

Amy Hill

From: Briaan Smit <bsmit@matzikamamun.co.za>
Sent: Wednesday, 11 September 2019 08:52
To: Amy Hill
Cc: Annali Van der Westhuizen ; Thesmé van Zyl; Riaan Basson; Lionel Phillips; Bernette Kriek; collab@matzikamamun.co.za
Subject: FW: Stakeholder Comment Period: Substation Extension and Installation of a Battery Energy Storage System at Skaapvlei
Attachments: 20120725_Decommissioning Proposal to Matz Munic 27 Jul 2012.pdf; Perseel 1852, ORN - 2 Julie 2014.tif

Dear me Hill,

The email below and the document with reference "533767" dated 28 August 2019, refer.

Thank you for the opportunity to provide comment on the above-mentioned application.

Please register the Matzika Municipality as a Interested and Affected Party to this application.

Attached please find the existing land use approval with reference "15/6/8/8 & Plot 1852, ORN" dated 2 July 2014 and 25 July 2012, for your attention.

Herewith please find the following feedback and/or comments:

1. Please note that the correct property description is Plot 1862, Olifants River Settlement.
2. The correct zoning of the above-mentioned property is as follows: Agricultural Zone I with a consent use for a renewable energy structure (which include a wind farm consisting out of 46 wind turbines with an electricity generating capacity of 100MW together with appurtenant structures) and a tourist facility. This office is of the view that the "battery storage system" forms part of "appurtenant structures" and thus in line with the current zoning of the above-mentioned property.
3. How will the fuel (petrol and diesel) be transported to the site, in what volume and in what frequency?
4. Has approval for the abstraction of water from the LORWUA operated water canal been obtained? Please take cognisance that the towns and rural areas are depended on the water supply provided by the canal and also the effect of the worst ever drought can is still be felt in the Matzikama Municipal area.
5. There must be an agreement with the Municipality with regards to the disposal of waste.
6. Traffic Impact Statement / Assessment must be provided which includes, but not limited to: the approved transportation route/s that will be used to transportation, the various intersections and the impact on them. 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.
7. 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.
8. It is recommended that you/contractors make use of local labour as far as possible.
9. The content of the approved conditions especially condition 22 within the attached approval letter 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.

Is the ESKOM Sere Wind Farm connected and providing electricity to the national electricity grid?

The Municipality reserves the right to submit contradictory and / or amended comments and request further information should any additional or new information be received.

Regards

Briaan Smit Pr. Pln A/1754/2013, MSAPI
Stadsbeplanning / Town Planning
MATZIKAMA MUNISIPALITEIT / MUNICIPALITY

☎ 027-201 3481
📄 027-213 3238
📍 98 Vredendal 8160
📄 Kerkstraat / Church Steet 37 Vredendal 8160



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From: Daniel Lubbe [mailto:daniel@matzikamamun.co.za]
Sent: Thursday, 05 September 2019 11:20
To: 'Lionel Phillips'; 'Annali van der Westhuizen'; 'Deone Wessels'; 'Briaan Smit'; 'Bernette Kriek'
Subject: FW: Stakeholder Comment Period: Substation Extension and Installation of a Battery Energy Storage System at Skaapvlei

Vir u aandag asb, dankie

Vriendelike Groete / Kind Regards

Danie Lubbe
Munisipale Bestuurder / Municipal Manager
MATZIKAMA MUNISIPALITEIT / MUNICIPALITY

☎ 027-201 3331 / 027-2013301
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From: David Joubert [mailto:mm@wcdm.co.za]
Sent: Thursday, 05 September 2019 09:39
To: daniel@matzikamamun.co.za; Hendrik Matthee <hjmatthee@wcdm.co.za>; Doretha Kotze <dkotze@wcdm.co.za>; Fred-Earl Williams <fwilliams@wcdm.co.za>
Subject: FW: Stakeholder Comment Period: Substation Extension and Installation of a Battery Energy Storage System at Skaapvlei

Goeie More

Sien meegaande...

