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Environmental



# ENVIRONMENTAL IMPACT ASSESSMENT STUDY FOR A PROPOSED CONCENTRATING SOLAR THERMAL POWER PLANT IN THE SIYANDA DISTRICT, NORTHERN CAPE

## **Consolidated Social Issues Trail** (Scoping and EIA Phases)

### **DEA REFERENCE NO: 12/12/20/1920**

### A PROJECT FOR:



### **NOVEMBER 2010**

### Bohlweki-SSI, Environmental Sector

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SCOPINO	G PHASE		
1.	From the perspective of Air Traffic Management (ATM) Communications, Navigation and Surveillance (CNS) the establishment of a Concentrated Solar Power Plant (CSP) conforming to the specifications provided, and located at the Olyvenhouts Drift and Bokpoort sites will not have a negative operational effect.	Mr. Matthys C Horak, Air Traffic and Navigation Services, ATM & AIS Specialist, Comment & Registration Form, E-mail: 24 May 2010 (Response to draft Environmental Scoping Report).	Comment noted.
2.	Electromagnetic interference to existing radio and TV broadcasting signals.	<i>Mr. Naas Breytenbach, Sentech Ltd, Comment &amp; Registration Form, E-mail: 14 April 2010.</i>	The proposed CSP plant will be designed to comply with the provisions of SANS 61000-6-4:2006 / IEC 61000-6- 4:2006 – " <i>Electromagnetic compatibility (EMC) Part 6-4:</i> <i>Generic standards - Emission standard for industrial</i> <i>environments</i> ".
	supply from the clean energy as part of commitments to Kyoto.		The South African Government has set a target of 10 000 GWh renewable energy contribution to final energy consumption by 2013. This is to be produced mainly from biomass, wind, solar and small-scale hydro. The renewable energy will principally be utilised for power generation and non-electric technologies such as solar water heating and

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			bio-fuels. This relates to approximately 4% (1 667 MW) of the projected electricity demand for 2013 (41 539 MW) <sup>1</sup> . The proposed 75 MW CSP project will assist the South African Government in meeting these renewable energy targets.
			Clean Development Mechanism
			The proposed project involves the diversification of electricity production fuel sources, improved efficiency in electricity production, a decrease in the quantity of fossil fuel burned, a decrease in Greenhouse Gas (GHG) emissions and a decrease in a number of other aerial pollutant emissions. This is in line with Government's commitment to reduce the country's Green House Gas emissions by 34% by 2020 and 42% by 2025.
			The proposed CSP project is likely to qualify for registration as a Clean Development Mechanism (CDM) project. It is hence Solafrica's intention to register the proposed project as a CDM project with the Executive Board of the CDM, managed by the United Nations Framework Convention on Climate Change (UNFCCC). This will allow Solafrica to register the project's GHG reductions as Certified Emission
			Reductions (CERs), also known as 'carbon credits'. The CERs can then be sold to potential buyers in developed

<sup>&</sup>lt;sup>1</sup> Department of Minerals and Energy. 2003. *White Paper on Renewable Energy.* 

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			countries who require these credits for compliance purposes. The project can therefore be seen as making a contribution to improving the sustainability of development in South Africa.
3.	The visual impacts in terms of reflection and the air pollution impact that will be associated with the construction of a solar tower will have a detrimental impact on the visual acceptance of the landscape.	Irmé van Zyl, Van Zyl Environmental Consultants, Comment & Registration Form, E-mail 15 April 2010.	<ul> <li><u>Visual Impact:</u></li> <li>Solafrica investigated the feasibility of two CSP technologies: parabolic trough and solar tower. Based on the REFIT's qualifying criteria the decision was made that parabolic trough will be the preferred technology to be implemented for the project.</li> <li>A Visual Impact Assessment (VIA) was conducted by MetroGIS based on: <ul> <li>Plant location alternatives selected based on the findings of a preliminary environmental sensitivity analysis, and</li> <li>The selected CSP technology – parabolic trough.</li> </ul> </li> <li>For detailed findings of the VIA refer to Chapter 6 – Impact Assessment.</li> <li><u>Air Quality:</u></li> </ul>

