



ENVIRONMENTAL MOTIVATION REPORT

for

EXTENSION OF EA VALIDITY PERIOD FOR THE HUMANSRUS PV 2 GRID CONNECTION

on

Remainder of the Farm 147 Humansrus,
Remainder of Farm Hoek Plaas 146 and
Portion 7 of Farm 117, Prieska, Siyathemba
Local Municipality, Northern Cape Province.

In terms of the

National Environmental Management Act (Act No. 107 of 1998, as
amended) & 2014 Environmental Impact Regulations



Prepared for Holder of EA: Humansrus Solar PV
Energy Facility 2 (Pty)Ltd

Date: 20 June 2025

Appointed EAP: Mr Dale Holder (2019/301)

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Report Reference: SIY317/29

Department Reference: 14/12/16/3/3/1/1318/AM3

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Appointed EAP: **Mr Dale Holder** (Ndip Nat Con]; EAPASA Registration Number **2019/301**). Mr Holder has over twenty years' experience as an environmental practitioner.

PURPOSE OF THIS REPORT:

Stakeholder Review and Comment

HOLDER OF EA:

Humansrus Solar PV Energy Facility 2 (Pty) Ltd

CAPE EAPRAC REFERENCE NO:

SIY317/29

SUBMISSION DATE

20 June 2025

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Portion 7 of Farm 117, Prieska, Siyathemba Local Municipality, Northern Cape
Province.**

Submitted for:

Stakeholder Review & Comment

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ENVIRONMENTAL MOTIVATION REPORT

1. INTRODUCTION & BACKGROUND

Humansrus Solar PV Energy Facility 2 (Pty) Ltd, hereafter referred to as the Holder of the EA, has applied for an amendment of their valid Environmental Authorisation (EA) (DFFE Reference: 14/12/16/3/3/1/1318) for the Authorised Humansrus PV2 Grid Connection.

The Facility has an existing EA, dated 30 April 2015. Several amendments to this EA have been granted by the DFFE as depicted in the Table below:

Table 1: EA Amendments affected for the Humansrus PV2 Grid Connection.

Amendment Ref#	Date	Purpose
14/12/16/3/3/1/1318/AM1	01 February 2016	Amendment of the approved route from Hydra Cuprum 132kV line to Kronos substation
14/12/16/3/3/1/1318/AM2	26 March 2020	Extension of the validity period by 5 years and change of contact details of the EA holder

This EA (as amended) authorised the following:

- 32 kV overhead transmission powerline, connection Humansrus PV Solar Energy Facility 2 to the nearby Kronos Eskom substation;
- Pylon structures of approximately 21 m in height; and
- Access or maintenance track beneath or parallel to the overhead line.

The Holder of the EA has applied for an additional amendment to the EA (this application) to update the contact details of the Holder of the EA and further extend the Validity period. To affect this further extension, the following amendments to the EA (as amended) have been applied for:

Table 2: Amendments applied for the Humansrus PV2 Grid Connection.

The proposed amendments are for the purpose of: - Updating the contact details of the holder of the EA; and - Extending the validity period of the EA. In order to affect the proposed amendments, the following changes to the EA, as amended, are required.
Amendment 1
Amendment 1 on page 1 of the EA amendment 14/12/16/3/3/1/1318/AM2 issued on 26 March 2020 confirmed the validity period as:

Amendment 1: Extension of the validity period

The activity must commence within a period of five (5) years from the date of expiry of the EA issued on 30 April 2015 (i.e. commence by 30 April 2020). If commencement of the activity does not occur within that period, the environmental authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken.

The reason for the extension of the validity period of the EA by an additional 5 years are due to the delays in the bidding process.

This is being amended to:

The activity must commence within a period of 10 years from the date of the lapsing of the EA issued on 30 April 2015, as amended (i.e. the EA lapses on 30 April 2025). If commencement of the activity does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken.

Amendment 2

Page 2 of the EA (as amended in 14/12/16/3/3/1/1318/AM2 on 26 March 2020) reflects the contact details of the holder of the EA as follows:

Mr Luis Jose Rein Rojo
Humansrus Solar PV Energy Facility 2 (Pty) Ltd
101, Block A, West Quay Building
7 West Quay Road, Waterfront
CAPE TOWN,
8001

Telephone: 021 418 2596
Fax: 086 611 0882
Email: lrein@grupocobra.com

This is being amended to:

Humansrus Solar PV Energy Facility 2 (Pty) Ltd

Mr Jose Minguillon Forteza

1st Floor, Building 9 – St Andrews

Inanda Greens Office Park

54 Wierda Rd West

Sandton 2196, Johannesburg

South Africa

Telephone Number: +27 (0) 740 67 04 04

Email Address: jminguillon@grupocobra.com

An application for the above amendments was submitted to the competent authority on 14 April 2025. The competent authority acknowledged receipt of the application on 29 April 2025 and confirmed that the application falls within the ambit of amendments to be applied for in terms of Part 1 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014, as amended. This application is therefore being undertaken in terms of Regulation 30 of the EIA Regulations, 2014 as amended.

Further to the acknowledgement, the competent authority requested additional information in support of this application. Please refer to the table below for the additional information requested by the competent authority as well as details as to how this information has been included in this report.

Table 3: Additional Information requested by the competent authority.

Information Requested	Details
A detailed motivation as to why the Department should extend the commencement period of the authorised development, including the advantages and disadvantages associated with the approval or refusal to the request for extension;	✓Please refer to section 2 of this report below.
The status (baseline) of the environment (social and biophysical) that was assessed during the initial assessment (by the relative specialist, if applicable);	✓Please refer to section 3 of this report below.
The current status of the assessed environment (social and biophysical) (by the relative specialist, if applicable);	✓As detailed in section 3 below a number of additional specialists were appointed to undertake site investigations and review the previous studies to determine whether there are any changes to the receiving environment, any changes to the impacts assessed and whether the mitigation measures previously outlined remain valid. Input from the following specialists is included in this motivation report: 1. Terrestrial Biodiversity, 2. Avifauna,

Information Requested	Details
	3. Aquatic Biodiversity and, 4. Agriculture.
A review of all specialist studies undertaken, and a detailed assessment, including a site verification report providing an indication of the status of the receiving environment (by the relative specialist, if applicable).	✓Please refer to section 3 below. Terrestrial Biodiversity, Avifaunal, Aquatic Biodiversity and Agricultural specialists undertook site inspections between January 2025 and April 2025 in order to verify the status of the receiving environment since the original studies were undertaken in 2015.
The terms of reference for the specialist reports and declaration of interest of each specialist must be provided.	✓The terms of reference for the current specialist input was to: 1. Review all previous specialist studies. 2. Undertake a site inspection and provide confirmation of the status of the receiving environment compared to that at the time of the original assessments done in 2014 and 2015. 3. Provide a reasoned confirmation as to whether the impact rating as provided in the original assessments remains valid; 4. Provide a reasoned confirmation whether the mitigation measures provided in the original assessments are still applicable. 5. Provide confirmation whether there are any new mitigation measures which need to be included into the EA, should the request to extend the commencement period be granted by the DFFE. 6. Provide an indication as to whether there are any new assessments/guidelines which are now relevant to the authorised development which were not undertaken as part of the initial assessment, must be taken into consideration and addressed in the report. 7. Provide a description and an assessment of any changes to the biophysical environment that has

