interpret the layout map.</li></ul>	
	- 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.	
	<b><u>(d) Public Participation</u></b>	
	(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.	

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	(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

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		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 <b>Appendix F</b> , where all evidence of public participation is included.
	<b><u>(e) Specialist assessments</u></b>	
	(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.
	<b><u>(f) Environmental Management Programme</u></b>	
	(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.
	<b><u>(g) General</u></b>	
	(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"> <li>• Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation.</li> <li>• Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.</li> </ul>

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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>17/07/2025 Via Email Ms Makhosazane Yeni - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment</p> <p><b>KLIPPUT SOLAR PV</b></p>	<b><u>(a)Project description and Listed Activities</u></b>	<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 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>	

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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 <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a>.</p>	<p>Duly noted. An amended Application Form will be submitted with the Final Environmental Impact Report.</p>
	<p><b><u>(b) Coordinates</u></b></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), Centrepont’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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	<b><u>(c) Alternatives</u></b>	
	<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>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>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>	
	<b><u>(d) Layout and Sensitivity Maps</u></b>	
	<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"> <li>➤ The PV development area.</li> <li>➤ Position of all associated infrastructure e.g., panels, BESS, on-site substations, powerline, etc.</li> <li>➤ All supporting onsite infrastructure such as permanent laydown area and auxiliary buildings, dangerous goods facility etc.</li> <li>➤ All existing infrastructure on the site, especially railway lines and roads;</li> <li>➤ 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);</li> <li>➤ 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.</li> <li>➤ Buffer areas;</li> </ul>	<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>	
	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 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.
	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, Klippot Solar PV and Makoppa Solar PV).	Kindly refer to Appendix D2 of the Draft Environmental Impact Report.
	Ensure that similar colours are not used to differentiate between infrastructure. i.e., items must be easily distinguishable on the legend.	Duly noted.
	Google maps will not be accepted for decision-making purposes	Duly noted.
	<b><u>(e) Public Participation Process (PPP)</u></b>	
	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 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	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.

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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.
	<b><u>(g) Specialist Assessments</u></b>	
	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.
	<p>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:</p> <ul style="list-style-type: none"> <li>➤ Agricultural Compliance Statement</li> <li>➤ Aquatic Biodiversity Impact Assessment.</li> <li>➤ Terrestrial Biodiversity Impact Assessment.</li> <li>➤ Plant Species Impact Assessment.</li> <li>➤ Animal Species Impact Assessment.</li> <li>➤ Avifaunal Impact Assessment</li> </ul>	<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>



Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<ul style="list-style-type: none"> <li>➤ Heritage Impact Assessment (including Cultural Heritage, Archaeology and Palaeontology)</li> <li>➤ Landscape and Visual Impact Assessment</li> <li>➤ Agricultural Compliance Statement.</li> <li>➤ Socio-Economic Impact Assessment.</li> <li>➤ Geotechnical Assessment.</li> </ul>	<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"> <li>➤ Defence Compliance Statement</li> <li>➤ Civil Aviation Compliance Statement.</li> </ul>	<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.	
	<b><u>(h) Environmental Management Programme</u></b>	
	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.
	<b><u>(i) Cumulative Assessment</u></b>	
	<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"> <li>➤ The cumulative impacts assessment must consider the existing, authorised but not yet developed, the proposed similar development and powerline in the area.</li> <li>➤ Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and</li> </ul>	Kindly refer to Section 6.11 of the Draft Environmental Impact Report for the assessment of Cumulative Impacts.

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	<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>																													
	<b>(j) General</b>																													
	<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><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><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></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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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>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"><li>• Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation.</li></ul>																												

