

Issues and Responses Summary: Eskom Battery Storage - Skaapvlei: Draft Basic Assessment Report

In compliance with the requirements of the Environmental Impact Assessment (EIA) Regulations, 2014, the Issues and Responses Summary reflects the *issues* raised by stakeholder¹ and received by SRK on the Draft Basic Assessment (BA) Report (BAR) released on 29 August 2019, as listed in Table 2. Responses are provided by SRK, Eskom and/or specialists.

Copies of original comments received by SRK are collated and presented in Appendix G6 of the Final BAR.

Issues are grouped into the following general themes in the Issues and Responses table (see Table 2):

- A. Planning
- B. Project Description
- C. Alternatives
- D. Waste Management
- E. Stormwater Management
- F. Water Use
- G. Fire Management
- H. Traffic
- I. Terrestrial Ecology
- J. Socio-Economic
- K. Heritage
- L. Need and Desirability
- M. Public Participation Process
- N. Risk Assessment
- O. EA Application
- P. Final BAR
- Q. EMPr
- R. Other

¹ Issues noting minor errors in the BAR (e.g. spelling errors) have not been included in the Issues and Responses Summary, but have been addressed.

Abbreviations and Acronyms used in the Issues and Responses Summary

BA	Basic Assessment	GN	General Notice
BAR	Basic Assessment Report	HWC	Heritage Western Cape
DEFF	Department of Environment, Forestry and Fisheries	LORWUA	Lower Olifants River Water Users Association
DEA&DP	Department of Environmental Affairs and Development Planning	MLM	Matzikama Local Municipality
DTPW	Department of Transport and Public Works	NEM:WA	National Environmental Management: Waste Act (59 of 2008)
EA	Environmental Authorisation	SAWIS	South African Waste Information System
EAP	Environmental Assessment Practitioner	SCC	Species of Conservation Concern
EIA	Environmental Impact Assessment	SWMP	Stormwater Management Plan
EMPr	Environmental Management Programme	WCDM	West Coast District Municipality

Written comments were received on the draft BAR from the stakeholders listed in Table 1.

Table 1: Stakeholders who submitted written comments

#	Stakeholder	Affiliation	Date received
1.	Smit, Briaan	Matzikama Local Municipality (MLM)	11 September 2019
2.	Kotze, Doretha	West Coast District Municipality (WCDM)	12 September 2019
3.	Duffell-Canham, Alana	CapeNature	23 September 2019
4.	Alberts, Herman	Department of Environment, Forestry and Fisheries (DEFF)	26 September 2019
5.	Corin, Anthony	Private	27 September 2019
6.	Schippers, Melanese	Department of Environmental Affairs and Development Planning (DEA&DP): Development Management	30 September 2019
7.	Baderoon, Muneeb	DEA&DP: Waste Management	30 September 2019
8.	Natus, Monique	DEA&DP: Pollution and Chemicals Management	30 September 2019
9.	Thobekile Zungu	DEA: Biodiversity Conservation	10 October 2019

Table 2: Issues and Responses Table: 533767 Eskom BESS Skaapvlei BAR

No	Issues	Stakeholder	Draft BAR response
A. Planning			
1.	The correct property description is Plot 1862, Olifants River Settlement.	MLM	Agreed. The property description (Erf 1862) in Table 3.1 of the BAR has been left as is.
2.	The correct zoning of the property is as follows: Agricultural Zone I with a consent use for a renewable energy structure (which includes a wind farm consisting out of 46 wind turbines with an electricity generating capacity of 100MW together with appurtenant structures) and a tourist facility.	MLM	Noted. The final BAR has been updated to reflect the correct zoning of Erf 1862, i.e. Agricultural Zone I with a consent use for a renewable energy structure (including appurtenant structures) and a tourist facility.
3.	The MLM is of the view that the project is in line with the current zoning of the property.	MLM	Noted.
4.	An updated to scale site layout plan (hard and soft copies) with GPS co-ordinates must be submitted to the Town Planning and Building Control Sections of the Matzikama Municipality.	MLM	The following has been recommended in the Final BAR as a condition of authorisation: "Submit a hard and soft copy of the site layout plan to the MLM Town Planning and Building Control departments once finalised and prior to construction. The layout plan should be to scale with GPS co-ordinates".
5.	The content of the approved conditions especially condition 22 (relating to financial provision) within the consent use approval letter (for a renewable structure) must be evaluated in relation between the existing infrastructure and land use on the property and the proposed "battery storage system" and the impact thereof on the agreement. If the agreement needs to be amended the required application must be submitted to the Municipality.	MLM	Eskom will evaluate the existing agreement with the MLM during the Design Phase.
6.	No development/construction should take place prior to approval of the relevant building plans by Matzikama Municipality.	WCDM	Noted.
B. Project Description			
7.	The reports are completely lacking in any detailed and quantified information, analysis, mitigation of any of the specific chemicals that are envisaged to be used.	Anthony Corin	Eskom is unable to specify detailed information on the technology type and final quantified information at this stage as this will be dictated by the market at the time of the tender call. In the absence of this information and in an effort to ensure that the risks and impacts have been assessed conservatively, the Risk Assessment conducted by Eskom (see Appendix E of the
8.	No detail is provided on the possible chemicals involved or the specific risks associated. This must be rectified.	Anthony Corin	

