
PROPOSED RUSTMO2 PV PLANT

COMMENTS AND RESPONSE REPORT

Submitted as part of the Final Basic Assessment Report
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PROJECT DETAILS

Title : Environmental Basic Assessment Process
Comments and Response Report: Proposed RustMo2 PV
Plant on a site near Buffelspoort, North West Province

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1. INTRODUCTION TO THE PROPOSED PROJECT

Momentous Energy, is proposing the establishment of a photovoltaic (PV) plant on a site near Buffelspoort in the North West Province.

In terms of the EIA Regulations published in terms of Section 24(5) of the National Environmental Management Act (NEMA, Act No. 107 of 1998), authorisation is required from the National Department of Environmental Affairs¹ (DEA) (in consultation with the relevant provincial department), for the establishment of the proposed PV plant. In terms of sections 24 and 24D of NEMA, as read with the EIA Regulations of GNR 543; GNR544; GNR545; and GNR546, a Basic Assessment process is required to be undertaken.

Savannah Environmental has been appointed as the independent environmental consultants to undertake the Environmental Basic Assessment to identify and assess any potential environmental impacts. As part of these environmental studies, interested and affected parties (I&APs) have been actively involved through a public involvement process. This process includes the placement of site notices and advertisements, as well as compiling an I&AP database and distributing letters regarding the project to identified stakeholders and I&APs.

2. OBJECTIVES OF THE COMMENTS AND RESPONSE REPORT

The Comments and Responses Report includes the comments received during the public participation process undertaken as part of the Environmental Basic Assessment Process for the proposed project. This includes responses to the advertisements, site notices, Background Information Document (BID), meetings, written comments received, and individual discussions with key stakeholders. The Comments and Responses Report has the following objectives:

- » To provide a formal and integrated record of all the issues raised by Interested and Affected Parties (I&APs) to date and the responses provided by the environmental team and the project proponent during the Basic Assessment process.
- » To provide a mechanism that allows all parties participating in the process (including the environmental authorities) to verify whether the issues raised have been considered and, where appropriate, adequately addressed by the environmental team.

The issues raised in this Comments and Responses Report reflect all the issues raised to date. Following the release of the Draft Basic Assessment Report, this report will be updated with any additional comments that are received.

¹ The DEA serves as the competent (authorising) authority for all power generation projects in South Africa.

3. IDENTIFICATION OF STAKEHOLDERS

The identification of I&APs was undertaken through the following mechanisms:

3.1 Contacting Authorities

Relevant government departments, municipalities, and ward councillors were contacted to inform them of the proposed project and to obtain their issues and comments in this regard either telephonically or through the submission of an electronic stakeholder letter (refer to Appendix E5 of the main report).

3.2 Newspaper Advertisement

Adverts were placed in the Rustenburg Herald (refer to Appendix E1 of the main report), the objective of which was to:

- » Notify I&APs of the proposed project and inform them of the Basic Assessment Process and the means by which comments, queries or objections could be raised;
- » Invite I&APs to become involved in the proposed project by registering as I&APs;
- » Invite I&APs to review the Draft Basic Assessment Report; and
- » Invite I&APs to the public meeting.

3.3 Site Notice

Both A2 and A4 site notices were erected at/or near the proposed development site and included information regarding the project, the public participation process and contact details of the public participation consultants (refer to Appendix E2 of the main report).

4. RECORDING OF COMMENTS AND RESPONSES

The table that follows includes the comment that was made, the individual it was made by, the type of communication, and a response from the Environmental Assessment Practitioner and project proponent.

No.	Issue	Raised by	Response
4.1 Participation Process			
1.	Please register me as an I&AP. My interest is to keep track of these developments and look at their footprints.	John Wesson, Region Manager North West Wildlife & Environment Society of SA - Northern Areas, comment made via email 23 June 2011	This has been actioned.
2.	Hi Bongani, I'm working for the Department of Agriculture, Forestry and Fisheries and I'm responsible for the administration of the National Forest Act 84 of 1998 as amended and i would like to register as affected stakeholder.	Nevhufumba Lufuno, Department of Agriculture, Forestry and Fisheries, comment made via email 22 July 2011	This has been actioned.
3.	Please register me on the database I am interested on issues pertaining to the protection of trees under the National Forestry Act 84 of 1998.	Itumeleng Monei, Department of Agriculture, Forestry and Fisheries, comment made via fax 01 August 2011	This has been actioned.
4.2 Rehabilitation			
4.	Will you be planting grass below the panels?	John Wesson, Region Manager North West Wildlife & Environment Society of SA - Northern Areas, comment made via email 23 June 2011	The developer has proposed to plant grass on the first phase of the project (RustMo1) and they are also proposing the same for RustMo2.
5.	Grass like Cynodon dactylon should be used.	John Wesson, Region Manager North West Wildlife & Environment Society of SA -	Comment noted and recommendation forwarded to the developer.

