

## AMDA Alpha, AMDA Bravo and AMDA Charlie – Comments and Responses Report

Note that comments and responses reflected below are relevant to all 3 of the abovementioned projects unless reflected otherwise.

Date	From	Representing	Comment	Response	Date Response
<b>REVISED ENVIRONMENTAL IMPACT ASSESSMENT REPORT</b>					
1 February 2017	Warren Morse	Mulilo Energy	Concerned that proposed powerline alignment impacts on an approved PV Facility	Powerline realigned to avoid the facility.	06 February 2017
30 January 2017	Mahlatse Shubane	DEA	<p>The AMDA ALPHA SOLAR FACILITY report received by the Department on 20 January 2017 has reference.</p> <p>It is unclear whether the report submitted to the Department is final or still draft. In addition, the report is titled AMDA ALPHA SOLAR PVE ENERGY FACILITY, but the CD is titled AMDA ALPHA, BRAVO and CHARLIE PV.</p>	<p>Our telephonic discussion yesterday refers. The revised EIR submitted is not the final document. This will be submitted to you for decision making, after the completion of the final 30 Day comment period.</p> <p>You are correct that the CD contained the Revised EIR's for all 3 projects, as I&amp;AP's were notified of the availability of all three projects simultaneously.</p>	31 January 2017
9 February 2017	Mmamohale Kabasa	DEA	Comment received from DEA on Revised Scoping Report. Please refer to table at beginning of Environmental Impact Report for detailed response to the DEA comment on the Revised EIR.	Please refer to table at beginning of Environmental Impact Report for detailed response to the DEA comment on the Revised EIR.	This document
<b>DRAFT ENVIRONMENTAL IMPACT ASSESSMENT</b>					
04 October 2016	Alcord November	Kai Garib Municipality	Confirmed Receipt of documents.	Noted	
20 October 2016	Natasha Hignett	SAHRA	Received Approvals in terms of the National Heritage Resources Act.	Noted	

31 October 2016	Thulisile Nyalunga	DEA	<p>Please indicate below where the project will take place inside urban areas or outside urban areas. Please double check all the listed activities you have applied for , for both projects (14/12/16/3/3/2/958 and 960), where there is an option, please choose one option that is applicable to the proposed project.</p> <p>The development of facilities or infrastructure for the transmission and distribution of electricity-</p> <p>(i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; or</p> <p>(ii) inside urban areas or industrial complexes with a capacity of 275 kilovolts or more.</p>	<p>Please accept my apologies for the incorrect DEA reference numbers on the Front cover of the report, the correct Department Reference Numbers for the projects on the property are as follows:</p> <ul style="list-style-type: none"> <li>- AMDA Delta PV – 14/12/16/3/3/2/958</li> <li>- AMDA ECHO PV – 14/12/16/3/3/2/960</li> <li>- AMDA Foxtrot PV – 14/12/16/3/3/2/959</li> </ul> <p>I understand that you are the case officer on 958 and 960, so those are AMDA Delta and AMDA Echo respectively.</p> <p>The project is outside an urban area, so the correct activity with regard to the distribution of electricity is: The development of facilities or infrastructure for the transmission and distribution of electricity-</p> <p>(i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; or</p>	
<b>SCOPING REPORT – COMMENT PERIOD 03 June 2016 – 04 July 2016</b>					
26 August	Chantel Schwarts	Department of	Please note that the abstraction and storage	Noted: The current proposal does not	EIR - Report