Information Requested	Details
	occurred since the initial EA was issued. 8. Provide a description and an assessment of the surrounding environment, in relation to new developments or changes in land use which might impact on the authorised project, the assessment must consider the following: 9. Identify cumulative impacts, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
The report mentioned above, must indicate if the impact rating as provided in the initial assessment remains valid; if the mitigation measures provided in the initial assessment are still applicable; or if there are any new mitigation measures which need to be included into the EA, should the request to extend the commencement period be granted by the Department.	✓Please refer to section 4 below, along with the specialist input attached in appendices D1 – D4. The findings of the new specialists as well as that of the EAP are that there are no increases to the level or nature of impacts previously assessed, nor are there any additional mitigation measures that need to be implemented to ensure that the originally assessed level of impacts remains.
An indication if there are any new assessments/guidelines which are now relevant to the authorised development which were not undertaken as part of the initial assessment, must be taken into consideration and addressed in the report.	✓Please refer to the legislative and policy framework discussion that is included in section 5 of this motivation report.
A description and an assessment of any changes to the environment (social and biophysical) that has occurred since the initial EA was issued;	✓Please refer to section 3 of this report read in conjunction with the specialist input attached in appendices D1 – D4. The outcome of the site inspections undertaken by the EAP and relevant specialists have confirmed that the receiving environment has remained unchanged since the original assessments were undertaken in 2014 and 2015.
A description and an assessment of the surrounding environment, in relation to new developments or changes in land use which might impact on the authorised project, the assessment must consider the following:	✓Please refer to section 4.7 below as well as the cumulative assessments included as part of the specialist input attached in appendices D1 – D4.

Information Requested	Details
• similar developments within a 30km radius; • Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land. • Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. • The cumulative impacts significance rating must also inform the need and desirability of the proposed development. • A cumulative impact environmental statement on whether the proposed development must proceed.	The participating specialists have confirmed that the Cumulative Impact associated with the facility remain low and that the following mitigation measures identified in the original study remain valid: • Minimise the development footprint as far as possible and allow the retention of some natural vegetation between the rows of panels or trackers. • The facility should be fenced off in a manner which allows fauna to pass by the facility as easily as possible. This implies not fencing-in large areas of intact vegetation into the facility and only the developed area should be fenced.
Consent from all affected landowners (where applicable);	✓Landowner consent was included as part of the application to amend the EA. This Landowner Consent is also attached to Appendix F of this motivation report.
The Public Participation Process must be conducted in terms of Chapter 6 of the EIA Regulations, 2014 as amended.	✓Please refer to section 6 of this motivation report. Proof of public participation will be included in the final motivation report that will be submitted to the competent authority on completion of the public participation process.
A comments and response report.	✓A comments and responses report will be included in the final Motivation Report on completion of the Public Participation Process.
Please attach a Valid EAPASA Certificate.	✓ A Valid EAPASA Certificate for the EAP, Mr Dale Holder, is attached in Appendix H.

2. MOTIVATION FOR AMENDMENT

Amendment 1 as outlined in Table 2 above is required to update the name and contact details of the holder of the EA (Humansrus Solar PV Energy Facility 2 (Pty) Ltd) to those details of the current responsible person. There are no environmental or social advantages or disadvantages associated with this amendment. This amendment will ensure that all future correspondence from the competent authority in respect of the environmental authorisation is addressed to the correct contact person for the holder of the environmental authorisation.

In relation to Amendment 2 (extension of the validity period of the EA), the proposed Humansrus Solar PV Energy Facility 2 inclusive of its Grid Connection (i.e. this application) was unsuccessful in the previous rounds of the Renewable Energy Independent Power Producers Procurement Programme (REIPPPP). The applicant wishes to extend the validity period of the EA, in order to participate in upcoming rounds of the REIPPPP. The Competent Authority have already authorized the EA for the Humansrus Solar PV Energy Facility 2, which is now valid until 08 May 2035. The renewal of the EA for the Humansrus PV2 Grid Connection will ensure that the supporting infrastructure for the Humansrus Solar PV Energy Facility 2 also remains valid.

It must be noted that the proposed amendments do not include application for any physical changes to the facility as previously authorised. The advantages and disadvantages of the proposed amendments are therefore limited to extension of the validity period and no other aspects, as these were dealt with as part of the original Environmental Impact Assessment Process.

The advantages of extending the validity period are as follows:

- **Strategic Environmental benefits:** The greater project (which includes the Humansrus Solar PV Energy Facility 2 as well as this grid connection) will contribute to South Africa's renewable energy goals, reducing reliance on fossil fuels and lowering greenhouse gas emissions.
- **Social and Economic benefits:** The greater project will create job opportunities during both the construction and operational phases, stimulating local economic growth. The LED projects associated with the project will furthermore significantly benefit the local economy
- **Energy Security:** By extending the validity period of the project, it has the potential of increasing the share of renewable energy in the national grid, the project will enhance energy security and stability.
- **Technological Advancements:** The extension of the EA allows for the incorporation of the latest technologies, improving efficiency and reducing costs.
- **Opportunity to participate in further procurement processes:** The extension of the EA will allow for the greater project to participate in upcoming rounds of the REIPPPP (or other procurement programme). This aligns with the objectives of Government's Integrated Resource Plan.
- **Aligning with timeframes of the PV Facility:** The EA for the PV was extended to 08 May 2035. It will be advantageous for the EA for the Grid Connection (this application) to similarly align with these timeframes.

These advantages collectively support sustainable development and the transition to cleaner energy sources, which is a key objective of National Government. Should the department refuse to extend the validity period of the EA, these environmental and social benefits would not be realised.

The EAP is of the view that there are no disadvantages of the proposed extension of the EA. The details regarding the proposed extension of the EA are being subjected to a public participation process in terms of Chapter 6 of the 2014 EIA regulations (as amended). Any concerns from the general public, State Departments or Organs of State will be highlighted through this consultative process and the results thereof will be provided to the competent authority to inform the decision making on the application to extend the EA validity period.

3. BIOPHYSICAL AND SOCIAL ATTRIBUTES OF THE SITE

During the Environmental Impact Assessment (2015) the attributes of the biophysical and social environment were described in detail with input from the participating specialists at the time. As part of this application for amendment, additional specialist input was obtained from relevant specialists¹ and additional review was undertaken by the EAP to determine whether any changes to the biophysical and social environment had occurred since the original assessment was undertaken.

Please see the sections below for the summary of the Biophysical and Social Attributes of the site at the time of the original Basic Assessment (BA) along with details as to whether these are still relevant.

3.1. Terrestrial Biodiversity Context

During the original BA process, the ecological specialist confirmed that the vegetation on site was predominantly Bushmanland Arid Shrubland (among the most extensive vegetation types in South Africa with an extent of 34 690 km²).