Kind regards

David Joubert
Municipal Manager
West Coast District Municipality
Email: mm@wcdm.co.za / Tel: +2722 433 8410 / Fax: +2722 433 8484 / Cell: +2771 876 2342
Website: www.westcoastdm.co.za



From: Amy Hill [mailto:AHill@srk.co.za]
Sent: Thursday, 29 August 2019 11:36
To: Amy Hill <AHill@srk.co.za>
Subject: Stakeholder Comment Period: Substation Extension and Installation of a Battery Energy Storage System at Skaapvlei

Dear Stakeholder

Basic Assessment Report for the Proposed Substation Extension and Installation of a Battery Energy Storage System at Skaapvlei, Western Cape

Eskom Holdings SOC Limited (Eskom) proposes to install a Battery Energy Storage System (BESS) at the existing Skaapvlei Substation located within the Sere Wind Energy Facility (WEF) in the Matzikama Local Municipality. The BESS will:

- Strengthen the electricity distribution network and address current voltage and capacity constraints;
- Integrate a greater amount of renewable energy from the Sere WEF into the electricity grid; and
- Reduce the requirement for investment in new conventional generation capacity (i.e. gas, nuclear, coal) and new distribution substations and powerlines to strengthen networks.

SRK Consulting (South Africa) (Pty) Ltd (SRK) was appointed by Eskom to undertake the Basic Assessment (BA) process, which is required in terms of the National Environmental Management Act 107 of 1998 and the Environmental Impact Assessment Regulations, 2014, in support of an application for Environmental Authorisation.

A BA Report (BAR) has been compiled and is hereby released for stakeholder comment. The BAR is available for public review and comment at the Lutzville Public Library and the offices of SRK Consulting in Rondebosch, Cape Town. The BAR can also be accessed electronically on the SRK website www.srk.co.za (via the 'Library' and 'Public Documents' links). Please find attached the Executive Summary for the BAR for your information.

Stakeholders are invited to **submit comments and/or request registration** on the project database. Stakeholders should include their name, contact details (specifying the preferred method of notification, e.g. e-mail), and an indication of any direct business, financial, personal, or other interest which they have in the application, to the contact person below, by **28 September 2019**. Note that only registered stakeholders will be notified of future opportunities to provide comment on relevant documentation. Following this date, and provided no significant amendments are required, the report will be finalised and submitted to the National Department of Environment, Forestry and Fisheries for decision-making.

For further information please contact Amy Hill at SRK Consulting: Tel: (021) 659 3060, Fax: (021) 685 7105, or Email: ahill@srk.co.za

We look forward to your comment on the document.

Kind regards

Amy Hill BSC (Hons)(Biodiversity and Ecology)
Environmental Consultant



SRK Consulting (South Africa) (Pty) Ltd.

The Administrative Building, Albion Spring, 183 Main Road, Rondebosch, 7700
Post Net Suite #206, Private Bag X18, Rondebosch, 7701

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Email: ahill@srk.co.za; Skype for Business: [hill@srk.co.za](https://www.skype.com/people/hill@srk.co.za)

www.srk.co.za

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Amy Hill

From: Doretha Kotze <dkotze@wcdm.co.za>
Sent: Thursday, 12 September 2019 14:02
To: Amy Hill
Cc: Collaborate Mailbox
Subject: RE: Stakeholder Comment Period: Substation Extension and Installation of a Battery Energy Storage System at Skaapvlei

Ref: 13/2/12/2/1

Madam

The West Coast District Municipality has no objection to the proposal provided the recommended mitigation measures are implemented. No development/construction should take place prior to approval of the relevant building plans by Matzikama Municipality.