No	Issues	Stakeholder	Draft BAR response															
			final BAR) and impact assessment undertaken by SRK (see Section 6 of the final BAR) assumes the worst-case scenario, i.e.: <ul style="list-style-type: none"> • 500 m³ of electrolyte will be stored on site during operation; • The chemicals envisioned to be used are toxic; and • The electrolyte will be of a liquid nature. The following has been recommended as a condition of authorisation: “Submit an updated Risk Assessment to DEFF once the technology type and associated chemical composition has been determined. Should any additional mitigation measures be identified, the EMPr must be amended to include these”.															
9.	The report is hardly lacking detail on numerous other potential impacts, which frankly are minor and almost negligible by comparison.	Anthony Corin	The Risk Assessment (Appendix E of the final BAR) identifies the major risks (unplanned events) associated with the project (e.g. battery explosions and electrolyte spills), while the impact assessment identifies potential impacts that the project may have on the environment based on the premise that the identified risks occur. SRK believes that the EMPr includes mitigation measures to adequately avoid/mitigate impacts and manage risks to appropriate levels.															
10.	The Draft BAR indicates the operational phase impact of an accidental electrolyte spill that may contaminate surrounding soil, resulting in groundwater contamination and the resultant deterioration of groundwater quality. Please clarify whether this impact is the same as soil contamination due to leakage and spillages of infrastructure for the storage of dangerous goods? If not, then the indicated impact (for both the development and operational phases) must be included and assessed in the Final BAR to be submitted to the competent authority.	DEA&DP	Dangerous goods will be stored on site during the construction and operation phases (see Table 1 below). Table 1: List of dangerous goods stored on site <table border="1" data-bbox="1102 810 2000 1026"> <thead> <tr> <th>Dangerous Good</th> <th>Volume</th> <th>Storage Infrastructure</th> </tr> </thead> <tbody> <tr> <td colspan="3">Construction Phase</td> </tr> <tr> <td>Fuel (petrol and diesel)</td> <td>1 m³</td> <td>Fuel tanks / bowsers</td> </tr> <tr> <td colspan="3">Operational Phase</td> </tr> <tr> <td>Chemical electrolyte</td> <td>500 m³</td> <td>Battery cells</td> </tr> </tbody> </table>	Dangerous Good	Volume	Storage Infrastructure	Construction Phase			Fuel (petrol and diesel)	1 m ³	Fuel tanks / bowsers	Operational Phase			Chemical electrolyte	500 m ³	Battery cells
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11.	It is noted that the project proposal includes the development of facilities or infrastructure for the storage of (a) dangerous good/s; however, the Draft BAR is not very specific what this will entail.	DEA&DP	Potential groundwater impacts associated with potential leaks and spills from storage infrastructure are assessed separately for each phase in Sections 6.2.2 and 6.3.2 of the BAR.															
12.	The activity description must be updated to clearly indicate how the development proposal is linked to the listed activity being applied for. In additional, the Final BAR must indicate the anticipated quantity/volume of the dangerous good/s that will be stored.	DEA&DP	The final BAR has been updated to describe the storage of dangerous goods more clearly (see Sections 3.4.5 and 3.5.3 of the Final BAR).															
13.	It is requested that the EAP provide detailed information regarding the specifications of the dangerous goods, i.e. quantities, type etc. In addition, the impacts associated with the relevant activity must be identified, described and assessed in the BAR.	DEFF																