¹ It must be noted that the specialists who undertook the original assessments were not available to provide input into this current amendment process. Relevant SACNASP registered specialists in each of these disciplines were consulted for input into this amendment.



Figure 1: Typical Vegetation of the Study Site in 2014 (Photograph: Todd, 2014)

The current Terrestrial Biodiversity Specialist (The Biodiversity Company, 2025) has verified that the broad scale vegetation remains unchanged as depicted in the figure below.



Figure 2: Typical vegetation on the Study Site in 2025 (Photograph: The Biodiversity Company, 2025)

During the original BA process the specialist (Todd, 2014) identified one habitat and described the site as broadly homogenous with some variation due to changes in soil depth and slope position. The habitat is described as "low open shrubland". Soils are mostly shallow and stony, with exposed calcrete in some areas and loose surface stone in other areas. Areas with deeper soils have taller and larger woody shrubs. The vegetation consists predominantly of shrub species, with a higher density of graminoids in certain areas.

No terrestrial fauna or flora Species of Conservation Concern (SCC) were observed on the site. The protected species *Boscia foetida* and *Titanopsis calcarea* were observed within the

Humansrus PV 2 grid area. It was also noted that there is a high likelihood of multiple additional protected species occurring in the project footprint, however none were observed.

Todd, 2024 confirmed that the habitat type is not considered highly sensitive. Moreover, the relative impact of the development is rated as Low due to the low sensitivity of the receiving environment and the proximity of the route to the existing road.

The current terrestrial biodiversity specialist (The Biodiversity Company, 2025) confirmed the previous specialist (Todd, 2014) findings that the site was found to be largely homogenous, and the findings support that the habitat represents a low open karoo shrubland. No ephemeral pans are located on the project site.

The current terrestrial biodiversity specialist (The Biodiversity Company, 2025) furthermore confirms the low sensitivity of the habitats as described in the original study (Todd, 2014).

It is concluded with input from the current specialist that the Terrestrial Biodiversity habitats and sensitivities as described as part of the original BA process remain unchanged.

The current screening tool for the Humansrus PV 2 Grid connection identified the Animal Species Theme as high, the Plant Species Theme as low and the Terrestrial Biodiversity Theme as Very High. The current specialist (The Biodiversity Company, 2025), refuted the Animal Species and Terrestrial Species sensitivities as per the table below.

Table 4: Animal Species, Plant Species and Terrestrial Biodiversity sensitivities as verified by the current Terrestrial Biodiversity Specialist, The Biodiversity Company 2025.

Screening Theme	Tool	Screening Tool	Specialist	Tool Validated or Disputed by Specialist - Reasoning
Animal Theme		High	Medium	Disputed – The project area of influence is homogenous and has some capability of supporting fauna species. Some species of conservation concern may occasionally move through the area, but it is unlikely that any SCC are resident. Avifauna are assessed separately.
Plant Theme		Low	Low	Validated – The homogenous shrubland provides some habitat for flora species. Flora species of conservation concern are unlikely, however protected species may be present.
Terrestrial Theme		Very High	Medium	Disputed – This habitat provides some ecosystem services, as well as supporting indigenous fauna and flora.

3.2. Avifaunal Context

During the original BA process (2015), the avifaunal composition of the site was not assessed as part of a standalone Avifaunal Assessment, as this was not a requirement at the time. The

Avifaunal component of the site was however assessed as part of the Ecological Assessment (Todd, 2014). In order to provide input into this application for extension of the EA, an Avifaunal Specialist (The Biodiversity Company, 2025) were appointed to review the findings of the original Ecological Assessment (Todd, 2014) and undertake a site verification to confirm the likely avifaunal species present on the site.

The original ecological study (Todd, 2014) found that the Avifaunal habitat was deemed to be broadly homogenous with some variation due to changes in soil depth and slope position. The habitat is described as low open shrubland, with only a few SCC's on site and in the surrounding environments. This was verified by the current specialist (The Biodiversity Company, 2025).

Furthermore, the original ecological study (Todd, 2014) assigned a medium sensitivity to the karoo Shrubland and a low sensitivity to roads and railways lines. This was verified by the current avifaunal specialist (The Biodiversity Company, 2025).

It is concluded with input from the current specialist that the Avifaunal habitats and sensitivities as described as part of the original BA process remain unchanged.

The current screening tool for the Humansrus PV 2 Grid connection identified the Animal Species Theme as high. The current specialist (The Biodiversity Company, 2025), refuted this as outlined in the Table below.

Table 5: Animal Species (specifically avifauna) sensitivities as verified by the current Terrestrial Biodiversity Specialist, The Biodiversity Company 2025.

Screening Theme	Tool	Screening Tool	Specialist	Tool Validated or Disputed by Specialist - Reasoning
Animal Theme (Avifauna)		High	Low	Disputed – The PAOI is homogenous and has some capability of supporting avifauna species. Some SCC may occasionally move through the area, but it is unlikely that any SCC are resident.

3.3. Aquatic Biodiversity Context

During the original BA process, Aquatic Biodiversity was considered as part of the Ecological Impact Assessment. This was supplemented by an opinion statement by Fluvius Environmental Consultants (2014) and a stormwater management plan (Aurecon, 2014) that formed part of the facilities EIR.

Todd, 2014, confirmed that no perennial watercourses or pans were identified on the site and as such, no sensitivity rating was allocated to aquatic features. Todd concluded that the entire site has a sensitivity rating of Medium (with the exception of portions transformed by roads and railway line which are deemed to have a low sensitivity). It should be noted that this is an overall ecological sensitivity rating (inclusive of terrestrial biodiversity, aquatic biodiversity, plant species and animal species) rather than aquatic biodiversity in isolation.

Fluvius, 2014 confirmed that the large drainage lines have largely been avoided in the preferred layouts and that minor non-perennial washouts and drainage lines may be impacted by the proposed development.

As part of this application for extension, an Aquatic Biodiversity Specialist (The Biodiversity Company) was appointed to undertake a site verification and review of the previous Aquatic Biodiversity input (Todd & Fluvius, 2014).

The Biodiversity Company, 2025, confirmed that no wetlands or rivers were identified within the footprint of the project during the site investigation in January 2025. A borrow pit filled with water was identified adjacent to the road. Evidence of this pit dates back to 2006 (i.e. the Borrow pit was in existence long before the original Basic Assessment Process was undertaken). This aligns with the Todd and Fluvius studies of 2014.



Figure 3: Example of the borrow pit (left) and dryland habitat (right) for the area (The Biodiversity Company, 2025).

It is concluded with input from the current specialist that the Aquatic Biodiversity habitats and sensitivities as described as part of the original BA process remain unchanged.

The current screening tool identified the sensitivity of the aquatic biodiversity theme as high. This was disputed by the current specialist, The Biodiversity company, 2025, who confirmed the aquatic sensitivity to be low due to the absence of water resources.