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		<ul style="list-style-type: none"> <li>Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.</li> </ul>
	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.
<b>17/07/2025</b> Via Email Ms Thulisile Nyalunga - Chief Directorate: Integrated Environmental Authorisations.	<u><b>(a) Coordinates</b></u> (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	The co-ordinates with all bend points for the preferred PV footprint (layout alternative 3), Centrepont's for associated infrastructure and bend points for the preferred grid connection (Grid Connection Alternative 1) is included in the tables above.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
<p>Department of Forestry, Fisheries and the Environment</p> <p><b>MAKOPPA SOLAR PV</b></p>	<p>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.</p>	
	<b><u>(b) Alternatives</u></b>	
	<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>
	<b><u>(c) Locality, Site Layout and Sensitivity Maps</u></b>	
	The draft EIAr must provide the following:	
	<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"> <li>➤ Internal roads infrastructure; and;</li> <li>➤ All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc.</li> </ul>	<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 solar PV 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>	<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</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<ul style="list-style-type: none"><li>➤ Permanent laydown area footprint;</li><li>➤ 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);</li><li>➤ Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used;</li><li>➤ 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;</li><li>➤ Location of access and service roads;</li><li>➤ All existing infrastructure on the site, especially railway lines and roads;</li><li>➤ Buffer areas;</li><li>➤ Buildings, including accommodation;</li><li>➤ All “no-go” areas; and</li><li>➤ A north arrow and legend/key, to enable the Department to interpret the layout map.</li></ul>	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.
	(iv) 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.
	(v)A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.	
	<b><u>(d) Public Participation</u></b>	
	(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.	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

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
		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 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.
	<b><u>(e) Specialist Assessments</u></b>	
	(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	All specialist studies were undertaken in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998.



Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	specialist assessments must be conducted in accordance with these protocols.	
	<b><u>(f) Environmental Management Programme</u></b>	
	(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.
	<b><u>(g) General</u></b>	
	(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"> <li>• Commencement of Construction Activities within 10 Years from the date of the Environmental Authorisation.</li> <li>• Completion of all non-operational aspects of the Environmental Authorisation within 10 years of commencement of construction activities.</li> </ul>
	(iii) Confirmation of the availability of services (e.g., sewage, water, etc. if required) must be included in the EIAr.	<p>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.</p>
	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.	
<b>19/08/2025</b> Via Online Website Registration Sphokasi Mbatha	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.
<b>13/08/2025</b> Via Email Ngoako Maphala – Chatleka CPA	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.
<b>28/07/2025</b> Via Email Malibongwe Nqai – Mainstream Renewable Energies	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
<b>COMMENTS RECEIVED ON THE DRAFT SCOPING REPORT</b>		
<p><b>21/05/2025</b> Via Email Ms Zamalanga Langa - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment:</p> <p><b>BETHEL SOLAR PV</b></p>	<b><u>(a) Listed activities</u></b>	
	<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&amp;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><b><u>(b) Screen tool report</u></b></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><b><u>(c) Public Participation Process</u></b></p>	
	<p>Please ensure that all issues raised, and comments received during the circulation of the SR from registered I&amp;APs and organs of state which have jurisdiction (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
	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 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.
	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.	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.
	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>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"> <li>1. a generation facility to be bid in the DMRE bidding round which includes all associated infrastructure;</li> <li>2. an application for EA for private off-taking agreements for more than 100MW;</li> </ol> <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&amp;AP register attached in Appendix F1.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<b><u>(d) Specialist Assessments</u></b>	
	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"> <li>- 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.</li> <li>- Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.</li> <li>- The significance rating must also inform the need and desirability of the proposed development.</li> </ul>	<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"> <li>1. Terrestrial Biodiversity,</li> <li>2. Animal Species,</li> <li>3. Plant Species,</li> <li>4. Aquatic Biodiversity, and</li> <li>5. Agriculture.</li> </ol> <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"> <li>- Tarryn Martin (Plant Species) - Pri. Sci. Nat 008745.</li> </ul>



Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		<ul style="list-style-type: none"> <li>- Nicole Dealtry (Terrestrial Biodiversity and Animal Species) - Pri. Sci. Nat. 130289.</li> <li>- Dr Lindi Steyn (Avifauna) – Pri.Sci.Nat. 119992.</li> <li>- Prasheen Singh (Aquatic Biodiversity) – Pri. Sci. Nat 116822.</li> <li>- Mariné Pienaar (Agricultural) – Pri. Sci. Nat. 00274/10.</li> </ul> <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>
	<b>(e) Layout &amp; Sensitivity Maps</b>	
	<p>The layout map included in the SR must be amended to include the following:</p> <ul style="list-style-type: none"> <li>- The PV development area.</li> <li>- Position of all infrastructure e.g., panels, BESS, on-site substations, powerline etc.</li> <li>- laydown area footprint Connection routes to the distribution/transmission network; and</li> <li>- The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected.</li> <li>- Buffer areas; and</li> <li>- All “no-go” areas.</li> <li>- 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.</li> </ul>	<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&amp;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"> <li>- 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</li> <li>- A combined map showing all the Cluster Projects (Bethel Solar PV, Draailoop Solar PV, Klipput Solar PV and Makoppa Solar PV)</li> <li>- Ensure that similar colours are not used to differentiate between infrastructure. i.e., items must be easily distinguishable in the Legend.</li> <li>- Google maps will not be accepted for decision-making purposes.</li> </ul>	<p>Environmental Impact Report and will be assessed by participating specialists. Registered I&amp;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><b><u>(f) Cumulative Impacts</u></b></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"> <li>- Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.</li> <li>- Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of</li> </ul>	<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"> <li>- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</li> <li>- A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul>	
	<b>General</b>	
	<p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:          “If S&amp;EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”.</p>	<p>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>
<b>21/05/2025</b>		
	<b>(a) Listed Activities and application form</b>	