No	Issues	Stakeholder	Draft BAR response
14.	<p>[In reference to Issue 10,] not all the impacts associated with the proposed development may have been identified and assessed in the Draft BAR. [If so] the EMPr must be updated to include the following recommendations:</p> <ul style="list-style-type: none"> • A complete list of all the potential impacts and mitigation measures for all the phases of the proposed development • A complete list of impact management outcomes for the proposed development; and • A complete list of impact management actions that will be undertaken for all phases of the proposed development. 	DEA&DP	<p>SRK is confident that all the impacts associated with the proposed development have been identified and assessed.</p> <p>Potential groundwater impacts associated with the potential leaks and spills of dangerous goods are assessed for construction and operation phases in Sections 6.2.2 and 6.3.2 of the BAR.</p> <p>Mitigation measures are included in the EMPr to mitigate these impacts.</p>
15.	<p><i>“Self-contained batteries - The electrolyte typically consists of a mixture of any of the following materials: lithium nickel cobalt aluminium oxide, lithium nickel manganese cobalt oxide, lithium nickel manganese oxide or lithium cobalt oxide.”</i> This statement is factually incorrect.</p>	Anthony Corin	<p>Agreed. This description is applicable to lithium-ion batteries and is not typical of solid-state batteries. This paragraph has been corrected to the following <i>“Solid-state battery electrolytes typically consist of Lead Acid (Pb), Nickel Cadmium (NiCad), Lithium-Ion (Li-ion), Sodium Sulphur (NaS) or Sodium Nickel Chloride / Zebra (NaNiCl).”</i></p> <p>SRK is confident that this correction does not compromise the overall findings of the report.</p>
16.	<p>It should be clarified that Lithium Ion Solid State batteries do not contain liquid electrolyte in a state able to spill, as they are vacuum starvation filled.</p>	Anthony Corin	<p>Solid-state battery electrolytes can be either liquid, gel polymer or solid in nature. e.g. Lead Acid and Nickel Cadmium cells will have liquid or gel electrolytes, while Lithium-ion will have gel or solid-state electrolytes.</p> <p>Liquid electrolytes are prone to spillage if containment is breached and for the purposes of this BA and taking the precautionary approach, SRK has assumed that Eskom will use a liquid-state electrolyte in a solid-state battery as the worst-case scenario.</p>
C. Alternatives			
17.	<p>Please provide a description of any identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 1 (2) (e) and 3 (1) (h) (i) of GN R.982 of 2014, as amended.</p>	DEFF	<p>In terms of Appendix 1 Section 3 (h)(i) of the EIA Regulations, 2014, project alternatives have been identified and are described in Section 3.3. of the BAR.</p>
D. Waste Management			
18.	<p>There must be an agreement with the Municipality with regards to the disposal of waste.</p>	MLM	<p>All waste will be managed in accordance with sections 16 (“general duty in respect of waste management”) and 21 (“general requirements for storage of waste”) of the National</p>
19.	<p>Please note that all waste must be managed in accordance with sections 16 (“general duty in respect of waste management”) and 21 (“general requirements for storage of waste”) of the NEM: WA.</p>	DEA&DP	

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20.	All hazardous waste intended for disposal to land may only be disposed of at a licensed hazardous waste disposal facility and proof of waste disposal certificates must be made available to the competent authority upon request.	DEA&DP	Environmental Management: Waste Act (59 of 2008) (NEM:WA) and all applicable municipal by-laws. An agreement will be established with the MLM for general waste disposed at landfills under the jurisdiction of the MLM. Hazardous waste will be disposed of at a licensed hazardous waste disposal facility and waste disposal manifests will be made available to the competent authority upon request.
21.	Battery wastes must be stored in properly secured and labelled containers. These containers must be stored under appropriate conditions prior to transportation to registered hazardous waste treatment or disposal facilities.	DEA&DP	Mitigation measures to this effect are included in the EMPr. Refer to "Stormwater management" mitigation measures in the EMPr (Appendix E of the final BAR).
22.	The NEM: WA and its requirements must be included in section 2.1 of the BAR.	DEA&DP	Noted. This has been included in the final BAR (see Section 2.1.3 of the final BAR).
23.	<p>Whilst the Draft BAR indicates that the applicant will temporarily store less than 100m³ of general and less than 80m³ of hazardous waste, please note the following waste management legislation for consideration in the Final BAR and EMPr: 2.3.1:</p> <ul style="list-style-type: none"> National Waste Information Regulations promulgated in Government Notice ("GN") No. R. 625 of 13 August 2012 List of waste management activities identified in GN No. 921 of 29 November 2013 (as amended) 	DEA&DP	<p>The purpose of the National Waste Information Regulations (GN R625 of 2012 promulgated in terms of NEM:WA) is to regulate the collection of data and information to fulfil the objectives of the South African waste information system (SAWIS). The Regulations apply to all persons conducting an activity listed in Annexure 1 of the Regulations, which specifies waste activities that must be registered on the SAWIS.</p> <p>Based on the information available at this stage, the proposed project will not trigger waste activities listed in Annexure 1.</p> <p>Deviations from the current proposal may require the need to register the activities on SAWIS.</p> <p>Government Notice (GN) 921 of 2013, gazetted and effective from 29 November 2013 in terms of NEM:WA and amended by GN R332 of 2014, provides a <i>List of Waste Management Activities that Have, or are Likely to Have, a Detrimental Effect on the Environment</i>.</p> <p>Based on the information available at this stage, the proposed project will not trigger waste management activities listed in terms of GN R921 of 2013.</p> <p>Deviations from the current proposal may require the need to obtain approval in terms of the NEM:WA.</p>

