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ATT: Nicola Rump
SRK Consulting (South Africa) (Pty) Ltd.
254 Walmer Boulevard
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RE: Part 2 Amendment Application with Regards to Layout Changes to the Beaufort West Solar PV Energy Facility located in in the Western Cape near to Beaufort West

SRK has been appointed by Mulilo, on behalf of the Beaufort West Solar PV Energy Facility (Pty) Ltd, to apply for a part 2 amendment application to the environmental authorisation issued to Upgrade Energy (dated 2023) for the Beaufort West Solar PV energy facility. A subsequent amendment to the authorisation was undertaken to change the holder from Upgrade Energy to Beaufort West Solar PV Energy Facility. The proposed changes mainly entail a revision of the footprint of the SEF, relative to what was assessed in the original BA for the project. SRK has requested comment from 3Foxes Biodiversity Solutions with regards to the proposed changes and their implications for impacts on terrestrial fauna and flora as compared to what was originally assessed. The original and amended layouts are depicted below in Figure 1 and Figure 2.

The amendment request includes the following changes to the layout as compared to the original assessed layout:

- The grid connection will remain within the authorised alignment, and no amendments to that authorisation are proposed, however the connections from the on-site substation to each individual SEF cluster would change.
- The capacity and components of the SEF will not change, only the spatial configuration of the arrays and various other components within the site.
- The revised project footprint falls within the sites previously assessed as part of the BA. Changes to the project description include increased internal road widths – 8 m and 6 m respectively, increased laydown area (up to 11 ha), possible increase in security fencing height), and inclusion of diesel fuel storage on site (<30 m3) .
- Security fencing will be installed around each SEF cluster.

Scope of the Amendment

In order to address the above proposed changes to the authorised layout of the development, this amendment statement letter provides an evaluation of the ecological impacts associated with the development with regards to the following:

1. An assessment of all impacts related to the proposed changes, including a comparison with those impacts as predicted in the EIA.
2. Measures to ensure avoidance, management and mitigation of impacts associated with the proposed change
3. Any changes to the EMPr

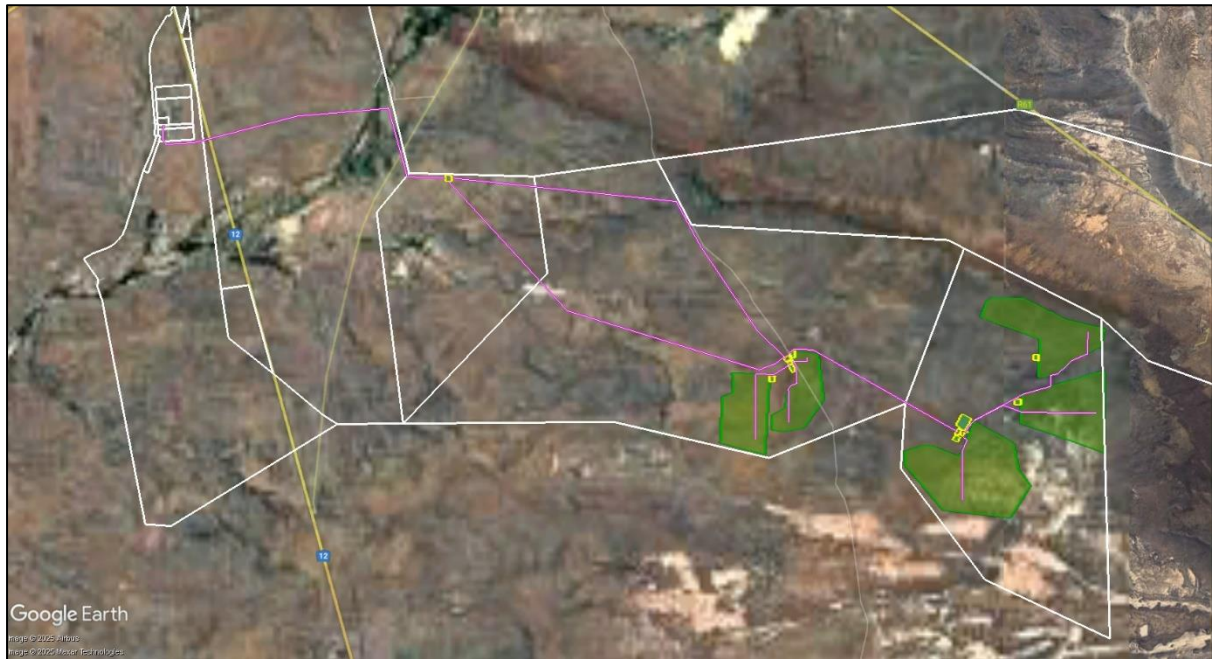


Figure 1. Original layout of the Beaufort West SEF as assessed in the original EIA for the development.

