

## PROPOSED VISSERSPAN SOLAR PV FACILITY – PROJECT 1

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 20209 and ended 19 July 2020)

(DEFF Ref. No: 14/12/16/3/3/1/2153)

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"	<b>EAP:</b> 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	<ul> <li>EAP:</li> <li>Paragraph 1 - cognisance taken of contents of paragraph.</li> <li>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.</li> </ul>

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		2019. Your application will be considered invalid without a screening	Paragraph 3 - cognisance taken of contents of paragraph.
		tool report.	
		All documentation delivered to the physical address contained in this	Paragraph 4 - Various emails sent to the Department to confirm:
		form must be delivered during the official Departmental Office Hours	i. time-frame for public participation (emails sent 09/06/2020 &
		which is visible on the Departmental gate. EIA related documents	08/07/2020)
		(includes application forms, reports or any EIA related submissions) that	ii. deadline for submission of final BAR (emails sent 15/08/2020 &
		are faxed; emailed; delivered to Security or placed in the Departmental	17/08/2020)
		Tender Box will not be accepted.	
		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	Paragraph 5 - cognisance taken of contents of paragraph.
		the time-frames prescribed in terms of these Regulations, unless an	
		extension has been granted by the Department in terms of Regulation	Paragraph 6 - cognisance taken of contents of paragraph.
		3(7) of the EIA Regulations, 2014, as amended.	
		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.	
		Kindly quote the abovementioned reference number in any future	
		correspondence in respect of the application.	
		Yours sincerely	
		Mr. Sabelo Malaza"	
		"Application Form and DBAR	EAP:
		1. Activity 1 of GN R.983 (as amended): You are advised to remove this	
		activity as the development applied for has a capacity of 100MW and	1. Activity removed.
		you have applied for Activity 1 of GN R.984 (as amended).	
		2. Activity 11(i) of GN R.983 (as amended): The activity description	2. Underground evacuation powerlines internal to the footprint of the
		states that the development of the evacuation powerlines will be	proposed development site on the Farm Visserspan No. 40, as well as
		assessed in a separate environmental application process. Please	leading to an adjacent site on the Farm Visserspan No. 40 i.e.
		clarify why this activity has been included in the application form.	Visserspan Solar PV – Project 2, form part of this application but the
	Date: 26/03/2020	Should the associated infrastructure include an on-site substation, you	development of a substation and tie-in/connection to the Eskom grid will
4		are required to state the capacity of the substation and its footprint.	only take place (in a separate EIA process) if the applicant is successful
4	Format: Email letter	Also note that infrastructure that triggers this activity requires a generic	in the next round of REIPPP bidding process. The underground 22kV
	I&AP:	EMPr to be submitted with the final BAR.	powerline/s leading to Project 2's site from Project 1 will be along the
		3. Should it apply:	road of an existing farm access road between the two projects
		a) The Generic EMPr for the development and expansion of substation	(approximately 90m in length).
		infrastructure for the transmission and distribution of electricity can be	
		downloaded from https://www.environment.gov.za/documents/forms	3. Does not apply.
		b) Part B: Section 2 of the generic EMPr must be completed, and an	
1		originally signed EMPr must be submitted with the final BAR. Please	4. Does not apply. Activity removed from the list of activities applied
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		note that Point 7.1.1 in Part B: Section 2 needs to match the details of	for.
		note that Point 7.1.1 in Part B: Section 2 needs to match the details of the applicant as contained in the application form.	for.

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4. Should it not apply: You are advised to remove this activity from the	5. The total development footprint will be cleared. Since there are
list of activities applied for.	patches of degradation and existing farm roads in the area, it is
5. Activity 15 of GN R.984 (as amended): Indicate the total indigenous	estimated that the total indigenous vegetation proposed for clearance is
vegetation proposed for clearance in hectares.	approximately 213ha.
6. Please ensure that all relevant listed activities are applied for, are	
specific and can be linked to the development activity or infrastructure	6. Cognisance taken of request.
as described in the project description.	
7. An amended application form must be submitted with the final BAR.	7. Amended application form submitted with the final BAR.
Please note that the Department's application form and other templates	
can be downloaded from the following link	8. Screening Tool Report attached as Appendix 11 of application form.
https://www.environment.gov.za/documents/forms	
8. You are required to submit the updated application form with a	9. Cognisance taken of request.
screening tool report, as has been the requirement since 04 October	
2019. Your application will be considered invalid without a screening	10. Cognisance taken of request. EAP Curriculum Vitae included in
tool report.	Appendix L of the final BAR after EAP Declaration.
9. You have not provided an electronic copy of the application form for	
the proposed development. Please ensure that an electronic and hard	11. EAP Declaration included in Appendix L of the final BAR.
copy of the updated application form and screening tool is submitted to	
the Department with the final BAR.	12. Table format of technical details for the proposed facility included in
10. You are required to include details and expertise of the EAP in the	final BAR. Minimum information requirements addressed in report.
BAR, including a curriculum vitae, in order to comply with the	
requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations,	13. Motivation for technology design alternative provided in final BAR in
2014, as amended.	a comparative table.
11. It is noted that the submitted application form has an undertaking	
under oath or affirmation by the EAP. However, the aforementioned	14. Motivation for lack of alternative sites, routes and layouts provided
oath was not included in the draft BAR. Please note that the final BAR	in final BAR.
must also have an undertaking under oath/affirmation by the EAP in	
order to comply with the requirements of Appendix 1(3)(1)(r) of the	15. Description provided in the final BAR.
NEMA EIA Regulations, 2014, as amended.	To. Description provided in the final DAR.
Technical details of the proposed facility and design alternative	16. Coordinates for the bend points of the proposed 218ha site
12. The EIAr must provide the technical details for the proposed facility	boundary (for Project 1 only), within Visserspan Farm, in degrees,
in a table format as well as their description and/or dimensions. A	minutes and seconds provided in Appendix A1 (Locality Maps) of the
sample for the minimum information required is listed under point 2 of	draft BAR, as well as Appendix A2 (Maps - Project Site Coordinates) of
Annexure 1, of the EIA information required for PV facilities below.	the final BAR.
13. Further, the EIAr must include the design alternative for the	
proposed 100MW PV facility.	17. Specialist studies conducted prior to submission of Bar. All
Alternatives	
	specialist reports included under Appendix G of the final BAR with recommendations included in BAR and EMPr.
14. Please note that Appendix $1(3)(1)(h)(x)$ of the Environmental Impact	recommendations included in DAK and EMPT.
Assessment (EIA) Regulations, 2014, as amended, requires that "if no	10. Chapteriot Deployation of Interpot former for Deployed 4 included at an
alternatives, including alternative locations for the activity were	18. Specialist Declaration of Interest forms for Project 1 included as
investigated, the motivation for not considering such" must be included	Appendix L of final BAR.
in the BAR. You are therefore required to provide a motivation should	

