

PROPOSED VISSERSPAN SOLAR PV FACILITY – PROJECT 3

APPLICANT: Ventura Renewable Energy (Pty) Ltd

DBAR COMMENT AND RESPONSE REPORT

Copies of actual correspondence in Appendix F1 (Supporting documents) of FBAR

(Public participation comment period started 09 March 2020 and ended 19 July 2020)

(DEFF Ref. No: 14/12/16/3/3/1/2155)

No.	Comment Date, Comment Format, Organisation/I&AP	Verbatim comments as quoted from I&AP correspondence	Response from EAP/Applicant/Specialist/Project Manager
1	Date: 10/03/2020 Format: Email I&AP: Mr. Sello Meko, Free State Department of Health, Bloemfontein	“Morning Mam, I will definitely be happy to send me the CD copies of DBARs at De Waal Road, Ehrlich Park, Bloemfontein please. Thank you Regards”	EAP: Email sent on 10/03/2020 requesting specific address, as well as clarification of I&AP’s section within the Department of Health.
2	Date: 10/03/2020 Format: Email I&AP: Ms. Annette Geertsema, Department of Agriculture, Forestry and Fisheries (DAFF)	“Good day Can you please confirm in which Province the proposed development is situated. Regards Annette”	EAP: Email response sent on 10/03/2020 stating that the proposed developments are in the Free State Province in REDZ 5 (near Dealesville).
3	Date: 12/03/2020 Format: Email letter I&AP: Mr. Sabelo Malaza, Chief Director: Integrated Environmental Authorisations, Department of Environmental Affairs. Letter signed by: Mr. Rhulani Kubayi, Control Environmental Officer: EIA Systems and Tools	“The Department confirms having received the Application for environmental Authorisation and a Draft Report for the abovementioned project on 11 March 2020. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested and Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided with an opportunity to comment on such reports once an application has been submitted to the Competent Authority. You are required to submit an updated Application form with a screening tool report as has been a requirement since 04 October	EAP: Paragraph 1 - cognisance taken of contents of paragraph. Paragraph 2 - Email response sent to Ms. Mahlangu as per enquiries contact listed on Departmental letter, on 09/06/2020 stating that the Screening Tool Report was submitted to the Department (at the same time as the Application Form) as an appendix (Appendix H, attached) to the draft basic assessment report (DBAR) hardcopy and electronic copy and it was indicated on the application form that the DBAR accompanied the application form. Email resent on 08/07/2020 to Ms. Ncube as project case officer listed on Departmental letter dated 26/03/2020.

		<p>2019. Your application will be considered invalid without a screening tool report.</p> <p>All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Office Hours which is visible on the Departmental gate. EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted.</p> <p>Not 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 time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.</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>Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p> <p>Yours sincerely Mr. Sabelo Malaza”</p>	<p>Paragraph 3 - cognisance taken of contents of paragraph.</p> <p>Paragraph 4 - Various emails sent to the Department to confirm: i. time-frame for public participation (emails sent 09/06/2020 & 08/07/2020) ii. deadline for submission of final BAR (emails sent 15/08/2020 & 17/08/2020)</p> <p>Paragraph 5 - cognisance taken of contents of paragraph.</p> <p>Paragraph 6 - cognisance taken of contents of paragraph.</p>
4	<p>Date: 26/03/2020 (email) Format: Email letter I&AP: Mr. Sabelo Malaza, Chief Director: Integrated Environmental Authorisations, Department of Environmental Affairs. Issued by Ms. Masina Litsoane, Assistant Director, National Infrastructure Projects (Letter not dated)</p>	<p>“The Application for Environmental Authorisation and Draft Basic Assessment Report (BAR) dated March 2020 and received by the Department on 11 March 2020, refer.</p> <p>This letter serves to inform you that the following information must be included to the Final BAR:</p> <p>(a) Listed Activities</p> <ul style="list-style-type: none"> • Please ensure that all relevant listed activities applied for are specific and can be linked to the development activity as described in the project description. Only activities applicable to the development must be applied for and assessed. • If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. • Ensure that all listed activities are included in the final BAR. <p>(b) Undertaking of an Oath</p> <ul style="list-style-type: none"> • The Department has noted that the submitted application form has an undertaking under oath or affirmation by the EAP. However, the aforementioned oath was not included in the draft BAR. Please note that the final BAR must also have an undertaking under oath/affirmation by the EAP. 	<p>EAP:</p> <p>(a) Cognisance taken of Department’s comments – amended application with all listed activities to be submitted with final BAR.</p> <p>(b) Undertaking under oath/affirmation by the EAP included as Appendix M of final BAR.</p> <p>(c) Cognisance taken of Department’s comment - Assessment of alternative technologies (and design) included in tabular form in final BAR indicating best technology alternative. No site or layout alternatives exist – motivation given in final BAR.</p> <p>(d) Proof of public participation in Appendix F of final BAR: Appendix F – Comments and Response Reports Appendix F1 – supporting documents including proof DBAR was subject to public participation in line with the EIA Regulations Appendix F2 – Public Participation Proof including proof DBAR was subject to public participation in line with the EIA Regulations Appendix F3 – I&AP Lists</p>