3.4. Agricultural Context

During the original BA process, an Agricultural Impact Assessment was not undertaken for the Humansrus PV2 Grid Connection, although one was undertaken for the Humansrus Solar PV Energy Facility 2.

As part of the study for the PV Facility, Mr Christo Lubbe, 2015, confirmed, that the site was unsuitable for commercial cultivation due to limiting factors such as shallow soil depth and hard setting carbonate horizons below surface. The low clay percentage results in low water holding capacity and low nutrient availability. Severe climatic conditions further limit commercial cultivation.

As part of this application for EA extension, an Agricultural Specialist (The Biodiversity Company, 2025) was appointed to undertake a site inspection to verify whether or not any new agricultural activities were present on the site since the 2015 study.

Following a site survey on the 3rd of April 2025, the Biodiversity Company confirmed that the findings of the previous study (Lubbe, 2014) for the PV remain valid taking cognisance that, no active cropping practices or irrigation infrastructure are found in the project area or has occurred over the lapsed years on the proposed grid connection site. The project area has a

low land capability and potential for cropping practices. The impacts to the overall soil and land capability sensitivity were “Low” across the entire affected area.

It is concluded with input from the current specialist that the Agricultural Potential and sensitivity as described as part of the original EIA process for the PV Facility and this grid connection remain unchanged.

3.5. Heritage Context

A heritage Impact Assessment (De Kock, 2015) which included Archaeology (ACO Associates, 2014), Palaeontology (Almond, 2014) and Cultural Heritage was undertaken as part of the original BA.

This original assessment confirmed that the potential impacts caused by the 132 kV powerline and the powerline access roads are likely to be limited and local.

Cultural Landscape refers to the imprint created on a natural landscape through human habitation and cultivation over an extended period of time. In this instance, thousands of years (pre-colonial history). Since the cultural landscape of an area is defined over many generations, it is unlikely that there are any changes to the cultural landscape that have occurred in the preceding 10 years.

Archaeological and Paleontological Impacts are generally considered permanent and irreversible, as the resources impacted are many thousands of years old and only change over the very long term. The low impact on archaeological and paleontological resources as determined in the original BA process, remain unchanged. The proposed amendments will therefore not result in any further Heritage Impacts.

3.6. Visual Context

During the original BA process, a visual specialist (Visual Resource Management Africa, 2014) provided input into the BA process. This included a viewshed analysis for all of the PV and Powerline alternatives. The only receptor identified, by the specialist, within the viewshed with high exposure was the R357 which is located adjacent to the proposed site.

A broad brush regional landscape survey was undertaken to identify key features that define the landscape context within the project approximate viewshed area. The following landmarks were identified by the specialist as significant in defining the surrounding areas characteristic landscape:

- Copperton mine and tailing storage facility
- Eskom substation and powerlines
- Solar energy context
- R357 road
- Old railway line
- Isolated farmsteads

This study found that the proposed transmission lines would not constitute a significant visual impact to the characteristic landscape and further detailed visual assessment is not necessary for the following reasons::

- The proposed project's close proximity to the Copperton mine and TSF.
- The old railway line and borrow pits degrade the landscape in the immediate vicinity.

- The area is an unofficial node for Solar Energy development with adjacent sites already having authorization.
- The alignment of the proposed project with municipal planning.

To assist in reducing the massing effects of multiple powerline structures the specialist recommended the following:

To reduce visual intrusion from the possible multiple powerlines linking up to different proposed PV projects in the vicinity, it is recommended that the powerlines as much as possible follow existing transmission line corridors.

- Transmission lines are not routed within 50m of the roads.
- The lay down should be located away from the main roads.
- Dust control measures should be implemented.
- There is a moderate preference for Power Line 2_01 as it set back from the roads.
- Power Line Alternative 2_02 is least preferred due to the double crossing of the R357.
- From a cumulative perspective, power lines should not be route on either side of the road i.e. one side of the road should be kept open with a preference for keeping eastern views away from the mine open.

Please note that the proposed amendments do not propose any physical changes to the authorised infrastructure. These findings and the suggested mitigation measured identified by the visual specialist remain unchanged.

4. ASSESSMENT AND COMPARISON OF IMPACTS

The following section provides details on the impacts that were assessed during the original Environmental Impact Assessment (2015) and those likely at the current time. This section has been completed with input from the following specialists.

- **Terrestrial Biodiversity:** Andine Erasmus (Cand. Sci. Nat. 164894) & Leigh-Ann de Wet (SACNASP 400233/12), The Biodiversity Company, April 2025.
- **Aquatic Biodiversity:** Andrew Husted (Pr Sci Nat 400213/11) & Zakariya Nakhlooda (SACNASP 120549), The Biodiversity Company, April 2025.
- **Avifauna:** Sam van Zwieten (Cand. Sci. Nat. 167363) & Dr Ryno Kemp (SACNASP 117462/17), The Biodiversity Company, April 2025.
- **Agriculture:** Dr Matthew Mamera (Pr Sci Nat 116356) & mMasilibela Seepamore (Pr Sci Nat 113907), mThe Biodiversity Company, April 2025.

The outcome of the additional specialist input is included in Appendices D1 – D5 of this motivation report. A comparison of impacts as originally assessed in 2015 and those verified by the abovementioned specialists and the EAP are included in the sections below.

4.1. Terrestrial Biodiversity Impacts

As outlined above, a Terrestrial Biodiversity Specialist was appointed to undertake a site investigation and to review the previous studies to determine whether the Impacts assessed in the original assessment have changed.

Table 6 Comparison of the quantitative assessment of Terrestrial Biodiversity Impacts of the initial assessment (Todd, 2014) and the current assessment (The Biodiversity Company, 2025)

Phase	Impact	Todd (2014)	The Biodiversity Company (2025)
		With mitigations	With mitigations
Planning and Construction	Impacts on vegetation and listed or protected plant species	Low Negative	Low Negative
	Direct faunal impacts	Low Negative	Low Negative
	Soil erosion risk	Low Negative	Low Negative
Operation	Alien plant invasion risk	Low Negative	Low Negative
	Soil erosion risk	Low Negative	Low Negative
	Faunal impacts	Low Negative	Low Negative

As can be seen in the table above, the current specialists (The Biodiversity Company, 2025) has verified the impacts assessed in the original study (Todd, 2014). The current specialist has furthermore confirmed the low Impacts on vegetation and listed or protected plant species and direct faunal impact to be low

The current specialist (The Biodiversity Company, 2025), confirmed that the mitigation measures identified in the original assessment remain relevant and that no new mitigation measures are required.

It is confirmed that there is no increase in the level or nature of terrestrial biodiversity impacts as assessed in the original assessment, nor are there any additional mitigation measures that need to be implemented at the current time.

4.2. Avifaunal Impacts

As outlined above, the assessment of avifaunal impacts formed part of the Ecological assessment that formed part of the original environmental impact assessment. As part of this application to extend the EA, an Avifaunal Specialist was appointed to undertake a site investigation and to review the previous studies to determine whether the Impacts assessed in the original assessment have changed.

