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REPORT

Comments and Responses Report

**Basic Assessment Process for the
proposed installation of Grid-Scale
Battery Storage and the
construction of associated
infrastructures at the Graafwater
Substation in the Western Cape**

Report No: 19108

Submitted to:

Department of Environmental, Forestry and
Fisheries
Environmental House
Steve Biko Road
Pretoria
0084

06 November 2020

19108



Directors: S. Pillay, N. Rajasakran



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LIST OF ACRONYMS

CRR	Comments and Responses Report
DEFF	Department of Environmental, Forestry and Fisheries
DEA&DP	Department of Environmental Affairs and Development Planning
DEIR	Draft Environmental Impact Assessment
EAP	Environmental Assessment Practitioner
FEIR	Final Impact Assessment Report
CN	Cape Nature
PPP	Public Participation Process

Comments and Responses Report for the Basic Assessment of the installation of the Grit-scale battery storage

This Comments and Responses Report (CRR) captures the comments and issues raised by stakeholders during the announcement and Basic Assessment process for the for the proposed installation of Grid-Scale Battery Storage and the construction of associated infrastructures at the Graafwater Substation in the Western Cape.

Comments received during the review period of the Draft Basic Assessment (DBAR), have been captured in this CRR which will form part of the Final Basic Assessment Report (FBAR), which will be submitted to the Department of Environmental, Forestry and Fisheries (DEFF) for consideration and decision-making after conclusion of the Public Participation Process (PPP).

For easy reference and review, comments / concerns / issues / recommendations have been categorised according to proposed impacts and captured alphabetically according to surname under each category.

	DATE OF COMMENT, FORMAT OF COMMENT / NAME OF ORGANISATION/I& AP	COMMENT	RESPONSE FORM EAP/APPLICANT/SPECIALIST
COMMENTS RAISED ON THE DRAFT BASIC ASSESSMENT REPORT			
1. COMMENTS RAISED BY THE DEPARTMENT OF ENVIRONMENT, FORESTRY AND FISHERIES (DEFF)			
	07/10/2020, Email Letter, Department of Environment, Forestry and Fisheries (Mmamohale Kabasa)	Dear Ms Mapinga COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED INSTALLATION OF A BATTERY ENERGY STORAGE SYSTEM (BESS) AT THE GRAAFWATER SUBSTATION ON PORTION 25 OF THE FARM BUEROSKRAAL 220 NEAR THE TOWN WORCESTER WITHIN THE CEDERBERG LOCAL MUNICIPALITY IN THE WESTERN CAPE PROVINCE	

		<p>The Draft Basic Assessment Report (BAR) dated September 2020 and received by this Department on 04 September 2020, refer.</p> <p>The Department has the following comments on the abovementioned amendment application:</p>	
		<p>Listed Activities</p> <ol style="list-style-type: none"> i. 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. Only activities applicable to the development must be applied for and assessed. 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., 	<p><u>Listed activities</u></p> <ol style="list-style-type: none"> i. Zitholele would like to confirm that all relevant listed activities have been applied for and they are specific and it can be linked to the development activity or infrastructure as described in the project description. ii. The application form has been amended and submitted with the Final BAR. iii. The details regarding the specifications of the dangerous goods, i.e. quantities, type etc. in addition, the impacts associated with the relevant activity have been included in the BAR in Table 4.1. Please refer to Appendix H-2 Integrated Risk Management Standard iv. A risk Assessment has been included under Appendix H3

		<p>quantities, type etc. In addition, the impacts associated with the relevant activity must be identified, described, and assessed in the BAR.</p> <p>iv. The final BAR must include specialist input, a risk assessment for the battery, and updates to the EMPr to address the additional risks.</p>	
		<p><u>Public participation</u></p> <p>i. Please ensure that comments from all relevant stakeholders are submitted to the Department with the final report. This includes but is not limited to the Western Cape Department of Environmental Affairs and Development Planning, Land Reform and Rural Development, the Cederberg Local Municipality, the West Coast District Municipality, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), the Department of Rural Development and Land Reform, the Department of Environment, Fisheries and Forestry: Directorate Biodiversity and Conservation and the Department of Environment,</p>	<p><u>Public Participation</u></p> <p>i. All comments received from stakeholders are included in the Comments and Response Report in Appendix E6 and proof of notification included in Appendix E5.</p> <p>ii. Comments and Response Report is included in Appendix E6.</p> <p>iii. All issues raised were taken into consideration and amendments were made in the Final BAR.</p> <p>iv. The PP Process undertaken is included in section 5 of the Final BAR.</p>

