



NTC Group

## COMMENTS AND RESPONSES REPORT

FOR THE

**THE PROPOSED HIGHVELD NORTH-WEST AND LOWVELD  
STRENGTHENING PROJECT: EQUIPPING OF EXISTING  
BORUTHO AND SILIMELA SUBSTATIONS AND DEVELOPMENT  
OF BORUTHO-SILIMELA 150KM 400KV TRANSMISSION LINE  
AND ASSOCIATED INFRASTRUCTURE, WITHIN THE  
CAPRICORN, SEKHUKHUNE AND WATERBERG DISTRICT  
MUNICIPALITIES, LIMPOPO PROVINCE**

August 2024

PREPARED BY:	PREPARED FOR:
NTC GROUP (PTY)LTD CDH Building 1 Protea Place Fredman Drive Sandton,Sundown 2196 TEL: Contact person:Tebogo Mapinga EMAIL: <a href="mailto:projects@ntcgroup.co.za">projects@ntcgroup.co.za</a>	ESKOM HOLDINGS SOC LIMITED P O BOX 1091 Johannesburg 2001 Masala Mugwagwa EMAIL: <a href="mailto:mugwagjm@eskom.co.za">mugwagjm@eskom.co.za</a>

## INTRODUCTION

National Transmission Company of South Africa (NTCSA), a subsidiary of Eskom Holdings SOC Limited has appointed NTC Group (Pty) Ltd as an independent Environmental Assessment Practitioner (EAP) to undertake a Basic Assessment (BA) Process for the proposed construction of the Borutho-Silimela 400kV powerline and its associated infrastructure. The length of the powerline is approximately 150km. The proposed power line is located between the Borutho Substation on farm Gillimberg 861 in Mokopane and runs south to the Silimela Substation on farm Loskop Noord 12, near Marble Hall within the Lepelle-Nkumpi, Mogalakwena, Modimolle-Mookgophong and Ephriam Mogale Local Municipalities, Limpopo Province. The construction of the power line will aid Eskom in strengthening the power supply within Limpopo Province.

As part of the Basic Assessment Process, a Public Participation Process in terms of Chapter 6 of the EIA Regulation, 2014 (as amended) was undertaken. Interested and affected parties (I&APs) were informed of the availability of the DBAR on the 25 April to 03 June 2024. The Draft Basic Assessment Report was made available for 30 days public review on various platforms and public venues. State departments were also notified of the availability of the reports (electronic copies were provided and hard copies were made available on request). It is noted that the State owned entities have to must submit their comments in writing within 30 days from the date on which it was requested to submit comments and if such State department fails to submit comments within such 30 days, it will be regarded that such State department has no comments. NCT received comments from the competent authority which in this case is the DFFE and LEDET as the Commenting Authority. All comments have been captured and addressed in this Comment and Responses Report (Refer to Table 1 below).


**Table 1: Acknowledgement Of Receipt/ Comments and Respond – Authorities, Department of Forestry, Fisheries and the Environment**

Name and Organisation of Authorities		Comment	Response from Specialist and NTC Group EAP
<p>Reference: 14/12/16/3/3/1/2979</p> <p>Enquiries: Salome Mambane</p> <p>Tel: 012 399 9385 Cell: 063 684 5431</p> <p>SMambane@dffe.gov.za</p> <p>Integrated Environmental Authorisations: Priority Infrastructure Developments</p> <p>Email dated 29/4/2024 and official comments letter dated 25/04/2024</p>		<p>NTC Environmental CHD Building, 1 Protea Place Fredman Drive SANDTON 2031</p> <p>Tel No: 011 462 2022 E-mail: tebogo@ntcgroup.co.za</p> <p>Dear Sir/Madam ACKNOWLEDGEMENT OF RECEIPT OF THE NEW APPLICATION FORM FOR ENVIRONMENTAL AUTHORISATION (BASIC ASSESSMENT PROCESS) AND DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED HIGHVELD NORTH-WEST AND LOWVELD STRENGTHENING PROJECT EXTENSION OF THE BORUTHO AND SILIMELA SUBSTATIONS AND DEVELOPMENT OF BORUTHO-SILIMELA 150KM 400 KV TRANSMISSION LINE AND ASSOCIATED INFRASTRUCTURE, LIMPOPO PROVINCE.</p> <p>The Department confirms having received the Application Form and Draft Basic Assessment Report for Environmental Authorisation for the abovementioned project on 25 April 2024. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.</p> <p>Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 2 of Chapter 4 of the</p>	<p>The acknowledgement of receipt dated the 29 August 23024 is noted. As per Regulation 40(3) of the EIA Regulations, 2014, as amended, potential Interested &amp; Affected Parties, including the Competent Authority, have been provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended prior to the submission of an application and once the application has been submitted to the Competent Authority.</p> <p>It is noted that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, that this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulation. Subsequent to submission of the Application form and Draft BAR for the DFFE on the 25 April 2024, there has been an amendment and/or deviation of the powerline which has resulted in the change of scope of work. therefore Therefore, NTC would like to notify the Department that the Final Basic Assessment Report will be submitted within 140 days from the date of submission of the application. The application was submitted to the Department on the 25 April 2024, therefore the Final BAR must be submitted before the 18 September 2024. This will allow sufficient time for the EAP and the specialists to amend the reports accordingly and allow the additional 30 days Public Participation Process to be undertaken. The DFFE confirmed receipt of the notification letter on the 09 July 2024.</p>