2016		Water and Sanitation.	<p>of water needs to be authorised by the Department.</p> <p>Any Spillage of Hazardous materials including diesel that may occur during the construction and operation must be submitted to the DWS.</p> <p>Any sewerage, greywater and washwater as well as waste generated during the construction phase must be collected and disposed of at a permitted facility. This must be confirmed in writing by the local authority.</p>	<p>involve any abstraction or storage of water.</p> <p>Noted: This has been included in the EMPr</p> <p>Noted. The intention is to utilise a conservancy tank for such effluent. The local authority has been requested to confirm capacity at their wastewater treatment works and at landfill sites to accept this waste and effluent.</p>	
15 July	Mahlatse Shubane	Department of Environmental Affairs	<p><b><u>COMMENT SPECIFIC TO AMDA ALPHA</u></b></p> <p>Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description.</p> <p>If the activities applied for in the application form differ from those mentioned in the FSR, an amended application form must be submitted.</p> <p>Please ensure that the application form is signed by the applicant and that a signed landowners notification form is submitted to this department.</p> <p>The final SR must investigate and Identify all traffic impacts associated with the proposed development.</p> <p>Please ensure that all issues raised and comments received during the circulation of</p>	<p>Please refer to Table 1 in the Final Scoping Report, which includes a table of all listed activities applied for as well as well as exactly a description as to which components of the proposed project each are applicable to.</p> <p>The activities considered in this FSR are the same activities as applied for in the Application form. The applicants originally signed declaration was included in appendix 7 of the application form. The signed landowner consent was included in Appendix 3 of the application form and is also included in Annexure G3 of the FSR.</p> <p>A traffic specialist was appointed to provide input into this environmental process. A copy of the traffic study is included in annexure E10. Please refer to annexure F6 and F7</p>	This doc

			<p>the SR from registered I&amp;AP's are adequately addressed in the scoping report. Proof of correspondence must be included. Should you be unable to obtain comments, proof of the attempts to obtain comment should be included.</p> <p>The public participation must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA regulations 2014.</p> <p>Please provide a description of any identified alternatives for the proposed activity that are feasible including the advantages and disadvantages that the proposed activity or alternatives.</p> <p>It is noted that activities that trigger section 19; S21 (i) and (c) of the NWA. A separate hydrological assessment to assess the impacts on surface water hydrology features is required.</p> <p>The Study area falls within the ambit of the square kilometre array – South Africa. The impacts associated with radio frequency interference on the SKA must form part of the environmental impact assessment. The applicant must engage with the SKA-SA on the specific terms of reference for any EMI and RFI studies that must take place as part of the Environmental Process.</p> <p>You are hereby advised that the final SR must provide the names of the specialists that will conduct the various studies as outlined in the PoSEIA.</p> <p>All specialist studies that were done in house must be peer reviewed externally before the</p>	<p>for this information.</p> <p>Please refer to section 21 of this report where compliance with these specific regulations is discussed in detail.</p> <p>The consideration of alternatives is attached in section 7 of the scoping report.</p> <p>The final scoping report includes a plan of study for a hydrological assessment to be undertaken.</p> <p>The plan of study for environmental impact assessment makes provision to undertake the necessary studies to the satisfaction of the SKA.</p> <p>The applicant is in the process of engaging with SKA – SA on the exact requirements and timing of studies to be undertaken during the EIA phase as well as those that have to take place at a later stage.</p> <p>The authors of the proposed specialist studies are listed in the scoping report. No specialist studies have been done in house and as such no review process is required.</p> <p>This scoping report does consider potential cumulative impacts, including both the other proposed projects on the property as well as those in the surrounding areas. The potential impacts identified by specialists are reflected. These will however be</p>	
--	--	--	--	---	--