other alternatives sites, routes, layouts and technologies not be	19. The Soil, Land Use and Agricultural Potential study, as well as the
considered.	Socio-economic study for Project 1 included as appendices G4 and G5,
15. A description of the process followed to reach each preferred	respectively, in the final BAR.
alternative within the site as per Appendix 1(3)(1)(h)(i) of the EIA	
Regulations (2014), as amended, must be incorporated into the final	20. Cognisance taken of Department's comment.
BAR.	
Coordinates	21. The Archaeological and Palaeontological Impact Assessments were
16. Provide coordinates for the bend points of the proposed 218ha site	submitted to SAHRA for comment. Please refer to final comment from
boundary (for Project 1 only), within Visserspan Farm, in degrees,	SAHRA as per Appendix E of the final BAR, recommendations of which
minutes and seconds.	were included in the final BAR and EMPr.
Specialist studies	
17. You are required to conduct Ecology and Hydrology specialist	22. Cognisance taken of Department's comment.
studies; to assess the impacts of the proposed development on the	
biodiversity of the area (CBAs, ESA, surface water and ground water	23. Cognisance taken of Department's comment.
features, fauna, etc); to determine the indigenous and disturbed	
vegetation to be cleared (in square metres); as well as provide	24. The layout map must indicate the following:
mitigation and management measures. This/ these reports must be	,
included in the final BAR.	25. Individual site and cumulative maps submitted.
18. The Specialist Declaration of Interest forms submitted for the	
specialist studies are for Visserspan Solar Photovoltaic Facility Project	26. Additional biodiversity map layer included in Regional Map
4. You are required to submit forms related to Project 1.	(Appendix A of Bar and Appendix 13 of EMPr) where CBA region is
19. The Soil, Land Use and Agricultural Potential study, as well as the	indicated with hatched lines. There are no protected areas in on close
Socio-economic study that have been submitted with the draft BAR are	to the proposed development site.
for Visserspan Solar Photovoltaic Facility Project <u>3</u> . You are required to	
submit studies related to Project 1.	27. Included in Appendix A (Maps) of the final BAR and Appendix 13 of
20. All specialist studies must provide a detailed description of all	EMPr.
limitations to their studies. It must be noted that all specialist studies	
must be conducted in the correct season, and conducting a specialist	28. Included in Appendix A (Maps) of the final BAR and Appendix 13 of
study in the incorrect season and providing that as a limitation will not	EMPr.
be accepted.	
21. The Archaeological and Palaeontological Impact Assessments must	29. A topographical map combining the final layout map superimposed
be submitted to SAHRA for comments, via the South African Heritage	(overlain) on the environmental sensitivity map must be submitted with
Resources Information System (SAHRIS). These comments must be	the final BAR.
must be addressed and incorporated in the final BAR.	
22. Should the comments SAHRA (or any other I&AP) propose	30. Shapefile of the preferred development layout/footprint submitted to
significant changes or new information to be added to the BAR (or	the Department on 08/09/2020.
EMPr), you are advised to refer to Regulation 19(1)(b) of the NEMA EIA	
Regulations, 2014, as amended.	31. Cognisance taken of Department's instruction (WGS 84 Spheroid
23. Should the appointed specialists specify contradicting	used).
recommendations, the EAP must clearly indicate the most reasonable	4004 <i>j</i> .
recommendation and substantiate this with defendable reasons; and	32. Cognisance taken of Department's instruction.
where necessary, include further expert advice.	oz. oognisanse taken of Department's instruction.
A copy of the final site layout map and alternatives	
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	All available biodiversity information must be used in the finalisation of	33. For Project 1, data was mapped at a scale of 1:15 000 to include all
	the layout map.	features. Metadata (and notes) include description of base data used
	24. The layout map must indicate the following:	for digitizing.
	<ul> <li>PV positions and its associated infrastructure;</li> </ul>	
	Permanent laydown area footprint;	34. Shapefile submitted on 08/09/2020 in zip file format with EIA
	Internal roads indicating width (construction period width and	application reference number as the subject line, via an email to
	operation period width) and with numbered sections between	MEssop@environment.gov.za (as per Appendices E1 and F1 of final
	the other site elements which they serve (to make commenting	BAR).
	on sections possible);	
	Wetlands, drainage lines, rivers, stream and water crossing of	35. Recommendations and mitigation measures recorded in the BAR
	roads and cables indicating the type of bridging structures that	and specialist studies included in the EMPr.
	will be used:	
		36. Final site layout map with clear legend included as Appendix B1 and A7 (with sensitivity overlay) of the BAR, as well as in Appendix 13 of the
	The location of sensitive environmental features on site e.g.	EMPr.
	CBAs, heritage sites, wetlands, drainage lines etc. that will be	
	affected by the facility and its associated infrastructure;	37. Final site layout map with clear legend included as Appendix B1
	Substation(s) and/or transformer(s) sites including their entire	and A7 (with sensitivity overlay) of the BAR, as well as in Appendix 13
	footprint;	of the EMPr. Detail provided in Section 5.1.3. (Technical Details) of the
	<ul> <li>Connection routes (including pylon positions) to the</li> </ul>	BAR.
	distribution/transmission network;	
	All existing infrastructure on the site, especially roads;	38. An environmental sensitivity map indicating environmentally
	Buffer areas;	sensitive areas and features identified during the basic assessment
	<ul> <li>Buildings, including accommodation; and</li> </ul>	process.
	All "no-go" areas.	
		39. Please refer to Appendix A3 and A7 of the final BAR.
	Topographical and sensitivity Maps	
	25. The maps in Appendix D provide information for the entire	40. Included in various places in the EMPr and specifically in section
	Visserspan Farm No. 40. The maps submitted with that final BAR may	7.10.11.
	provide information for the entire extent of Visserspan Farm but it is	
	required that maps displaying geographical information particular to the	41. Included in various places in the BAR and EMPr.
	portion of the farm designated for Project 1 only, be included in the	
	report.	42. Included in various places in the BAR and EMPr.
	26. The Biodiversity map provided in Appendix D utilises similar colours	
	for "Protected" and "CBA 1" which makes it difficult to distinguish	43. A high level traffic management plan has been included as
	between the two.	Appendix 20 of the EMPr. Detailed traffic management planning will be
	27. A locality map indicating the location of the proposed site, in relation	
	to the nearest town (within the region) must be on an A3 page and	should the environmental authorisation be granted and the Applicant be
	submitted with the final BAR.	successful in the bidding process i.e. prior to commencement of
	28. An environmental sensitivity map indicating environmentally	construction of the proposed development.
	sensitive areas and features identified during the basic assessment	44. A storm water management plan has been included as Annardiy 24
	process must be on an A3 page with a clear legend.	44. A storm water management plan has been included as Appendix 21 of the EMPr.
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29. A topographical map combining the final layout map superimposed	
(overlain) on the environmental sensitivity map must be submitted with	45. A fire management plan to be implemented during the construction
the final BAR.	and operation of the facility as per the EMPr.
Shapefile of the preferred Development layout	
30. A shapefile of the preferred development layout/footprint must be	46. EMPr includes measures to protect archaeological sites, artefacts,
submitted to this Department.	palaeontological fossils or graves from construction and operational
31. The shapefile must be created using the Hartebeesthoek 94 Datum	impacts.
and the data should be in decimal Degree Format using the WGS 84	
Spheroid.	47. Cognisance taken of Department's comment.
32. The shapefile must include at a minimum the following extensions	
i.eshp, .shx, .dbf, .prj, and, .xml (Metafile). If specific symbology was	48. EMPr edited to remove ambiguous statements where relevant.
assigned to the file, then the .avi and/or the .lyr file must also be	
included.	49. All relevant stakeholders' comments submitted as Appendices E
33. Data must be mapped at a scale of 1:10 000 (please specify if an	(Correspondence with Organs of State/National Partner Entities) and F1
alternative scale was used). The metadata must include a description of	(Supporting Documents) of the final BAR.
the base data used for digitizing.	
34. The shapefile must be submitted in a zip file using the EIA	50. Comments from the Department's Biodiversity and Conservation
application reference number as the title. The shape file must be	Section included in Appendix E2 (DEFF Biodiversity Directorate) and F1
submitted to:	(Supporting Documents) of the final BAR.
Postal Address: Department of Environmental Affairs, Private Bag	
X447, Pretoria, 0001	51. Cognisance taken of Department's comment.
Physical Address: Environment House, 473 Steve Biko Road,	
Pretoria	52. I&AP comments submitted as Appendices E (Correspondence with
For Attention: Muhammad Essop, Integrated Environmental	Organs of State/National Partner Entities) and F1 (Supporting
Authorisations, Strategic Infrastructure Developments	Documents) of the final BAR.
Telephone Number: 012 399 9406	
Email Address: MEssop@environment.gov.za	53. Proof of correspondence with various stakeholders included in
The Environmental Management Programme (EMPr)	Appendices E and F of the final BAR.
The EMPr to be submitted as part of the BAR must include the	
following:	54. Cognisance taken of Department's comment. CRR included as
35. All recommendations and mitigation measures recorded in the BAR	Appendix F of final BAR.
and the specialist studies conducted.	
36. A good quality final site layout map with clear legend.	55. Cognisance taken of Department's comment.
37. Measures as dictated by the final site layout map and micro-siting.	
38. An environmental sensitivity map indicating environmentally	56. Cognisance taken of Department's comment.
sensitive areas and features identified during the basic assessment	
process.	57. Clear description of all associated infrastructure. This description
39. A map combining the final layout map superimposed (overlain) on	must include, but not limited to the following:
the environmental sensitivity map.	Powerlines;
40. An alien invasive management plan to be implemented during	<ul> <li>Internal roads infrastructure; and;</li> </ul>
construction and operation of the facility. The plan must include	<ul> <li>All supporting onsite infrastructure such as laydown area,</li> </ul>
mitigation measures to reduce the invasion of alien species and ensure	guard house, and control room etc.
	guara nouse, and control room etc.