	<p>•Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(s) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include:</p> <p><i>“an undertaking under oath or affirmation by the EAP in relation to:</i> <i>(i) the correctness of the information provided in the reports;</i> <i>(ii) the inclusion of comments and inputs from stakeholders and I&APs;</i> <i>(iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and</i> <i>(iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties”.</i></p> <p>(c) Alternatives</p> <p>• Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content:</p> <p>(i) details of all the alternatives considered;</p> <p>(ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</p> <p>(iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;</p> <p>(iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> <p>(v) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts—</p> <p>(a) can be reversed;</p> <p>(b) may cause irreplaceable loss of resources; and</p> <p>(c) can be avoided, managed or mitigated;</p> <p>(vi) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;</p> <p>(vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that</p>	<p>. Cognisance taken of Department’s comments under General.</p>
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	<p>may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> <p>(viii) the possible mitigation measures that could be applied and level of residual risk;</p> <p>(ix) the outcome of the site selection matrix;</p> <p>(x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and</p> <p>(xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity.</p> <ul style="list-style-type: none"> • Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1. <p>(d) Public Participation Process</p> <p>The following information must be submitted with the Final BAR:</p> <ul style="list-style-type: none"> • A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended; • Copies/proof of all comments received from stakeholders during Draft BAR comment period must be included in the final BAR. Should you be unable to obtain comments, proof should 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 ; • A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the Draft BAR must be submitted with the final BAR and the format must be in the table format as indicated in Appendix 1 of this comments letter. Please note that comments received from this Department must also form part of the comment and response report. 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; • The final report must also indicate that this draft report has been subjected to a public participation process. <p>General</p> <p>Please also ensure that the Final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per the Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.</p> <p>You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that:</p>	
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5	<p>Date: 06/04/2020 Format: Email I&AP: Mr. Gerhard van Rhyn (Landowner/ farmer and temporary co-ordinator of about 35 farmers in region)</p>	<p>“Dear Vivienne The current lock down situation prohibits any meaningful liaison between affected farmers. May we request a postponement of the cut-off date? Regards Gerhard van Rhyn”</p>	<p>EAP: Email response sent on 06/04/2020 extending the public participation period for an additional 22 days after the initial 16 April end of lockdown date, to the 08 May 2020. Subsequent emails from EAP extended comments period to 30 June 2020, with a final extension to 19 July 2020.</p>
6	<p>Date: 17/04/2020 Format: Email letter I&AP: Ms. Ragna Redelstorff, Heritage Officer, South African Heritage Resources Agency (SAHRA)</p>	<p>“Final Comment In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)</p> <p>Four, solar PV projects are proposed on the Farm Visserspan No. 40 near Dealesville (Figure 4). Each stand-alone facility will have a maximum generating capacity of 100MW and include the following infrastructure: Solar panels covering an area of about 200ha. The solar arrays will be raised approximately 500mm above ground level and will have single axis tracking systems. Transmission and distribution lines for connection to the Eskom Perseus substation; Invertor-transformer stations on concrete beds. Offices, workshops, stores, maintenance sheds, ablution facilities, and Security/fencing.</p> <p>The proposed project entails the construction of a total of four Solar PV projects including associated infrastructure (transmission and distribution lines for connection to the Eskom Perseus substation; invertor-transformer stations on concrete beds; offices, workshops, stores, maintenance sheds, ablution facilities and security/fencing) over an area of approximately 800ha on the Farm Visserspan 40 near Dealesville, Tokologo Local Municipality, Free State Province. An Archaeological Impact Assessment (AIA) and a Palaeontological Impact Assessment (PIA) were submitted with the application. It must be noted that SAHRA will provide a separate comment for each of the four projects as each of them constitutes a separate NEMA application.</p> <p>This comment is issued specifically for Visserspan Solar PV Facility - Project 3. <i>KAPLAN, J. 2020. ARCHAEOLOGICAL IMPACT ASSESSMENT - ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED VISSERSPAN SOLAR PV FACILITY ON THE FARM VISSERSPAN NO. 40 NEAR DEALESVILLE, TOKOLOGO LOCAL MUNICIPALITY, FREE STATE PROVINCE.</i> A field survey revealed the following results for Solar PV Project 3:</p>	<p>EAP: Cognisance taken of introductory summary of project.</p> <p>Archaeological Specialist’s recommendations: 1. Cognisance taken of recommendation. 2. Area of historical/heritage significance excluded from development site footprint and designated as a heritage no go area. 3. Archaeological Specialist’s recommendations included in final BAR and EMPr with contact numbers should any human burials be found during construction. 4. Archaeological Specialist’s recommendations included in EMPr.</p> <p>Palaeontological Specialist’s recommendations: Palaeontological Specialist’s recommendations included in final BAR and EMPr with contact numbers should any human burials be found during construction. Cognisance taken of Specialist’s recommendation.</p> <p>Final Comments: Cognisance taken of scope of SAHRA’s comment and that SAHRA has no objection to the proposed development subject to the respective specialists’ recommendations. 1. Requirement to stop work immediate should any objects of archaeological or palaeontological remains be found during construction included in the final BAR and EMPr. 2. Process that the ECO must follow to inform the SAHRA and contact an archaeologist and/or palaeontologist included in final BAR and EMPr. 3. Cognisance taken of regulator’s comment. 4. A Chance Finds Procedure included as Appendix 19 of the EMPr.</p>

		<p>A field survey revealed the following results for Solar PV Project 3: A broken grindstone fragment near the north western boundary fence; A small scatter of MSA tools (flakes, chunks & a core) in weathered hornfels on an eroded land surface</p> <p><i>Author's Recommendations:</i></p> <ol style="list-style-type: none"> 1. No mitigation of archaeological resources is required is required prior to construction activities commencing. 2. Historic (c. 1899), calcrete and clay, sheep and cattle enclosures within the farm werf must not be disturbed, damaged or altered in any way by development activities. The structures are protected under Section 34 of the National Heritage Resources Act (No. 29 of 1999) and cannot be disturbed in any way without a permit issued by SAHRA. 3. If any human burials are uncovered during construction activities then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and will require inspection by a professional archaeologist. 4. The above recommendations must be included in the Environmental Management Plan (EMP) for the proposed development. <p><i>ALMOND, J. 2020. PALAEOANTHROPOLOGICAL SPECIALIST STUDY: COMBINED DESKTOP & FIELD-BASED ASSESSMENT - FOUR PROPOSED SOLAR PV PROJECTS ON FARM VISSERSPAN NO. 40 NEAR DEALESVILLE, TOKOLOGO LOCAL MUNICIPALITY, FREE STATE PROVINCE.</i></p> <p>It is noted that the proposed associated grid connection to Eskom's Perseus substation has not been assessed in the PIA.</p> <p>The proposed area is underlain by sediments of the Tierberg Formation (Ecca Group, Karoo Supergroup) that are extensively disrupted and veined by Quaternary calcrete as well as baked by dolerite intrusions of the Karoo Dolerite Suite, and as such are of low sensitivity. They are mantled by Quaternary to Holocene orange sands, in part of aeolian origin. The calcrete hardpans encountered within the study area are of low palaeontological sensitivity.</p> <p>A few small blocks of petrified fossil wood – reworked from Tierberg bedrocks – were found among surface gravels around the margins of a pan in the SE corner of Visserspan No. 40, which fall outside the solar PV project area.</p> <p><i>Author's Recommendations:</i></p> <p><i>Should fossil remains such as bones, teeth, shells or petrified wood be discovered before or during the construction phase, these should be safeguarded (preferably in situ) and the ECO should alert the South African Heritage Resources Agency, SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. POBox 4637, Cape Town 8000,</i></p>	
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South Africa. Phone: +27 (0)21 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). This is so that appropriate mitigation (e.g. recording, sampling or collection) can be taken by a professional palaeontologist (See tabulated Chance Fossil Finds Procedure appended to this report).