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			<ul> <li>a) Construction Phase</li> <li>During the construction phase the only likely impacts on air quality may be from: <ul> <li>The generation of dust, and</li> <li>The use of a diesel generator(s) on-site for electricity supply purposes.</li> </ul> </li> <li>The significance of the impact(s) is considered negligible and can be mitigated accordingly.</li> <li>b) Operational Phase</li> <li>The proposed plant's energy output may be supplemented by the inclusion of a 15% contribution (maximum) from the combustion of fossil fuel for co-firing purposes. In such instance the particulate level shall be below the Air Quality Act (Act 29 of 2004) limit of 50mg/Nm<sup>3</sup>.</li> <li>The significance of impacts on air quality during the operational phase of the plant is considered negligible.</li> </ul>
4.	The effect of an energy project as proposed on the environment, wildlife and heritage sites.	Professor RA Hasty, Comment & Registration Form, E-mail: 12 May 2010.	Refer to Chapters 5 ( <i>Description of the Receiving Environment</i> ) and 6 ( <i>Impact Assessment</i> ) for details on the findings of the specialist studies.

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5.	It is a wise idea to make use of natural resources. It will create temporary and permanent employment opportunities.	Mr. Johannes Nowalaza, Department of Education, Comment & Registration Form, April 2010.	<ul> <li>The labour force required for the proposed plant is estimated at:</li> <li>Construction phase: 300–400 workers, and</li> <li>Operational phase: 40 workers.</li> </ul>
	Training should be provided in solar systems and energy.		Solafrica is currently evaluating various community upliftment programmes / initiatives which will likely involve training, amongst other – relevant stakeholders will be approached once such programmes / initiatives have been finalised.
	Households must be able to save capital.		Comment noted.
6.	Water must be used in a correct economical and technological way. Water should be re-cycled, purified and re-used.	Mr. JMS Botha, Boegoeberg Water Use Association, Comment & Registration Form, April 2010.	A Water Treatment Plant (WTP) will be constructed on the CSP plant site for the treatment of raw water for the provision of potable and demineralised water to the plant operations. The WTP will be designed accordingly to permit for the re-treatment of waste water or process effluents produced by the plant operations. The plant will therefore operate on the principal of "zero discharge". This approach will enhance the sustainability of plant operations.
	On site workers should be supplied with potable water and sanitation facilities.		Potable water and sanitation facilities will be provided to contractors and/or employees during both the construction

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			and operational phases of the project.
7.	Members of the Farmers Association are currently farming (cattle grazing) on the Farm Olyvenhouts Drift and the proposed project may affect the grazing land.	Mr. Abraham Morkel, Louisvale- Weg Up-and-Coming Farmers Association, Comment & Registration Form, April 2010.	<ul> <li>Solafrica considered the following two candidate sites for the proposed CSP development:</li> <li>Olyvenhouts Drift (Upington),</li> <li>Bokpoort (Groblershoop).</li> </ul> An engineering pre-feasibility study conducted by Hatch Africa Energy included, amongst other, an assessment on the technical feasibility of the above candidate sites - the study was concluded during July 2010. In addition to the afore-mentioned assessment a site selection process based on various environmental specialist disciplines was conducted as part of the EIA Process. Considering both the technical and environmental feasibility of the candidate sites it was concluded that the Bokpoort site is the preferred / nominated site for the for the Solafrica project.
8.	Possible electricity supply to the Vastrap weapon range.	J.G. van Jaarsveld, Vastrap Weaponrange, Comment and Response Report, April 2010	Solafrica as an Independent Power Producer will enter into a Power Purchase Agreement with Eskom to supply the national utility with auxiliary electricity generated by the CSP plant. The proposed plant will be connected to Eskom's Garona

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			<ul> <li>Substation (located on the Farm Bokpoort) via a 132kV overhead powerline. The Garona Substation forms part of the national transmission network which will enable the supply of electricity to:</li> <li>Eskom's distribution network running from the Garona Substation to the Upington region, and</li> <li>The transmission network running from Garona substation to the Ferrum Substation (Limpopo Province).</li> </ul>
9.	The Khara Hais Local Municipality has promulgated a municipal by-law regulating developments within the 1:100 year floodline of the Orange River. Consideration must be given to this by-law should any aspect of the proposed project affect the 1:100 year floodline.	Mr. Ivan Juries, Public Meeting, Kalksloot Community Hall, 18 June 2010.	<ul> <li>Comment noted. Solafrica considered the following two candidate sites for the proposed CSP development:</li> <li>Olyvenhouts Drift (Upington),</li> <li>Bokpoort (Groblershoop).</li> </ul> An engineering pre-feasibility study conducted by Hatch Africa Energy included, amongst other, an assessment on the technical feasibility of the above candidate sites - the study was concluded during July 2010. In addition to the afore-mentioned assessment a site selection process based on various environmental specialist disciplines was conducted as part of the EIA Process. Considering both the technical and environmental feasibility of the candidate sites it was concluded that the Bokpoort site is the preferred / nominated site for the for the Solafrica project. The Farm Bokpoort falls under the jurisdiction of the !Kheis Local