			<p>submission of the Final EIR.</p> <p>The Department requires that a cumulative impact assessment be undertaken in the final SR to determine potential fatal flaws. This assessment must incorporate cumulative impacts from all specialist assessments. The terms of reference for the Agricultural Specialist study must include:</p> <ul style="list-style-type: none"> <li>- Assessment of the loss of Agricultural land;</li> <li>- The impact of the loss of agricultural land on the property as well the greater area.</li> </ul> <p>A graphical representation of the proposed development within the respective geographical areas must be provided.</p> <p>In terms of Appendix 2 of the EIA regulations 2014, the report must include an undertaking under oath or affirmation by the EAP in relation to:</p> <p>In terms of Appendix 2 the name of the EAP who compiled the report as well as his expertise to undertake such work.</p> <p>Furthermore, you are reminded that the Final Scoping Report submitted to the department must comply with all the requirements in terms of the scope of assessment and content of scoping reports in accordance with Appendix 2 and Regulations 21(1) of the EIA regulations, 2014.</p>	<p>assessed in more detail in the Environmental Impact Assessment Phase of the Projects as per the Plan of Study for EIR.</p> <p>These points have been included in the terms of reference for the agricultural specialist study.</p> <p>The intent of this requirement is very unclear. The “respective geographic area” is deemed to be the Northern, and as such, the series of plans attached in Appendix A are deemed to comply with this requirement.</p> <p>The EAP declaration included in Annexure G4 is deemed to be an affirmation that complies with this requirement as outlined in Appendix 2. This scoping report was authored by Mr Dale Holder of Cape EAPrac. A summary of his CV is included in Annexure G4.</p> <p>Cape EAPrac believes that the scoping report does comply with these requirements. The table above provides a quick reference as to how these requirements have been incorporated into this scoping report.</p>	
21 July 216	Mmamohale Kabasa	Department of Environmental Affairs.	<p><b><u>APPLICABLE TO AMDA BRAVO ONLY</u></b></p> <p>Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description.</p>	<p>Please refer to Table 1 in the Final Scoping Report, which includes a table of all listed activities applied for as well as well as exactly a description as to which components of the proposed project each are applicable</p>	This Document

			<p>If the activities applied for in the application form differ from those mentioned in the FSR, an amended application form must be submitted.</p> <p>The Final SR must provide evidence that all relevant and identified competent authorities have been given an opportunity to comment on the proposed development.</p> <p>Please ensure that all issues raised and comments received during the circulation of the SR from registered I&amp;AP's are adequately addressed in the scoping report. Proof of correspondence must be included. Should you be unable to obtain comments, proof of the attempts to obtain comment should be included.</p> <p>Please provide a description of any identified alternatives for the proposed activity that are feasible including the advantages and disadvantages that the proposed activity or alternatives.</p> <p>It is noted that activities that trigger section 19; S21 (i) and (c) of the NWA. A separate hydrological assessment to assess the impacts on surface water hydrology features is required.</p> <p>The Study area falls within the ambit of the square kilometre array – South Africa. The impacts associated with radio frequency interference on the SKA must form part of the environmental impact assessment. The applicant must engage with the SKA-SA on the specific terms of reference for any EMI and</p>	<p>to.</p> <p>The activities considered in this FSR are the same activities as applied for in the Application form.</p> <p>Please refer to Appendix F for proof in this regard.</p> <p>Please refer to annexure F6 and F7 for this information.</p> <p>The consideration of alternatives is attached in section 7 of the scoping report.</p> <p>The final scoping report includes a plan of study for a hydrological assessment to be undertaken.</p> <p>The plan of study for environmental impact assessment makes provision to undertake the necessary studies to the satisfaction of the SKA.</p> <p>The applicant is in the process of engaging with SKA – SA on the exact requirements and timing of studies to be undertaken during the EIA phase as well as those that have to take place at a later stage.</p> <p>Noted – Dr Brian Colloty has been appointed to undertake a freshwater assessment of the development. This will be used to inform the stormwater management plan.</p> <p>A traffic specialist was appointed to</p>	
--	--	--	---	--	--