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		<p>EIA Regulations, 2014, as amended. You are therefore referred to Regulation 19 of the EIA Regulations, 2014 as amended.</p> <p>Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested &amp; Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.</p> <p>Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.</p> <p>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.</p> <p>Kind Regards, Salome Mambane</p> <p>Integrated Environmental Authorisations:</p> <p>Priority Infrastructure Developments</p>	<p>The Applicant notes that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>

Name and Organisation of Authorities		Comment	Response from Specialist and NTC Group EAP
<p>Reference: Borutho-Silimela Powerline</p> <p>Enquiries: Portia Makitla/Tebogo Kgaphola</p> <p>Telephone: 012 399 9411</p> <p>E-Mail: pmakitla@dffe.gov.za</p>		<p>NTC Environmental CHD Building, 1 Protea Place Fredman Drive SANDTON 2031</p> <p>Dear Ms. Morwasehla</p> <p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED CONSTRUCTION OF THE BORUTHO-SILIMELA 150KM 400kV POWER LINE AND ASSOCIATED INFRASTRUCTURE WITHIN SEKHUKHUNE AND WATERBERG DISTRICT MUNICIPALITIES, LIMPOPO PROVINCE.</p> <p>The Directorate: Biodiversity Conservation reviewed and evaluated the draft report. According to the information provided in the report, a large proportion of the proposed development area being categorized on delineated biodiversity areas CBA 1, CBA 2, ESA 1 and ESA 2. No environmental fatal flaws or unacceptable impacts were identified in the detailed specialist studies conducted, provided that the recommended mitigation measures are implemented. The majority of the watercourses in the study area are likely to have been impacted by agriculture and cattle farming to varying degrees, as well as mining in some areas.</p> <p>To ensure the continued persistence of ecosystems and that national conservation targets are achieved, it is essential that impacts on sensitive and highly localised habitats are minimized or avoided altogether.</p> <p>The proposed powerline traverses the following conservation areas: Witvinger Nature Reserve, Potgietersrus Nature Reserve and Palmer Private Nature Reserve. Kindly obtain comments from the Directorate: PAPME for the attention of Ms M Mudau MaMudau@dffe.gov.za.</p> <p>The Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dffe.gov.za for the attention of Mr. Seoka Lekota.</p>	<p>Thank you for the comment, yes it is correct that a large proportion of the proposed development area being categorized on delineated biodiversity areas CBA 1, CBA 2, ESA 1 and ESA 2. No environmental fatal flaws or unacceptable impacts were identified in the detailed specialist studies conducted, provided that the recommended mitigation measures are implemented. The mitigation measures have been incorporated in the EMPR's which have been included in the DBAR as Appendix O.</p>

Name and Organisation of Authorities		Comment	Response from Specialist and NTC Group EAP
		<p>Yours faithfully</p>  <p><b>Mr. Seoka Lekota</b> Control Biodiversity Officer Grade B: Biodiversity Conservation Department of Forestry, Fisheries &amp; the Environment Date: 03/06/2024</p> 	
<p>Ref:12/9/CR-W332 HEAD OFFICE Department of ECONOMIC DEVELOPMENT,ENVIRONMENT &amp; TOURISM (LEDET)</p> <p>Evridiki Towers,20 Hans van rensburg street, Private Bag X9484 Polokwane, 0700</p> <p>Enquiries:Mr Molepo ME Tel: 015 295 8827 / 063 695 0760 E-mail: molepoME@ledet.gov.za</p>		<p>For attention: Tebogo Mapinga Tel: 011 462 2022 / 073 722 8882 E-mail: Projects@ntcgroup.co.za</p> <p>RE: DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED CONSTRUCTION OF THE BORUTHO-SILIMELA 150KM 400KV POWER LINE AND ASSOCIATED INFRASTRUCTURE WITHIN SEKHUKHUNE AND WATERBERG DISTRICT MUNICIPALITIES, LIMPOPO PROVINCE.</p> <p>The copy of Basic Assessment Report and its supporting documents with regard to the above-mentioned project received by the Department on 3 June 2024 refer.</p> <p>1. The Department has reviewed report and its supporting documents and would like to outline the following:</p>	<p>It is noted that the powerline route will pass through Protected Areas (PA), as per the Waterberg Bioregional Plan (WBP) Gazetted in Provincial Notice 1 of 2019, No 2966 of 04 January 2019. The Impacts of the proposed construction of the powerline within the Protected Afeas have been assessed in the Terrestrial Assessment Report (refer to Appendix E) and in Section 6 of the DBAR. The mitigation measures proposed have been incorporated in the EMPRs, refer to Appendix O of the DBAR.</p>