Table 7 Comparison of the quantitative assessment of Avifaunal impacts of the initial assessment (Todd, 2014) and the current assessment (The Biodiversity Company, 2025)

Phase	Impact	Todd (2014)	TBC (2025)
		With mitigations	With mitigations
Planning and Construction	Impacts on avifauna vegetation	Low Negative	Low Negative
	Direct avifauna impacts	Low Negative	Low Negative
	Soil erosion risk	Low Negative	Low Negative
Operation	Alien plant invasion risk	Low Negative	Low Negative
	Soil erosion risk	Low Negative	Low Negative
	Avifauna impacts	Low Negative	Low Negative

As can be seen in the table above, the original specialists confirmed the impacts associated with avifaunal habitat and direct impacts on avifauna are likely to be low.

The current avifaunal specialist (The Biodiversity Company, 2025), confirmed that the mitigation measures identified in the original assessment remain relevant and that no new mitigation measures are required.

It is confirmed that there is no increase in the level or nature of avifaunal impacts as assessed in the original assessment, nor are there any additional mitigation measures that need to be implemented at the current time.

4.3. Aquatic Biodiversity Impacts

As outlined above, the assessment of aquatic biodiversity impacts formed part of the original Ecological assessment (Todd, 2014) and this was supplemented by an aquatic opinion letter (Fluvius, 2014) and a Stormwater Management Plan (Aurecon, 2014). As part of this application to extend the EA, an Aquatic Biodiversity Specialist was appointed to undertake a site investigation and to review the previous studies to determine whether the Impacts assessed in the original assessment have changed.

Since the previous specialist (Todd, 2014) did not assess the impacts on Aquatic Biodiversity in isolation (but rather as part of the general ecology), the current specialist has assessed the impact on aquatic biodiversity to confirm whether it aligns with the overall medium to low ecological impact previously assessed.

Table 8 Assessment Construction Phase of Aquatic Biodiversity Impacts (The Biodiversity Company, 2025)

Nature of the Impact	Status	Impact Rating
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Loss or degradation in ecosystem services;	Before mitigation	Low
	After mitigation	Low
Increase in erosion and sedimentation;	Before mitigation	Low
	After mitigation	Low
Introduction and spread of alien and invasive vegetation;	Before mitigation	Low
	After mitigation	Low

Table 9 Assessment Operational Phase of Aquatic Biodiversity Impacts (The Biodiversity Company, 2025)

Nature of the Impact	Status	Impact Rating
Loss or degradation in ecosystem services;	Before mitigation	Low
	After mitigation	Low
Increase in erosion and sedimentation;	Before mitigation	Low
	After mitigation	Low
Introduction and spread of alien and invasive vegetation;	Before mitigation	Low
	After mitigation	Low

As can be seen in the table above, all impacts on Aquatic Biodiversity have been assessed by the current specialist (The Biodiversity Company, 2025) to be of Low significance. This aligns with the medium to low ecological impact assessed in the original study (Todd, 2014).

The current Aquatic Biodiversity specialist (The Biodiversity Company, 2025), confirmed that the ecological mitigation measures identified in the original assessment remain relevant and that no new mitigation measures are required.

It is confirmed that there is no increase in the level or nature of aquatic impacts as considered in the original ecological assessment, nor are there any additional mitigation measures that need to be implemented at the current time.

4.4. Agricultural Impacts

As outlined above, the original EIA for the PV facility included an agricultural specialist assessment (an agricultural assessment was not undertaken for the original Humansrus PV 2 Grid connection, as Powerline infrastructure has minimal impacts on agricultural operations).

As part of this application to extend the EA, an Agricultural specialist was appointed to undertake a site investigation and to review the previous studies to determine whether the Impacts assessed in the original assessment have changed.

The agricultural specialist (The Biodiversity Company, 2025) undertook follow-up specialist site survey on the 3rd of April 2025 and has confirmed that the findings of the previous study for the PV site (Lubbe, 2014) remain valid.

The specialist furthermore confirmed that, no active cropping practices or irrigation infrastructure are found in the project area or has occurred over the years along the powerline corridor.

The previous agricultural specialist (Lubbe, 2014) confirmed that the site is largely unsuitable for cultivation due to the following limiting factors:

- Low annual rainfall, high evaporation and extreme temperatures restrict dry land cultivation.
- The very shallow soil depth with its limited water holding capacity restricts root development.
- The soils have carbonate-rich B-horizons. The use of calcic soils is limited by climate (low rainfall and high evaporation), shallow soil depth, high pH, low plant available P and trace elements (especially Fe), toxic levels of extractable B and stoniness. All calcic soils are highly susceptible to water erosion.

The previous specialist furthermore confirmed that the very fine sand grade of topsoil influences the stability and increases erodibility potential. Low clay percentage results in low water holding capacity and low nutrient availability, resulting in low soil fertility.

The above findings of the previous agricultural specialist have been confirmed by the current specialist (The Biodiversity Company 2025).

It is confirmed that there is no increase in the level or nature of agricultural impacts as considered in the original agricultural assessment, nor are there any additional mitigation measures that need to be implemented at the current time.

4.5. Heritage Impacts.

As outlined above, impacts on heritage resources (Cultural Landscape as well as Archaeology and Palaeontology) are permanent and do not change over the medium or long term.

Cultural Landscape refers to the imprint created on a natural landscape through human habitation and cultivation over an extended period. In this instance, thousands of years (pre-colonial history). Since the cultural landscape of an area is defined over many generations, it is unlikely that there are any changes to the cultural landscape that have occurred in the preceding 10 years.

Archaeological and Paleontological Impacts are generally considered permanent and irreversible, as the resources impacted are many thousands of years old and only change over the long term. The low impact on archaeological and paleontological resources as determined in the original BA process, remain unchanged. The proposed amendments will therefore not result in any further Heritage Impacts.

It is confirmed that there is no increase in the level or nature of heritage impacts as considered in the original Heritage Impact Assessment, nor are there any additional mitigation measures that need to be implemented at the current time. The SAHRA consent for this project remains valid.

4.6. Visual Impacts

During the Environmental Impact Assessment process, a visual assessment was undertaken by Mr Stephen Stead of Visual Resource Management Africa (VRMA, 2014). This study found that none of the powerline alternatives would constitute a significant visual impact to the characteristic of the landscape. This finding remains unchanged as the visual resources of the regional landscape have degraded to some extent by the addition of energy infrastructure that was not present at the time of the original assessment.

4.7. Cumulative Impacts

Cumulative impacts cannot be considered for the powerline in isolation and need to consider the powerline along with the PV Facility to which it connects, which in this instance is the Humansrus Solar PV Energy Facility 2.

From a terrestrial biodiversity point of view, the original ecological assessment (Todd, 2014) made the following comments on development in the area:

There is, however, a large amount of other renewable energy development in the area, which raises the possibility of significant cumulative impacts. However, a number of the applications have lapsed and there are no preferred bidders in the immediate area either, suggesting that not all of the proposed facilities will ultimately be built. Nevertheless, due to the presence of the Kronos and Garona substations, the area is likely to remain attractive to renewable energy developers, and it is likely that there will ultimately be a number of different renewable energy facilities operating in the area.