The specialist involved would require a collection permit from SAHRA. Fossil material must be curated in an approved repository (e.g. museum or university collection) and all fieldwork and reports should meet the minimum standards for palaeontological impact studies developed by SAHRA (2013).

Final comment

It must be noted that this comment is issued specifically for Visserspan Solar PV Facility - Project 2, that covers an area of around 218ha. The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has reviewed the AIA and PIA. As no heritage resources will be impacted by Visserspan Solar PV Facility – Project 2, and the sensitivity of palaeontological resources is considered low, SAHRA APM has no objections against the proposed development subject to the specialists' recommendations and the conditions as outlined below that must be adhered to and must be incorporated into the Environmental Management Programme (EMPr) for implementation:

1. Should any objects of archaeological or palaeontological remains be found during construction activities, work must immediately stop in that area and the Environmental Control Officer (ECO) must be informed.
2. The ECO must inform the South African Heritage Recourse Agency (SAHRA) and contact an archaeologist and/or palaeontologist, depending on the nature of the find, to assess the importance and rescue them if necessary (with the relevant SAHRA permit). No work may be resumed in this area without the permission from the ECO and SAHRA.
3. If the newly discovered heritage resource is considered significant a Phase 2 assessment may be required. A permit from the responsible heritage authority will be needed.
4. A Chance Finds Procedures must be developed for the project to ensure that standard protocols and steps are followed should any heritage and/or fossil resources be uncovered during all phases of the project. These procedures should outline the steps and reporting structure to be followed in the instance that heritage resources are found. This must be included in the Environmental Awareness Plan.
5. The final BAR and appendices must be submitted to SAHRA upon submission to DEA. Should the project be granted Environmental Authorisation, SAHRA must be notified and all relevant documents

		submitted to the case file. Should you have any further queries, please contact the designated official using the case number quoted above in the case header.”	
7	<p>Date: 05/05/2020 Format: Email I&AP: Mr. Deon Edwards (Telephonic call followed by email)</p>	<p>“Good day Vivienne Ref: Visserspan Solar Plant (Dealesville) From: Deon Edwards</p> <p>Further to our discussions of todays date, Having been employed on a similar project, Boshof 65mw Solar plant as a Safety officer, I hereby wish to register as an I&AP pertaining to the above project.</p> <p>Your assistance regarding this matter will be greatly appreciated.</p> <p>Kind Regards Deon Edwards”</p>	<p>EAP:</p> <p>Email response sent on 06/05/2020 thanking I&AP for telephonic conversation and email and confirming registration as I&AP for the projects: Visserspan Solar PV Plants 1, 2, 3 and 4.</p>
8	<p>Date: 06/05/2020 Format: Email I&AP: Mr. Deon Edwards</p>	<p>“Many thanks pertaing to the matter Deon”</p>	<p>EAP:</p> <p>Cognisance taken of I&AP’s thanks.</p>
9	<p>Date: 08/06/2020 Format: Email I&AP: Mr. John Geeringh, Senior Consultant Environmental Management, Land and Rights, Eskom Transmission Division, Megawatt Park</p>	<p>“Please find Eskom General comments and setbacks guideline for consideration by the applicant. Please send me KMZ files of the affected properties and proposed layouts as well as the proposed grid connections.</p> <p>Kind regards</p> <p>John Geeringh (Pr Sci Nat)”</p>	<p>EAP:</p> <p>Cognisance taken of I&APs email response to notification of public participation comment period extension to 30 June 2020. A second extension to the comment period deadline was made to 19 July 2020. Email sent to I&AP on 26 August 2020 for Visserspan Solar PV Plants 1, 2, 3 and 4, stating that: “the requested kmz files were attached to email. The four Visserspan projects are all ground based, crystalline, solar PV facilities. The proposed/draft layout drawing for Projects 1 to 4 will be sent in a subsequent email due to possible email file size limitations.</p> <p>Email further stated that there are <u>no</u> overhead power lines linked to any of these four applications since all electrical cables/evacuation power lines will run underground to a proposed common <u>future</u> sub-station from where evacuated power will tie-in to the Eskom grid. Underground electricity lines from the four Visserspan solar PV facilities only lead up to the proposed future sub-station. The development of the substation and connection to the Eskom grid <u>does not</u> form part of this application. Only if the proponent is successful in the next independent power producer (IPP) bidding process, will the design and various authorisation processes for construction of the</p>

			<p>proposed IPP sub-station and above ground pylons (for grid connection) take place.</p> <p>Lastly, email stated that the proponent has communicated to EnviroAfrica that they have made application for cost estimate letters from Eskom for the near-by Perseus sub-station and initial indicators are that there is enough capacity at Perseus for tie-in.</p> <p>A second email sent to I&AP on 26/08/2020, with a combined draft layout drawing for the four proposed ground based, crystalline solar PV facilities proposed on Visserspan Farm No. 40, near Dealesville, Free State Province.</p> <p>Individual draft layout drawings (per project) are available if required. Please zoom in for drawing details.”</p>
10	<p>Date: 01/07/2020 Format: Email I&AP: Mr. John Geeringh, Senior Consultant Environmental Management, Land and Rights, Eskom Transmission Division, Megawatt Park</p>	<p>“Please find Eskom General comments and setbacks guideline for consideration by the applicant. Please send me KMZ files of the affected properties and proposed layouts as well as the proposed grid connections.</p> <p>Kind regards</p> <p>John Geeringh (Pr Sci Nat)”</p>	<p>EAP:</p> <p>Cognisance taken of I&APs email response to notification of public participation comment period extension to 30 June 2020. A second extension to the comment period deadline was made to 19 July 2020. Email sent to I&AP on 26 August 2020 for Visserspan Solar PV Plants 1, 2, 3 and 4, stating that: “the requested kmz files were attached to email. The four Visserspan projects are all ground based, crystalline, solar PV facilities. The proposed/draft layout drawing for Projects 1 to 4 will be sent in a subsequent email due to possible email file size limitations.</p> <p>Email further stated that there are <u>no</u> overhead power lines linked to any of these four applications since all electrical cables/evacuation power lines will run underground to a proposed common <u>future</u> sub-station from where evacuated power will tie-in to the Eskom grid. Underground electricity lines from the four Visserspan solar PV facilities only lead up to the proposed future sub-station. The development of the substation and connection to the Eskom grid <u>does not</u> form part of this application. Only if the proponent is successful in the next independent power producer (IPP) bidding process, will the design and various authorisation processes for construction of the proposed IPP sub-station and above ground pylons (for grid connection) take place.</p> <p>Lastly, email stated that the proponent has communicated to EnviroAfrica that they have made application for cost estimate letters</p>