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		<p>1.1. Kindly note that in terms of the Waterberg Bioregional Plan (WBP) Gazetted in Provincial Notice 1 of 2019, No 2966 of 04 January 2019, the powerline route will pass through Protected Areas (PA). In light of the aforementioned, an Environmental Management Programme report must outline mitigation measures as may be required by management authorities of the PAs. It is noted that consultation has been initiated in this regard.</p> <p>Please do not hesitate to contact this Department should have any queries in this respect.</p> <p>Yours faithfully,</p>  <p>DEPUTY DIRECTOR ENVIRONMENTAL QUALITY MANAGEMENT DATE: 21/7/2024</p>	
<p>DFFE</p> <p>Reference:14/12/16/3/3/1/2979</p> <p>Enquiries: Ms Olivia Letlalo</p> <p>Telephone: 012 399 8815</p> <p>E-mail: oletlalo@dffe.gov.za</p>		<p>Dear Ms Rasivhetshele</p> <p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED CONSTRUCTION OF THE BORUTHO-SILIMELA 150KM 400kV POWER LINE AND ASSOCIATED INFRASTRUCTURE, WITHIN THE LEPELLE-NKUMPI, MOGALAKWENA, MODIMOLLE - MOOKGOPONG AND EPHRAIM LOCAL MUNICIPALITIES IN LIMPOPO PROVINCE</p> <p>The draft Basic Assessment Report (BAR) dated April 2024 and received by this Competent Authority (CA) on 25 April 2024, refers.</p> <p>This letter serves to inform you that the following information must be included to the final BAR:</p> <p>Project Description</p> <p>The CA acknowledges the project description provided on page 13 of the draft BAR and on page 9 of the application form, however, it has been noted that the project description provided</p>	<p>The project Description of the project included in Section 2 of the DBAR and the application Form have been aligned.</p>



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		<p>on page 9 of the application form, is not as the same as that provided on page 13 of the draft BAR. Therefore, when submitting the final BAR and the amended application form, you are advised to provide a similar project description in both documents, and which includes the technical components of the proposed development with the associated infrastructures.</p> <p>In addition, you are advised to provide the technical details and the dimensions of the associated infrastructures such as substation and temporal/permanent laydown areas, and for linear activities such as roads or internal roads, you are advised to provide the length and width of the linear infrastructures.</p> <p>It has been noted that the proposed 400kV powerline will connect from both Borutho Substation and Silimela Substation, and that both substations are to be extended to accommodate the proposed 400kV, however, it is not provided which yards are to be extended on both substations to accommodate the proposed 400kV powerline. Therefore, you are advised to indicate if the extension of both substations will introduce a new construction of a 400kV yard or an extension of already existing 400kV yard.</p> <p>It has been noted that the basic assessment process has been followed for the proposed development as the grid infrastructure corridor falls within Electricity Grid Infrastructure (EGI) Corridor. The CA acknowledges the attached pre-negotiated route agreements (Appendix 7B), however you are advised that as per Government Notice No 145 of 26 February 2021, you are required to submit the route negotiated with all landowners of the properties to be affected by the proposed development. Therefore, ensure you submit such agreements of the negotiated route in the final BAR.</p> <p>On page 14 of the draft BAR, it has been noted that both Borutho Substation and Silimela Substation are provided as infrastructures for the proposed development, while on page 13 of the draft BAR, it has been indicated that Silimela and Borutho substations already have been</p>	<p>The technical dimensions of the associated infrastructure, temporary/permanent laydown areas have been included in Section 2 Table 2 of the DBAR.</p> <p>It is important to note that Silimela and Borutho substations have already been approved for construction under other Environmental Authorisations and as such, exist. Therefore, the proposed expansion works entail accommodation of 1 x 400kV feeder bay for Silimela Line 1 and 1 x 400kV feeder bay for Borutho Line 1. There will be no expansion of the existing terrace or substation boundaries.</p> <p>Silimela and Borutho substations have already been approved for construction under other Environmental Authorisations and as such, exist. Therefore, the proposed expansion works entail</p>