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	<ul style="list-style-type: none"> Waste Classification and Management Regulations promulgated in GN No. R. 634 of 23 August 2013 		<p>The purpose of the Waste Classification and Management Regulations (GN R634 of 2013 promulgated in terms of NEM:WA) is to:</p> <ul style="list-style-type: none"> Regulate the classification and management of waste in a manner which supports and implements the provisions of NEM:WA; Establish a mechanism and procedure for the listing of waste management activities that do not require a WML; Prescribe requirements for the disposal of waste to landfill; Prescribe requirements and timeframes for the management of certain wastes; and Prescribe general duties of waste generators, transporters and managers. <p>Annexure 1 of the Regulations specifies wastes that do not require classification or assessment, including general waste.</p> <p>Eskom is required to comply with the Waste Classification and Management Regulations, 2013, and the final BAR has been updated to reflect this.</p>
E. Stormwater Management			
24.	The Stormwater Management Plan (SWMP) dated 15 April 2019 must be implemented to ensure that on-site activities do not culminate in off-site pollution.	DEA&DP	Noted. The following is recommended as a condition of authorisation: <i>“Implement the SWMP”</i> .
F. Water Use			
25.	Has approval for the abstraction of water from the Lower Olifants River Water Users Association (LORWUA) operated water canal been obtained? Please take cognisance that the towns and rural areas are dependent on the water supply provided by the canal and also the effect of the worst ever drought can still be felt in the Matzikama Municipal area.	MLM	The LORWUA has confirmed that the potable water demand for the construction phase (~150 m ³ per day) can be accommodated and that final approval will be granted closer to commencement of construction (see Appendix G of the final BAR).
G. Fire Management			
26.	How will the fuel be transported to the site, in what volume and in what frequency?	MLM	<p>Up to 1 000 litres of fuel (petrol and diesel) will be temporarily stored on site during the construction phase.</p> <p>The fuel will be transported by vehicle to site by the Contractor on an ad hoc basis. Depending on the equipment used / required at the time (e.g. generators, plant, etc.), fuel will be transported to site on the vehicle in jerry cans or 210 liter storage containers.</p> <p>Applicable municipal bylaws will be adhered to, including permitting requirements in terms of fire and safety by laws.</p>
H. Traffic			
27.	Traffic Impact Statement / Assessment must be provided which includes, but not limited to: the approved transportation route/s	MLM	SRK is confident in the assessment of traffic impacts (<i>very low and insignificant</i> – see Section 6.8.1 of the final BAR) and does not believe that a Traffic Impact Assessment / statement is