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<ul> <li>that the continuous monitoring and removal of alien species is undertaken.</li> <li>41. A plant rescue and protection plan which allows for the maximum transplant of conservation important species from areas to be transformed. This plan must be compiled by a vegetation specialist familiar with the site and be implemented prior to commencement of the construction phase.</li> </ul>	<ul> <li>All necessary details regarding all possible locations and sizes of the proposed satellite substation and the main substation.</li> <li>Information on services required on the site, e.g. sewage, refuse removal, water and electricity, agreements with suppliers and confirmation of capacity been obtained must be provided.</li> </ul>
42. A re-vegetation and habitat rehabilitation plan to be implemented during the construction and operation of the facility. Restoration must be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery of natural habitats.	58. A <u>cumulative impact assessment</u> of the facility with other solar energy facilities within a 30km radius of the proposed development site.
43. A traffic management plan for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan must include measures to minimize impacts on local commuters e.g. limiting construction	59. Maps as sourced from <u>https://www.environment.gov.za/mapsgraphics</u> on the location of renewable energy developments in the region, included as Appendix A6 of the final BAR.
vehicles travelling on public roadways during the morning and late afternoon commute time and avoid using roads through densely populated built-up areas so as not to disturb existing retail and commercial operations.	60. 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.
44. A storm water management plan to be implemented during the construction and operation of the facility. The plan must ensure	61. Cognisance taken of Department's comment.
compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion. The plan must include the construction of appropriate design measures that allow surface and subsurface movement of water along drainage lines so as not to impede natural surface and subsurface flows. Drainage measures must promote dissipation of storm water run-off.	62. The botanical specialist disagrees with the Biodiversity Directorate's stance that the site area warrants BCBA1 status. Is should be noted that the area which the botanical specialist stated should be conserved for biodiversity reasons was designated as a no-go area and left completely out of the proposed development site footprint. The
45. A fire management plan to be implemented during the construction and operation of the facility.	63. Motivation provided where applicable.
<ul> <li>46. Measures to protect archaeological sites, artefacts, palaeontological fossils or graves from construction and operational impacts.</li> <li>47. Ensure that the EMPr complies with Appendix A of the EIA Regulations 2014 (as amended).</li> <li>48. The EMPr must not contain any ambiguity. Where applicable,</li> </ul>	64. Telephonic communication with Departmental case officer to make the necessary arrangements to conduct a site inspection made on 02 September 2020. Department's stance regarding site visits during Lockdown Level 2 discussed.
statements containing the word "should' or "may' are to be amended to "must".	65. Cognisance taken of Department's comment.
Public Participation 49. Ensure that all relevant stakeholders' comments are submitted to	66. Cognisance taken of Department's comment.
the Department with the final BAR. This includes but is not limited to the Department of Agriculture, Land Reform and Rural Development (DALRRD), Free State Department of Economic, Small Business	67. Cognisance taken of Department's comment.
Development, Tourism and Environmental Affairs, the South African	