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		<p>approved for construction under other Environmental Authorisations and as such, exist. Therefore, you are advised to provide clarity if both substations form part of this EA application or not.</p> <p>SG 21 Digit Codes and Coordinates</p> <ul style="list-style-type: none"> <li>The CA acknowledges the SG 21 Digit Codes on page 16 to 20 of the draft BAR; however, you are advised to ensure that the farm names and numbers with their SG 21 Digit Codes provided in the final BAR are the same with those provided in Appendix 9 of the amended application form.</li> <li>The CA acknowledges the coordinates provide on page 20 of the draft BAR, however, for each property, you are advised to provide the powerline coordinates from the start, middle and end points. In addition, for the associated infrastructures such as the substation and laydown areas, you are advised to provide the four corner and centre points coordinates.</li> </ul> <p>Screening Tool Report</p> <ul style="list-style-type: none"> <li>It has been noted that the screening tool reports for the powerline and associated infrastructures are included in the draft BAR, however, there is no EIA Reference numbers and compiler signatures on the aforesaid reports. Therefore, you are advised to provide the EIA reference number and sign the abovementioned reports to be submitted with the final BAR.</li> </ul> <p>Listed Activities</p> <ul style="list-style-type: none"> <li>It has been noted that the word/s “should and may” have been used in the description of activity 19 of Listing Notice (LN) 1 and activity 9 of LN 2. Please refrain from using such word/s, since it creates an uncertainty regarding the applicability of the listed activity applied for, for the proposed development. In addition, please note that the project description and listed activities are not based on a precautionary approach.</li> </ul>	<p>accommodation of 1 x 400kV feeder bay for Silimela Line 1 and 1 x 400kV feeder bay for Borutho Line 1. There will be no expansion of the existing terrace or substation boundaries.</p> <p>The SG 21 Digit Codes included in the DBAR and in Ammendix 9 of the application form are aligned.</p> <p>The start, middle co-ordinates and end co-ordinates of the proposed powerline, the four corner co-ordinates of the Borutho and Silimela Substation have been included in Section 2, Table 3 of the DBAR.</p> <p>The DFFE and the compiler signature has been incorporated into the Screening Report. Refer to Appendix N.</p> <p>The description of the listed activities in the application and DBAR and been amended accordingly.</p>

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		<ul style="list-style-type: none"> <li>For activity 12 of LN 1, it has been noted that the placement of linear infrastructure (i.e., overhead powerlines) will be located within or within 32m of watercourses, however, the physical footprints of the linear infrastructures are not provided, therefore, you are advised to provide the physical footprint of the linear infrastructure/s which are 100 square meters or more and that are within 32m of a water course.</li> <li>For activity 19 of LN 1, the CA acknowledges that the listed activity will be triggered as the topsoil used within the facility will be removed from the identified areas within the site. This might include areas identified within wetlands. However, you are advised to provide the capacity of the materials which are more than 10 cubic meters to determine the applicability of this activity.</li> <li>For activity 28 of LN 1, the CA acknowledges that activity 28(ii) is triggered as the proposed powerline will transverse land used for agricultural purposes. The power line and associated infrastructure is located outside an urban area and will cover an area over one hectare or more. Please provide the size of the total land to be developed or cover by the powerline in hectares in order to determine the applicability of this listed activity.</li> <li>It has been noted that for activity 30 of Listing Notice (LN) 1, the proposed 400kV power line will transverse the Witvinger Nature Reserve and the Potgietersrus Nature Reserves. Therefore, for the description to trigger the listed activity, the CA advise you to note the following: <ul style="list-style-type: none"> <li>➤ To obtain comments from the management authority of all the above-mentioned nature reserves.</li> <li>➤ To obtain comments from the DFFE Biodiversity Conservation, LEDET: Biodiversity Section; DFFE: Protected Areas and the Department of Water and Sanitation (DWS).</li> </ul> </li> <li>Based on the above, please note that since the proposed route will overlap or go through the Protected Areas, approval from the Management Authority in terms of the National Environmental Management: <ul style="list-style-type: none"> <li>Protected Areas Act, 2003; Section 50 (5) for commercial and community activities in the National Park,</li> </ul> </li> </ul>	<p>The proposed powerline from the Borutho Substation and the Silimela Substation is approximately 150km in extent. The powerline study route/area is 250m wide and the servitude within the route will not be more than 90m wide.</p> <p>The proposed powerline from the Borutho Substation and the Silimela Substation is approximately 150km in extent. The powerline study route/area is 250m wide and the servitude within the route will not be more than 90m wide.</p> <p>Permit applications have been submitted to SANBI and LEDET. Refer to Appendix 12 of the application form.</p> <p>The amended Draft BAR will be submitted to the Department's Protected Areas Directorate (DFFE and LEDET) for comments and obtain approval from the Management Authority in terms of the National Environmental Management: Protected</p>

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		<p>and/or World Heritage Site must be obtained and be submitted with the final report. Comments from this Department's Protected Areas Directorate must be obtained to confirm whether approval from the Management Authority in terms of the National Environmental Management: Protected Areas Act, 2003; Section 50 (5) is required.</p> <ul style="list-style-type: none"> <li>For activity 4 of LN 3, please indicate the dimensions of the road to determine the applicability of this listed activity.</li> <li>It has been noted that activities in LN 3 have been applied for because the site falls "within critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans....". Therefore, you are requested to indicate in the project description of the aforesaid listed activities that the CA has adopted the biodiversity plans or bioregional plans. Proof confirming the adoption of systematic biodiversity plans from the relevant CA must be submitted with the final report. Should it be that the systematic biodiversity plan is not adopted, the activities would not be triggered.</li> <li>Kindly be advised that listed activities are not based on a precautionary approach. Please ensure that all the listed activities in the amended application form and final SR are clear and final for decision making purposes.</li> <li>Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. In addition, the onus is on the applicant and the Environmental Assessment Practitioner (EAP) to ensure that all the applicable listed activities are included in the application and the final BAR. Failure to do so may result in unnecessary delays in the processing of the application.</li> </ul>	<p>Areas Act, 2003; Section 50 (5). The Protected Areas Directorate will also be included to the Stakeholders.</p> <p>The dimensions of the roads will only be firmed up during the detail designs. At this stage the information cannot provide.</p> <p>Your comment is noted.</p> <p>Your comment is noted.</p> <p>Your comment is noted.</p>