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			Municipality. The applicant will consider any by-law(s) applicable to the project.
			The impacts associated with the CSP development on water resources will be assessed and addressed (in detail) as part of the Water Use License Application (WULA) Process currently being undertaken.
	Is the site considered by Solafrica for the CSP plant on the site which Eskom is planning to construct a CSP plant?		The Farm Olyvenhouts Drift was a candidate site for the proposed CSP plant development. Eskom obtained approval in 2006 from the DEA for the development of a CSP plant (solar tower) on <b>a portion</b> of this particular farm.
	Will the applicant utilise electricity from the municipal grid for purposes of the construction of the plant.		The applicant will either utilise an independent diesel generator or electrivity from the local Eskom grid for the generation of off-grid electricity – the outcome will depend on discussions with Eskom.
	Will the plant have any negative human health impacts on Klippunt community members?		The design of the plant will comply with the provisions of the Occupational Health and Safety Act (Act 85 of 1993). It can therefore be concluded that no negative impacts on human health are expected. Furthermore the Olyvenhouts Drift site was eliminated as a candidate site during the site selection process conducted as part of the EIA Process.
	Were the farmers in the area notified of the proposed development?		Landowners, where such contact details were readily available, were notified of the project. Furthermore the

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			relevant Water Use Associations (Boegoeberg, Swartkop and Upington Islands) supplying water to farmers was notified.
			Local farmers were also consulted during the WULA.
	Should any social investment in the community be considered by the applicant, then direct interaction should be sought with the community to identify the needs of the community.		Comment noted. The local community will be consulted.
	To date, the community has been consulted in English. The preferred language of the overall community is Afrikaans. In future all correspondence to the community should be in Afrikaans. Furthermore the site notice for the project was placed in area considered to be remote. Public participation meetings for the EIA phase should be scheduled for the evenings.		Comments noted. Information regarding the Public Participation Process was communicated in both Afrikaans and English. In terms of the EIA Regulations it is required that a site notice be placed on the site, which the consultant complied with by erecting a notice at the entrance to the Farm Olyvenhouts Drift, across from the access road to the Klippunt/Kalksloot settlements.
	Is the Farm Olyvenhouts Drift privately owned land?		The land is privately owned.
	Feedback on the number of employment opportunities to be created by the CSP development must be given to the community during the EIA Phase Public Participation.		<ul> <li>The labour force required for the proposed plant is estimated at:</li> <li>Construction phase: 300–400 workers, and</li> <li>Operational phase: 40 workers.</li> </ul>

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10.	The area is known for sand storms. Will the construction and operation of the CSP result in more dust from such storms.	Francina Jobson, Public Meeting, Kalksloot Community Hall, 18 June 2010.	Construction activities will increase dust pollution. This impact will however be temporary and restricted to the construction phase (2-3 years) of the project. Such impacts that may transpire during this phase of the project can be mitigated accordingly by the implementation of an Environmental Management Plan and can therefore be considered as being negligible.
			Dust is not good for the operations of the CSP plant and the project will also seek dust suppression measures, such as reducing the dust from the adjacent roads. This will therefore tend to reduce overall dust pollution once the project is operational.
11.	Will the applicant purchase the portion of the Farm Bokpoort should environmental authorisation be granted by the relevant authority.	Jakobus Blom, Focus Group Meeting, Kheis Local Municipality, 17 June 2010.	A conservative 250 hectare portion of land is being considered for the development of the plant. Once environmental authorisation is granted the applicant will enter into a purchase/lease agreement with the owner of the Farm Bokpoort.
			An application for the subdivision of agricultural land (in terms of Act 70 of 1970) will be submitted to the National Department of Agriculture for approval, should this be required. In addition, an application for the rezoning of the