		<p>Fisheries and Forestry: Directorate Forestry.</p> <p>ii. A Comments and Response trail report (C&R) must be submitted with the final report. The C&R report must incorporate all comments for this application. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "noted" is not regarded as an adequate response to I&AP's comments.</p> <p>iii. Please ensure that all issues raised, and comments received during the circulation of the draft report from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final report. Proof of correspondence with the various stakeholders must be included in the final report. 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</p>	
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		<p>terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014 as amended.</p> <p>iv. The final report must also indicate that this draft report has been subjected to a public participation process.</p>	
		<p><u>Layout & Sensitivity Maps</u></p> <p>i. The final report must include an environmental sensitivity map indicating environmental sensitive areas, buffer areas and features identified during the assessment process.</p> <p>ii. The final report must provide the technical details of the proposed facility in a table format as well as their description and/or dimensions.</p> <p>iii. A copy of the final layout map must be submitted with the final report. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g. roads. The layout map must indicate the following:</p> <p>(a) All supporting onsite infrastructure e.g. roads (existing and proposed);</p>	<p><u>Layout & Sensitivity Maps</u></p> <p>i. Environmental Sensitivity Map included within the BAR and in Appendix B.</p> <p>ii. Technical details of the proposed facility is included Section 2, Table 2.2 in Final BAR. It should be noted that the layout was optimised and the final technical Table 8.2 has been included in Section 8 of the BAR</p> <p>iii. A layout map with environmental sensitivities overlaid is included in Appendix B.</p>

		<p>(b) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;</p> <p>(c) Buffer areas; and</p> <p>(d) All "no-go" areas.</p> <p>(e) The above map must be overlain with an environmental sensitivity map. (iv) Google maps will not be accepted.</p>	
		<p><u>Specialist assessments</u></p> <p>i. The maps used within the specialist studies must comply with comment c(i) of this comments letter.</p> <p>ii. The EAP must provide confirmation that all specialists were provided with the same request of proposed amendments as well as ensure that the terms of reference for all the identified specialist studies include the following:</p> <ul style="list-style-type: none"> • A detailed description of the study's methodology; indication of the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed 	<p><u>Specialist Assessments</u></p> <p>i. The specialist map complies with comment c(i).</p> <p>ii. Confirmation of amendment request has been included in Appendix E5.</p> <p>iii. The EAP has taken the comment to consideration.</p>

		<p>and are recommending for authorisations</p> <ul style="list-style-type: none">• Provide a detailed description of all limitations to the studies. All specialist studies must be conducted in the right season and providing that as a limitation will not be allowed.• Please note that the Department considers a 'no-go' area, as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.• Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.• All specialist studies must be final, and provide detailed/practical mitigation measures and recommendations, and must not recommend further studies to be completed post EA.• Should specialists recommend specific mitigation measures; these must be clearly indicated.	
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		<ul style="list-style-type: none">• Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.• A detailed process flow 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.• Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.• The significance rating must also inform the need and desirability of the proposed development.• A cumulative impact environmental statement on whether the proposed development must proceed. <p>iii. Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with</p>	
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		<p>defendable reasons; and were necessary, include further expertise advice.</p>	
		<p><u>The EMPr must also include the following:</u></p> <p>i. Please be informed that the following content must be incorporated within the EMPr as indicated in Appendix 4 of the EIA Regulations 2014, as amended:</p> <ul style="list-style-type: none"> • Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including a curriculum vitae. • A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers. • A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed, and mitigated as identified through the environmental impact assessment process for all phases of the development including- <ul style="list-style-type: none"> ○ Planning and design; ○ Pre-construction activities; ○ Construction activities; 	<p><u>The EMPr</u></p> <ul style="list-style-type: none"> • The EMPr included all recommendations and mitigation measures recorded in BAR and the specialist studies conducted. • The Details and expertise of the EAP who prepared the EMPr have been included in Section 5 off the EMPr and the CV's have been included in Appendix A of the EMPr. • An environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process has been included in the BAR and included in Appendix B of the BAR. • 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 has been included in the BAR • The EMPR complies with Appendix 4 of the EIA Regulations, 2014, as amended.