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		<ul style="list-style-type: none"> <li>If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted for final review and decision making. Please note that the Department's has been amended and can be downloaded from the following link <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a></li> </ul> <p>Alternatives</p> <ul style="list-style-type: none"> <li>The CA acknowledges the discussion of the site alternatives on page 26 of the draft BAR, and that a 250m servitude route is being studied and the servitude for the proposed powerline will not be more than 90m wide within the 250m servitude. However, it has been indicated that the reason for studying a 250 wide route was to ensure that should there be a need to shift the powerline position, there would be room for movement. Therefore, you are advised provide a discussion of the powerline route alternatives with affected landowners and indicate the position of the preferred powerline route alternative (including the reasons as to why preferred) in the final BAR.</li> <li>On page 13 of the draft BAR, it has been indicated that no layout alternatives have been considered in this draft BAR, while it is provided that the position of the powerline is not confirmed with the 250m servitude. Therefore, when submitting the final BAR, within the proposed identified 250m wide servitude, you are advised to provide the discussion of the design and layout alternative and indicate the preferred layout alternative with the preferred powerline route alternative.</li> <li>Please note that Appendix 1(3)(1)(h)(x) of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, requires that "if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such" must be included in the BAR. You are therefore required to provide motivation should other alternative sites, routes, layouts, and technologies not be considered. In addition, you are advised that motivation for not providing alternatives cannot be considered, especially if the proposed development will affect sensitive areas. You are advised to ensure that the final development layout avoids sensitive areas.</li> </ul>	<p>Your comment is noted. The activities applied for in the application form and the DBAR are aligned.</p> <p>Please note that the 250 m corridor was provided to the specialists to allow for the optimisation of the layout should no-go areas be identified, with that said, there are no alternatives to be assessed for the proposed development.</p>

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		<ul style="list-style-type: none"> <li>A description of the process followed to reach the preferred alternative within the site as per Appendix 1(3)(1)(h)(i) of the EIA Regulations (2014), as amended, must be incorporated into the final BAR.</li> </ul> <p>Layout and Sensitivity Maps</p> <ul style="list-style-type: none"> <li>The CA acknowledges the attached Appendix A3 (layout map) submitted with the draft BAR, however, from the overall sensitivity map, please note that no activity is allowed within CBA 1. In addition, it has been noted from the sensitivity map that the proposed grid connection traverse sensitive features such as wetlands, heritage sites, ESA's and CBA's, therefore, you are advised to provide buffers for the sensitive feature, no-go areas and mitigation measures i.e. spanning the waterbodies, /as recommended by the specialist to ensure avoidance of impacts on sensitive areas by the proposed development.</li> <li>Please provide a layout map which indicates the following: <ul style="list-style-type: none"> <li>➤ Position of all infrastructure e.g., the 132kV powerline, substation, electrical distribution infrastructure as per page of the application form.</li> <li>➤ Permanent laydown area footprint.</li> <li>➤ All supporting onsite infrastructure e.g., roads (existing and proposed).</li> <li>➤ All existing infrastructure on the site.</li> <li>➤ The location of sensitive environmental features on site e.g., CBAs, ESAs, heritage sites, wetlands, drainage lines etc. that will be affected.</li> <li>➤ Buffer areas of the above sensitive areas; and</li> <li>➤ All "no-go" areas.</li> </ul> </li> <li>Please ensure that the above map has a clear legend that communicates with details of the map.</li> <li>The above map must be overlain with a sensitivity map and a cumulative map which shows the proposed powerline with associated infrastructures as well as neighbouring powerlines.</li> </ul>	<p>Comment is noted. Please refer to Appendix B for A3 Maps.</p> <p>Comment is noted. Please refer to <b>Appendix B</b> for A3 Maps. The dimensions of the roads as well as the tower positions will only be firmed up during the detail designs. At this stage the information cannot provide.</p> <p>Sensitivity Maps that indicate the proposed grid connection in relation to the Sensitivity Map sensitive features such as wetlands, heritage sites, ESA's and CBA' have been included in the Report.</p>