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><b>DRAAILOOP SOLAR PV</b></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: <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a>.</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><b><u>(b) Screen tool report</u></b></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><b><u>(c) Locality, Site Layout and Sensitivity Maps</u></b></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"> <li>- Powerlines and substation;</li> <li>- Internal roads infrastructure; and;</li> <li>- All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc.</li> <li>- All necessary details regarding all possible locations and sizes of the proposed solar PV infrastructure.</li> </ul>	<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"> <li>- Permanent laydown area footprint;</li> </ul>	<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>

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	<ul style="list-style-type: none"> <li>- 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);</li> <li>- Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used;</li> <li>- 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;</li> <li>- Substation(s) and/or transformer(s) sites, including their entire footprint;</li> <li>- Location of access and service roads;</li> <li>- Connection routes (including pylon positions) to the distribution/transmission network;</li> <li>- All existing infrastructure on the site, especially railway lines and roads;</li> <li>- Buffer areas;</li> <li>- Buildings, including accommodation;</li> <li>- All “no-go” areas; and</li> <li>- A north arrow and legend/key, to enable the Department to interpret the layout map.</li> <li>- An environmental sensitivity map indicating environmentally sensitive areas and features identified during the assessment process.</li> <li>- A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.</li> </ul>	<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&amp;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&amp;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><b><u>(d)Draft SR comments</u></b></p> <p>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.
	<b><u>(e) Specialists’ declaration form</u></b>	
	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>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"> <li>- Tarryn Martin (Plant Species) - Pri. Sci. Nat 008745.</li> <li>- Nicole Dealtry (Terrestrial Biodiversity and Animal Species) - Pri. Sci. Nat. 130289.</li> <li>- Dr Lindi Steyn (Avifauna) – Pri.Sci.Nat. 119992.</li> <li>- Prasheen Singh (Aquatic Biodiversity) – Pri. Sci. Nat 116822.</li> <li>- Mariné Pienaar (Agricultural) – Pri. Sci. Nat. 00274/10.</li> </ul> <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>
	<b><u>(f) Public Participation Process</u></b>	
	You are required to include the following	

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&amp;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&amp;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&amp;AP's comments.</p>	<p>Final Scoping Report has been updated to address comments where necessary.</p>
	<b>(g) Specialist Assessments to be conducted in the EIA phase</b>	
	<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"> <li>6. Terrestrial Biodiversity,</li> <li>7. Animal Species,</li> <li>8. Plant Species,</li> <li>9. Aquatic Biodiversity, and</li> <li>10. Agriculture.</li> </ol> <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>
	<b>(h) Cumulative Assessment to be conducted in the EIA phase</b>	
	<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"> <li>- Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be</li> </ul>	<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>



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	<p>quantified and indicated, i.e. hectares of cumulatively transformed land.</p> <ul style="list-style-type: none"> <li>- Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</li> <li>- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</li> <li>- A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul>	<p>projects, and secondly to assess the cumulative impacts of these four projects along with other similarly authorised projects within a 30km radius.</p>
	<b>General</b>	
	<p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:          "If S&amp;EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority"</p>	<p>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>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>