		<ul style="list-style-type: none">○ Rehabilitation of the environment after construction and where applicable post closure; and○ Where relevant, operation activities.• A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) of Appendix 4 of the EIA Regulations 2014, as amended, will be achieved, and must, where applicable, include actions to-<ul style="list-style-type: none">• Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;• Comply with any prescribed environmental management standards or practices;• Comply with any applicable provisions of the Act regarding closure, where applicable; and• Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.• The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.• The frequency of monitoring the implementation of the impact management	
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		<p>actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.</p> <ul style="list-style-type: none">• An indication of the persons who will be responsible for the implementation of the impact management actions.• The time periods within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented• The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.• A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.	
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		<p><u>General</u></p> <p>i. Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.</p> <p>You are further reminded to comply with Regulation 32(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: "The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority-</p> <ul style="list-style-type: none"> • a report, reflecting- <ul style="list-style-type: none"> i. an assessment of all impacts related to the proposed change; ii. advantages and disadvantages associated with the proposed change; and iii. measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and iv. any changes to the EMPr; <p>which report-</p> <ul style="list-style-type: none"> • had been subjected to a public participation process, which had been 	<p><u>General</u></p> <p>All general comments have been noted and included in the BAR.</p>
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		<p>agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential and registered interested and affected parties, including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority, and</p> <ul style="list-style-type: none"> • reflects the incorporation of comments received, including any comments of the competent authority. <p>Should there be significant changes or new information that has been added to the motivation report 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 32(1)(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 report 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 report, which changes or information was not contained in the report consulted on during the initial public</p>	
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		<p>participation process contemplated in subregulation (1)(a) and that the revised report will be subjected to another public participation process of at least 30 days".</p> <p>In the event where subregulation (1)(b) applies, the report, which reflects the incorporation of comments received, including any comments of the competent authority, must be submitted to the competent authority within 140 days of receipt of the application by the competent authority.</p> <p>Should you fail to meet any of the timeframes stipulated in Regulation 32 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 faithfully</p>	
<p>2. Comments raised by Department of Environmental Affairs and Development Planning</p>			
<p>1.2.1</p>	<p>02/10/2020, Letter,</p>	<p>Dear Madam,</p>	<p>Based on the DEFF Screening Tool the site was identified to be highly sensitive, therefore an Ecologist was</p>