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	that will be used to transportation, the various intersections and the impact on them.		required. Although the frequency and details of transport routes cannot be specified at this stage, construction vehicles will approach the site via routes that can accommodate heavy vehicles, e.g. N7, R363 and DR2225.
28.	Due to the condition of the existing roads and intersections within the Municipal area comment and/or approval from the Western Cape Government: Road Network Management must be obtained.	MLM	The provincial Department of Transport and Public Works (DTPW) is registered as a stakeholder on the project database (see Appendix D of the Final BAR) and was notified of the availability of the draft BAR for review/comment. No comments were received from DTPW. The following has been recommended as a condition of authorisation: <i>“Obtain comment and/or approval from the Western Cape Government: Road Network Management prior to commencing construction activities.”</i>
I. Terrestrial Ecology			
29.	We note that search and rescue has been recommended for certain plant species. The bulbs identified are able to be relocated if done at the correct time of year. It is important that a suitable receiving area is identified as part of the impact assessment process.	CapeNature	The following mitigation measure has been broadened to address this issue: <i>“Appoint a suitably qualified person to identify species of conservation concern (SCC) and protected species within the construction footprint and oversee the rescue and relocation of these species into a suitable receptor site.”</i>
30.	We support a follow-up spring survey to ensure that all Species of Conservation Concern are able to be identified. In order to not delay the application process, it should be noted that the window to do the survey in 2019 ends mid-October but the plants will probably not be able to be translocated until late winter next year.	CapeNature	Noted.
31.	The entire project falls within a CBA1 which is fully functional, and still intact. The proposed area comprises of endangered plant species of conservation concern such as <i>Babiana virescens</i> , <i>Babiana teretifolia</i> , <i>Pelargonium appendiculatum</i> and <i>Tylecodon fragalis</i> . Given that the overall biodiversity objective is to minimize loss to biodiversity as possible, the Directorate is not in support of the development within the proposed site.	DEA: Biodiversity Conservation	The WCBSP (2017) provides a good indication of the sensitivity of ecological features and conservation priorities, and is therefore considered in the BAR and has informed detailed site assessment, even though the plan has not been subjected to stakeholder review, does not

No	Issues	Stakeholder	Draft BAR response
			<p>take into account other land use imperatives, is not an approved (bioregional) plan in terms of NEM:BA, and therefore has limited legal status as a land-use decision support tool.</p> <p>The loss of CBA is assessed by the vegetation specialist to be <i>low</i> following mitigation for the following reasons:</p> <ol style="list-style-type: none"> The physical extent of the disturbance footprint will be extremely small relative to the full extent of the CBA (less than 19.8 ha spread over the ~30 600 ha CBA [0.06%]); Construction of the substation extension, BESS platform and associated infrastructure is unlikely to significantly alter the overall functioning of the CBA, given the intact nature of the surrounding landscape; The project is unlikely to disrupt ecological connectivity as fauna are likely to already avoid the affected area on account of the existing activities at the Substation and WEF administration buildings; Construction on portions of the site which host high concentrations of SCC has been avoided as far as practicable; and A search and rescue has been recommended for SCC. <p>As such, it is SRK's assessment that the project impacts would be sustainable, and would not significantly jeopardise the integrity of the habitat unit.</p> <p>This assessment is supported by the vegetation specialist.</p>
32.	The impacts associated with the clearance of indigenous vegetation of an area of approximately 19.8ha were assessed. Page 25 of the Draft BAR states that it is highly unlikely that the entire area will be cleared. The Final BAR to be submitted to the competent authority must clearly indicate how the development proposal is linked to the listed activity being applied for, and whether the proposed development will result in the clearance of the entire 19.8ha of indigenous vegetation. Please be reminded that the mitigation hierarchy must always be implemented and that impacts must be avoided as far as possible.	DEA&DP	<p>The footprint of the proposed substation extension (~2.1 ha) will be cleared for construction of a concrete platform. Portions of the remainder of the construction footprint (~17.7 ha) will be cleared for laydown areas, a site office, vehicle parking, waste collection areas, etc. albeit unlikely to cumulatively amount to 17.7 ha.</p> <p>The clearance of the 2.1 ha of indigenous vegetation for the substation extension is unavoidable and impacts associated with the loss of indigenous vegetation and SCC are assessed to be <i>low</i> (with mitigation) (see Section 6.4.1.1 of the final BAR). There is scope to avoid clearance of indigenous vegetation in portions of the remainder of the construction footprint (~17.7 ha) and vegetation clearance will be limited to what is absolutely essential (see "Vegetation Clearing" mitigation measures in the EMPr – Appendix E of the final BAR).</p>
J. Socio-Economic			
33.	It is recommended that you/contractors make use of local labour as far as possible.	MLM	Noted. Targets will be set for the use of local labour based on the needs of the proponent and the availability of existing skills and people that are willing to undergo training (see "Employment" mitigation measures in the EMPr – Appendix E of the final BAR).
K. Heritage			
34.	Please be advised that the comment from Heritage Western Cape (HWC) was not included in the Draft BAR and must be included in the Final BAR to be submitted to the competent authority.	DEA&DP	The comment received from HWC on 30 April 2019 is attached as Appendix H of the final BAR.