Todd (2014) further states that although cumulative impacts are a potential concern, the affected habitat is not considered rare or sensitive and is widely available in the area, with the result that the contribution of the current development to cumulative impacts is likely to be **low**.

This was verified by the current Terrestrial Biodiversity and Avifaunal Specialists (The Biodiversity Company, 2025), who have assessed the cumulative impacts as follows:

Table 10 Assessment of Cumulative Impacts on Terrestrial Biodiversity, including the animal and plant species (The Biodiversity Company, 2025)

Impact	Sensitivity of Receiving Environment	Probability of Impact	Significance (with mitigation)
Destruction, fragmentation of the vegetation community, and loss of habitat; spread of alien and invasive species; displacement and mortality of the faunal community	Ecology with limited sensitivity/importance	Likely	Low

From an Aquatic Biodiversity Perspective, the current specialist (The Biodiversity Company 2025) has confirmed that the quantitative impact of the proposed project in isolation on aquatic biodiversity is anticipated to be "Absent" due to the avoidance of these systems. The cumulative impact of the proposed project on aquatic biodiversity is also anticipated to be "Low". It should be noted that pre-existing modifications to the systems do exist to some degree. Since the layout achieves avoidance of large and/or sensitive watercourses and that stormwater plan will be implemented, no irreplaceable loss of freshwater biodiversity is anticipated.

Table 11: Cumulative Impacts to aquatic biodiversity associated with the proposed project

Status	Cumulative Effect	Impact Significance	Impact Rating	Can impact be mitigated?	Is the impact acceptable ?
Impact in isolation	-	-	Absent	Yes	Yes
Cumulative impact	1	21	Low		

The following mitigation measures, to address cumulative impacts, as identified in the original assessment remain valid:

- Minimise the development footprint as far as possible.
- Powerline infrastructure should not run on both sides of the road, but only 1.

5. LEGISLATIVE AND POLICY FRAMEWORK

The applicable legislation and policies have been updated since the submission of the Final Environmental Impact Report for the facility, in 2015 and these changes in legislation have been considered as part of this Application for amendment (extension of the validity period of the EA). The table below lists the applicable legislation and policy framework that was considered in the original assessment, and whether this remains valid. New legislation and policy relevant to the project is discussed thereafter.

Table 12: Legislation and policy guidelines originally considered in the BA process for the Humansrus Solar PV Energy Facility 1 any additional considerations applicable to the extension of the EA.

Legislation	Additional considerations applicable to the current application to extend the validity period of the EA.
NATIONAL LEGISLATION	
The Constitution of the Republic of South Africa	No additional considerations are applicable to the proposed extension of the validity period of the EA.
National Environmental Management Act (NEMA, Act 107 of 1998) & EIA Regulations 2014, as amended.	The NEMA EIA Regulations were amended in 2014 & 2017. This application is being undertaken in terms of this legislation. All similarly listed activities are applicable to those originally assessed and authorised i.e. no additional activities are applicable to the proposed extension of the validity period of the EA.
National Environmental Management: Biodiversity Act (Act 10 of 2004)	The ecosystem threat status of the mapped vegetation type remains unchanged. The site conditions remain the same as previously assessed, as confirmed with input from relevant specialists. No nationally protected faunal or flora species were identified during the original assessment (Todd, 2014)

Legislation	Additional considerations applicable to the current application to extend the validity period of the EA.
	or the current assessment (The Biodiversity Company, 2024).
Conservation of Agricultural Resources Act – CARA (Act 43 of 1983):	No additional considerations applicable to the proposed extension of the validity period of the EA.
The Subdivision of Agricultural Land, Act 70 of 1970	No additional considerations applicable to the extension of the EA for the proposed facility.
National Water Act, No 36 of 1998	In terms of the original study, any activities that impede or divert the flow of water in a watercourse or alter the bed, banks, course or characteristics of a watercourse (21c and 21i) will require approval in terms of the National Water Act. This remains unchanged in this application for extension of the validity period of the EA.
National Forests Act (No. 84 of 1998):	No natural forest or protected trees were identified within the footprint of the proposed facility and this remains unchanged.
National Heritage Resources Act (NHRA, Act 25 of 1998)	A SAHRA confirmed that no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required and this remains unchanged.

Since the original assessment in 2015 and present, the most significant change in legislation and policy is associated with the National Screening tool and the minimum assessment criteria for the assessment of themes identified in the screening tool. One of the terms of references to the current specialists were to consider the outcome of the screening tool and to confirm or refute the sensitivity of the relevant theme sensitivity.

In Terms of the Terrestrial Biodiversity (including the animal and plant themes), the following sensitivities were identified in the screening tool.

- Animal Species Theme – High. This is due to the possible presence of one high sensitivity avifauna Species of Conservation Concern (SCC) – *Neotis ludwigii*.
- Plant Species Theme – Medium. Due to the likely presence of two medium sensitivity flora SCC – *Tridentea virescens* & Sensitive species 144; and
- Terrestrial Theme - Very High. Due to the presence of a FEPA Sub catchment.

The current terrestrial biodiversity specialist (The Biodiversity Company, 2025) has refuted these sensitivities outlined in the screening tool and confirms the Low sensitivity for these themes as outlined in the original assessment (Todd, 2014).

The Screening tool defines the Aquatic Biodiversity Theme as High. This is due to the site being within a FEPA Sub catchment. The current specialist (The Biodiversity Company, 2025) has refuted the high sensitivity theme for Aquatic Biodiversity and confirmed a low sensitivity determined by the original Ecological Specialist (Todd, 2014). This low rating was assigned by the current specialist, as there are no Natural Aquatic Biodiversity Features along the powerline corridor.

The IDP and SDF of the local municipality have been amended since this project was authorised in 2015. The promotion and development of renewable energy infrastructure within the municipality remains a key objective of both the IDP and the SDF.

The Integrated Development Plan (IDP) of Siyathemba Municipality outlines several key initiatives and strategies aimed at promoting sustainable development, including the integration of renewable energy sources.

- Sustainable Development Goals (SDGs): The IDP aligns with national and provincial SDGs, emphasizing the importance of renewable energy in achieving sustainable development.
- Energy Efficiency Projects: The IDP includes plans for energy efficiency projects that aim to reduce the municipality's carbon footprint and promote the use of renewable energy sources.
- Community Engagement: The IDP highlights the outcomes of community consultation meetings, where renewable energy projects were discussed as part of the municipality's commitment to sustainable development.
- Budget Allocation: Specific budget allocations are made for renewable energy projects, ensuring that these initiatives are financially supported and can be effectively implemented.