Regards

Doretha Kotze
Stads- en Streekbeplanner/Town and Regional Planner
Weskus Distriksmunisipaliteit
Langstraat 58 Long Street
Posbus 242 PO Box
MOORREESBURG 7310
Tel: 022 433 8523
West Coast District Municipality



From: Amy Hill [mailto:AHill@srk.co.za]
Sent: 29 August 2019 11:36 AM
To: Amy Hill
Subject: Stakeholder Comment Period: Substation Extension and Installation of a Battery Energy Storage System at Skaapvlei

Dear Stakeholder

Basic Assessment Report for the Proposed Substation Extension and Installation of a Battery Energy Storage System at Skaapvlei, Western Cape

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- Integrate a greater amount of renewable energy from the Sere WEF into the electricity grid; and
- Reduce the requirement for investment in new conventional generation capacity (i.e. gas, nuclear, coal) and new distribution substations and powerlines to strengthen networks.

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For further information please contact Amy Hill at SRK Consulting: Tel: (021) 659 3060, Fax: (021) 685 7105, or Email: ahill@srk.co.za

We look forward to your comment on the document.

Kind regards

Amy Hill BSC (Hons)(Biodiversity and Ecology)
Environmental Consultant



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BIODIVERSITY CAPABILITIES

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website www.capenature.co.za
enquiries Alana Duffell-Canham
telephone +27 21 866 8000 **fax** +27 21 866 1523
email aduffell-canham@capenature.co.za
reference SSD14/2/6/1/8/3/1852_Eskom_BatteryESS_Skaapvlei
date 23 September 2019

Amy Hill
SRK Consulting
Private Bag X18
Rondebosch
7701

By email: ahill@srk.co.za

Dear Ms Hill

RE: Proposed substation extension and installation of a battery energy storage system at Skaapvlei – Draft Basic Assessment Report.
DEA Ref: TBC

CapeNature would like to thank you for the opportunity to comment on the Draft Basic Assessment Report (DBAR) and wish to make the following comments:

1. The proposed development site is in an area which supports Namaqualand Sand Fynbos. Namaqualand Sand Fynbos is currently not listed as a threatened ecosystem and has approximately 79% of its original extent remaining.
2. The site is located on the edge of a Critical Biodiversity Area but is adjacent to an already disturbed area. Expansion towards the south and south-east should be kept to an absolute minimum.
3. 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 areas is identified as part of the impact assessment process. 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 reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Alana Duffell-Canham

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Bond-Smith, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA · 0001· Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

DEA Reference: 14/12/16/3/3/1/2065

Enquiries: Herman Alberts

Telephone: (012) 399 9371 **E-mail:** HAlberts@henvironment.gov.za

Mr Scott Masson
SRK Consulting (South Africa) (Pty) Ltd
Postnet Suite Number 206
Private Bag X18
RONDEBOSCH
7700

Telephone Number: (021) 659 3060
E-Mail Address: smasson@srk.co.za

PER E-MAIL / MAIL

Dear Mr Masson

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESKOM BATTERY STORAGE SYSTEM AT SKAAPVLEI SUBSTATION, SKAAPVLEI, WEST COAST, WESTERN CAPE

The draft Basic Assessment Report (BAR) dated August 2019 and received by this Department on 29 August 2019 refer.

On 08 December 2014 the Minister of Water and Environmental Affairs promulgated regulations in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), viz, the NEMA Environmental Impact Assessment (EIA) Regulations 2014 (GN R982, R983, R984 and R985 of 04 December 2014). The NEMA EIA Regulations, 2014 and listing notices, were subsequently amended on 07 April 2017 (refer to GN R324, R325, R326, R327 of 07 April 2017) and is being referred to as NEMA EIA Regulations, 2014, as amended. The same referencing would apply to the listing notices containing the listed activities that would require Environmental Authorisation.

This letter serves to inform you that the following information must be included to the final BAR:

(a) Listed Activities

- i. 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.
- ii. If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.environment.gov.za/documents/forms>.
- iii. 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.

(b) Alternatives

- i. 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. Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.

(c) Specialist Declaration of Interest

- i. 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. The forms are available on Department's website (please use the Department's template).
- ii. A risk assessment for each of the proposed technology alternatives proposed must be conducted and included in the final BAR.