Civil Aviation Authority (SACAA, the Department of Transport, Tikogolo	68. Submission of final BAR in accordance with Department's COVID-
Local Municipality, Department of Water and Sanitation (DWS), the	19 (lockdown) regulations. Verification regarding submission of
South African National Roads Agency Limited (SANRAL), the South	hardcopy made – EIA Administration confirmed that hardcopies and
African Heritage resources Agency (SAHRA), Department of Mineral	CD/DVD /USB submissions are <u>not</u> being accepted during lockdown (as
Resources and Energy, National Energy Regulator of South Africa	per Appendices E1 and F1 of the final BAR).
(NERSA), South African National Defence Force, Eskom and BirdLlfe	
South Africa.	69. Cognisance taken of Department's comment.
50. Comments must be obtained from this Department's Biodiversity	
and Conservation Section of this Department. Further to that, these	70. Cognisance taken of Department's comment.
comments must be addressed and incorporated in the final Basic	
Assessment Report.	
The contact details are as follows:	
Biodiversity and Conservation	
Attention: Mr. Stanley Tshitwamulomoni	
Tel: 012 399 9587	
Email: <u>StanleyT@environment.gov.za</u>	
51. The Public Participation Process must be conducted in terms of	
Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as	
amended.	
52. Copies of original comments received from I&APs and organs of	
state, which have jurisdiction in respect of the proposed activity are	
submitted to the Department with the final BAR.	
53. Proof of correspondence with the various stakeholders 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. In terms of Regulation 41(2)(b) of the EIA	
Regulations, 2014, as amended, please provide proof of written notice	
for the availability of the BAR for comment.	
54. All issues raised and comments received during the circulation of	
the draft BAR from I&APs and organs of state which have jurisdiction in	
respect of the proposed activity are adequately addressed in the final	
BAR, including comments from this Department, and must be	
incorporated into a Comments and Response Report (CRR).	
55. 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 an I&AP's comment.	
56. Attendance registers and minutes of any meetings held by the	
Environmental Assessment Practitioner (EAP) with Interested and	
Affected Parties (I&APs) and other role players must be included in the	
final BAR.	
The final BAR must also provide the following:	