			<p>from Eskom for the near-by Perseus sub-station and initial indicators are that there is enough capacity at Perseus for tie-in.</p> <p>A second email sent to I&AP on 26/08/2020, with a combined draft layout drawing for the four proposed ground based, crystalline solar PV facilities proposed on Visserspan Farm No. 40, near Dealesville, Free State Province.</p> <p>Individual draft layout drawings (per project) are available if required. Please zoom in for drawing details.”</p>
11	<p>Date: 17/07/2020 Format: Email I&AP: Mr. Gerhard van Rhyn (Landowner/ farmer and temporary co-ordinator of about 35 farmers in region)</p>	<p>“Hallo Vivienne Van ons benadeeldes het weer gepraat oor al die sonplaasontwikkelings in ons streek,asook oor die feit dat ons nie baie suksesvol is wanneer ons aan die prosesse deelneem nie. Ons gevoel is dat daar nie werklik indringend aan ons objeksies en versoeke aandag gegee word nie. Reaksies wat ons ontvang oor ons bekommernisse word telkemale weerspreek deur algemene vae antwoorde,sonder die nodige diepgaande ontleding daarvan. Ongelukkig word ontwikkelings goedgekeur wat op die langtermyn nie die gewenste uitkomste in ons streek gaan meebring nie. Ons gevoel is dat ons bloot deel vorm van die wetlike proses en vereiste om die proses legitiem en suksesvol af te handel. Die hele proses word uitsluitlik tot voordeel van die ontwikkelaar hanteer. Objektiwiteit en rasionaliteit t.o.v. van ons klagtes en besware bestaan tans glad nie. Ons voel dat ons nie meer blindelings aan hierdie uitmergelende prosse kan deelneem nie. Ons gevoel is om hierdie situasie met verantwoordelike departemente en rolspelers verder te bespreek voordat ons weer aan prosesse deelneem. Die feit dat ons tans onderworpe is aan "lock down " maak dit vir ons verder moeilik om suksesvol aan prosesse te kan deelneem. Ons werkswyse en strategie sal moet aangepas word,aangesien ons tans ons tyd mors om aan die prosesse deel te neem. Hiermee versoek ons `n verdere uitstel asook grasie om hierdie situasie met die nodige rolspelers te bespreek totdat die situasie rondom Covid 19 verbeter.. Groete Gerhard van Rhyn”</p>	<p>EAP:</p> <p>Email response sent on 03/08/2020 thanking I&AP for telephonic conversation and email and confirming registration as I&AP for the projects: Visserspan Solar PV Plants 1, 2, 3 and 4.</p>
PUBLIC PARTICIPATION COMMENT PERIOD CLOSED (approximately 58 days excluding COVID-19 lockdown period of 27 March 2020 to 05 June 2020)			
12	<p>Date: 31/07/2020 Format: Email</p>	<p>“Hallo Vivienne Ek wag vir `n reaksie op my skrywe asb. Groete</p>	<p>EAP:</p>

	I&AP: Mr. Gerhard van Rhyn (Landowner/ farmer and temporary co-ordinator of about 35 farmers in region)	Gerhard van Rhyn”	Email response sent on 03/08/2020 thanking I&AP for telephonic conversation and email and confirming registration as I&AP for the projects: Visserspan Solar PV Plants 1, 2, 3 and 4.
13	Date: 17/08/2020 Format: Email letter (email received 21/08/2020; letter attached to email dated 17/08/2020) I&AP: Ms. Portia Makitla, Letter signed by Mr. Seoka Lekota (Control Biodiversity Officer Grade B: Biodiversity Conservation, DEFF)	“COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED VISSERSPAN 1 AND 2 SOLAR PV FACILITIES FREE STATE PROVINCE The Directorate: Biodiversity Conservation review and evaluated the aforementioned draft report. Based on the information provided in the DBAR, the study area is located with the Renewable energy Development Zone 5 (REDZ 5), the Critical Biodiversity Area (CBA) and Ecological Support Area (ESA). According to the DBAR the Botanical Impact Assessment is attached to the report as Appendix G1 for Visserspan Project 2 & 2 but during the review Appendix G1 could not be found. Based on the above; the Directorate Biodiversity & Conservation is unable to comment on the proposed development you are therefore requested to attached the specialist studies and resubmit the DBAR for comment.”	EAP: Email response sent to Ms. Makitla on 21/08/2020 and copies to Seoka Lekota and Stanley Tshitwamulomoni of the DAFF: “Thank you for the Directorate Biodiversity Conservation’s (Directorate’s) comments received today for the four Visserspan projects. I am a bit concerned regarding the comment made that the Appendix G1 for both Visserspan Solar PV Facility - Project 2 (Ref. No. 14/12/16/3/3/1/2153) and Visserspan Solar PV Facility - Project 2 (Ref. No. 14/12/16/3/3/1/2154) were not available since they have been on EnviroAfrica’s website as part of the public participation process and as indicated in email correspondence sent to the Directorate in June, when the public participation process deadline was extended for a third time to the 19 July 2020 (as per the email below). I have tried to call the Directorate a few times this morning to gain clarity on this issue since the Directorate’s comment has been received at a rather late stage. In the comments received from the Directorate today (Friday, 21 August 2020 09:11), I was instructed to resubmit the required appendices and DBARs to the Directorate for comment. The Visserspan projects are all on a very tight deadline and the final BAR is due to be submitted to the Department for decision on 28 August 2020. Both the DBARs and appendices are on EnviroAfrica’s website but I can also try to compress the files and email them to you if that will make it easier? <u>Please</u> let me know if I may email you the required files today.”
14	Date: 21/08/2020 Format: Email I&AP: Ms. Portia Makitla, Biodiversity Conservation, DEFF	“Sorry for commenting late on this project. You can email me the Botanical Study we will ensure that we provide you with the comments before the 28 th .”	EAP: Email response sent to Ms. Makitla on 24/08/2020: “Thank you for your response. Please find Project 2’s report attached. Please confirm receipt. Project 2’s report to follow ...”
15	Date: 24/08/2020 Format: Email I&AP: Ms. Portia Makitla, Biodiversity Conservation, DEFF	“Report received.”	EAP: Email response sent to Ms. Makitla on 24/08/2020: “Thank you for your response. Please find Project 2’s report attached. Please confirm receipt. Project 2’s report to follow ...”