The Spatial Development Framework (SDF) of Siyathemba Municipality provides a strategic vision for spatial planning and land use management, with a focus on integrating renewable energy solutions. Key aspects include:

- Strategic Objectives: The SDF outlines strategic objectives that include the promotion of renewable energy projects to support sustainable urban and rural development.
- Land Use Planning: The SDF incorporates land use planning objectives that facilitate the development of renewable energy infrastructure, such as solar farms and wind energy facilities.
- Environmental Considerations: The SDF emphasizes the importance of environmental sustainability and the role of renewable energy in reducing the municipality's environmental impact.
- Legal Framework: The SDF is developed within a legal framework that supports the integration of renewable energy projects, ensuring compliance with national and provincial regulations.

These documents collectively demonstrate Siyathemba Municipality's commitment to incorporating renewable energy (which include associated powerline infrastructure) into its development plans, promoting sustainability, and reducing its carbon footprint.

Another guideline that was published since the original BA process, and which requires consideration, is the Environmental Impact Assessment Guideline for Renewable Energy.

The Minister of Environmental Affairs published the Environmental Impact Assessment Guideline for Renewable Energy in terms of section 24J of the National Environmental Management Act, 1998 (Act No. 107 of 1998) on 16 October 2016.

In pursuit of promoting the country's Renewable Energy development imperatives, the Government has been actively encouraging the role of Independent Power Producers (IPPs) to feed into the national grid. Through its REIPPPP, the DoE has been engaging with the sector in order to strengthen the role of IPPs in renewable energy development. Launched during 2011, the REIPPPP is designed so as to contribute towards a target of 3 725MW, and towards

socio-economic and environmentally sustainable development, as well as to further stimulate the renewable industry in South Africa.

In order to facilitate the development of IPPs in South Africa, these guidelines have been written to assist project planning, financing, permitting, and implementation for both developers and regulators. The guideline is principally intended for use by the following stakeholder groups:

- Public Sector Authorities (as regulator and/or competent authority);
- Joint public sector authorities and project funders, e.g., Eskom, IDC, etc.
- Private Sector Entities (as project funder/developer/consultant);
- Other interested and affected parties (as determined by the project location and/or scope).

This guideline aims to ensure that all potential environmental issues pertaining to renewable energy projects (inclusive of their grid connection infrastructure) are adequately and timeously assessed and addressed as necessary so as to ensure sustainable roll-out of these technologies by creating a better understanding of the environmental approval process for renewable energy projects.

The guidelines list the following possible environmental impacts associated with the development of solar energy facilities.

Table 13: Potential environmental impacts of solar energy projects (Adapted from DEA, 2016) showing where they have been considered in this report.

Impact Description	Relevant Legislation	Applicability to this project
Visual Impact	NEMA	Specialist input formed part of the original application for environmental authorisation. Please also refer to section 4.6 above.
Noise Impact (CSP)	NEMA	Not applicable, as CSP is not considered as a technology alternative.
Land Use Transformation (fuel growth and production)	NEMA, NEMPAA, NHRA	Not Applicable to PV or its associated grid.
Impacts on Cultural Heritage	NEMA, NHRA	Specialist input formed part of the original application for environmental authorisation. Please also refer to section 4.5 above.
Impacts on Biodiversity	NEMA, NEMBA, NEMPAA, NFA	Specialist input formed part of the original application for environmental authorisation. Please also refer to section 4.1 and 4.2 above
Impacts on Water Resources	NEMA, NEMICMA, NWA, WSA	Specialist input formed part of the original

Impact Description	Relevant Legislation	Applicability to this project
		application for environmental authorisation. Please also refer to section 4.3 above
Hazardous Waste Generation (CSP and PV)	NEMA, NEMWA, HAS	The EMPr makes provision for damaged and defunct PV infrastructure for dismantling and re-use.
Electromagnetic Interference	NEMA	An EMI and RFI path loss study was completed as part of the original application for environmental authorisations for the PV part of the project. As the proposed extension does not include any physical changes to the PV facility, nor this Grid Connection Infrastructure, these studies remain valid.
Aircraft Interference	NEMA, MSA	The applicant The applicant is in possession of a valid obstacle certificate (in terms of Part 30-27 of the Civil Aviation Act).
Loss of Agricultural Land	SALA	Specialist input formed part of the original application for environmental authorisation. Please also refer to section 4.4 above
Sterilisation of mineral resources	MPRDA	The applicant has confirmation in terms of section 53 of the MPRDA for the properties affected by the Grid connection.

6. PUBLIC PARTICIPATION & STAKEHOLDER ENGAGEMENT

The competent Authority has requested that public participation be undertaken in terms of Chapter 6 of the 2014 EIA Regulations (as amended). Details of and proof of the public participation undertaken will be included in the Final Motivation report that will be submitted for consideration and decision making after completion of the public participation process.

Section 40(2) in Chapter 6 of regulation 982 requires that the public participation process contemplated in this regulation must provide access to all information that reasonably has or may have the potential to influence any decision with regard to an application unless access to that information is protected by law and must include consultation with—

- (a) the competent authority;
- (b) every State department that administers a law relating to a matter affecting the environment relevant to an application for an environmental authorisation;
- (c) all organs of state which have jurisdiction in respect of the activity to which the application relates; and
- (d) all potential, or, where relevant, registered interested and affected parties.

In order to comply with this requirement, the proposal is to provide all parties, listed in subsections a, b and c above, with full digital copies of the Draft Motivation report and all appendices. Such digital copies will be provided to the competent authority, organs of state and state departments via digital platforms such as WeTransfer/Dropbox/Sharepoint.

In terms of point d above, all Interested & Affected Parties (I&APs) that are identified, or register as part of the process will be provided access to the Draft Motivation Report via the following:

1. The digital copy of the documentation that will be available on the Cape EAPrac website and any other digital platform that is identified by Cape EAPrac or the recipients such as WeTransfer / Dropbox / Sharepoint.
2. I&AP's that do not have access to digital platforms, will be offered the option of receiving flashdrives/CDs with the complete reports;
3. Potential and registered I&APs will be informed that copies of the documentation can be provided via postal or courier services should it be necessary.

All I&AP's that were registered as part of the original environmental process will also be notified of the availability of this Draft Motivation Report for review and comment.

A comment period of **30 Days** has been allowed in compliance with Chapter 6.

The draft Motivation Report will be circulated for comment at the same time that is provided to the competent authority for review. Submissions received during this period will be considered by the project team and specialists and responded to. The final motivation report will reflect the outcome of the stakeholder engagement process in accordance with the POPIA.

Table 14: Public participation actions undertaken for the amendment of the Environmental Authorisation of the Humansrus PV2 Grid Connection.

Regulated Requirement	Proposed Actions
(1) If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for an environmental authorisation in respect of such activity, obtain the written consent of the landowner or person in control of the land to undertake such activity on that land. (2) Subregulation (1) does not apply in respect of- (a) linear activities;	The landowner of Farm 147 Humansrus (i.e. the non linear components of the Grid Connection) is also the person in control of the land. Landowner consent has been obtained and is appended to this motivation report.