	<p>Department of Environment Affairs and Development Planning (Adri La Meyer)</p>	<p>The e-mail notification of 31 August 2020 providing a Background Information Document (“BID”) to the project and notifying interested and affected parties (“I&APs”) of the availability a Draft Basic Assessment Report refers.</p> <p>The Department has downloaded the Draft Basic Assessment Report (“BAR”) dated 01 September 2020 from the website of the environmental assessment practitioner (“EAP”). Following a review of the Draft BAR, the Department advises that it may be necessary to release a Revised Draft BAR (inclusive of all relevant specialist studies/opinions) for additional public participation to all registered I&APs, per regulation 19(2) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) Environmental Impact Assessment (“EIA”) Regulations, 2014 (as amended). The Revised Draft BAR and Environmental Management Programme (“EMPr”) must meet all the information requirements of Appendices 1 and 4 of the NEMA EIA Regulations, 2014 (as amended), respectively. Please find consolidated comments from various directorates within the Department in support of the recommendation of a Revised Draft BAR.</p>	<p>appointed to conduct a site is to confirm the Environmental sensitivities of the proposed site. It should be noted that based on the Ecological Assessment conducted the site has been highly degraded and the overall significance of the development on the site will be low. Majority of the proposed infrastructure will be located inside the substation’s HV Yard. The Specialist report complies with the requirements as listed in the Terrestrial Ecology Protocol.</p> <p>A Heritage Specialist was appointed and it was confirm that the significance of the impact will be very low. Heritage Western Cape also confirmed that the potential impact on Heritage and Paleontological Features will be low Comments have been attached to the report.</p> <p>We have however taken your comments in to consideration with specific reference to the construction on new access roads and infrastructures in well vegetated areas. We have subsequently optimised the layout to reflect that the existing roads be utilised, an additional access road directly to the BESS site will be constructed to ensure easy access and safety of movement. The Battery area has been reduced and restricted to disturbed areas (please refer to the confirmation letter from the Specialist in Appendix F1-A. The BAR complies with Appendix 1 of the EIA Regulations, the EMPr complies with Appendix 4 on the EIA Regulations and the specialist report complies with Appendix 6 of the EIA Regulations.</p> <p>We would also like to emphasise that Zitholele has complied with the Public Participation Plan which was approved by DEFF. Board we placed in varies location which providing background on the project and the BAR findings. Hard copy reports were made available at the</p>
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			<p>local Library, the Municipality, the Clinic and the Local Shop and no comments were received from the community (there is very little interest in the project). The Municipality also confirmed that they have no comments.</p> <p>No substantive amendments have been made to the report that would warrant releasing the BAR for the second round of public participation.</p>
2.2 Comments raised by Department of Environmental Affairs and Development Planning (Directorate: Development Management)			
<p>02/10/2020, Letter, Department of Environment Affairs and Development Planning (Region 1) – Ms Naadiya Wookey (Naadiya.Wookey @westerncape.gov .za; Tel: (021 483 2742))</p>	<p>Please be advised that the 21-digit Surveyor-General (“SG”) code provided in the Draft BAR is incorrect. The correct 21-digit SG code is C0200000000022000025. Please correct this error.</p>	<p>The 21-digit Surveyor General have been corrected in the Final BAR.</p>	
	<p>Throughout the Draft BAR it is indicated that the proposed development will have a battery storage capacity of approximately 20 Megawatt per Hours (“MWh”) and 500m³ electrolyte storage volume; however, on page 15 it is indicated that the proposed development will have a storage capacity of approximately 36MW and 850m³ electrolyte storage volume. Clarity with respect to the proposed battery storage and dangerous goods storage is required.</p>	<p>The storage capacity will be approximately 20 MWh and 500m³ and this has been corrected in the Final BAR.</p>	
	<p>It is noted that Activity 14 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) is being applied for. Please note that should the storage of electrolyte be more than 500m³, Activity 4 of Listing Notice 2 of the NEMA EIA Regulations,</p>	<p>The storage capacity will be approximately 20 MWh and 500m³, therefore this activity will not apply.</p>	

		2014 (as amended) will be applicable and a Scoping & Environmental Impact Reporting process would have to be followed.	
		It is further noted that Activity 10 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) is being applied for. Please note that since the proposed storage of electrolyte exceeds 80m ³ , Activity 10 of Listing Notice 3 of is not applicable and must be removed from the BAR and application for environmental authorisation ("EA").	The activity has been removed from the BAR and the application form has been amended.
		A detailed description of the proposed temporary widening and/or lengthening of access roads must be provided. This must include an approximate extent of indigenous vegetation to be cleared due to the proposed road widening activities. The EAP is further advised to consider the applicability of Activity 18 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) pertaining to the widening and/or lengthening of a road.	Subsequent to the receipt to the comments from the Department it has been concluded that the existing access road to the substation will be utilised as far as possible for the construction phase. An additional access road from the main access road directly to the BESS site will be constructed to ensure easy access and safety of movement. Therefore, minimum clearance of natural vegetation is required.
		A description of the proposed development in relation to the applicable listed activities must be provided. This must include, inter alia, the estimated thresholds associated with the applicable listed activities.	The description has been provided in Section 4 Table 4.1.
		Given that the proposed development may require the clearance of indigenous vegetation, the applicability of Activity 27 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) must be investigated and reported on.	The layout has been optimised and all construction work will be on the front part of the substation where there is existing stoning. The back area with natural vegetation will no longer be used, therefore no clearing of vegetation is required.
		The Ecological Survey Statement compiled by EnviRoss CC dated February 2020 stated that "It is recommended that as much of the laydown area as possible be included within the existing	The proposed BESS as well as lay-down areas will be on the already disturbed/paved area in front of the substation. The back area with existing vegetation although already