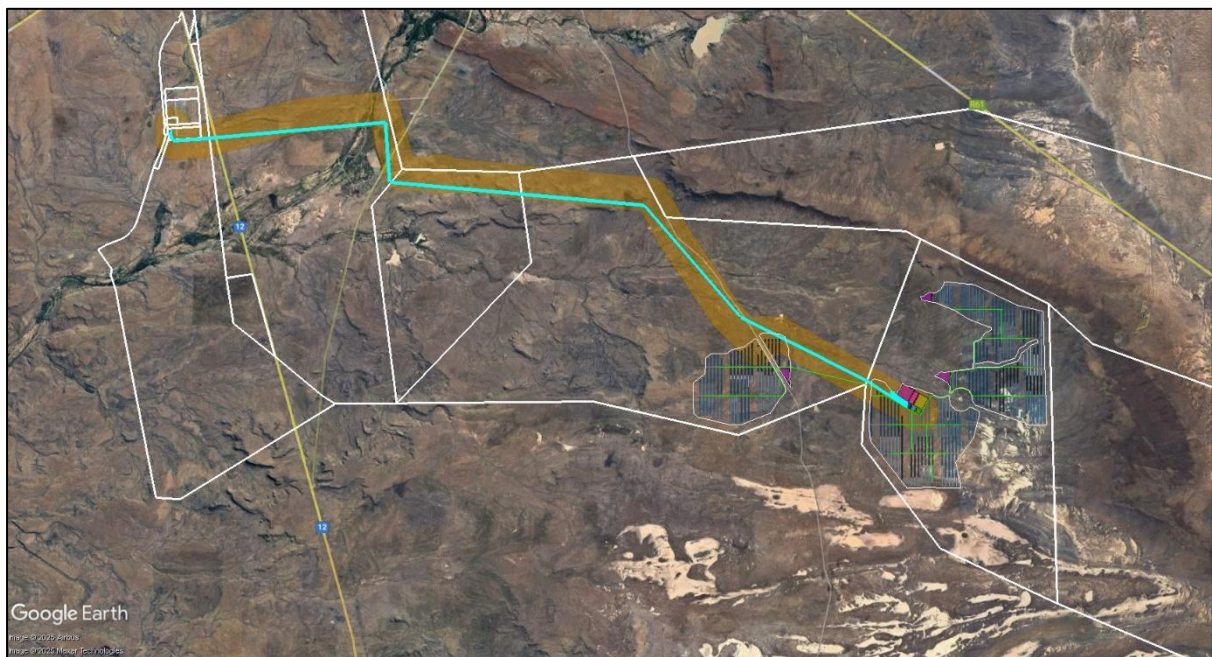


Figure 2. Amended layout of the Beaufort West SEF, showing the final preferred alternative and development areas.

1. An assessment of all impacts related to the proposed change, including a comparison with those impacts predicted in the EIA.

The original assessment of the PV facility, consisted of a plant species compliance statement, animal species compliance statement and terrestrial biodiversity assessment. As such, since the revised amended layout falls within the original assessed project area, the compliance statements would still be applicable to the amended layout. Although there are some minor changes to the layout, these would not affect the overall impacts on plant and animal species and as such there would not be any consequences for the two compliance statements.

In terms of the Terrestrial Biodiversity Assessment, a full assessment was conducted and the significance of the impacts assessed for the PV facility are provided below. There are no changes in impact significance resulting from the changes associated with the amendment. The amended layout (both the preferred and alternative layout) is not significantly different in location or overall footprint as compared to the original assessment and as such, the original assessment is considered applicable to the current amended layout as well.

Table 1. Summary of post-mitigation Terrestrial Ecological impacts associated with the Beaufort West SEF and grid connection for the original assessment and the current amendment.

Impact	Original Assessment	Current Amendment
Beaufort West SEF Grid Connection		
Impact on CBAs and ESAs due to presence and operation of the PV Facility and associated infrastructure	Medium Negative	Medium Negative
Cumulative Impacts on ecological processes	Low Negative	Low Negative

2. Advantages and disadvantages associated with the proposed change

The changes to the layout would not entail any significant ecological advantages or disadvantages for the development, for terrestrial fauna, flora or overall terrestrial biodiversity. There are no significant advantages or disadvantages of the changes that would affect the impacts of the development as assessed. As such, the Preferred Layout is considered to be similar to the Alternative Layout in terms of ecological impact and the current Preferred Layout is therefore considered acceptable.

3. Measures to ensure avoidance, management and mitigation of impacts associated with the proposed change

The changes to the layout are within the original assessed development footprint and would not result in any new, novel or increased impacts. As such, there are no additional changes to the mitigation and avoidance measures that were recommended in the original studies. In addition, the cumulative impacts associated with the amendment are considered to be the same as those as assessed and thus there would no changes to the overall cumulative impacts associated with the changes. All of the

mitigation and avoidance measures as recommended in the BA are held up by the current study and should be applicable to the amendment as well.

4. Any changes to the EMPr

There are no recommended changes to the EMPr and all of the mitigation and avoidance measures as recommended in the BA are applicable to the amended layouts, for flora, fauna and overall terrestrial ecology.

Conclusions and Recommendations

The amended layout of the Beaufort West Solar PV Energy Facility development would not generate any novel impacts or increase the severity of existing impacts associated with the SEF, for flora, fauna and overall terrestrial ecology. No additional mitigation or avoidance measures, beyond those already recommended in the EIA study are required for the amendment. As such, there are no reasons to oppose the proposed amendment and it can therefore be supported from an ecological point of view.

Sincerely

A handwritten signature in black ink, appearing to read 'Simon Todd', with a stylized, cursive script.

Simon Todd
Director
3Foxes Biodiversity Solutions