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><b>23/05/2025</b> Via Email Ms Makhosazane Yeni - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment</p> <p><b>KLIPPUT SOLAR PV</b></p>	<b><u>Project description and Listed Activities</u></b>	
	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 <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a> .	A revised application form will be submitted with the Draft Environmental Impact Report once the Final Preferred Layout is determined.
	<p><b><u>Alternatives</u></b></p> <p>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</p>	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.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	preferred options for all assessed alternatives must be determined and be clear throughout the EIA report.	
	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.	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.
	<b><u>Layout and Sensitivity Maps.</u></b>	
	<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"> <li>- The PV development area.</li> <li>- Position of all infrastructure e.g., panels, BESS, on-site substations, powerline etc.</li> <li>- Existing roads and other associated infrastructure.</li> <li>- Laydown area; and</li> <li>- The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines etc. that will be affected.</li> <li>- Buffer areas; and</li> <li>- All “no-go” areas.</li> <li>- 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.</li> <li>- The above map must be overlain with a sensitivity map and a cumulative map which shows neighbouring renewable energy developments.</li> <li>- A combined map showing all the Cluster Projects (Bethel Solar PV, Draailoop Solar PV, Klipput Solar PV and Makoppa Solar PV).</li> </ul>	<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&amp;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&amp;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>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<ul style="list-style-type: none"> <li>- Ensure that similar colours are not used to differentiate between infrastructure. i.e., items must be easily distinguishable on the legend.</li> <li>- Google maps will not be accepted for decision-making purposes.</li> </ul>	
	<b>Public Participation Process ("PPP").</b>	
	<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 &amp; 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 Makhado Local Municipality, Vhembe District Municipality, Department of Economic Development, Environment &amp; 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>The PPP must be conducted in terms of Regulations 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</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 &amp; 44.</p>
	<p>A Comments and Responses trail report ("C&amp;RR") must be compiled, continuously updated throughout the EIA process for this proposed development starting with the final SR. The C&amp;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&amp;APs), the date</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&amp;AP comments have been reflected verbatim and responded to in detail. This Comment and Responses Report also indicates where the</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	comments were received (actual comments received) and responses provided.	Final Scoping Report has been updated to address comments where necessary.
	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.	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.
	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.	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.
	<b><u>Screening Tool Report</u></b>	
	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 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.	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.
<b><u>Specialist Assessments</u></b>		
	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	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.

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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 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

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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"> <li>11. Terrestrial Biodiversity,</li> <li>12. Animal Species,</li> <li>13. Plant Species,</li> <li>14. Aquatic Biodiversity, and</li> <li>15. Agriculture.</li> </ol> <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"> <li>- Tarryn Martin (Plant Species) - Pri. Sci. Nat 008745.</li> <li>- Nicole Dealtry (Terrestrial Biodiversity and Animal Species) - Pri. Sci. Nat. 130289.</li> <li>- Dr Lindi Steyn (Avifauna) – Pri.Sci.Nat. 119992.</li> <li>- Prasheen Singh (Aquatic Biodiversity) – Pri. Sci. Nat 116822.</li> <li>- Mariné Pienaar (Agricultural) – Pri. Sci. Nat. 00274/10.</li> </ul>



Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<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><b><u>Environmental Management Programme</u></b></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>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>	<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>

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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.	
	<b>Cumulative Assessment</b>	
	<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"> <li>- The cumulative impacts assessment must consider the existing, authorised but not yet developed, the proposed similar development and powerline in the area.</li> <li>- Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</li> <li>- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</li> <li>- A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul>	<p>The Plan of study for 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>
<b>General</b>		
	<p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:</p> <p>"If S&amp;EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority".</p>	<p>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><b>28/05/2025</b> Via Email Ms Thulisile Nyalunga - Chief Directorate: Integrated Environmental Authorisations. Department of Forestry, Fisheries and the Environment</p> <p><b>MAKOPPA SOLAR PV</b></p>	<b><u>(a) Listed Activities and Application Form</u></b>	
	(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: <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a> .	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.
	<b><u>(b) Screen Tool Report</u></b>	
	(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.
	<b><u>(c) Locality, Site Layout and Sensitivity Maps</u></b>	

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	The report must provide the following:	
	(i) A clear description of all associated infrastructure. This description must include, but is not limited to the following: <ul style="list-style-type: none"> <li>- Powerlines and substation;</li> <li>- Internal roads infrastructure; and;</li> <li>- All supporting onsite infrastructure such as laydown area and auxiliary buildings, dangerous goods facility etc.</li> </ul>	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.
	(ii) All necessary details regarding all possible locations and sizes of the proposed solar PV infrastructure.	
	(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: <ul style="list-style-type: none"> <li>- Permanent laydown area footprint;</li> <li>- 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);</li> <li>- Wetlands, drainage lines, rivers, streams and water crossings of roads and cables indicating the type of bridging structures that will be used;</li> <li>- 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;</li> <li>- Substation(s) and/or transformer(s) sites, including their entire footprint;</li> <li>- Location of access and service roads;</li> <li>- Connection routes (including pylon positions) to the distribution/transmission network;</li> <li>- All existing infrastructure on the site, especially railway lines and roads;</li> </ul>	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.