			Email query sent to Ms. Makitla on 24/08/2020: "Did you receive Project 2's report as well?"
16	<p>Date: 24/08/2020 Format: Email letter (email received 25/08/2020; letter attached to email dated 24/08/2020) I&AP: Ms. Portia Makitla. Letter signed by Mr. Seoka Lekota (Control Biodiversity Officer Grade B: Biodiversity Conservation, DEFF)</p>	<p>"Attached please find the aforementioned DBAR comments. COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED VISSERSPAN 1 AND 2 SOLAR PV FACILITIES FREE STATE PROVINCE The Directorate: Biodiversity Conservation review and evaluated the aforementioned draft report. Based on the information provided in the DBAR, the study area is located within the Critical Biodiversity Area (CBA) and Ecological Support Area (ESA); Therefore, the proposed development would result in the loss of Vaal-Vet Sandy grassland which is listed as a threatened ecosystem (Endangered A1) in the National List of Threatened Ecosystems. Conclusion of the botanist is that <i>"even though the areas of Visserspan Solar PV Project 2 is acceptable for building renewable energy infrastructure, the impact of clearing of the vegetation would still be Negatively high. No meaningful mitigation measures would be possible."</i> According to the mitigation hierarchy this warrant avoidance. Please explain how the mitigation hierarchy were applied in determining the suitability of the project site in relation to the management and conservation of biodiversity. Based on the information provided the directorate Biodiversity Conservation view the proposed solar PV facility as a fatal flaw there would be high local loss of this vegetation type (habitat) and loss of ecological functionality. Mitigation options are minimal to zero and the impact at a local scale is thus Negatively high which cannot be avoided.</p>	<p>EAP: Emailed EAP and specialist letters included in final BAR (Appendice G6c and G6a respectively) and also sent in response to Ms. Makitla on 11/09/2020 (Due to size, refer to Appendix G6c of the final BAR for letter with photographs).</p>
17	<p>Date: 26/08/2020 Format: Email I&AP: Mr. Davis Sibongile</p>	<p>"Subject: re: Inviro Practitioner Good Day Please see attached. Regards" Attachment: Original I&AP notification letter sent by EnviroAfrica on 06 March 2020 as part of the public participation process, as well as a NOSA bursary application form for Mr. Serame Petrus Galeboe with a handwritten note providing banking details and asking, "Please send me a letter for employment detail. Email 407 Bhubueng Street Tshwaraganang</p>	<p>EAP: Email query sent 26/08/2020 stating that, "As previously communicated to Ms. Galeboe, please note the information letter/email sent out was not for employment or work/tender opportunities - this process was merely for information sharing as part of the environmental impact assessment process for the above project. The public participation process ended on 19 July 2020."</p>

		Dealesville 9348"	
18	<p>Date: 27/08/2020 Format: Email I&AP: Mr. John Geeringh, Senior Consultant Environmental Management, Land and Rights, Eskom Transmission Division, Megawatt Park</p>	<p>"Thank you, Regards John"</p>	<p>EAP:</p> <p>Cognisance taken of I&P's thanks.</p>
19	<p>Date: 26/08/2020 Format: Email from EAP in response to telephonic enquiry I&AP: Ms. Thembu Nyoka (National DAFF)</p>	<p>Ms. Nyoka from national DAFF made a telephonic enquiry as to the footprint sizes of the proposed developments relative to the total farm\ size.</p> <p><i>(Written response given by EAP).</i></p>	<p>EAP:</p> <p>"Dear Thembu As per your telephonic request this morning, The total footprint of the Farm Visserspan No. 40 = 1275.4069ha (c.f. Appendix 3 of the application form which contains the landowner's consent information including the farm extent) Footprint of: Visserspan Project No. 1 = approximately 218ha Visserspan Project No. 2 = approximately 223ha Visserspan Project No. 3 = approximately 222ha Visserspan Project No. 4 = approximately 237.5ha (made up of Visserspan Project 4 east = 175ha and Visserspan Project 4 west = 62.6ha and excluding the heritage no-go area in Project 4 east, of approximately 0.07ha)</p> <p>Thus, the footprint of the land proposed to be left undeveloped by the proposed solar PV facilities = approximately 375ha.</p> <p>This is 'undeveloped' area is made up of the current farm and heritage structures (including internal farm access roads), as well as areas of the property which, for biodiversity reasons, were deliberately avoided and designated as 'no-go' areas when planning the layout of the solar PV facilities e.g. the wetland areas/pans on the farm - a buffer area of at least 100m (in most instances, more than 100m) was left surrounding the Visserspan wetland/pan features and certain patches and corridors of good condition grassland (particularly adjacent to Project 2 and Project 2 solar facility sites). These areas which were deliberately avoided, will also allow recovery of the biodiversity post the projected lifespan of the proposed solar PV developments."</p>