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		<p>➤ The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p> <p>➤ Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.</p> <p>➤ Please note further that the protocols require certain specialists' to be registered with SACNASP. Refer to the relevant protocols in this regard.</p> <p>➤ Please include a table in the final BAR summarising the specialist studies required by the Screening Tool, a column indicating whether these studies will be conducted or not, and motivation if any study will not be undertaken. Please note that if any of the specialists' studies and requirements recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report, as per the requirements of the Protocols.</p> <p>➤ Please also ensure that the final BAR includes the Site Verification Report as required by the relevant environmental themes and assessments.</p> <p>➤ Should it be determined that there is a need for additional specialist studies to be undertaken based on the outcome of public participation, these must be commissioned and be included in the final BAR reports for public comment.</p> <p>Participation Process</p> <ul style="list-style-type: none"> <li>• Please ensure that comments from all relevant stakeholders are submitted to the Department with the final BAR. This includes but not limited to the Department of Forestry, Fisheries, and</li> </ul>	<p>Comment noted, all specialist studies have highlighted their Assumptions and Limitations. Please refer to <b>Appendix E and M</b> for the Specialist Studies Undertaken.</p> <p>No contradicting recommendations were made by the specialists. Please refer to <b>Appendix E and M</b> for the Specialist Studies Undertaken.</p> <p>All Specialists Appointed are SACNASP Registered, please refer to for the Specialist Studies Undertaken.</p> <p>Please refer to Section 1 of the BAR.</p> <p>Please refer to Appendix P of the Draft BAR.</p> <p>Comment noted, a need for a Civil Aviation Sensitivity study based on the findings of the screening Tool was identified and the assessment was conducted. Refer to Appendix M.</p> <p>Please refer to <b>Appendix D</b> for proof of stakeholder consultation.</p>



Name and Organisation of Authorities		Comment	Response from Specialist and NTC Group EAP
		<p>the Environment (DFFE): Protected Areas Planning and Management Effectiveness Directorate, Biodiversity Planning and Conservation (BCAdmin@environment.gov.za); Limpopo Department of Economic Development, Environment and Tourism (LEDET); Eskom, South African Heritage Resources Agency (SAHRA), South African Civil Aviation Authority, Endangered Wildlife Trust, Birdlife South Africa, Department of Human Settlement, Water and Sanitation, South African National Defence Force, Local interest groups, for example: Councillors and Rate Payers associations; Surrounding landowners, Farmer Organisations, Environmental Groups and NGOs; and Grassroots communities and structures as well as the affected district and local municipalities.</p> <ul style="list-style-type: none"> <li>• Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.</li> <li>• The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended and the approved Public Participation Plan.</li> <li>• The comments and response trail report (C&amp;R) must be submitted with the final BAR. The C&amp;R report must incorporate all comments for this development. The C&amp;R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter.</li> <li>• Please ensure that all issues raised, and comments received during the circulation of the BAR from registered I&amp;APs and organs of state which have jurisdiction (including this Department's comments) in respect of the proposed activity are adequately addressed. Comments made by I&amp;APs must be comprehensively captured (copy verbatim if required) and</li> <li>• Please ensure that comments from all relevant stakeholders are submitted to the Department with the final BAR. This includes but not limited to the Department of Forestry, Fisheries, and the Environment (DFFE): Protected Areas Planning and Management Effectiveness Directorate, Biodiversity Planning and Conservation (BCAdmin@environment.gov.za); Limpopo Department of Economic Development, Environment and Tourism (LEDET); Eskom,</li> </ul>	<p>Please refer to <b>Appendix D</b> for proof of stakeholder consultation.</p> <p>Public Participation Process was conducted in terms of Regulations 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014.</p> <p>Please refer to Appendix D-4.</p> <p>Please refer to <b>Appendix D</b> for proof of stakeholder consultation.</p> <p>Please refer to <b>Appendix D</b> for proof of stakeholder consultation.</p>








Name and Organisation of Authorities		Comment	Response from Specialist and NTC Group EAP
		<p>South African Heritage Resources Agency (SAHRA), South African Civil Aviation Authority, Endangered Wildlife Trust, Birdlife South Africa, Department of Human Settlement, Water and Sanitation, South African National Defence Force, Local interest groups, for example: Councillors and Rate Payers associations; Surrounding landowners, Farmer Organisations, Environmental Groups and NGOs; and Grassroots communities and structures as well as the affected district and local municipalities.</p> <ul style="list-style-type: none"> <li>• Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.</li> <li>• The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended and the approved Public Participation Plan.</li> <li>• The comments and response trail report (C&amp;R) must be submitted with the final BAR. The C&amp;R report must incorporate all comments for this development. The C&amp;R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter.</li> <li>• Please ensure that all issues raised, and comments received during the circulation of the BAR from registered I&amp;APs and organs of state which have jurisdiction (including this Department's comments) in respect of the proposed activity are adequately addressed. Comments made by I&amp;APs must be comprehensively captured (copy verbatim if required) and responded to clearly and fully. Please note that a response such as "Noted" is not regarded as an adequate response to I&amp;AP's comments.</li> </ul> <p><b>Cumulative Impact</b></p> <ul style="list-style-type: none"> <li>• It has been noted that cumulative impacts for the proposed development has been provided as per specialist study, however, when submitting the final BAR, the cumulative impacts of the proposed development must be undertaken as per the requirements of the EIA Regulations, 2014 as amended.</li> <li>• Based on the above, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</li> </ul>	<p>Please refer to <b>Appendix D</b> for proof of stakeholder consultation.</p> <p>Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014.</p> <p>Refer to Appendix D-4 for the Comment And Responses Report.</p> <p>Comment is noted. Cumulative impacts have been assessed and incorporated in the amended Draft BAR. Refer to Section 6.10 of the BAR.</p>