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L. Need and Desirability			
35.	The need and desirability must also be explained in terms of the (then) National Department of Environmental Affairs' Guideline on Need and Desirability (second version published in 2017 in terms of section 24J of the National Environmental Management Act, 1998 (Act No. 107 of 1998)). An updated description of the need and desirability must be included in the Final BAR.	DEA&DP	There are various proxies for assessing the need and desirability of a project, notably national and regional documents which enunciate the strategic needs and desires of broader society and communities: project alignment with these documents is discussed in Section 2 of the final BAR. Amongst others, the National Department of Environmental Affairs' Guideline on Need and Desirability (2017) informed the needs and desirability of the project, which is specifically discussed in Section 7.2 (Analysis of Need and Desirability of the Project) of the final BAR. The DEA Need and Desirability Guideline was also consulted in the identification and assessment of impacts. The proponent's motivation for the project (Section 3.1 of the final BAR) also informs the need and desirability of the project.
M. Public Participation Process			
36.	The following information must be submitted with the final BAR: <ul style="list-style-type: none"> A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended; Copies of all comments received during the draft BAR comment period; and A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report. 	DEFF	Refer to Appendix D1 of the final BAR. Refer to Appendix D4 of the final BAR. Refer to Appendix D3 of the final BAR.
37.	Please ensure that all issues raised and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.	DEFF	Noted.
38.	Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.	DEFF	Refer to Appendix D2 of the final BAR.

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N. Risk Assessment			
39.	A risk assessment for each of the proposed technology alternatives proposed must be conducted and included in the final BAR.	DEFF	Refer to Appendix E of the final BAR.
O. EA Application			
40.	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.	DEFF	Noted.
41.	If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted.	DEFF	Noted.
P. Final BAR			
42.	The final BAR must also have an undertaking under oath/affirmation by the EAP (administered by a Commissioner of Oaths).	DEFF	Refer to Appendix I of the Final BAR.
43.	Specialist Declaration of Interest forms must be attached to the final BAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted.	DEFF	
44.	You are required to include the details and expertise of the EAP in the BAR, including a curriculum vitae, in order to comply with the requirements of Appendix 1(3)(1)(a) of the NEMA EIA Regulations, 2014, as amended.	DEFF	Refer to Appendix A of the Final BAR.
45.	The final BAR must include the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.	DEFF	The EAP recommends that non-operational activities conclude within five years of the date of issue of the Environmental Authorisation. The final BAR has been updated to include the above recommendation.
Q. EMPr			
46.	The EMPr must also include the following: <ul style="list-style-type: none"> All recommendations and mitigation measures recorded in the BAR and the specialist studies conducted. An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process. 	DEFF	<p>All recommendations and mitigation measures recorded in the BAR and the vegetation study are included in the EMPr.</p> <p>All environmental sensitivity maps included in the BAR have now been included in the EMPr.</p>

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	<ul style="list-style-type: none"> Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants. The EMPr must include a detailed fire management and protection plan. 		<p>There are no watercourses or wetlands within 500 m of the proposed site and no impacts are anticipated on surface water / hydrological features.</p> <p>Potential groundwater impacts associated with the potential leaks and spills of dangerous goods are assessed to be <i>insignificant</i> during the construction phase and <i>very low</i> during the operational phase (see Sections 6.2.2 and 6.3.2 of the final BAR). Mitigation measures are included in the EMPr to mitigate these impacts.</p> <p>As stated in the EMPr, Eskom is required to develop emergency procedures which will include fire management.</p>
47.	A fine system should be implemented for potential transgressions.	DEA&DP	In SRK's experience, penalty systems are difficult to enforce and do not necessarily assist in avoiding/mitigation impacts. SRK believes that the corrective actions described in Section 3.2.3 of the EMPr (see Appendix E of the final BAR) adequately address potential transgressions in such a way that repeated corrective action is not required.
R. Other			
48.	Is the ESKOM Sere Wind Farm connected and providing electricity to the national electricity grid?	MLM	Eskom has confirmed that the Sere Wind Farm is providing electricity into the national grid.
49.	The West Coast District Municipality has no objection to the proposal provided the recommended mitigation measures are implemented.	WCDM	Noted.