20	<p>Date: 08/09/2020 Format: Email I&AP: Mr. Jack Morton, Department of Agriculture and Rural Development, Free State (DARD)</p>	<p>“Thanks have received it. Just to keep you up to speed with the process that the applications will follow: 1.I will hand the applications over to one of my officials to investigate. 2.He will present his findings at our next meeting that is on 16 September 2020 3. After the meeting I will compile a recommendation letter to National Department in Pretoria for signature by our Chief Director. 4.After I receive the signed recommendation it will be sent to Pretoria for the final letter from the Delegate of the Minister. 5. Unfortunately the National Department is the only authorised entity to give an letter / approval / permit regarding applications and they will only consider an application after receipt of a recommendation from the provincial recommendation committee. Hope this give you an understanding into the process.”</p>	<p>EAP:</p> <p>Cognisance taken of I&P’s receipt of emailed information and explanation of the process followed by the provincial authority, DARD.</p>
21	<p>Date: 08/09/2020 Format: Email letter I&AP: Ms. Samantha Ralston-Paton, BirdLife South Africa</p>	<p>Thank you for approaching BirdLife South Africa for comment on the above proposed developments. BirdLife South Africa supports the responsible development of renewable energy. While we are not aware of any obvious “red flags” to development with regards to impacts on birds, the loss of Critical Biodiversity Areas and Endangered grassland habitat is a concern. However, it is impossible to provide an informed opinion of the proposed development without further information on the faunal communities potentially affected. We have consulted the Southern African Bird Atlas Project 2 and habitat suitability models which indicate the area contains potential habitat for threatened species including Ludwig’s Bustard, <i>Neotis ludwigii</i> (Endangered) and Secretarybird, <i>Sagittarius serpentarius</i> (Vulnerable). It is, however, not clear how important this habitat is for these and other threatened species. For example, are there any leks or nests in the project area of influence? Based on the information available, we suspect (but cannot confirm) that greatest impact of the proposed developments will be as a result of the associated infrastructure (i.e. collisions with powerlines). Species affected would include water using the nearby wetlands) and pans (e.g. Lesser and Greater Flamingos, <i>Phoenicopterus minor</i> and <i>roseus</i>, Near Threatened). In conclusion, we are of the opinion that there is insufficient information to make an informed decision and encourage you to appoint a bird specialist to thoroughly assess the impacts of the proposed development and propose an appropriate mitigation strategy.</p>	<p>EAP:</p> <p>Cognisance taken of I&P’s concern regarding loss of critical biodiversity area and endangered grassland habitat.</p> <p>Inclusion in final BAR and EMPr of BirdLife South Africa’s Position Statement regarding solar PV developments (summarises guideline document referred to in I&AP’s comment).</p> <p>I&AP’s suspects that the greatest impact from the development (which they cannot confirm), would be as a result of the associated infrastructure i.e. collisions with powerlines. However, this development specifically does not have any overhead powerlines. Therefore, the I&AP’s suspicion (for this particular project) is not relevant.</p> <p>I&AP’s encouragement to appoint a bird specialist to thoroughly assess the impacts of the proposed development and propose an appropriate mitigation strategy was already addressed to a large degree even before comment was received since the Position Statement was referenced and recommendations were made in both the final BAR and EMPr for an ecologist / biodiversity specialist (fauna, including avifauna, and flora) to survey the site <u>prior</u> to construction, so that appropriate plans such as search and rescue / relocation, mitigation and management, would be developed as required.</p>

		Please see the attached guidelines for solar energy and birds for your future reference.	Guideline is a book summarised in the Position Statement which is included in the final BAR as well as the EMPr.
22		END OF DBAR COMMENT AND RESPONSE REPORT	

PROPOSED VISSERSPAN SOLAR PV FACILITY – PROJECT 3

APPLICANT: Ventura Renewable Energy (Pty) Ltd

PRE-APPLICATION COMMENT AND RESPONSE TRAIL REPORT

(Public participation comment period started 13 November 2019 and ended 15 December 2019)

(DEFF Ref. No: To be provided)

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager
1	<p>Date: 14/11/2019 Format: Email I&AP: Mr. Sello Meko, Demand and Acquisition, Free State Department of Health, Bloemfontein</p>	<p>With reference to Visserspan Solar PV Facility - Project 1:</p> <ul style="list-style-type: none"> i. Request for authority to inform consumers regarding what type of source of electricity is being supplied to consumers (i.e. renewable vs. non-renewable) since I&AP claims that non-renewable should be cheaper. ii. Complaint that the cost of electricity is not affordable and the electricity tariff should go down as the country stabilises as renewable energy input increases. iii. Comment that the energy harvested from renewable sources should have a storage system and use of renewable energy for national supply should be disclosed to the public. iv. Suggestion that any product produced using renewable energy should be taxed at a lower rate. 	<p>EAP:</p> <ul style="list-style-type: none"> i. to vi. Cognisance taken of comments. v. Individual registered as an I&AP. Email notification of same and of availability of DBAR sent 06/03/2020.
2	<p>Date: 18/11/2019 Format: Email I&AP: Ms. Primrose Ndzululeka</p>	<p>With reference to Visserspan Solar PV Facility - Project 1, several statements made on what appears to be another company/organisation (no company name/details provided):</p> <ul style="list-style-type: none"> i. Entity 'keeps the lights on' when state entities fail to. ii. Lights are 'kept on' at affordable prices through the use of solar panels. iii. Potential customers will have power when the rest of the country has outages. 	<p>EAP:</p> <ul style="list-style-type: none"> i. to vi. Cognisance taken of comments. vii. Registration of organisation (represented by contact individual) as an I&AP included since a second email was received shortly after the current one with more contact details. Email notification of same and of availability of DBAR sent 06/03/2020.