		<p>transformed footprint, and as much of the peripheral vegetated areas be allowed to retain their vegetated features.” The recommendations made by the ecological specialist must be considered as part of the alternatives. The EAP is further reminded that the mitigation hierarchy must be implemented and that potential impacts must be avoided as far as possible.</p>	<p>within the substation footprint will not be used for the BESS.</p>
		<p>The Ecological Survey Statement indicates that the indigenous vegetation on the proposed development site is Leipoldtville Sand Fynbos with an ecosystem status of Endangered. However, according to the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) National List of Ecosystems that are Threatened and in Need of Protection of 09 December 2011, Leipoldtville Sand Fynbos vegetation is classified as Vulnerable. Please correct this error.</p>	<p>This has been corrected in the BAR.</p>
		<p>It is noted that a Screening Tool Report (generated from the National Web Based Environmental Screening Tool) and site sensitivity verification reports (required in terms of the “Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for environmental authorisation”) (“the Protocols”) have not been included in the Draft BAR. Please note that the submission of a Screening Tool Report is compulsory as of 04 October 2019 when applying for EA in terms of regulations 19 and 21 of the NEMA EIA Regulations, 2014 (as amended).</p>	<p>A DEFF screening report has been included in Appendix 4 of the EA Application Form.</p>

		<p>Please further note that according to the Protocols, before commencing with a specialist assessment, the current use of the land and environmental sensitivity of the site under consideration identified by the screening tool must be confirmed by undertaking a site sensitivity verification. A site sensitivity verification report for applicable environmental themes must therefore be provided. Further, a signed copy of the specific compliance statement for each applicable environmental theme identified must be included in the recommended Revised Draft BAR and circulated to all registered I&APs parties for their information.</p> <p>Please note that specialist reports conducted after 9 May 2020 for environmental themes that do not have defined Protocols, must meet the requirements of Appendix 6 of the NEMA EIA Regulations, 2014 (as amended). x</p>	<p>Based on the DEFF Screening Tool the site was identified to be highly sensitive, therefore an Ecologist was appointed to conduct a site is to confirm the Environmental sensitivities of the proposed site. It should be noted that based on the Ecological Assessment conducted the site has been highly degraded and the overall significance of the development on the site will be low. Majority of the proposed infrastructure will be located inside the substation’s HV Yard. The Specialist report complies with the requirements as listed in the Terrestrial Ecology Protocol.</p> <p>A Heritage Specialist was appointed and it was confirm that the significance of the impact will be very low. Heritage Western Cape also confirmed that the potential impact on Heritage and Paleontological Features will be low Comments have been attached to the report.</p> <p>We have however taken your comments in to consideration with specific reference to the construction on new access roads and infrastructures in well vegetated areas. We have subsequently optimised the layout to reflect that the existing roads be utilised, an additional access road directly to the BESS site will be constructed to ensure easy access and safety of movement. The Battery area has been reduced and restricted to disturbed areas (please refer to the confirmation letter from the Specialist in Appendix F1-A. The BAR complies with Appendix 1 of the EIA Regulations, the EMPr complies with Appendix 4 on the EIA Regulations and the specialist report complies with Appendix 6 of the EIA Regulations.</p> <p>No substantive amendments have been made to the report that would warrant releasing the BAR for the second round of public participation.</p>
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		The recommendations and mitigation measures proposed by the EAP and specialists, and the related engineering specifications provided in Appendix D of the Draft BAR must be included as part of the EMPr.	Recommendations and mitigation measures were included in the EMPr.
		The I&AP database contained in Appendix E6 does not include the details of the adjacent landowners to the proposed site. Proof of the public participation process undertaken must be included in the Final BAR to be submitted to the competent authority. The proof must include comments received from commenting authorities and from other I&APs, together with the EAP's responses to the comments. The EAP is further reminded that all comments received on the Draft BAR (and potential Revised Draft BAR) must be adequately addressed prior to submission of the Final BAR.	Proof of notification of the PPP to I&APs and communication is included in Appendix E5.
		A rehabilitation programme for the rehabilitation of the temporary roads must be included in the EMPr. Given that the proposed site is adjacent to a public road (i.e. R364), dust mitigation measures must be included in the EMPr.	No temporary roads will be constructed. The existing access road of the substation will be utilised during construction phase.
		The Draft BAR indicates that topsoil stockpiles must be protected from erosion; however, the depth of topsoil for conservation purposes, the height restrictions of topsoil stockpiles, the period of stockpiling of topsoil, and the replacement of the topsoil is not clearly defined in the Draft BAR. Clarification of topsoil management, storage and conservation is therefore required.	The management of stockpiles has been discussed in detail in the EMPr.
		Throughout the Draft BAR and the EMPr, it is indicated "Error! Reference source not found." This error must be corrected.	This has been corrected.