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	<ul style="list-style-type: none"> <li>- Buffer areas;</li> <li>- Buildings, including accommodation;</li> <li>- All “no-go” areas; and</li> <li>- A north arrow and legend/key, to enable the Department to interpret the layout map.</li> </ul>	
	(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.
	<b><u>(d) Draft SR Comments</u></b>	
	(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.

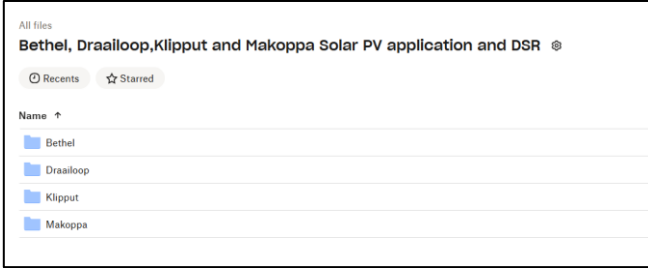
Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<b><u>(e) Specialist Declaration Forms</u></b>	
	(i) Please ensure that details of the specialists that prepared the specialist reports, including their curriculum vitae and specialist declarations of independence, are included in the Report. You are referred to Appendix 6 (1) (1) (a)-(b) of the EIA Regulations, 2014, as amended).	<p>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"> <li>- Tarryn Martin (Plant Species) - Pri. Sci. Nat 008745.</li> <li>- Nicole Dealtry (Terrestrial Biodiversity and Animal Species) - Pri. Sci. Nat. 130289.</li> <li>- Dr Lindi Steyn (Avifauna) – Pri.Sci.Nat. 119992.</li> <li>- Prasheen Singh (Aquatic Biodiversity) – Pri. Sci. Nat 116822.</li> <li>- Mariné Pienaar (Agricultural) – Pri. Sci. Nat. 00274/10.</li> </ul> <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>
	<b><u>(f) Public Participation Process</u></b>	
	(i) The public participation process must include the following:	
	<ul style="list-style-type: none"> <li>- 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;</li> </ul>	Please refer to Appendix F3 of the Final Scoping Report.
	<ul style="list-style-type: none"> <li>- Proof of the newspaper advertisement;</li> </ul>	Please refer to Appendix F3 of the Final Scoping Report.
	<ul style="list-style-type: none"> <li>- Proof of a notice, notice board or advertisement</li> </ul>	Please refer to Appendix F3 of the Final Scoping Report.
	<ul style="list-style-type: none"> <li>- Proof of the written notification to the interested and affected parties.</li> </ul>	Please refer to Appendix F4 of the Final Scoping Report.
	(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	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

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.
	<b><u>(g) Specialist Assessments to be conducted in the EIA phase</u></b>	
	(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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	have come into effect. Please note that specialist assessments must be conducted per these protocols.	<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>
<b><u>(h) Cumulative Assessment to be conducted in the EIA phase</u></b>		
	<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"> <li>- Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.</li> <li>- Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</li> <li>- The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</li> <li>- A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul>	<p>The Plan of study for 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>
<b><u>General</u></b>		
	You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:	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



Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p>"If S&amp;EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority"</p>	<p>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>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
<p><b>26/05/2025</b> 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><b>20/05/2025</b> 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&amp;AP via an alternative download link. <a href="https://we.tl/t-GXbThSZYh5">https://we.tl/t-GXbThSZYh5</a></p>  <p>Confirmed receipt of documentation.</p>
		<p>This is noted.</p>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
<b>20/05/2025</b> Via Email Siboniso Khumalo	Online Registration via Cape EAPrac website received.	Registration confirmed. This party has been added to the I&AP register – Please refer to Appendix F1 of the Final Scoping Report.
	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.	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.
<b>07/05/2025</b> Via Email John Geeringh - Senior Consultant Environmental Management, National Transmission Company South Africa	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.	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
<b>07/05/2025</b> Via Online Website Registration M Lephoswe	Online Registration via Cape EAPrac website received.	Registration confirmed. This party has been added to the I&AP register – Please refer to Appendix F1 of the Final Scoping Report.
<b>02/05/2025 – 06/05/2025</b> Via Email Motshewa Matimolane - Chatleka Community Property Association	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.	Bethel Report Provided via email on 02 May 2025.
	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.	Registration confirmed. This party has been added to the I&AP register – Please refer to Appendix F1 of the Final Scoping Report.
	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.	