			<p>RFI studies that must take place as part of the Environmental Process.</p> <p>The Hydrology specialist must make input into the Stormwater Management Plan. The traffic and transport assessment is not considered as a management plan and an assessment must be conducted by an independent specialist and not the applicant.</p> <p>You are hereby advised that the final SR must provide the names of the specialists that will conduct the various studies as outlined in the PoSEIA.</p> <p>All specialist studies that were done in house must be peer reviewed externally before the submission of the Final EIR.</p> <p>A significant amount of materials and equipment will be delivered to site during the construction phase of the development and will thus have an impact on the environment. The impacts of this activity must be fully identified and assessed.</p> <p>The terms of reference for all the identified specialists must include the following:</p> <ul style="list-style-type: none"> <li>- Assessment of Cumulative impacts</li> <li>- Cumulative impacts must be clearly defined, and where possible, the size of the identified impact must be quantified and indicated.</li> <li>- Detailed process flow and proof must be provided.</li> <li>- The cumulative impact assessment must also inform the need and desirability of the proposed project.</li> <li>- A cumulative impact statement on</li> </ul>	<p>provide input into this environmental process. A copy of the traffic study is included in annexure E10.</p> <p>The authors of the proposed specialist studies are listed in the scoping report.</p> <p>No specialist studies have been done in house and as such no review process is required.</p> <p>The impact of the actual delivery to site (i.e. the transport of materials by road) are considered in the traffic management and transport plan. The proposed facility layout specifically includes a laydown area for this purpose. The physical impact, most notably damage to vegetation at the laydown area has been considered and will be assessed in detail by the specialists during the environmental impact assessment phase of the environmental process.</p> <p>Noted – the POS for EIA reflects this accordingly.</p> <p>This scoping report does consider potential cumulative impacts, including both the other proposed projects on the property as well as those in the surrounding areas. The potential impacts identified by specialists are reflected. These will however be assessed in more detail in the Environmental Impact Assessment Phase of the Projects as per the Plan of Study for EIR.</p>	
--	--	--	---	---	--

			<p>whether the proposed development must proceed.</p> <p>In terms of Appendix 2 of the EIA regulations 2014, the report must include an undertaking under oath or affirmation by the EAP in relation to:</p> <p>The affirmation of oath by the EAP must be witnessed and signed by a commissioner of oath.</p> <p>In terms of Appendix 2 the name of the EAP who compiled the report as well as his expertise to undertake such work.</p> <p>Furthermore, you are reminded that the Final Scoping Report submitted to the department must comply with all the requirements in terms of the scope of assessment and content of scoping reports in accordance with Appendix 2 and Regulations 21(1) of the EIA regulations, 2014.</p>	<p>The EAP declaration included in Annexure G4 is deemed to be an affirmation that complies with this requirement as outlined in Appendix 2. Kindly note, the regulatory requirement is for the EAP to include an undertaking under oath OR an affirmation and not an affirmation of oath. The declaration in Annexure G4 thus complies with this.</p> <p>This scoping report was authored by Mr Dale Holder of Cape EAPrac. A summary of his CV is included in Annexure G4.</p> <p>Cape EAPrac believes that the scoping report does comply with these requirements. The table above provides a quick reference as to how these requirements have been incorporated into this scoping report.</p>	
18 July 2016	Thabile Sangweni	Department of Environmental Affairs	<p><b><u>APPLICABLE TO AMDA CHARLIE ONLY</u></b></p> <p>Please ensure that all relevant listed activities are applied for, are specific and that it can be linked to the development activity or infrastructure as described in the project description.</p> <p>If the activities applied for in the application form differ from those mentioned in the FSR, an amended application form must be submitted.</p> <p>Please ensure that all issues raised and comments received during the circulation of the SR from registered I&amp;AP's are adequately addressed in the scoping report. Proof of</p>	<p>Please refer to Table 1 in the Final Scoping Report, which includes a table of all listed activities applied for as well as well as exactly a description as to which components of the proposed project each are applicable to.</p> <p>The activities considered in this FSR are the same activities as applied for in the Application form.</p> <p>Please refer to annexure F6 and F7 for this information.</p> <p>Please refer to section 21 of this report</p>	This Document