(d) Undertaking of an Oath

- i. The Department has noted that the submitted application form has an undertaking under oath or affirmation by the EAP. However, the aforementioned oath was not included in the draft BAR, but rather an appendix of the application form attached to the BAR. Please note that the final BAR must also have an undertaking under oath/affirmation by the EAP.
- ii. Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 1(3)(r) of the NEMA EIA Regulations, 2014, as amended, which states that the BAR must include:
"an undertaking under oath or affirmation by the EAP in relation to:
 - (i) the correctness of the information provided in the reports;*
 - (ii) the inclusion of comments and inputs from stakeholders and I&APs;*
 - (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and*
 - (iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties".*

(e) Details and Expertise of the EAP

- i. 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.

(f) Public Participation Process

- i. The following information must be submitted with the final BAR:
 - 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.
- ii. 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.
- iii. 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. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

(g) Environmental Management Programme

- i. The EMP must also include the following:
 - 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.
 - 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.
- ii. In addition to the above, the EMPr must comply with Appendix 4 of the EIA Regulations, 2014, as amended.

General

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended. You are further reminded that the BAR needs to comply with Appendix 1 of the EIA Regulations, 2014 as amended.

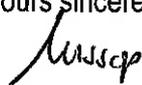
You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *“Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority - (a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”*

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: *“the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days”.*

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



Mr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Environmental Affairs

Signed by: Mr Muhammad Essop

Designation: Acting Deputy Director: Priority Infrastructure Projects

Date: 26/09/2019

cc:	Ms Justine Wyngaardt	Eskom Holdings SOC Limited	E-mail: wyngaajo@eskom.co.za
	Ms Adri La Meyer	WC DEADP	E-mail: Adri.LaMeyer@westerncape.gov.za
	Mr Danie Lubbe	Matzikamma Local Municipality	E-mail: daniel@matzikamamun.co.za

Amy Hill

From: A F Corin <afcorin@iafrica.com>
Sent: Friday, 27 September 2019 12:00
To: Amy Hill
Subject: Paleisheuwel & Skaapvlei & Other Eskom Battery Storage

Dear Amy

I have been made aware and had insight into some of the BAR information related to the above two projects only earlier today.

I have added a caveat as I am not sure whether there may be other projects you are involved in of similar/identical nature. If so, please accept this note to apply to those projects as well.

My name is Anthony Corin, involved in various aspects of the renewable energy (including energy storage) industry for a number of years. My preferred method of communication is via e-mail, to the following address: afcorin@iafrica.com

As such, I have a specific technical interest in these applications and the assurance that they are conducted as accurately and correctly as possible.

Please add me to your list of registered stakeholders as I would like the opportunity to provide comment & input once able to review all relevant documentation.

A cursory review of the documentation shows clear lack of technical detail, incorrect description & possible incorrect classification of various aspects related in particular to the solid state options.

Look forward to your feedback.

Kind Regards
Anthony Corin

DEPARTMENTAL REFERENCES:

16/3/3/6/4/1/1/F3/8/3260/19 (Development Management)
19/2/5/3/F3/8/WL0143/19 (Waste Management)
19/3/2/4/F3/12/DDF049/19 (Pollution and Chemicals Management)

DATE: 30 September 2019

The Board of Directors
SRK Consulting (South Africa) (Pty) Ltd
Post Net Suite #206
Private Bag X18
RONDEBOSCH
7701

For attention: Ms Amy Hill

Tel: (021) 659 3060
E-mail: ahill@srk.co.za

PER E-MAIL

Dear Madam

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED INSTALLATION OF THE ESKOM BATTERY ENERGY STORAGE SYSTEM AND THE EXPANSION OF THE SKAAPVLEI SUBSTATION WITHIN THE SERE WIND ENERGY FACILITY ON ERF NO. 1862, KOEKENAAP (DEFF REF: 14/12/16/3/3/1/2065)

The e-mail notification of 29 August 2019 notifying interested and affected parties of the development proposal and the availability of the Draft Basic Assessment Report ("BAR"), and the Draft BAR dated August 2019 as received by the Department on 29 August 2019 refer. Please find consolidated comment from various directorates within the Department on the Draft BAR.