2.3 Comments raised by Department of Environmental Affairs and Development Planning (Directorate: Waste Management)		
<p>02/10/2020, Letter, Department of Environment Affairs and Development Planning (Mr Gary Arendse Gary.Arendse@westerncape.gov.za; Tel: (021) 483 6307)</p>	<p>Please note that the addresses on page 4 of the bid that indicate where the draft bar and related information could be accessed, is incorrect. The addresses provided for the Graafwater public library and Graafwater municipal library are in Worcester.</p>	<p>This has been verified and the Library is referred to as the Graafwater Public Library. The Library is located in Graafwater.</p>
	<p>Please note that hazardous waste generated during the operational phase must under no circumstances be mixed with general waste. Should this occur, the entire volume of general waste will be classified as hazardous waste and must be managed as such.</p>	<p>Noted, this recommendation has been included in the EMPr.</p>
	<p>Please adhere to the National Norms and Standards for the Storage of Waste promulgated in Government Notice No. 926 of 29 November 2013 if the volumes of waste stored for longer than 90 days exceed 80m³ for hazardous waste and/or 100m³ for general waste. This must be noted as waste production during construction is estimated at 72m³.</p>	<p>Noted, this recommendation has been noted included in the EMPr.</p>
	<p>Please note that the transporter of hazardous waste generated at the proposed development during construction and operation, must be registered with this Department's Integrated Pollution and Waste Information System, whom must report on volumes of hazardous waste transported.</p>	<p>Noted, this recommendation has been noted included in the EMPr.</p>
	<p>As vehicles and machinery will be operational onsite during construction, an area for machinery/refuelling must be demarcated.</p>	<p>Noted, this recommendation has been noted included in the EMPr.</p>

2.4 Comments raised by Department of Environmental Affairs and Development Planning (Directorate: Pollution and Chemical Management)		
	<p>02/10/2020, Letter, Department of Environment Affairs and Development Planning (Gunther.Frantz@westerncape.gov.za; Tel: (021) 483 2975)</p>	<p>Although the preferred technology alternative is a closed system, the following recommendations are provided to prevent and manage potential contamination of water resources, including groundwater emanating from the site during the construction, operational and decommissioning phases:</p> <p>Compilation and adherence to a procedure for the safe handling of battery cells;</p> <p>Compilation of an emergency spill response plan for implementation in the event of a spill or leakage;</p> <p>Provision of spill kits on the site for clean-up of spills and leaks;</p> <p>Immediate clean-up of spills and disposal of contaminated absorbents, materials or soil at a licensed hazardous waste disposal facility;</p> <p>Recording and reporting of all fuel, oil, hydraulic fluid or electrolyte spills or leaks so that appropriate clean-up measures can be implemented. A copy of these records must be made available to authorities on request throughout the project lifecycle;</p> <p>All liquid chemicals and fuel must be stored in a bunded area with a capacity of at least 110% of the maximum allowable volume;</p>
	<p>This has been included in the EMPr. The Integrated Risk Management Systems will be implemented (refer to Appendix H2).</p>	

