

Ms Mosili Ntene  
Acting Director: Environmental Impact Assessment  
Department of Environmental Affairs and Tourism  
Private Bag X 447  
**PRETORIA**  
0001

Date: 20 August 2008

Enquiries:  
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Reference: GEM08\_L131

**REQUEST FOR AN AMENDMENT TO THE ENVIRONMENTAL AUTHORISATION FOR THE PROPOSED PUMPED-STORAGE SCHEME IN THE STEELPOORT AREA, LIMPOPO PROVINCE (DEAT REFERENCE #: 12/12/20/858)**

Dear Ms Ntene

The meeting between the Department of Environmental Affairs & Tourism (DEAT) and Eskom Holdings (Eskom) w.r.t. the above issue on 19 August 2008 has reference.

Due to an important omission in the Environmental Authorisation (EA) for the said project issued on 24 October 2007, Eskom herewith respectfully requests the DEAT to amend the said EA. This amendment would entail the inclusion of the "Farm Steynsdrift 145 JS" into the Environmental Authorisation, as one of the authorised sites on which listed activities applied for by Eskom, could be undertaken. This property forms an integral part of the pumped storage scheme, and was hence included in the Environmental Impact Assessment (EIA) and associated studies for the activities associated with this power station development.

This request for an amendment is supported by the explanation and documentation provided in the sub-sections below:

- (a) **Pre-feasibility studies:** The pre-feasibility studies undertaken by the BKS identified the scheme A3 as the most feasible scheme, among the alternatives. The location of this scheme was described to include the farms Keerom 151 JS, Luipershoek 149 JS and Steynsdrift 145 JS.

It is therefore evident from that this particular property had been included in the project feasibility studies and the associated public participation process.

Please see "Annexure A" as evidence of this.

- (b) **Application form:** The application forms (original and revised) submitted by the Environmental Assessment Practitioner, *Bohlweki Environmental* (on behalf of Eskom) to DEAT on 17 October 2006, and March 2007, respectively included the property "Steysndrift 145 JS" in the "SITE IDENTIFICATION AND LINKAGE" section of the application form(s) (page 1), but was not included in the section marked "PROPERTY DESCRIPTION" (page 2). Eskom acknowledges the omission from this particular section.

Please see "Annexure B".

- (c) **Consent forms:** The owner of this farm is Dr WJS Enslin. This landowner was contacted at the commencement of the EIA process, and was requested for his consent on undertaking the EIA studies on his land. Dr Enslin signed the Consent Form. This was an indication of his notification of the process.

Please see "Annexure C".

- (d) **Involvement of landowner/lessee in the Public Participation Process:** Mr Niek Gouws is currently leasing the property from Dr Enslin, and resides on the farm Steysndrift. He was contacted as a landowner for the EIA process, and was involved throughout the public involvement process. Please see "Annexure D".

On identification of farmers' concerns during the EIA process, a special meeting was convened on the 04 August 2007, in which Dr Enslin was also present. See "Annexure" E. The project enjoyed support from most of the consulted I&APs, with some concerns in various areas. The relevant Farmers' Union was also in principle not against the project, but wanted a presentation of the whole planned development in the area (including Transmission and Distribution activities). This was requested to assist them in taking an informed decision when it came to land purchase negotiations.

- (e) **Minutes of public participation:** As early as during the Scoping public consultation process, the farms to be affected by the studies and the developed were provided in the presentations. See "Annexure F".
- (f) **Land purchase:** Eskom purchased the farm Steysndrift from Dr Enslin, with the land purchase process initiated before the conclusion of the EIA process. This is an additional indication that this particular property was involved in Eskom's planning as per the farm delineation provided by the BKS study.

- (g) **Activities associated with the power plant:** As part of the technical description the EIA (Scoping report and EIA report) mentions activities like "Intake and Outfall structures", "Waterways", "Power House Complex" and "Power House Complex Access", as shown in **Figure X**; and "Access and Site Roads", as shown in **Figure Y**. The positions of these activities, and parts of some, indicate that these would be located/occur on the Farm Steysndrift. The environmental impacts that would result from these activities have been studied in the EIA phase and mitigation measures have been proposed in the **Environmental Management Plan**, which was accepted and approved by the DEAT on 22 May 2008. .

- (h) **Environmental Impact Assessment Studies:** The zone of impact is identified in specialist' studies in the final Environmental Impact Report submitted to DEAT. In the studies, the property is also denoted as an area of impact and has been covered by the studies. In addition to this, the environmental impacts associated with these activities occurring on this property are covered throughout the Environmental

Management Plan, e.g. 4.15.2 on Dust control; Section 4.21 on Waste Management, etc.

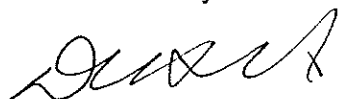
On the basis of the above explanations and documentation, Eskom would like to assure the DEAT that the farm Steynsdrift 145 JS was indeed included in the EIA process and assessed accordingly. The omission of the property name under "property description" on page 2 of the application form was an oversight on the part of the project team. Through this document and other relevant information, it has been demonstrated that the Farm Steynsdrift has been comprehensively assessed to the same level of detail as all other farms have been detailed. In addition to this, the public participation process has included Steynsdrift and its landowners, and it has been clearly denoted as a farm which will envelope some of the activities of the scheme. The farm was also clearly mentioned in public participation process, as one of the three properties to be used for the pumped storage scheme. From the very first phases of the process, the landowner and adjacent landowners were, through the process, aware of the farm's inclusion in the project development of the pumped storage scheme.

Furthermore, Eskom has iterrogated any possible impacts of the proposed amendment, in line with Section 42 of the No R 385 of the NEMA regulations, and has inferred that the amendment is a "non-substantive amendment to the environmental authorisation" and "the environmental or the rights or interests of other parties are not likely to be adversely affected". Hence this amendment is deemed as an administrative process.

Eskom believes the above is sufficient evidence of the inclusion of the farm Steynsdrift in the power station planning processes before and during the EIA process. Hence, Eskom respectfully requests that the DEAT treats this as an administrative process, and for the required amendment(s) to the Environmental Authorisation to be effected.

I trust you find this arrangement in order.

Yours Sincerely



DL Herbst

**ENVIRONMENTAL MANAGER**

**GENERATION DIVISION**