Name and Organisation of Authorities		Comment	Response from Specialist and NTC Group EAP
		<p>➤ Assess the cumulative impacts of the proposed (not yet authorised), authorised (not yet constructed) and existing OHPL and substations.</p> <p>➤ 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.</p> <p>➤ The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</p> <p>➤ A cumulative impact environmental statement on whether the proposed development must proceed.</p> <p><b>Environmental Management Programme (EMPr)</b></p> <ul style="list-style-type: none"> <li>• The CA acknowledges both the substation and powerline generic EMPr's submitted with the draft BAR. You are advised to include these in the final BAR.</li> <li>•The generic EMPrs must not contain any ambiguity. Where applicable, statements containing the word "should" or "may" are to be amended to "must".</li> </ul> <p><b>General</b></p> <p>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 -</p> <p>(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."</p> <p>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</p>	<p>Comment is noted.</p> <p>Comment noted.</p> <p>It is noted that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, that this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulation. Subsequent to submission of the Application form and DBAR for the DFFE on the 25 April 2024, there has been an amendment and/or deviation of the powerline which has resulted in the change of scope of work. therefore Therefore, NTC would like to notify the Department that the Final</p>

Name and Organisation of Authorities		Comment	Response from Specialist and NTC Group EAP										
		<p>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 sub-regulation (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”.</p> <p>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.</p> <p>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.</p> <p>Yours sincerely</p> <p> Dr Sabelo Malaza Chief Director: Integrated Environmental Authorisations Department of Forestry, Fisheries and the Environment Signed by: Ms Olivia Letlalo Designation: Deputy Director: Prioritised Infrastructure Projects Date: 24/05/2024</p> <table><tr><td>cc</td><td>Madinare Mukhuba</td><td>Eskom Holdings SOC Limited</td><td>Tel: 011 516 7350</td><td>Email: <a href="mailto:mukhubdm@eskom.co.za">mukhubdm@eskom.co.za</a></td></tr><tr><td></td><td>Mr Rhulani Mthombeni</td><td>Limpopo (LEDET)</td><td>Tel: 015 293 8300</td><td>Email: <a href="mailto:mthombeniRV@ledet.gov.za">mthombeniRV@ledet.gov.za</a></td></tr></table>	cc	Madinare Mukhuba	Eskom Holdings SOC Limited	Tel: 011 516 7350	Email: <a href="mailto:mukhubdm@eskom.co.za">mukhubdm@eskom.co.za</a>		Mr Rhulani Mthombeni	Limpopo (LEDET)	Tel: 015 293 8300	Email: <a href="mailto:mthombeniRV@ledet.gov.za">mthombeniRV@ledet.gov.za</a>	<p>Basic Assessment Report will be submitted within 140 days from the date of submission of the application. The application was submitted to the Department on the 25 April 2024, therefore the Final BAR must be submitted before the 18 September 2024. This will allow sufficient time for the EAP and the specialists to amend the reports accordingly and allow the additional 30 days Public Participation Process to be undertaken. The DFFE confirmed receipt of the notication letter on the 09 July 2024.</p> <p>The Applicant notes that no activity may commence without an Evnironmental Authorisation.</p>
cc	Madinare Mukhuba	Eskom Holdings SOC Limited	Tel: 011 516 7350	Email: <a href="mailto:mukhubdm@eskom.co.za">mukhubdm@eskom.co.za</a>									
	Mr Rhulani Mthombeni	Limpopo (LEDET)	Tel: 015 293 8300	Email: <a href="mailto:mthombeniRV@ledet.gov.za">mthombeniRV@ledet.gov.za</a>									

**Table 2: Comments and Response , Lepelle Nkumpi, Mogalakwena, Modimolle-Mookgopong and Ephraim Mogale Local Municipalities.**