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager
		<ul style="list-style-type: none"> iv. Entity differs from competitors since they also supply road lighting. v. Entity claims to have a team that specialises in installing solar panels and determining customers' needs. vi. The biggest milestone reached is getting a local supplier and contributing towards the country's economy and the next target milestone is to sell 10 000 solar panels by the end of 2020. 	
3	<p>Date: 18/11/2019 Format: Second email I&AP: Ms. Primrose Ndzululeka, Golden Four Trading</p>	<p>A second email received shortly after the above email but no specific project number specified:</p> <ul style="list-style-type: none"> i. Proposal to purchase solar panels from Golden Four Trading for solar powered irrigation and solar power street lights for the proposed developments. ii. Comment that Golden Four Trading sold solar powered irrigation panels to Glen College with effective results (lasting up to 10 years with minimum maintenance). iii. Statement that electricity tariffs are high at the proposed facility will be high primarily due to irrigation systems and other electrical equipment. In addition, electricity demand fluctuates with peak demands in the morning and evenings. iv. Statement that solar panels are part of the fourth industrial revolution and the proposed facility should purchase solar panels at the prices provided. 	<p>EAP:</p> <ul style="list-style-type: none"> i. to vi. Cognisance taken of comments. v. Registration of organisation (represented by contact individual) as an I&AP for all projects. Email notification of same and of availability of DBAR sent 06/03/2020.
4	<p>Date: 18/11/2019 Format: Email I&AP: Mr. Albertus Teseling representing Concordia Trust</p>	<ul style="list-style-type: none"> i. Request for registration as an I&AP (for Visserspan Solar PV Facility no project number specified) 	<p>EAP:</p> <ul style="list-style-type: none"> i. Registration of organisation (represented by contact individual) for all projects. Email notification of same and of availability of DBAR sent 02/03/2020. ii. Note: Email from I&AP was forwarded from Mr. Pieter Venter who sent with a group email the initial maildrop information sheets for Projects 1 to 4, to several entities – all addresses in forwarded email added to I&AP register and email notification of same and of availability of DBAR sent 06/03/2020.
5	<p>Date: 18/11/2019 Format: Email I&AP: Mr. Ralph Damonse, Pontus Consulting (Pty) Ltd, Panorama, Cape Town</p>	<ul style="list-style-type: none"> i. Request for registration as an I&AP for Visserspan Solar PV Facility - Project 2 	<p>EAP:</p> <ul style="list-style-type: none"> i. Registration of individual as an I&AP. Email notification of same and of availability of DBAR sent 06/03/2020.

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager
6	<p>Date: 18/11/2019 Format: Email I&AP: Ms. Meisie Nel, Farm Brakfontein 1/636 close to Eskom power line</p>	<ul style="list-style-type: none"> i. Request for registration as an I&AP for Visserspan Solar Project (no number specified). ii. Mention that I&AP's farm is Brakfontein 1/636 and is very close to Eskom power line which goes through the farm. iii. Statement that I&P is not opposed to providing her entire farm for the project. iv. Request to please consider iii above. 	<p>EAP:</p> <ul style="list-style-type: none"> i. Registration of individual as an I&AP. Email notification of same and of availability of DBAR sent 06/03/2020.
7	<p>Date: 19/11/2019 Format: Email sent I&AP: Mr. Stanley Robertson, Director of Lezmin 1383 CC and Trustee of Three Star Trust (Owner of Farm Beestepan)</p>	<ul style="list-style-type: none"> i. Record of telephonic <u>contact made by EAP</u> with I&AP and registration of I&AP in two capacities - Director of Lezmin 1383 CC and Trustee of Three Star Trust (Owner of Farm Beestepan immediate neighbour to the south west of Visserspan Solar PV Project 1). 	<p>EAP:</p> <ul style="list-style-type: none"> i. Registration of entity as an I&AP and request for I&AP to inform other I&APs of project. Email notification of same sent 19/11/2019. Email notification of availability of DBAR sent 06/03/2020.
8	<p>Date: 19/11/2019 Format: Email sent I&AP: Mr. Pierre Greyling, Farm Perseus</p>	<ul style="list-style-type: none"> i. Record of telephonic <u>contact made by EAP</u> with I&AP and registration of I&AP as representative of Farm Perseus (south of Farm Visserspan) 	<p>EAP:</p> <ul style="list-style-type: none"> i. Registration of entity as an I&AP and request for I&AP to inform other I&APs of project. Email notification of same sent 19/11/2019. Email notification of availability of DBAR sent 06/03/2020.
9	<p>Date: 25/11/2019 Format: Email facsimile I&AP: Mr. Thabang Peter Nakedi</p>	<ul style="list-style-type: none"> i. Receipt of faxed copy of <i>Curriculum Vitae</i> (CV) and identity document of I&AP. 	<p>EAP:</p> <ul style="list-style-type: none"> i. Registration of entity as an I&AP. Email response to I&AP that EnviroAfrica is responsible for the EIA process and not employment opportunities but that I&AP should follow the process to see when potential employment opportunities may arise, should the project be developed. Email of same and notification of availability of DBAR sent 06/03/2020.
10	<p>Date: 26/11/2019 Format: Email (fax) I&AP: Mr. Senelo Kaneng, Director, Kaneng Security and Trading (Pty) Ltd</p>	<ul style="list-style-type: none"> i. Note that the Visserspan Solar PV Project 2 includes a fence and maintenance office and that Kaneng Security has been operating in the Tokologo Local Municipal area since 2014. ii. Request for more information related to Visserspan Solar PV Project 2 in terms of opportunities for small business development and benefits for Kaneng Security. 	<p>EAP:</p> <ul style="list-style-type: none"> i. Registration of entity as an I&AP. Email response to I&AP that EnviroAfrica is responsible for the EIA process and not employment opportunities but that I&AP should follow the process to see when potential employment opportunities may arise, should the project be developed. Email of same and notification of availability of DBAR sent 06/03/2020.
11	<p>Date: 26/11/2019 Format: Email</p>	<ul style="list-style-type: none"> i. Note that I&AP's name is Sylvester and would like to know more about the EIA process for the Visserspan Solar PV Facility Project 	