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			plant site from <i>"agriculture"</i> to <i>"industrial"</i> (or any equivalent zoning in terms of the relevant town planning scheme/ordinance) will be submitted to the !Kheis Local Municipality for review and approval.
	Has the applicant decided on a plant location alternative?		Yes. Refer to Chapter 5 ( <i>Site Selection and Sensitivity Analysis</i> ) and 7 ( <i>Impact Assessment</i> ) for a detailed assessment of the location alternatives considered during the EIA Phase.
	Are there any other companies interested in renewable energy developments in the !Kheis Local Municipality area?		Bohlweki-SSI Environmental is aware of multiple projects currently under investigation to determine the feasibility of renewable energy projects in the Siyanda District as this segment of the energy market is emerging rapidly in South Africa
	Has the applicant considered the entire region before the Farm Bokpoort was selected as a site alternative?		Previous investigations undertaken by Eskom Holding Limited in 2006 to assess feasible locations for CSP developments concluded that the Northern Cape Province was the most suitable, specifically Upington and Groblershoop. These areas were most suitable based on the high levels of solar radiation recorded which is the primary consideration for such projects. Other considerations included topography, possible water resources, and the availability of land, existing engineering infrastructure and importantly the probability of connecting to the national electricity grid.

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12.	Will there be less power outages in future if the proposed CSP development is approved and operational?	Hans Bosman, Public Meeting, Groblershoop, 17 June 2010.	The CSP plant will augment the electricity supply capacity which is likely to result in fewer cases of power outages.
	Will this project have an impact on the current electricity tariffs?		The pricing tarrifs for renewable energy under the REFIT Programme have been budgeted in terms of the Eskom's recent multi-year price determination, therefore no impact on current electricity tariffs are forthcoming.
	Will local upcoming farmers benefit from this project in terms of supplying electricity to the farms.		Upcoming farmers would not benefit directly from the electricity supply in that direct connection from farms in the area to the plant will not be possible.
			Solafrica as an Independent Power Producer will enter into a Power Purchase Agreement with Eskom to supply the national utility with auxiliary electricity generated by the CSP plant.
			<ul> <li>The proposed plant will be connected to Eskom's Garona Substation (located on the Farm Bokpoort) via a 132kV overhead powerline. The Garona Substation forms part of the national transmission network which will enable the supply of electricity to:</li> <li>Eskom's distribution network running from the Garona Substation to the Upington region, and</li> </ul>

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			• The transmission network running from Garona substation to the Ferrum Substation (Limpopo Province).
			Various other legislated processes must first be undertaken to obtain the relevant authorisations/approvals applicable to the project prior to the commencement of the project – this typically included amongst other an EIA, WUL and town planning approval.
			An engineering company has also been appointed by the applicant to undertake the required preliminary and detailed engineering design of the plant. Only once the relevant approvals have been obtained and the engineering design phase concluded can construction of the plant commence.
			Ground-breaking is scheduled for 2012 however this is only an estimation and dependant on various factors i.e. timeous completion of the engineering design and various regulatory approvals and licensing required.
	Employment opportunities will be welcomed in the area.		As noted above, there will be employment opportunities during construction and operations of the project. As far as possible people from the local area will be employed.
	What is the purpose of registering as an Interested and Affected Party (I&AP)?		By registering as an I&AP such parties will be informed of further meetings, the availability of the project

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			documentation, decisions made by the relevant authorities and any progress related to the project. In addition it provides I&APs with a formal platform to raise any comments and concerns regarding the project.
13.	The Khara Hais Local Municipality had not been informed of the proposed project.	Willem Engelbrecht, Focus Group Meeting, Khara Hais Local Municipality, 18 June 2010.	<ul> <li>The Khara Hais Local Municipality was informed on the following occasions:</li> <li>March 2010 (30-day notification),</li> <li>May 2010 (public review of the Environmental Scoping Report) and</li> <li>June 2010 (stakeholder meeting).</li> </ul> This included a meeting with the Municipal Manager of the Khara Hais municipality. A request for a presentation to the Council of the Municipality was also made through the Municipal Manager's office by phone, fax and email. Further to the above, various meetings with other key officials of the municipality have been held – as part of the Water Use Licensing Application Process.
	The site under consideration by the applicant is municipal owned land (the Farm Klipkraal). The KHLM should have been consulted and given consent to the applicant prior to the commencement of the EIA Process.		The candidate site, the Farm Olyvenhouts Drift, is privately owned land and therefore consent from the municipality was not required. The farm directly adjacent to Olyvenhouts Drift (to the east), the Farm Klipkraal is municipal owned land.