Regulated Requirement	Proposed Actions
The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of an application or proposed application which is subjected to public participation by -	
(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of - (i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and (ii) any alternative site;	Site notices were placed at two positions on along the powerline on Wednesday 18 June 2025. Proof of these notices will be included in the Public Participation Report which will be submitted with the Final Motivation Report.
(b) giving written notice, in any of the manners provided for in section 47D of the Act, to -	
(i) the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	This Draft Motivation Report has been shared with the relevant Ward Councillor to distribute to the relevant Ward Committees. Ward Committees will distribute the information documents to occupiers/residents of the affected area.
(ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	This Draft Motivation Report has been shared with the relevant Ward Councillor to distribute to the relevant Ward Committees. Ward Committees will distribute the information documents to the Occupiers/residents of the affected area.
(iii) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;	The ward councillor will be notified of this environmental process and will be provided with a digital copy of the documentation.
(iv) the municipality which has jurisdiction in the area;	The Siyathemba Municipality (Planning, Technical Services & Environmental) will be notified of this environmental process and will be provided with digital copies of all documentation.
(v) any organ of state having jurisdiction in respect of any aspect of the activity; and	All organs of state that have jurisdiction in respect of the activity will be notified of this environmental process and will be provided with digital copies of all documentation.
(vi) any other party as required by the competent authority;	DFFE will be given an opportunity to comment on the Draft Motivation Report. Should they identify additional parties that need to provide comment, copies of the documentation and opportunity to comment will be provided to such parties.

Regulated Requirement	Proposed Actions
(c) placing an advertisement in - (i) one local newspaper; or (ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	An advert has been placed in the Veldbrand Courier calling for I&APs to register and advising on what documentation is available and how to access it. There is currently no official EIA Gazette that has been published specifically for the purpose of providing public notice of applications.
(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official Gazette referred to in paragraph (c)(ii);and	Adverts will not be placed in provincial or national newspapers, as the potential impacts will not extend beyond the borders of the municipal area.
(e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to - (i) illiteracy; (ii) disability; or (iii) any other disadvantage.	Notifications will include provision for alternative engagement in the event of illiteracy, disability or any other disadvantage. In such instances, Cape EAPrac will engage with such individuals in such a manner as agreed on with the competent authority. Virtual meetings / telephone calls as reasonable alternative methods of public participation will be utilised, where I&APs request such, because they are unable to utilise some of the methods provided.
(3) A notice, notice board or advertisement referred to in subregulation (2) must - (a) give details of the application or proposed application which is subjected to public participation; and (b) state - (i) whether basic assessment or S&EIR procedures are being applied to the application; (ii) the nature and location of the activity to which the application relates; (iii) where further information on the application or proposed application can be obtained; and (iv) the manner in which and the person to whom representations in respect of the	All notification and adverts will comply with this requirement.

Regulated Requirement	Proposed Actions
application or proposed application may be made.	
(4) A notice board referred to in subregulation (2) must - (a) be of a size at least 60cm by 42cm; and (b) display the required information in lettering and in a format as may be determined by the competent authority.	The site notices placed comply with these requirements.
(5) Where public participation is conducted in terms of this regulation for an application or proposed application, subregulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public participation process contemplated in regulations 19(1)(b) or 23(1)(b) or the public participation process contemplated in regulation 21(2)(d), on condition that - (a) such process has been preceded by a public participation process which included compliance with subregulation (2)(a), (b), (c) and (d); and (b) written notice is given to registered interested and affected parties regarding where the - (i) revised basic assessment report or, EMPr or closure plan, as contemplated in regulation 19(1)(b); (ii) revised environmental impact report or EMPr as contemplated in regulation 23(1)(b); or (iii) environmental impact report and EMPr as contemplated in regulation 21(2)(d); may be obtained, the manner in which and the person to whom representations on these reports or plans may be made and the date on which such representations are due.	This will be complied with if final reports are produced later in the environmental process.
(6) When complying with this regulation, the person conducting the public participation process must ensure that - (a) information containing all relevant facts in respect of the application or proposed application is made available to potential interested and affected parties; and (b) participation by potential or registered interested and affected parties is facilitated in such a manner that all potential or	All reports that are submitted to the competent authority will be subject to a public participation process of a minimum of 30 days. These include: - Draft Motivation Report - All specialist reports that form part of this environmental amendment process.

Regulated Requirement	Proposed Actions
registered interested and affected parties are provided with a reasonable opportunity to comment on the application or proposed application. (7) Where an environmental authorisation is required in terms of these Regulations and an authorisation, permit or licence is required in terms of a specific environmental management Act, the public participation process contemplated in this Chapter may be combined with any public participation processes prescribed in terms of a specific environmental management Act, on condition that all relevant authorities agree to such combination of processes.	

7. CONCLUSION AND RECOMMENDATIONS

Cape EAPrac is of the opinion that the information contained in this Motivation Report and the documentation attached hereto, is sufficient to allow the competent authority and Potential and Registered I&AP's to consider the potential negative and/or positive impacts associated with the proposed extension of the validity period of the Environmental Authorisation for the proposed Humansrus PV2 Grid Connection.

All participating specialists and the EAP have confirmed that:

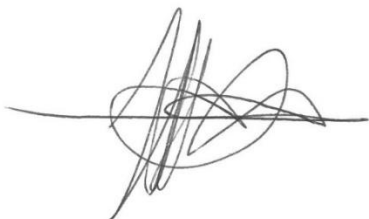
1. The state of the biophysical and social environment remains the same as previously assessed.
2. The significance of impacts remains the same as previously assessed.
3. The Cumulative impacts remain the same as previously assessed.
4. The mitigation and management measures outlined in the Final Environmental Impact Report for the facility remain relevant and no further mitigation measures are required.

It is the reasoned view of the EAP that the proposed amendments (Extension of the validity period of the EA) can be considered for authorisation subject to the outcome of the public participation process and full implementation of the existing EMPr and existing EA Conditions.

8. DECLARATION OF THE APPOINTED ENVIRONEMNTAL ASSESSMENT PRACTITIONER

I, DALE HOLDER EAP Registration Number: 2 0 1 9 / 3 0 1
as the Appointed EAP hereby declare/affirm that:

- my EAP Registration is current and up to date, and will inform the Applicant and Department if the registration should lapse during this pre-application process;
- the information provided or to be provided as part of this Application form, is true and correct;
- in terms of the general requirement to be independent:
 - other than fair remuneration for work performed/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity;
 - or
- in terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed/will disclose, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this Application form;
- I have ensured/will ensure that information containing all relevant facts in respect of the Application form was/will be distributed or was/will be made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were/will be provided with a reasonable opportunity to participate and to provide comments;
- I have ensured/will ensure that the comments of all interested and affected parties were/will be considered, recorded and submitted to the Competent Authority in respect of this Application form;
- I have ensured/will ensure the inclusion of inputs and recommendations from any specialists in respect of the Application form, where relevant;
- I have kept/will keep a register of all interested and affected parties that participated in the public participation process;
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014; and
- All specialist investigations must comment on how the potential impacts relate to climate change concerns.



19 June 2025

Signature of the Appointed EAP:

Date:

Cape Environmental Assessment Practitioners