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager
	I&AP: Mr. Thabo (Sylvester) Seliba	<p>since I&AP is interested in applying for a job and has experience in includes a fence and maintenance office and that Kaneng Security solar plant construction.</p> <p>ii. Further note that I&AP is aware that EnviroAfrica CC has been appointed by Ventura Renewable Energy (Pty) Ltd.</p> <p>iii. Query as to where to forward a CV for open vacancies.</p>	<p>EAP:</p> <p>i. Registration of entity as an I&AP. Email response to I&AP that EnviroAfrica is responsible for the EIA process and not employment opportunities but that I&AP should follow the process to see when potential employment opportunities may arise, should the project be developed. Email of same and notification of availability of DBAR sent 06/03/2020.</p>
12	<p>Date: 02/12/2019 Format: Email facsimile I&AP: . Thabang Peter Nakedi</p>	<p>i. Receipt of faxed copy of <i>Curriculum Vitae</i> (CV) and identity document of I&AP.</p>	<p>EAP:</p> <p>i. Registration of entity as an I&AP. Email response to I&AP that EnviroAfrica is responsible for the EIA process and not employment opportunities but that I&AP should follow the process to see when potential employment opportunities may arise, should the project be developed. Email of same and notification of availability of DBAR sent 06/03/2020.</p>
13	<p>Date: 02/12/2019 Format: Email I&AP: Serame Petrus Galeboe</p>	<p>i. Receipt of email with copy of <i>Curriculum Vitae</i> (CV) and identity document of I&AP.</p>	<p>EAP:</p> <p>i. Registration of entity as an I&AP. Email response to I&AP that EnviroAfrica is responsible for the EIA process and not employment opportunities but that I&AP should follow the process to see when potential employment opportunities may arise, should the project be developed. Email of same and notification of availability of DBAR sent 06/03/2020.</p>
14	<p>Date: 10/12/2019 Format: Email with letter and signed petition I&AP: Mr. Gerhard van Rhyn (temporary co-ordination of registration for various farmers in region)</p>	<p>i. Email received (following telephonic conversation) of interested and affected farmers who want to register.</p> <p>ii. Letter addressed to EAP indicating application to register for the Visserspan Solar PV Facility Project:</p> <p>a. Note that the farmers included on a two-page typed list attached to the letter, hereby apply to register to take part in the EIA for the Farm Visserspan, identified as "Solar PV Facility".</p> <p>b. Mention that contact details as well as names of parties concerned are enclosed and request that correspondence and important information be sent to each of the parties individually from now on since this letter serves only to co-ordinate the effort to ensure the farmers are registered in time.</p> <p>c. Statement that this is the third solar development close to Dealesville in the Free State and that the properties identified for these developments are almost adjacent. Comment that the first two</p>	<p>EAP:</p> <p>i. Email sent on 17/12/2019, confirming receipt of correspondence from I&AP and acknowledging that I&APs have been registered.</p> <p>ii.</p> <p>a. Inclusion of list of farmers in I&AP register</p> <p>b. Email of notification of availability of DBAR sent to individual parties on 06/03/2020 (where possible after attempting to get postal addresses, electronic copies of DBAR sent to I&APs).</p> <p>c. Agreed – the cumulative effect should all the proposed solar PV developments be constructed, should have been considered/assessed when Renewable energy Development Zone 5 (REDZ 5) was declared by the Government.</p> <p>d. Noted.</p> <p>e. Agreed – all input/comments from I&APs are valued to allow a more robust assessment process.</p>

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager
		<p>impact studies were done by the CSIR and Visserspan's study will be done by EnviroAfrica. Statement that since the three developments are so close to one another, it simply does not make sense to undertake the studies in isolation since the combined impact of all the development on the environment is dramatically different from that indicated for an individual impact study.</p> <p>d. Statement that since the projects are so close to each other, the same farmers will be negatively impacted by all of them. Further statement that besides the wider impact on Dealesville and the environment, the collective effect of these developments in an area already compromised by Eskom power developments is being ignored. Comment that these developments will have a catastrophic effect on agricultural activities and farmers in the area.</p> <p>e. Request that as part of the study, the I&APs would like to voice their concerns regarding the negative impact of the development and provide reasons as to why it is not viable.</p> <p>f. Statement that criteria currently used by developers to justify their choice of the specific area around Dealesville, are the strongest arguments amongst the farmers as to why it is not suitable for any further power developments.</p> <p>g. Statement that no private development can be sanctioned if it is to the detriment of other peoples' careers and livelihoods. Further statement that none of the developments are undertaken due to national importance but they are being undertaken by private developers solely to make money in the process.</p> <p>h. Offer that should any additional information be required, the farmers would be glad to co-operate.</p>	<p>f. The criteria currently used by solar facility developers to justify the location of their respective proposed developments around Dealesville is due to the fact that the area has been zoned or allocated by the national Government as one of 8 areas currently earmarked for such development (the developers merely source a farmer willing to sell or lease property for the development within the REDZ. The selection of areas in the country for REDZs would have undergone an impact assessment process which should have been subject to public scrutiny and comment before the area was declared a REDZ. This would have been done prior to any private developer proposing to develop facilities in the region. Therefore, the comment that the area is not suitable for solar PV facility developments is an issue that needed to be raised when the REDZ were being assessed before they were declared by Government as such.</p> <p>g. The statement that private developers make money in the process is true since this is the nature of their business - they develop plants to meet a need that has been identified. In this case the need has been identified by the national Government as having national importance and is considered one of the Government's 18 Strategic Infrastructure Projects (SIPs). Offer that should any additional information be required, the farmers would be glad to co-operate</p>
15	<p>Date: 16/12/2019 Format: Resend of email with letter and signed petition I&AP: Mr. Gerhard van Rhyn (temporary co-ordination of registration for various farmers in region)</p>	<p>i. Original communication resent by I&AP (i.e. email detailed in no. 12 above).</p>	<p>EAP: i. Noted.</p>
16	<p>Date: 27/01/2020 Format: Email</p>	<p>i. Thanks expressed for notification of the Visserspan Solar PV Facility Projects.</p>	<p>EAP: i. Email acknowledged on 06/03.2020 and content noted.</p>

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager
	I&AP: Ms. Ragna Redelstorff, Heritage Officer (Archaeology, Palaeontology and Meteorites Unit, South African Heritage Resources Agency (SAHRA))	ii. Reminder that SAHRA does not accept hardcopies, emails or website links but that the application information must be submitted on the South African Heritage Resources Information System (SAHRIS). Website link provided.	ii. Archaeology specialist appointed to upload all heritage related information and issue a SAHRA notice of intent to develop document on SAHRIS.
17	Date: 02/03/2020 Format: Email I&AP: Serame Petrus Galeboe	i. Receipt of email stating I&AP is waiting for a response and address has changed.	EAP: i. Registration of entity as an I&AP. Email response to I&AP that EnviroAfrica is responsible for the EIA process and not employment opportunities but that I&AP should follow the process to see when potential employment opportunities may arise, should the project be developed. Email of same and notification of availability of DBAR sent 06/03/2020.
18		END OF TRAIL REPORT	