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57. Clear description of all associated infrastructure. This description must include, but not limited to the following:	
Powerlines;      Interval and the inferent metanes and the	
Internal roads infrastructure; and;	
All supporting onsite infrastructure such as laydown area,	
guard house, and control room etc.	
<ul> <li>All necessary details regarding all possible locations and sizes</li> </ul>	
of the proposed satellite substation and the main substation.	
<ul> <li>Information on services required on the site, e.g. sewage,</li> </ul>	
refuse removal, water and electricity, agreements with	
suppliers and confirmation of capacity been obtained must be	
provided.	
58. A cumulative impact assessment of the facility with other solar	
energy facilities within a 30km radius of the proposed development site.	
59. Please note that information on location of renewable energy	
developments can be accessed from	
https://www.environment.gov.za/mapsgraphics.	
60. 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.	
61. 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 and internal cables is allowed in the 'no-go' areas.	
62. 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.	
63. The EAP must provide detailed motivation if any of the above	
requirements is not required by the proposed development and not	
included in the EMPr.	
General	
64. The EAP is requested to contact the Department (subsequent to the	
national lockdown) to make the necessary arrangements to conduct a	
site inspection.	
65. You are reminded that the final BAR to be submitted to this	
Department must comply with all the requirements in terms of the scope	
of assessment and content of the basic assessment reports in	
accordance with Appendix 1 of the 2014 EIA Regulations, as amended.	
66. You are further reminded to comply with regulation 19(1)(a) and (b)	
 of the 2014 EIA Regulations, as amended [regulations quoted]	

		<ul> <li>67. Should you fail to meet any of the timeframes stipulated in Regulation 19 of the 2014 EIA Regulations, as amended, your application will lapse.</li> <li>68. You are requested to submit one (1) electronic copy (1 CD/DVD /USB) and one (1) hard copy of the final BAR to the Department</li> <li>69. Please also find attached information that must be used in the preparation of the final BAR. This will enable the Department to speedily review the BAR and make a decision on the application.</li> <li>70. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No.107 of 1998, as amended, which stipulates that no activity may commence prior to an Environmental Authorisation being granted by the Department.</li> </ul>	
5	Date: 06/04/2020 Format: Email I&AP: Mr. Gerhard van Rhyn (Landowner/ farmer and temporary co-ordinator of about 35 farmers in region)	"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"	<b>EAP:</b> 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.
6	Date: 17/04/2020 Format: Email letter I&AP: Ms. Ragna Redelstorff, Heritage Officer, South African Heritage Resources Agency (SAHRA)	<ul> <li>"Final Comment In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)</li> <li>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.</li> <li>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</li> </ul>	<ul> <li>EAP:</li> <li>Cognisance taken of introductory summary of project.</li> <li>Archaeological Specialist's recommendations: <ol> <li>Cognisance taken of recommendation.</li> <li>Area of historical/heritage significance excluded from development site footprint and designated as a heritage no go area.</li> <li>Archaeological Specialist's recommendations included in final BAR and EMPr with contact numbers should any human burials be found during construction.</li> <li>Archaeological Specialist's recommendations included in EMPr.</li> </ol> </li> <li>Palaeontological Specialist's recommendations: Included in final BAR and EMPr with contact numbers should any human burials be found during construction.</li> <li>Archaeological Specialist's recommendations included in final BAR and EMPr with contact numbers should any human burials be found during construction.</li> <li>Cognisance taken of Specialist's recommendations.</li> </ul> Final Comments: <ul> <li>Cognisance taken of scope of SAHRA's comment and that SAHRA has no objection to the proposed development subject to the respective specialist' recommendations.</li> </ul>

that SAHRA will provide a separate comment for each of the four	1. Requirement to stop work immediate should any objects of
projects as each of them constitutes a separate	archaeological or palaeontological remains be found during construction
NEMA application.	included in the final BAR and EMPr.
This comment is issued specifically for Visserspan Solar PV	2. Process that the ECO must follow to inform the SAHRA and contact
Facility - Project 1.	an archaeologist and/or palaeontologist included in final BAR and
KAPLAN, J. 2020. ARCHAEOLOGICAL IMPACT ASSESSMENT - ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED	EMPr. 3. Cognisance taken of regulator's comment.
VISSERSPAN SOLAR PV FACILITY ON THE FARM VISSERSPAN	4. A Chance Finds Procedure included as Appendix 19 of the EMPr.
NO. 40 NEAR DEALESVILLE, TOKOLOGO LOCAL MUNICIPALITY,	4. A Chance Finds Frocedule included as Appendix 19 of the EMFT.
FREE STATE PROVINCE.	
A field survey revealed the following results for Solar PV Project 1: No	
archaeological resources were	
identified in this area	
Author's Recommendations:	
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.	
ALMOND, J. 2020. PALAEONTOLOGICAL 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.	
It is noted that the proposed associated grid connection to Eskom's	
Perseus substation has not been assessed in the PIA.	
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.	

