

## Amy Hill

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**From:** Doretha Kotze <dkotze@wcdm.co.za>  
**Sent:** Thursday, 12 September 2019 14:03  
**To:** Amy Hill  
**Cc:** Collaborate Mailbox  
**Subject:** RE: Stakeholder Comment Period: Installation of a Battery Energy Storage System at Paleisheuwel, Western Cape

Ref: 13/2/12/4/1

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 the approval of building plans by Cederberg 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



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**From:** Amy Hill [mailto:AHill@srk.co.za]  
**Sent:** 29 August 2019 12:20 PM  
**To:** Amy Hill  
**Subject:** Stakeholder Comment Period: Installation of a Battery Energy Storage System at Paleisheuwel, Western Cape

Dear Stakeholder

### **Basic Assessment Report for the Proposed Installation of a Battery Energy Storage System at Paleisheuwel, Western Cape**

Eskom Holdings SOC Limited (Eskom) proposes to install a Battery Energy Storage System (BESS) at the existing Paleisheuwel Substation located adjacent to the Paleisheuwel Solar Photovoltaic (PV) Plant in the Cederberg 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 Paleisheuvel Solar PV Plant 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](http://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](mailto: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  
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[www.srk.co.za](http://www.srk.co.za)

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## BIODIVERSITY CAPABILITIES

**postal** Private Bag X5014 Stellenbosch 7599  
**physical** Assegaaibosch Nature Reserve Jonkershoek  
**website** [www.capenature.co.za](http://www.capenature.co.za)  
**enquiries** Alana Duffell-Canham  
**telephone** +27 21 866 8000 **fax** +27 21 866 1523  
**email** [aduffell-canham@capenature.co.za](mailto:aduffell-canham@capenature.co.za)  
**reference** SSD14/2/6/1/8/2/400-10\_Eskom\_BatteryESS\_Paleisheuwel  
**date** 23 September 2019

Amy Hill  
SRK Consulting  
Private Bag X18  
Rondebosch  
7701

By email: [ahill@srk.co.za](mailto:ahill@srk.co.za)

Dear Ms Hill

**RE: Proposed substation extension and installation of a battery energy storage system at Paleisheuwel – 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 occurs in an area which supports Leipoldtville Sand Fynbos. According to a study conducted by CapeNature's conservation planner in 2016 using landcover imagery far more recent than that used for the 2011 NSBA, Leipoldtville Sand Fynbos is rapidly declining and had only approximately 40% of its original extent remaining which means it qualifies as Endangered in terms of Criteria A1 of the NSBA listings. This is likely to be reflected in the new NSBA listings which will be released soon. Leipoldtville Sand Fynbos is also known to support a high number of Species of Conservation Concern.
2. Although the site has not been determined as a Critical Biodiversity Area, its mapping as an Ecological Support Area means that it is recognised as still being important for supporting Leipoldtville Sand Fynbos habitat. The presence of a fairly high number of SCC in a relatively small area confirms this.
3. There is no real mitigation for the loss of Endangered habitat and SCC on this site. Although search and rescue is good practice for certain species and where a suitable receiving area has been identified, it is not considered to be a mitigation measure that significantly lowers impacts. In this instance, *Leucospermum rodolentum* is not considered a suitable species for translocation. Although it may be possible to collect seeds, it is unlikely that these will be successfully propagated and be planted in a suitable area.
4. CapeNature, therefore suggests that the layout be revised and the Battery Energy Storage System (BESS) and other new infrastructure be placed on the southern side of

the site and the natural vegetation on the northern side be left intact. The money that would have been spent on search and rescue efforts should be used to rehabilitate and maintain the site and other Eskom sites which also support Leipoldtville Sand Fynbos.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alana Duffell-Canham', written in a cursive style.

Alana Duffell-Canham



## 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: 14/12/16/3/3/1/2066

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 PALEISHEUWEL SUBSTATION, PALEISHEUWEL, WEST COAST

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 EMPr 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

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**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

## Amy Hill

---

**From:** A F Corin <afcorin@iafrica.com>  
**Sent:** Monday, 30 September 2019 12:07  
**To:** Amy Hill  
**Subject:** Re: Paleisheuvel & Skaapvlei & Other Eskom Battery Storage  
**Attachments:** 533767\_Eskom\_Battery\_Storage\_BAR\_Paleisheuvel\_BAR (Comments embedded).pdf

Morning Amy

I have attached the Paleisheuvel Bar with embedded comments in yellow, as well as highlighted text (also in yellow) that these comments apply to.

Please note that all comments apply equally to the Skaapvlei project, as the equivalent narrative in each seems identical for all practical purposes.

For brevity, only the Paleisheuvel BAR is attached hereto with specific comments.

Please also note that besides the specifics in the attachment, the following general comments apply to both projects.

These projects involve the storage of hazardous chemicals (in the case of all flow batteries) in large quantities with mechanical manipulation thereof (pumping), a key feature.

The reports are completely lacking in any detailed and quantified information, analysis, mitigation of any of the specific chemicals that are envisaged to be used. This is almost unfathomable, as the report is hardly lacking detail on numerous other potential impacts, which frankly are minor and almost negligible by comparison.

If any of the above or the attached requires further clarification, please advise.