1. Directorate: Development Management (Region 1) – Ms Melanese Schippers (Melanese.Schippers@westerncape.gov.za; Tel: (021) 483 8349):

1.1 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. The activity description must be updated to clearly indicate how the development proposal is linked to

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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.

- 1.2 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.
- 1.3 In addition to the need and desirability for the proposed development as described in the Draft BAR, 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.
- 1.4 Per paragraph 1.1 above, it is not clear what the storage of the dangerous good/s will entail. 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.
- 1.5 Since not all the impacts associated with the proposed development may have been identified and assessed in the Draft BAR, the Environmental Management Programme ("EMPr") must be updated to include the following recommendations:
 - 1.5.1 A complete list of all the potential impacts and mitigation measures for all the phases of the proposed development;
 - 1.5.2 A complete list of impact management outcomes for the proposed development;
 - 1.5.3 A complete list of impact management actions that will be undertaken for all phases of the proposed development; and
 - 1.5.4 Appropriate fines for potential transgressions.
- 1.6 Page 11 of the Draft BAR states that "*HWC confirmed that since there is no reason to believe that the proposed project will impact on heritage resources, no further action in terms of Section 38 if the NHRA is required.*" Please be advised that the comment from Heritage Western Cape was not included in the Draft BAR and must be included in the Final BAR to be submitted to the competent authority.
2. Directorate: Waste Management – Mr Muneeb Baderoon (Muneeb.Baderoon@westerncape.gov.za; Tel: (021) 483 2965):
 - 2.1 The National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) ("NEM: WA") and its requirements must be included in section 2.1 of the BAR. 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.

- 2.2 Your attention is drawn to Schedule 3 of the NEM: WA which defines and identifies categories and types of waste. Category A(15) of Schedule 3 identifies certain types of construction waste as hazardous waste that must be stored in hazardous waste containers for its eventual treatment or disposal at a hazardous waste facility (i.e. it may not be disposed of or treated with non-hazardous construction waste). 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.
- 2.3 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 National Waste Information Regulations promulgated in Government Notice ("GN") No. R. 625 of 13 August 2012;
- 2.3.2 List of waste management activities identified in GN No. 921 of 29 November 2013 (as amended); and
- 2.3.3 Waste Classification and Management Regulations promulgated in GN No. R. 634 of 23 August 2013.
3. Directorate: Pollution and Chemicals Management – Ms Monique Natus (Monique.Natus@westerncape.gov.za; Tel: (021) 483 6839):
- 3.1 The Stormwater Management Plan dated 15 April 2019 must be implemented to ensure that on-site activities do not culminate in off-site pollution.
- 3.2 The applicant should adhere to all legislation and procedures regarding the disposal of hazardous waste. 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.
4. Please direct any enquiries to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.
5. The Department reserves the right to revise initial comments and request further information based on any information received.

Yours faithfully



pp **HEAD OF DEPARTMENT**

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING



environmental affairs

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PER E-MAIL

Dear Sir/Madam

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SUBSTATION EXTENSION AND INSTALLATION OF A BATTERY ENERGY STORAGE SYSTEM AT SKAAPVLEI, WESTERN CAPE PROVINCE

The Directorate: Biodiversity Conservation confirms having received the aforementioned Draft Basic Assessment Report (DBAR) for comments and it is not in support of the proposed development due to following reasons:

- The entire project falls within a Critical Biodiversity area 1 which is fully functional, and still intact.
- The proposed area comprises of endangered plant species of conservation concern such as *Babiana virescens*, *Babiana teretifolia*, *Pelargonium appendiculatum* and *Tylecodon fragalis*.

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.

Yours faithfully

Mr Seoka Lekota
Control Biodiversity Office Grade B: Biodiversity Conservation
Department of Environmental Affairs
Date: 09/10/2019