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.	
Author's Recommendations:	
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,	
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 1, 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 1, 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.	
nemage autionty will be needed.	

		<ul> <li>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.</li> <li>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.</li> <li>Should you have any further queries, please contact the designated official using the case number quoted above in the case header."</li> </ul>	
7	Date: 05/05/2020 Format: Email I&AP: Mr. Deon Edwards (Telephonic call followed by email)	<ul> <li>"Good day Vivienne Ref: Visserspan Solar Plant ( Dealesville ) From: Deon Edwards</li> <li>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&amp;AP pertaining to the above project.</li> <li>Your assistance regarding this matter will be greatly appreciated.</li> <li>Kind Regards Deon Edwards"</li> </ul>	<b>EAP:</b> 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.
8	Date: 06/05/2020 Format: Email I&AP: Mr. Deon Edwards	"Many thanks pertaing to the matter Deon"	EAP: Cognisance taken of I&AP's thanks.
9	Date: 08/06/2020 Format: Email I&AP: Mr. John Geeringh, Senior Consultant Environmental Management, Land and Rights, Eskom Transmission Division, Megawatt Park	"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. Kind regards John Geeringh (Pr Sci Nat)"	<b>EAP:</b> 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.

			<ul> <li>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> substation 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.</li> <li>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.</li> <li>A second email sent to I&amp;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.</li> <li>Individual draft layout drawings (per project) are available if required. Please zoom in for drawing details."</li> </ul>
10	Date: 01/07/2020 Format: Email I&AP: Mr. John Geeringh, Senior Consultant Environmental Management, Land and Rights, Eskom Transmission Division, Megawatt Park	"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. Kind regards John Geeringh (Pr Sci Nat)"	<ul> <li>EAP:</li> <li>Cognisance taken of I&amp;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&amp;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.</li> <li>Email further stated that there are no 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> substation from where evacuated power will tie-in to the Eskom grid. Underground electricity lines from the four Visserspan solar PV</li> </ul>

			<ul> <li>facilities only lead up to the proposed future sub-station. The development of the substation and connection to the Eskom grid <u>does</u> <u>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.</li> <li>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.</li> <li>A second email sent to I&amp;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.</li> <li>Individual draft layout drawings (per project) are available if</li> </ul>
			required. Please zoom in for drawing details."
11	Date: 17/07/2020 Format: Email I&AP: Mr. Gerhard van Rhyn (Landowner/ farmer and temporary co-ordinator of about 35 farmers in region)	"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 ontwikkellaar hanteer. Objektiweteit 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.	EAP: 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.

12	PUBLIC PARTICIP Date: 31/07/2020 Format: Email I&AP: Mr. Gerhard van Rhyn (Landowner/ farmer and temporary co-ordinator of about 35 farmers in region)	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" <b>ATION COMMENT PERIOD CLOSED (approximately 58 days excludin</b> "Hallo Vivienne Ek wag vir `n reaksie op my skrywe asb. Groete Gerhard van Rhyn"	g COVID-19 lockdown period of 27 March 2020 to 05 June 2020) EAP: 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 1 & 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."	<b>EAP:</b> 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 1 (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? Please let me know if I may email you the required files today."
14	Date: 21/08/2020 Format: Email	"Sorry for commenting late on this project.	EAP:

	<b>I&amp;AP:</b> Ms. Portia Makitla, Biodiversity Conservation, DEFF	You can email me the Botanical Study we will ensure that we provide you with the comments before the 28 <sup>th</sup> ."	Email response sent to Ms. Makitla on 24/08/2020: "Thank you for your response. Please find Project 1'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 1'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	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)	"Attached please find the aforementioned DBAR comments. <b>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR</b> <b>THE PROPOSED VISSERSPAN 1 AND 2 SOLAR PV FACILITIES</b> <b>FREE STATE PROVINCE</b> 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 threated ecosystem (Endangered A1) in the National List of Threated Ecosystems. The botanist in the conclusion of the study highlighted that <i>"although the study area is in an area classified and mapped as a CBA1 area, my findings were that the area does not warrant CBA1 status and is suitable for building a solar PV installation". This statement is confusing, please elaborate further in the final report and also obtain comments from the provincial department and or any conservation agencies to confirm whether they are in agreement with the specialist as they are the custodianship of biodiversity in the Free State Province. Based on the information provided the directorate Biodiversity Conservation is of the view that the proposed Visserspan 1 solar PV facility will result in fatal flaw since projects sites cover major part of an area designated as highly sensitive and according to the specialist the degraded areas are no longer degraded since they have reverted to Vaal-Vet Sandy Grassland (good condition). In conclusion; the development within an areas classified as CBA1 is not supported."</i>	<b>EAP:</b> 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).
17	Date: 26/08/2020 Format: Email	"Subject: re: Inviro Practictioner	EAP:

	<b>I&amp;AP:</b> Mr. Davis Sibongile	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 Dealesville 9348"	Email query sent 26/08/2020 stating that, "As previously communicated to Ms. Galeboe, please note the information letter/email sent out was <b>not for employment or work/tender opportunities</b> - 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."
18	Date: 27/08/2020 Format: Email I&AP: Mr. John Geeringh, Senior Consultant Environmental Management, Land and Rights, Eskom Transmission Division, Megawatt Park	"Thank you, Regards John"	EAP: Cognisance taken of I&P's thanks.
19	Date: 26/08/2020 Format: Email from EAP in response to telephonic enquiry I&AP: Ms. Thembi Nyoka (National DAFF)	Ms. Nyoka from national DAFF made a telephonic enquiry as to the footprint sizes of the proposed developments relative to the total farm\size. (Written response given by EAP).	<ul> <li>EAP:</li> <li>"Dear Thembi 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:</li> <li>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)</li> <li>Thus, the footprint of the land proposed to be left undeveloped by the proposed solar PV facilities = approximately 375ha.</li> </ul>

			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 1 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."
20	Date: 08/09/2020 Format: Email I&AP: Mr. Jack Morton, Department of Agriculture and Rural Development, Free State (DARD)	<ul> <li>"Thanks have received it. Just to keep you up to speed with the process that the applications will follow:</li> <li>1.1 will hand the applications over to one of my officials to investigate.</li> <li>2.He will present his findings at our next meeting that is on 16 September 2020</li> <li>3. After the meeting I will compile a recommendation letter to National Department in Pretoria for signature by our Chief Director.</li> <li>4.After I receive the signed recommendation it will be sent to Pretoria for the final letter from the Delegate of the Minister.</li> <li>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.</li> <li>Hope this give you an understanding into the process."</li> </ul>	<b>EAP:</b> Cognisance taken of I&P's receipt of emailed information and explanation of the process followed by the provincial authority, DARD.
21	Date: 08/09/2020 Format: Email letter I&AP: Ms. Samantha Ralston-Paton, BirdLife South Africa	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</i>	<ul> <li>EAP:</li> <li>Cognisance taken of I&amp;P's concern regarding loss of critical biodiversity area and endangered grassland habitat.</li> <li>Inclusion in final BAR and EMPr of BirdLife South Africa's Position Statement regarding solar PV developments (summarises guideline document referred to in I&amp;AP's comment).</li> <li>I&amp;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&amp;AP's suspicion (for this particular project) is not relevant.</li> </ul>

	<i>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. Please see the attached guidelines for solar energy and birds for your future reference.	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. 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 1

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/Proje[ct Manager
1	Date: 14/11/2019 Format: Email I&AP: Mr. Sello Meko, Demand and Acquisition, Free State Department of Health, Bloemfontein	<ul> <li>With reference to Visserspan Solar PV Facility - Project 1:</li> <li>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&amp;AP claims that non-renewable should be cheaper.</li> <li>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.</li> <li>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.</li> <li>iv. Suggestion that any product produced using renewable energy should be taxed at a lower rate.</li> </ul>	EAP: 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	Date: 18/11/2019 Format: Email I&AP: Ms. Primrose Ndzululeka	<ul> <li>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):</li> <li>i. Entity 'keeps the lights on' when state entities fail to.</li> <li>ii. Lights are 'kept on' at affordable prices through the use of solar panels.</li> <li>iii. Potential customers will have power when the rest of the country has outages.</li> </ul>	<b>EAP:</b> 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.

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		<ul> <li>iv.Entity differs from competitors since they also supply road lighting.</li> <li>v. Entity claims to have a team that specialises in installing solar panels and determining customers' needs.</li> <li>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.</li> </ul>	
3	Date: 18/11/2019 Format: Second email I&AP: Ms. Primrose Ndzululeka, Golden Four Trading	<ul> <li>A second email received shortly after the above email but no specific project number specified:</li> <li>i. Proposal to purchase solar panels from Golden Four Trading for solar powered irrigation and solar power street lights for the proposed developments.</li> <li>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).</li> <li>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.</li> <li>iv. Statement that solar panels are part of the fourth industrial revolution and the proposed facility should purchase solar panels at the prices provided.</li> </ul>	EAP: 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	Date: 18/11/2019 Format: Email I&AP: Mr. Albertus Teseling representing Concordia Trust	i. Request for registration as an I&AP (for Visserspan Solar PV Facility no project number specified)	<ul> <li>EAP:</li> <li>i. Registration of organisation (represented by contact individual) for all projects. Email notification of same and of availability of DBAR sent 02/03/2020.</li> <li>ii. Note: Email from I&amp;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&amp;AP register and email notification of same and of availability of DBAR sent 06/03/2020.</li> </ul>
5	Date: 18/11/2019 Format: Email I&AP: Mr. Ralph Damonse, Pontus Consulting (Pty) Ltd, Panorama, Cape Town	<ul> <li>Request for registration as an I&amp;AP for Visserspan Solar PV Facility - Project 2</li> </ul>	<b>EAP:</b> i. Registration of individual as an I&AP. Email notification of same and of availability of DBAR sent 06/03/2020.