			<p>correspondence must be included. Should you be unable to obtain comments, proof of the attempts to obtain comment should be included.</p> <p>The public participation must be conducted in terms of Regulation 39, 40, 41, 42, 43 and 44 of the EIA regulations 2014.</p> <p>It is noted that no activity under GN R9856 is being applied for. However, should they at a later stage be found to be applicable, an amended application form must be submitted to the Department.</p> <p>The specialist studies must be specific to each of the sites applied for.</p> <p>The Department requires that a cumulative impact assessment be undertaken in the final SR to determine potential fatal flaws. This assessment must incorporate cumulative impacts from all specialist assessments. Detailed cumulative assessments must be undertaken by all specialists.</p> <p>A socio economic Assessment must be conducted to determine the impacts that the proposed activity may have on the social and economic environment of the area.</p> <p>The Study area falls within the ambit of the square kilometre array – South Africa. The impacts associated with radio frequency interference on the SKA must form part of the environmental impact assessment. The applicant must engage with the SKA-SA on the specific terms of reference for any EMI and RFI studies that must take place as part of the</p>	<p>where compliance with these specific regulations is discussed in detail.</p> <p>Noted – At this stage, no activities in terms of R985 are envisioned to take place as part of this development</p> <p>Noted – only the avifaunal specialist study and transport plan has combined the three projects on this property into single studies, as these two studies cannot isolate this specific development from the remainder.</p> <p>This scoping report does consider potential cumulative impacts, including both the other proposed projects on the property as well as those in the surrounding areas. The potential impacts identified by specialists are reflected. These will however be assessed in more detail in the Environmental Impact Assessment Phase of the Projects as per the Plan of Study for EIR.</p> <p>This has formed part of their terms of reference.</p> <p>Mr Tony Barbour has been appointed to undertake this study. The Plan of Study for EIR has been updated to reflect this.</p> <p>The plan of study for environmental impact assessment makes provision to undertake the necessary studies to the satisfaction of the SKA.</p>	
--	--	--	--	--	--

			<p>Environmental Process.</p> <p>The avifaunal assessment undertaken by Mr Simon Todd (an ecologist) must be peer reviewed by an avifaunal specialist.</p> <p>It is noted that activities that trigger section 19; S21 (i) and (c) of the NWA. A separate hydrological assessment to assess the impacts on surface water hydrology features is required.</p> <p>Please provide a description of any identified alternatives for the proposed activity that are feasible including the advantages and disadvantages that the proposed activity or alternatives.</p> <p>In terms of Appendix 2 the name of the EAP who compiled the report as well as his expertise to undertake such work.</p> <p>Furthermore, you are reminded that the Final Scoping Report submitted to the department must comply with all the requirements in terms of the scope of assessment and content of scoping reports in accordance with Appendix 2 and Regulations 21(1) of the EIA regulations, 2014.</p> <p>The final SR must investigate and Identify all traffic impacts associated with the proposed development.</p> <p>Please ensure that the application form is signed by the applicant and that a signed landowners notification form is submitted to this department.</p>	<p>The applicant is in the process of engaging with SKA – SA on the exact requirements and timing of studies to be undertaken during the EIA phase as well as those that have to take place at a later stage.</p> <p>Please note that the Avifaunal Specialist Study was undertaken by Mr Blair Zoghby, who is an Avifaunal Specialist. Blair Zoghby has been involved in ornithological conservation and research for eight years and holds an MSc degree in Zoology/Conservation Biology obtained through the Percy FitzPatrick Institute of African Ornithology, University of Cape Town, South Africa. He has undertaken numerous avian impact assessments across the country.</p> <p>The final scoping report includes a plan of study for a hydrological assessment to be undertaken.</p> <p>The consideration of alternatives is attached in section 7 of the scoping report. This scoping report was authored by Mr Dale Holder of Cape EAPrac. A summary of his CV is included in Annexure G4.</p> <p>Cape EAPrac believes that the scoping report does comply with these requirements. The table above provides a quick reference as to how these requirements have been</p>	
--	--	--	---	--	--