		<p>Frequent and appropriate disposal of both general and hazardous waste to prevent pollution of soil and groundwater;</p> <p>Installation of leak detection monitoring systems;</p> <p>On-site battery maintenance should only be undertaken on impermeable surfaces with secondary containment measures. Any resulting hazardous substances must be disposed of appropriately; and</p> <p>Provision of suitable emergency and safety signage on site, and demarcation of any areas which may pose a safety risk (including hazardous substances). Emergency numbers for the local police, fire department, the applicant (Eskom) and the local municipality must be placed in a prominent clearly visible area on site;</p>	
		<p>Please note that both the National Department of Environmental Affairs and this Directorate must be duly notified immediately of any incident in terms of section 30 of the NEMA, 1998 (page 12 of the EMPr).</p>	<p>Noted, the statement in the EMPr has been amended to indicate that the Provincial Department will be notified immediately of any incident</p>
		<p>Comment must be sought from the local fire department on the appropriate firefighting methods and materials to be used, in the event of a major fire at the substation.</p>	<p>Appropriate firefighting methods and materials will be sought from the local firefighting department.</p>
		<p>The Ecological Statement and page 65 of the Draft BAR refer to a nearby watercourse. According to the ecological specialist, an area to the west of the road has been categorised as an Ecological Support Area associated with a watercourse. Section 6.3 (hydrology) of the Draft BAR however</p>	<p>The Ecological Statement in the BAR has been amended to include the hydrological feature near the site.</p>

		only deals only with rainfall data and no mention is made of any surface water features near the proposed site. Please ensure that a description of all surface water features, whether perennial, non-perennial or ephemeral, is included in the BAR	
		Further to the above, given the potential presence of a watercourse in reasonable proximity to the proposed development, and despite the relative flat topography of the area, the recommendations of the ecological specialist are strongly supported, with reference to erosion control, storm water management and management and mitigation of chemical spills.	Noted.
		Per paragraph 1.17 above, references related to "Error! Reference source not found" must be rectified accordingly.	This has been corrected.
		Kindly quote the abovementioned reference numbers in any future communication in respect of this correspondence.	This has been noted.
		Please direct any enquiries to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.	
		The Department reserves the right to revise initial comments and request further information based on any information received.	
3. COMMENTS RAISED BY HERITAGE WESTERN CAPE			
1.3.1	17/09/2020, Email Letter, Heritage Western Cape (Dr. Mxolisi Dlamuka)	NOTIFICATION OF INTENT TO DEVELOP: PROPOSED INSTALLATION OF A GRID-SCALE BATTERY STORAGE SYSTEM AND ASSOCIATED INFRASTRUCTURE ON PTN 25/220, AT THE GRAAFWATER SUBSTATION, GRAAFWATER, CEDERBERG SUBMITTED IN	This Heritage Western Cape shall be notified should any heritage features be discovered.

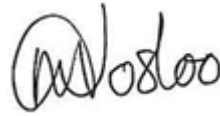
		<p>TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)</p> <p>CASE NUMBER: 20022413SB0907E</p> <p>The matter above has reference.</p> <p>Heritage Western Cape is in receipt of your application for the above matter received on 8 September 2020. This matter was discussed at the Heritage Officers meeting held on 14 September 2020.</p> <p>You are hereby notified that, since there is no reason to believe that the proposed installation of a grid-scale battery storage system and associated infrastructure on Ptn 25/220, at the Graafwater Substation, Graafwater, Cederberg will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.</p> <p>However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately and Heritage Western Cape must be notified without delay.</p> <p>This letter does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.</p>	
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		<p>HWC reserves the right to request additional information as required.</p> <p>Should you have any further queries, please contact the official above and quote the case number.</p> <p>Yours faithfully</p> <p>Dr. Mxolisi Dlamuka Chief Executive Officer</p>	
4. COMMENTS RECEIVED FROM THE CLANWILLIAM FIRE DEPARTMENT			
	23/10/2020, Email, Clanwilliam Fire Department (N Scholtz))	<p>Good Day Ms Morwasehla</p> <p>As discussed per telephone. I have no comment at this stage of the process. Later on when plans are submitted to the local municipality I will require a Fire Plan that shows the layout of Fire Fighting and safety equipment needed for the site.</p> <p>Kind regards</p> <p>N Scholtz</p>	<p>Noted, thank you very much for your comments. Eskom will liaise with the Fire Department once the plans have been finalised.</p>

ZITHOLELE CONSULTING (PTY) LTD



Tebogo Mapinga
Project Manager



Dr Mathys Vosloo
Project Associate