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14.	The Khara Hais Local Municipality is concerned that consultants do not conduct adequate Public Participation and that regular feedback is not provided to stakeholders.	Andre Phete, Focus Group Meeting, Khara Hais Local Municipality 18 June 2010.	Consultants are guided by the EIA Regulations which stipulates the minimum requirements for Public Participation. The minimum requirements were adhered to and in instances additional measures were taken to inform all parties. This included relevant provincial and local authorities, ward councillors and affected communities.
	Consultants should contact both the Office of the Speaker and the Municipal Manager's Office as to ensure that relevant local councillors are notified of the project and the relevant information is disseminated to applicable stakeholders whom may assist the consultants with notifying the public.		Bohlweki-SSI Environmental and the project developers have consulted with both the Office of the Speaker and the Municipal Manager (in person) during the Scoping phase. Furthermore Bohlweki-SSI has adopted the general approach of contacting the Office of the Speaker as a first point of communication with the local authority. This has historically proven to be the best approach.
			A request for a presentation to the Council of the Municipality was also made through the Municipal Manager's office by phone, fax and email.
			The ward councillors have been contacted to assist with notifying the affected communities – they included Councillors Klasie and Koloi.
15.	Detailed information on social aspects such as	Mr. MEA October, Focus Group	The labour force required for the proposed plant is

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	employment opportunities must be reported on to the Khara Hais Local Municipality.	Meeting, Khara Hais Local Municipality 18 June 2010.	<ul> <li>estimated at:</li> <li>Construction phase: 300–400 workers, and</li> <li>Operational phase: 40 workers.</li> </ul>
EIA PHA	SE		
16.	Requested more information on the current electricity use from the Garona Substation and how will the new development affect the transmission capacity.	Mr. Wilco Fourie, Public Meeting, Orange River Cellars (Groblershoop), 12 October 2010.	Frank Benedek provided input on the current incoming and outgoing transmission capacity of the Garona Substation. He further discussed voltage breakdown (transmission / distribution). Eskom is proposing to construct a new transmission line, namely the 400 kV Ferrum-Mercury transmission line which will connect at the Garona Substation. The proposed transmission line will provide the additional capacity to transmit newly generated electricity from the Northern Cape to other areas of the country. A 132 kV transmission line will be required to connect the plant to the National Grid. The proposed connection point
	A question was raised whether Eskom is		will be the Garona Substation.
	(near Upington) as described in the presentation.		technology and not the Parabolic Trough technology proposed By Solafrica. The parabolic trough technology was selected due to its operational / commercial success

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					and maturity which has been proven by various similar plants in other countries such as Spain and the United States.
					Eskom is developing the CSP plant (Power Tower) as a research / pilot project and will focus on testing the technology in South Africa for likely future deployment. The Power Tower technology had not yet been successful proven on this scale proposed by Eskom in any other country.
	Why was groundwater one of the assessed parameters in the EIA.				Possible contamination of the groundwater resource had to be assessed and all possible impacts had to be mitigated to avoid such incidents. Various substances (including diesel, heat transfer fluid etc.) will be stored on the site which may impact ground water resources.
	Can the plant can be expanded in the near future.				The plant can be expanded by adding additional trough "modules" to the existing solar field. By adding modules the generation capacity of the plant will be increased. It is planned that the plant will generate 75 MW and the option does exist for Solafrica to expand at a later stage. The expansion of the facility may require that an EIA.
17.	A major concern with regards to the type of cooling technology (wet cooling as a preferred	Various, Orange	Public River	Meeting, Cellars	The cooling technology to be implemented has not finalised and will only be finalised once the detailed plant designs

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	option) and volume of water to be used by the plant for wet-cooling purposes was raised during the meeting. The attendees wanted to know whether other cooling technologies such as hybrid and or dry-cooling systems could not be implemented for the plant.	(Groblershoop), 2010.	12	October	are complete. The developer / engineering team are however researching the possibility of implementing a hybrid cooling system which is a combination of wet/evaporative and dry-cooling technologies.
	Who will receive the generated electricity and who will purchase the electricity from the developer.				The EAP provided an overview of the proposed Renewable Energy Feed-in Tariff (REFIT) programme and how the programme will be implemented. As a concluding remark it was stated that the generated electricity will be purchased by Eskom using the pre-determined tariff stipulated in the REFIT programme. Eskom will distribute the electricity to the National Electricity Grid.
	What methodology was used to identify the noise impacts resulting from the plant.				The noise specialist assesses existing noise sources and sensitive receptors in the surrounding area. The specialist then uses a measurement device to identify the baseline noise levels of existing noise sources. Then the noise levels of the proposed plant during its operations are calculated. The specialist then determines the impact of the noise of the plant operations using measured baseline noise levels. The final product of the assessment is "influence zone" map indicating noise contours and how these contours affect sensitive receptors.
	Will the existing road(s) be upgraded.				The gravel road from the N8 to the Bokpoort site will be