Regards  
Anthony Corin

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**From:** Amy Hill <AHill@srk.co.za>  
**Date:** Fri, 27 Sep 2019 10:08:22 +0000  
**To:** A F Corin <afcorin@iafrica.com>  
**Subject:** RE: Paleisheuvel & Skaapvlei & Other Eskom Battery Storage

Good day Anthony

Thank you for your email. SRK Consulting is managing the Basic Assessment (BA) process for the proposed battery storage projects in both Skaapvlei and Paleisheuvel. I have added you to the stakeholder database.

The BA reports (BARs) are available for public comment at the below two website addresses:

<https://www.srk.co.za/en/za-eskom-battery-storage-bar-paleisheuvel-western-cape>

<https://www.srk.co.za/en/za-eskom-battery-storage-bar-skaapvlei-western-cape>

Please note that the public comment period ends on Monday, 30 September 2019.

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  
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[www.srk.co.za](http://www.srk.co.za)

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**From:** A F Corin <[afcorin@iafrica.com](mailto:afcorin@iafrica.com)>  
**Sent:** Friday, 27 September 2019 12:00  
**To:** Amy Hill <[AHill@srk.co.za](mailto:AHill@srk.co.za)>  
**Subject:** Paleisheuvel & 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](mailto: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 show 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/F2/3/2136/19 (Development Management)

19/2/5/3/F2/3/WL0142/19 (Waste Management)

19/3/2/F2/2/DDF050/19 (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](mailto: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 AT THE PALEISHEUWEL SUBSTATION ON PORTION 10 OF THE FARM BERGVALLEY NO. 400, CITRUSDAL (DEFF REF: 14/12/16/3/3/1/2066)**

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 Rondine Isaacs ([Rondine.Isaacs@westerncape.gov.za](mailto:Rondine.Isaacs@westerncape.gov.za); Tel: (021) 483 4098);
  - 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

the listed activity being applied for. In addition, the Final BAR must indicate the anticipated quantity/volume of the dangerous good/s that will be stored.

- 1.2 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.
- 1.3 Section 6.1.2 of the Draft BAR indicates that Heritage Western Cape ("HWC") confirmed that the proposed project will not impact on heritage resources. The final comment from HWC must be included in the Final BAR to be submitted to the competent authority.
- 1.4 Should the competent authority decide to authorise the proposed development, then the Environmental Management Programme ("EMPr") and the mitigation measures recommended in the BAR and the various specialist reports must be strictly implemented.
2. Directorate: Waste Management – Mr Waleed Galvaan ([Waleed.Galvaan@westerncape.gov.za](mailto:Waleed.Galvaan@westerncape.gov.za); Tel: (021) 483 8788):
  - 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 100m<sup>3</sup> of general and less than 80m<sup>3</sup> 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](mailto:Monique.Natus@westerncape.gov.za); Tel: (021) 483 6839):
  - 3.1 This Directorate has reviewed the Draft BAR and EMPr and is satisfied that the pollution risks have been identified and the impacts have been adequately addressed. All specialist recommendations, including pollution risk mitigation measures, must always be implemented and adhered to.
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**

Department:  
Environmental Affairs  
**REPUBLIC OF SOUTH AFRICA**

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Tel (+ 27 12) 399 9372

**Reference:** Paleisheuvel BESS

**Enquiries:** Ms Portia Makitla

**Telephone:** 012-399 9411 **E-mail:** pmakitla@environment.gov.za

Amy Hill  
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7700

Telephone Number: +27 (21) 659 3060  
Email Address: [ahill@srk.co.za](mailto:ahill@srk.co.za)

### **PER E-MAIL**

Dear Sir/Madam

### **COMMENTS ON THE BASIC ASSESSMENT REPORT FOR PROPOSED ESKOM BATTERY STORAGE SYSTEM AT PALEISHEUWEL SUBSTATION, WEST COAST, WESTERN CAPE PROVINCE**

The Directorate: Biodiversity Conservation received and evaluated the Basic Assessment Report (BAR) for the above mentioned project and its specialist's studies.

The proposed development is located within an area designated as ESA 1 category according to the Western Cape Biodiversity Spatial Plan (WCBSP). The ESA on site does not provide any ecological functionality and does not sustain any CBAs or terrestrial features. However, the Botanist observed one threatened plant species on site during the field survey. Therefore, the Directorate: Biodiversity Conservation does not have any objections to the proposed development. Notwithstanding the above; the following recommendations must be implemented and adhered to:

- A Botanist must perform the final walkthrough prior construction to identify species of conservation concern;
- A permit must be obtained from relevant authorities for the removal or disturbance of any species listed in terms of TOPs and Red Data list;
- All disturbed and cleared areas must be re-vegetated with indigenous perennial shrubs and grasses from the local area;

- Alien invasive plant species in and around the proposed development area must be removed in terms of Conservation of Agricultural Resources Act (CARA) and National Environmental Management Biodiversity Act (NEMBA); follow up-actions for at least five years need to take place; and
- Concurrent rehabilitation and alien vegetation control program within all sensitive areas must be implemented.

The overall biodiversity objective is to minimise loss to biodiversity as possible. Therefore, in order to achieve this objective the above mentioned recommendations must be adhered to.

Yours faithfully



**Mr Seoka Lekota**

**Directorate: Biodiversity Conservation**

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**Date: 07/10/2019**