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6	Date: 18/11/2019 Format: Email I&AP: Ms. Meisie Nel, Farm Brakfontein 1/636 close to Eskom power line	<ul> <li>i. Request for registration as an I&amp;AP for Visserspan Solar Project (no number specified).</li> <li>ii. Mention that I&amp;AP's farm is Brakfontein 1/636 and is very close to Eskom power line which goes through the farm.</li> <li>iii. Statement that I&amp;P is not opposed to providing her entire farm for the project.</li> <li>iv. Request to please consider iii above.</li> </ul>	<b>EAP:</b> i. Registration of individual as an I&AP. Email notification of same and of availability of DBAR sent 06/03/2020.
7	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)	<ol> <li>Record of telephonic <u>contact made by EAP</u> with I&amp;AP and registration of I&amp;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).</li> </ol>	<b>EAP:</b> 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	Date: 19/11/2019 Format: Email sent I&AP: Mr. Pierre Greyling, Farm Perseus	<ul> <li>Record of telephonic <u>contact made by EAP</u> with I&amp;AP and registration of I&amp;AP as representative of Farm Perseus (south of Farm Visserspan)</li> </ul>	<b>EAP:</b> 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	Date: 25/11/2019 Format: Email facsimile I&AP: Mr. Thabang Peter Nakedi	<ol> <li>Receipt of faxed copy of <i>Curriculum Vitae</i> (CV) and identity document of I&amp;AP.</li> </ol>	<b>EAP:</b> 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	Date: 26/11/2019 Format: Email (fax) I&AP: Mr. Senelo Kaneng, Director, Kaneng Securityand Trading (Pty) Ltd	<ul> <li>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.</li> <li>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.</li> </ul>	<b>EAP:</b> 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	Date: 26/11/2019 Format: Email	<ol> <li>Note that I&amp;AP's name is Sylvester and would like to know more about the EIA process for the Visserspan Solar PV Facility Project</li> </ol>	

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	<b>I&amp;AP:</b> Mr. Thabo (Sylvester) Seliba	<ul> <li>since I&amp;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.</li> <li>ii. Further note that I&amp;AP is aware that EnviroAfrica CC has been appointed by Ventura Renewable Energy (Pty) Ltd.</li> <li>iii. Query as to where to forward a CV for open vacancies.</li> </ul>	<b>EAP:</b> 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.
12	Date: 02/12/2019 Format: Email facsimile I&AP: . Thabang Peter Nakedi	<ol> <li>Receipt of faxed copy of <i>Curriculum Vitae</i> (CV) and identity document of I&amp;AP.</li> </ol>	<b>EAP:</b> 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.
13	Date: 02/12/2019 Format: Email I&AP: Serame Petrus Galeboe	<ol> <li>Receipt of email with copy of <i>Curriculum Vitae</i> (CV) and identity document of I&amp;AP.</li> </ol>	<b>EAP:</b> 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.
14	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)	<ul> <li>i. Email received (following telephonic conversation) of interested and affected farmers who want to register.</li> <li>ii. Letter addressed to EAP indicating application to register for the Visserspan Solar PV Facility Project: <ul> <li>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".</li> <li>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.</li> <li>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</li> </ul> </li> </ul>	<ul> <li>EAP:</li> <li>i. Email sent on 17/12/2019, confirming receipt of correspondence from I&amp;AP and acknowledging that I&amp;APs have been registered.</li> <li>ii.</li> <li>a. Inclusion of list of farmers in I&amp;AP register</li> <li>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&amp;APs).</li> <li>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.</li> <li>d. Noted.</li> <li>e. Agreed – all input/comments from I&amp;APs are valued to allow a more robust assessment process.</li> </ul>

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		<ul> <li>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.</li> <li>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.</li> <li>e. Request that as part of the study, the I&amp;APs would like to voice their concerns regarding the negative impact of the development and provide reasons as to why it is not viable.</li> <li>f. 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.</li> <li>h. Offer that should any additional information be required, the farmers would be glad to co-operate.</li> </ul>	<ul> <li>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.</li> <li>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's 18 Strategic Infrastructure Projects (SIPs). Offer that should any additional information be required, the farmers would be glad to co-operate</li> </ul>
15	Date: 16/12/2019 Format: Resend of email with letter and signed petition <b>I&amp;AP:</b> Mr. Gerhard van Rhyn (temporary co- ordination of registration for various farmers in region)	<ol> <li>Original communication resent by I&amp;AP (i.e. email detailed in no. 12 above).</li> </ol>	EAP: i. Noted.
16	Date: 27/01/2020 Format: Email	<ul> <li>Thanks expressed for notification of the Visserspan Solar PV Facility Projects.</li> </ul>	EAP: i. Email acknowledged on 06/03.2020 and content noted.

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	<b>I&amp;AP:</b> Ms. Ragna Redelstorff, Heritage Officer (Archaeology, Palaeontology and Meteorites Unit, South African Heritage Resources Agency (SAHRA)	<ul> <li>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.</li> </ul>	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	<ol> <li>Receipt of email stating I&amp;AP is waiting for a response and address has changed.</li> </ol>	<b>EAP:</b> 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	