No.	Issue	Raised by	Response
		Northern Areas, comment made via email 23 June 2011	
4.3 Forestry			
6.	A single individual protected tree species (sclerocarya birrea subs, Marula) is present on the site. It is situated in the immediate vicinity of the old homestead and is assumed to have been planted by early inhabitants of the property. An application for permit for removal/damage/cutting or pruning of protected tree species as per National Forest Act, 84 of 1998 as amended need to be submitted to the department Of Agriculture, Forestry and Fisheries prior to commencements of construction.	Nevhufumba Lufuno, Department of Agriculture, Forestry and Fisheries, comment made via letter 18 August 2011	Momentous Energy will not remove the tree. An application will be made to prune the tree annually.
7.	Before construction comments debushing will be done for removing all the natural vegetation in the area and as such the woodland is disturbed and an application for removal of natural trees will need to be submitted and a license for removal in terms of section 7 of the National Forest Act be granted to the applicant. Both the application form for section 15(1) protected trees and section 7 of the National Forest Act will be forwarded to the applicant.	Nevhufumba Lufuno, Department of Agriculture, Forestry and Fisheries, comment made via letter 18 August 2011	Momentous Energy will initiate the relevant applications before construction.

No.	Issue	Raised by	Response
<i>4.4 Technical</i>			
8.	Interested in: <ul style="list-style-type: none"> • reviewing the Layout (Electrical reticulation) • review of services • Environmental Impact of panels 	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made via reply form 11 August 2011	Relevant information will be provided by Momentous Energy.
9.	How are you going to connect to the substation	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made during focus group meeting 11 August 2011	The proposed powerline is to run straight from RustMo2 site mini-substation to Eskom's Spruitfontein substation.
10.	You need to document your plans whether the powerline will be underground or overhead so that we can agree. If the powerline is overhead we will need to put the appropriate restrictions for our trucks.	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made during focus group meeting 11 August 2011	Gareth (Momentous Energy): Momentous Energy will be happy to go with either underground or overhead.
11.	How are you going to couple with Eskom?	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made during focus group meeting 11 August 2011	Gareth (Momentous Energy): We will put an 88kv feeder which Eskom has approved.
12.	If you are putting 88kv you wouldn't want to use underground would you?	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made during focus group meeting 11 August 2011	Gareth (Momentous Energy): Underground wouldn't be ideal for 88Kv.

No.	Issue	Raised by	Response
13.	88Kv underground would be a safety risk	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made during focus group meeting 11 August 2011	Gareth (Momentous Energy): Comment noted, overhead would definitely be ideal.
14.	Based on your trade-off studies which would be more economic: overhead or underground	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made during focus group meeting 11 August 2011	Gareth (Momentous Energy): Overhead cables are more economic
15.	We have no problems with overhead we will just have to put the relevant height limiters. There are also minimum heights from Eskom that you will have to adhere to and I'm sure if you adhere to these everything will be fine	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made during focus group meeting 11 August 2011	Comment noted
16.	After your designs have been finalised we would like to know where your access off the road would be.	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made during focus group meeting 11 August 2011	Gareth (Momentous Energy): We will provide you with the details. It would be ideal for us to access the site from the road.
4.5 Security			
17.	If you put underground cables you will be at a risk of cable theft as this is a problem in the area	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made during	Gareth (Momentous Energy): We are proposing to have 24 hour security on site.

No.	Issue	Raised by	Response
		focus group meeting 11 August 2011	
18.	Copper cable theft is a serious issue in the area so you need to consider this in whatever decision you make regarding the types of cables you use.	Raphael Mwangobola, Marikana Platinum Mine Engineering Manager, comment made during focus group meeting 11 August 2011	Gareth (Momentous Energy): Comment noted. However we are happy to use which ever method in order to accommodate the mine.
<i>4.6 Heritage</i>			
19.	SAHRA has no objection to the proposed development. The developer should ensure that a Palaeontological Study is undertaken and comment provided by the relevant heritage authority prior to development activities	Collete Scheermeyer of the South African Heritage Resources Agency (SAHRA), comment made via letter and email 16 August 2011	The relevant Palaeontological Study has been conducted and the report has been submitted for comments to the heritage authority. A copy of the report is attached in Appendix D4 of the main report.