Name and organization of I&Ps	Comment	Response from Specialist and NTC Group EAP
<p><b>Registration No:</b> [REDACTED]</p> <p><b>JOHANNES MASUBELELE DEVELOPMENT &amp; PROJECT(PTY)Ltd</b></p> <p>Enquiries: M.J Masubele</p> <p>Cell: [REDACTED]</p> <p>Email: [REDACTED]</p> <p>Community Property Developer</p>	<p>Date: 14 May 2024</p> <p>Subject: Notice of Mixed property Development at Gilimberg Farm 861LR</p> <p>Attention: 1. NTC Group and ESKOM</p> <p>2. Mogalakwena Municipality and Town planning Including Engineers</p> <p>3. All Professional teams for entire project at Gilimberg Farm 861LR</p> <p>(a) Town Planning</p> <p>(b) Engineers and Project Managers (c ) Architectural</p> <p>(d) EIA</p> <p>I Malose Johannes Masubelele Community Property Developer I would like to inform NTC Group website: WWW.NTCGroup.co.za,</p> <p>Email: ppp@cagroup.co.za, Karabo@ntcgroup.co.za.</p> <p>I was informed by Mogalakwena Municipality regarding Eskom Project at Gilimberg Farm 861LR</p> <p>Project Description</p> <p>Eskom is proposing to consult 400 V power line between the existing borutho and silimela substation the power line is approximately 150km in extent.</p> <p>Project Location</p> <p>The proposed 400KV powerline will transverse the local municipality namely, Ephraim Mogale, Modimolle. Mokgophong and Mogalakwena within the Limpopo province. The powerline will transverse the following properties</p> <p>Portion 6 of Gilimberg Farm 861LR and others we inform you as NTC Group that the Developer, Johannes Masubelele Development and Project is the current property Developer at Portion 6 of Gilimberg Farm 861LR</p> <p>I will Attach the following</p> <p>(a) Town Planner Masterplan for all items</p> <p>(b) Architectural Drawings plans of five show houses total number of houses will be 2000 for housing component and all commercial items on the Masterplan</p> <p>(c) Engineers Master Plans are currently on process and also architectural Master plan and EIA</p>	<p>Your comment is noted, based on the pegging Map provided, please note that the proposed powerline will not affect or impact on the proposed mixed development property.</p>

	<p>(d) EIA we have progress report and awaiting engineers master plans to submit application of basic assessment process for the project. I would like to inform you that you may need more voltage for Eskom to supply the entire Project with Electricity at Gilimberg Farm 861LR Property Development</p> <p> M.J Masubelele Community Property Developer</p>	
<p><b>CEO OF SEKHUKHUNE DEVELOPMENT AGENCY</b> <b>Mantwa Makanyane</b></p> <p><b>Enquiry: Makanyane M</b> <b>CEO</b> <b>Tel:</b>  <b>Email:</b> </p>	<p>Good afternoon, I'm Mantwa Makanyane, The CEO of Sekhukhune Development Agency..the Entity of Sekhukhune District Municipality.</p> <p>Please share the presentation, would also like to ask if there's is a structure adopted to ensure that theres a process for SNME and community beneficiation, how many direct jobs will the project provide and is there a training and development that can take place to prepare the communities and sMMEs to advantage of these opportunities especially in Sekhukhune.</p> <p>SDA is interested in ensuring that the communities and sMMEs are considered for work opportunities and that we develop a process for project intake within the jurisdiction of Sekhukhune .My email address </p> <p>May we have the full skills development training interventions proposed for these communities...i believe a skills audit must take place to inform these interventions.</p>	The presentation was shared with on the 22 May 2024.
<p><b>South African Civil Aviation Authority (SACAA)</b></p> <p><b>Enquiry: Nrateng Mashiloane</b></p>	<p>From: Nrateng Mashiloane </p> <p>Date: Monday, 10 June 2024 at 15:10</p> <p>To: Tebogo Mapinga &lt;tebogo@ntcgroup.co.za&gt;</p> <p>Cc: Evelyn Shogole , Pamela Madondo </p> <p>Subject: RE: Notification Process for the proposed Borutho-Silimela 400kV power line and associated infrastructure, Limpopo Province</p>	

<p><b>Environmental scientist</b></p> <p><b>Aviation Environmental Compliance Department</b></p> <p>Tel: [REDACTED]</p> <p>Email: [REDACTED]</p> <p>Website: <b>www.caa.co.za</b></p>	<p>Good day,</p> <p>I hope this email finds you well. Kindly note that the SACAA has transferred all obstacle assessments and applications responsibilities to Air Traffic and Navigation Services (ATNS) as published on the SACAA website: <a href="http://www.caa.co.za/industryinformation/obstacles/">www.caa.co.za/industryinformation/obstacles/</a> . A formal application must be lodged with Air Traffic and Navigation Services (ATNS) for a formal obstacles assessment to be conducted. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: <a href="http://www.caa.co.za">www.caa.co.za</a>.</p> <p>Kind regards,</p> <p>Nrateng Mashiloane</p> <p>Aviation Environmental Compliance Department</p> <p>Aviation Safety Infrastructure (ASI)- Aviation Environmental Compliance</p> <p>Tel: [REDACTED]   Fax: [REDACTED] Email: [REDACTED]   <a href="http://www.caa.co.za">www.caa.co.za</a></p>	<p>Your comment is noted. GWI Aviation Advisory was appointed to to conduct a Civil Aviation Sensitivity Study &amp; Obstacle Assessment. The findings of the CASS are that the sensitivity is low, and that no Civil Aviation Compliance Statement will be required for the purposes of environmental authorisation.</p> <p>It is however noted that the CAA Obstacle Approval processes per CA139.27 will need to be complied with, and amended aerodrome operating procedures will need to be implemented before the commencement of construction activities.</p>
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