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			upgraded. Upgrading will include infill of the road to level and grade the road which will allow for easy truck access during construction. The tarring of the road is a possibility and that Solafrica is currently investigating the feasibility thereof.
	How high will the proposed bulk water pipeline will be at the railway bridge.		The pipeline design has not been completed and therefore the proposed height of the pipeline is unknown.
	The attendees expressed their support for the project as a whole however they did not endorse the wet cooling systems as the preferred cooling technology.		Comment is noted. Solafrica is currently investigating hybrid and dry-cooling systems.
17.	Do case studies exist of operating CSP plants which proves the success of the technology.	Ronney van der Westhuizen, Focus Group Meeting, !Kheis Local Municipality (Groblershoop), 13 October 2010.	Currently no CSP plants are operational in South Africa and therefore the success of the technology on operational level has not yet been tested locally. However the CSP technology has been successfully implemented in countries such as Spain and the United States – some of these plants, similar in technology as proposed by Solafrica, have been operational on a commercial scale in excess of 20 years. The plant proposed by Solafrica will be a first of its kind in South Africa.

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			of renewable power generation technologies such as solar power in South Africa as this form of electricity generation has been proven as being more sustainable compared to conventional generation options such as coal fired power stations. Furthermore the Renewable Energy Feed-In Tariff (REFIT) programme has been developed by the Department of Energy in order to motivate Independent Power Producers (IPPs) to invest and develop renewable power generation plants / projects in South Africa.
	What is the likely success or failure of the project		Various authorisations / permits / licenses are required from different spheres of government in terms of numerous pieces of legislation prior to the development of the plant. The success of the project will therefore largely be dependant on obtaining such authorisations / permits / licenses – environmental authorisation, Water Use License are such examples The purpose of the meeting was to discuss issues pertaining to the application for environmental authorisation and that no environmental fatal flaws prohibiting the development of plant were identified during the EIA. These findings will be presented to the Department of Environmental Affairs mandated to approve such applications; therefore the final approval lies with this Department.
	What is role of the !Kheis Municipality would be in the development of the CSP plant and what are		The municipality will directly benefit from the plant by means of property taxes – the portion of the Farm Bokpoort

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	the benefits that would arise as a result of the development.		earmarked for the plant will be subdivided and rezoned as "industrial". Furthermore the development will create temporary and permanent jobs opportunities (directly and indirectly) during both the construction and operational phases of the project. The developer, Solafrica, is also proposing to implement a skills development programme once the CSP plant is operational. Other social investment initiatives are being investigated by Solafrica – the !Kheis Local Municipality will be informed of and involved in such programmes / initiatives once finalised. In conclusion the REFIT programme requires that a percentage / portion of the investment in renewable energy projects be granted to Black Economic Empowerment (BEE) companies.
18.	What is the impact on the current farm workers living on the Farm Bokpoort.	Luke Solomon, Focus Group Meeting, !Kheis Local Municipality (Groblershoop), 13 October 2010.	It is the intention of Solafrica to purchase the Farm Bokpoort or a portion thereof from the landowner. Initial indications are that the farmer will relocate to another portion of the farm owned by the landowner. It is unclear as to whether the farm workers will be relocated with the farmer.
19.	Will Solafrica be constructing any new road infrastructure or will existing roads be used and if	Nico Fourie, Focus Group Meeting, !Kheis Local	The existing gravel access road from the N8 will be utilised during both the construction and operational phase of

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	so will it be upgraded. Mr NF stated that a notification should be issued to the Department of Public Works and Roads stating the exact maintenance methodologies that will be implemented and the period for which the developer will maintain the road during the construction and operational phases. NF also advised the developer that road upgrading and maintenance can be implemented in a labour intensive manner which will be preferred by the local and provincial department.	Municipality (Groblershoop), 13 October 2010.	<ul> <li>project. It is the intention of Solafrica to upgrade and maintain this road to a certain degree. Upgrading for construction will as a minimum entail the infilling of sections of the gravel road where dips are present – this will allow for easy truck access.</li> <li>New roads will only be constructed for internal access purposes on the plant site.</li> <li>Comment noted. Solafrica will liaise directly with the Department on the matter once the exact maintenance methodology has been determined.</li> </ul>