				<p>incorporated into this scoping report.</p> <p>A traffic specialist was appointed to provide input into this environmental process. A copy of the traffic study is included in annexure E10.</p> <p>The applicants originally signed declaration was included in appendix 7 of the application form. The signed landowner consent was included in Appendix 3 of the application form and is also included in Annexure G3 of the FSR.</p>	
12 July 2016	Rene de Kock	SANRAL	Requested whether SANRAL had commented or not.	No comments received from SANRAL to date. The EAP to provide SANRAL with latest layout Maps for Impact assessment phase.	
07 March 2016	James Williams	Stopaq Southern Africa (Pty) Ltd	<b><u>APPLICABLE TO AMDA ALPHA AND AMDA CHARLIE</u></b> Potential service provider. Provided the EAP with information on corrosion protection products.	EAP submitted this information to project developers , to consider further if the project enters the construction phase.	
11 July 2016	Mahlatse Shubaner	Department of Environmental Affairs	Requested digital copies of Scoping Reports	Digital copies of scoping reports provided on CD	11 July 2016
11 March 2016	Ivan Moolman	Kai Garib Municipality	Registered as an Interested and Affected Party	Registration confirmed	11 July 2016
21 July 2016	Adrian Tiplady	SKA	Dr Tiplady in response to a request from the applicant provided guidance in terms of the scope of the studies that need to take place as part of the Environmental Process.	The final terms of reference for RFE and EMI studies will be agreed upon with SKA before being finalised.	21 July 2016.
<b>PRE APPLICATION DRAFT SCOPING REPORT – 11 March – 01 April 2016</b>					
16 March 2016	Mr John Geeringh	Eskom	<p>Provided a copy of the following Eskom Guidelines / Requirements:</p> <p>- Eskom Requirements for working in or</p>	Noted. These requirements have been provided to the developer. Relevant provisions will also be included in the Environmental	16 March 2012.

			<p>near Eskom servitudes.</p> <ul style="list-style-type: none"> <li>- Renewable Energy Generation Plant Setbacks from Eskom infrastructure.</li> </ul>	<p>Management Programme, that will form part of the Environmental Impact Assessment Phase of the environmental process.</p>	
16 March 2016	Dr Adrian Tiplady	SKA	<p>A high level risk assessment has been conducted at the South African SKA Project Office to determine the potential impact of such facilities on the Square Kilometre Array. This letter serves to confirm the outcomes of the risk assessment, and proposals for any future investigations associated with this facility.</p> <p>I. The location of the proposed facilities has been provided for in the form of a Google Earth shapefile,</p> <p>II. The nearest SKA station has been identified as SKA 2362, at approximately 25 km from the proposed installation;</p> <p>III. Based on distance to the nearest SKA station, and the information currently available on the detailed design of the PV installations, these facilities poses a medium to high risk of detrimental impact on the SKA;</p> <p>IV. Any transmitters that are to be established, or have been established, at the site for the purposes of voice and data communication will be required to comply with the relevant AGA regulations concerning the restriction of use of the radio frequency spectrum that applies in the area concerned;</p> <p>V. As a result of the medium to high risk associated with the multiple photovoltaic facilities, significant mitigation measures would be required to lower the risk of detrimental impact to an acceptable level. The SKA project office recommends that further EMI and RFI detailed studies be conducted as significant mitigation measures would be required to lower the risk of detrimental impact to an</p>	<p>The project developer has committed to the following:</p> <p>This project is within the AGAA demarcated areas and in order to ensure that the proposed facility will comply with the electromagnetic and radio frequency interference limitations in the AGAA, the appropriate precautions will be implemented.</p> <p>Prior to any construction or site preparation taking place, appropriate Electromagnetic Interference (EMI) studies will be conducted by the Developer and the appropriate risk mitigation measures instituted in order to mitigate the risk of Electromagnetic Interference on the SKA.</p> <p>The risk associated with radio frequency interference on the SKA will be confirmed by measurement following construction of the facility and the appropriate risk mitigation measures instituted in order to mitigate the risk of radio frequency interference on the SKA.</p>	SR

			<p>acceptable level. The South African SKA Project Office would like to be kept informed of progress with this project, and reserves the right to further risk assessments at a later stage.</p> <p>This technical advice is provided by the South African SKA Project Office on the basis of the protection requirements of the SKA in South Africa, and does not constitute legal approval of the renewable energy projects in terms of the Astronomy Geographic Advantage Act, the Management Authority, and its regulations or declarations.</p>		
04 April 2016	Nicole Abrahams	SANRAL	Requested that she be registered on all three projects. Also requested a copy of Site Layout plans.	Registration confirmed and site layout plans provided.	9 March 2016
09 March 2016	Melanie Miles	Leads to Business	Requested fo be registered on AMDA Alpha, AMDA Bravo and AMDA Charlie developments.	Registration confirmed.	09 March 2016