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<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><b>1.Failure to Acknowledge Ongoing Land Claims</b></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><b>2. Inadequate Treatment of Ancestral and Indigenous Rights</b></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><b>3. Lack of Meaningful Empowerment and Ownership for Affected Communities</b></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:</p> <p>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&amp;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&amp;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>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
		We look forward to further engagement with the Chatleka CPA as part of this environmental process.
<p><b>06/05/2025</b> 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>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><b>The Silenced Heritage of Our Land</b></p> <p>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>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><b>The Gravity of This Omission</b></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"> <li>• Farm 431</li> <li>• Remainder of Farm 466</li> <li>• Portion 1 of Farm 425</li> <li>• Remainder of Farm 430</li> <li>• Portion 1 of Farm 466</li> </ul> <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><b>Development Cannot Be Built on Erasure</b></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>

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<p><b>Specific Objections to the Draft Scoping Report</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>	<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><b>Our Position and Way Forward</b></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"> <li>1. Immediate suspension of the environmental authorization process until all affected CPAs have been properly identified and meaningfully consulted.</li> <li>2. Revision of the Draft Scoping Report to include comprehensive information about existing land claims on all affected properties.</li> <li>3. Development of a framework for meaningful participation of CPAs in decision-making regarding the proposed developments.</li> </ol>	<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>



Date of Comment, format of comment, name of organization/I&AP	Comment	Response
	<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><b>06/05/2025</b> Via Online Website Registration Solomon Mongalo</p>	Registration only.	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><b>05/05/2025</b> Via Online Website Registration Sinkie Nkosi</p>	Registration only.	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><b>05/05/2025</b> Via Online Website Registration Siboniso Khumalo</p>	Interested Party and would like to know more about these developments.	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><b>05/05/2025</b> Via Online Website Registration Matome Richard Malefo</p>	Against the project on our Chatleka CPA farms. Hands off.	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.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
<b>05/05/2025</b> Via Online Website Registration Makgetsi Matimolane	Affected beneficiary from Chatleka CPA, restitution land claimant	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.
<b>25/04/2025</b> Via Email Canny Mosebjadi Mothapo: South African Civil Aviation Authority:	Thank you for the EIA notification, may you kindly resend the attachments to <a href="mailto:environment@caa.co.za">environment@caa.co.za</a> 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 <a href="mailto:environment@caa.co.za">environment@caa.co.za</a> , going forward please.	<a href="mailto:environment@caa.co.za">environment@caa.co.za</a> has been registered as an I&AP for this environmental process. All other CAA email addresses have been deregistered.
<b>COMMENTS RECEIVED PRIOR TO SUBMISSION OF THE DRAFT SCOPING REPORT</b>		
<b>06/04/2025</b> Via Online Website Registration Justine Wtngaardt – JUWI Renewable Energies	Kindly Register myself as an I&AP OBO JUWI Renewable Energies.	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.
<b>07/03/2025</b> Via Online Website Registration Stephan Jacobs – WKN Windcurrent	Registration only.	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.
<b>18/02/2025</b> Via Email Johann Killian – ABO Energy South Africa (Pty) Ltd	Please register me as an I&AP for the Proposed Tabor Solar PV Facilities and Integrated Grid Connection Infrastructure project.	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.

Date of Comment, format of comment, name of organization/I&AP	Comment	Response
<b>07/02/2025</b> Via Email Atlantic Energy Partners	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?	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.
<b>07/03/2025</b> Via Online Website Registration Zakiya Abrahams - WKN Windcurrent	Registration only.	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.
<b>05/02/2025</b> Via Online Website Registration Lusani Madali	Request for registration as I&AP.	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.
<b>04/02/2025</b> Via Email Bluecrane Environmental	Request for registration as I&AP.	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.
<b>31/01/2025</b> Via Online Website Registration David Nunez	Registration only.	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.