

**MOSSEL BAY OCGT: EIA FOR ADDITIONAL UNITS, DRAFT EIR
ANNEXURE G: ISSUES TRAIL FROM FINAL SCOPING REPORT, MARCH 2007**

No.	Individual	Organisation	Question, Issue or Concern	Reference	Action/ Response
1	Anonymous	Unknown	Fourteen day period for comments as advertised in Mossel Bay Advertiser on 26 January 2007 is contrary to PAJA requirements.	Letter to Mossel Bay Advertiser of 2 February 2007 and fax to Ninham Shand dated 26 January 2007.	This was a request from Eskom, which was withdrawn on receipt of anonymous objections. The comment period was extended to 30 days, as per legal requirements. See Section 4.2 of the draft EIR.
2	Anonymous	Unknown	Local community is not benefiting from this project.	Fax to Ninham Shand dated 26 January 2007.	This will be addressed in the social specialist study. See Annexure D of the draft EIR.
3	Johan du Preez	Dana Bay Residents Association (DBRA)	EIA process is seriously flawed as the State's constitutional duty to protect the environment is compromised by filling the roles of developer, legislator, judge, jury and policeman.	Email dated 8 February 2007.	This is a constitutional matter and beyond the scope of this EIA. As far as possible, Eskom as the developer would comply with all relevant legislation.
4			DBRA reservations about the location of the original OCGT plant were wiped off the table by poor quality in-house site screening process.	Email dated 8 February 2007.	The original site screening was regarded as acceptable by the review consultant and the environmental authority at the time.
5			The emissions will impact negatively on the community who will receive no direct benefits from the facility.	Email dated 8 February 2007.	The specialist air quality study will shed light on emission impacts. Benefits in terms of more reliable electricity supply generally, will result. The community could have long term benefits in terms of possible employment during the plant operation and maintenance, if the community has the skills required by Eskom. See Section 5.6.4 of the draft EIR.
6			Eskom's decision to locate the plant within a few kilometres of a number of residential areas is based on the need to avoid long lead times associated with "Greenfield" sites.	Email dated 8 February 2007.	The decision is based on the economics of fuel supply to the plant, integration with the transmission network and availability of the general services from the existing site already established.
6			The site should have been closer to the Proteus substation, which would have eliminated the need for two 10 km long 400kV transmission lines. The erection of these lines has already resulted in the destruction of a number of Red Data vegetation species.	Email dated 8 February 2007.	The desirability of Proteus as a site for the OCGT was examined during the original EIA, but was rejected for several cogent reasons.

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7			No consideration was given to DBRA argument that the development would undermine the sustainable development future of Mossel Bay, which is based on tourism.	Email dated 8 February 2007.	This was dealt with during the previous EIA process.
8			Can the generation capacity be capped once the three additional units have been installed?	Email dated 8 February 2007.	The decision for the capacity increase is informed by the national electricity demand and growth. Should there be indications that there is a requirement for increased capacity, Eskom will endeavour to explore other feasible locations for additional plants.
9			PetroSA and OCGT Plant will both generate visual, noise, air and water pollution, but only the Nitrogen Oxide emission values are being assessed for both facilities.	Email dated 8 February 2007.	All specialist studies will be required to consider the current baseline status of the area, which includes activities within PetroSA. See Chapter 5 of the draft EIR.
10			PetroSA has a poor environmental track record.	Email dated 8 February 2007.	This process cannot address environmental management issues within PetroSA.
11			The supply of millions of litres of fuel (an "upstream activity") has not been assessed in the EIA.	Email dated 8 February 2007.	Noted. A strategic-level assessment would be required to address this, which is outside the scope of the present EIA.
12			The impacts arising from the stormwater management system and polluted discharges from PetroSA into a river have not been assessed.	Email dated 8 February 2007.	The relevant specialist has been tasked to address this issue in the EIR. See Sections 5.5.1 and 5.6.5 of the draft EIR.
13			The EIA of the initial facility should be declared invalid as the public has been misled regarding the envisaged capacity. The fact that the original installed transmission lines have enough capacity for the upgrade as well bears testament to this.	Email dated 8 February 2007.	The decision for the capacity increase is informed by the national electricity demand and growth. The initial EIA process was responding to the national electricity demand/growth at the time. Transmission lines are built and operated based on requirements of the grid code, and generally do have spare capacity to evacuate power, which is being utilised in this instance.
14			The DBRA is concerned that the state will continue to condone incremental expansion on sites, which should not have been approved in the first place.	Email dated 8 February 2007.	Noted and to be brought to the attention of the environmental authorities.

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15			Press releases indicate that Eskom will not have sufficient generation capacity until at least 2010/11. It is therefore reasonable to expect that, once commissioned, the OCGT plants at Atlantis and Mossel Bay will have to be utilised to supply the national grid on a regular basis instead of, as was originally intended, during peak periods only. The assessment of impacts should therefore be based on all the turbines operating for at least 16 hours per day.	Email dated 8 February 2007.	The present EIA is based on an operating regime of 5 hours per day on weekdays. In emergency situations this could increase to 8 hours per day. The OCGT plant is designed to operate during peak periods. The operation of the OCGT is dictated by the design and economic impacts (fuel consumption and associated costs). Eskom has other plants that are used to provide additional base-load power requirements.
16			Residential areas such as Dana Bay, Asla Park, Moquini are located much closer to the OCGT Plant than the 13km shown on the Locality Map for Mossel Bay and as described in the report.	Email dated 8 February 2007.	Noted. A larger scale map showing the surrounding residential areas will be included in the EIR. See Figure 3 of the draft EIR.
17			In terms of the "Assessment criteria for the evaluation of impacts" Dana Bay (p4 of PoS for EIR) and other residential areas should be considered as "local" as they are within 7km of the site.	Email dated 8 February 2007.	Noted and will be considered in the EIR. See Chapter 5 of the draft EIR.
18			The health impacts associated with emissions, especially diesel fuel, should receive special attention.	Email dated 8 February 2007.	This will be addressed as part of the EIR. See Section 5.6.4 of the draft EIR.
19			The external reporting requirements of the EMP should include the required interaction with I&APs and external verification of in-stack and ground level monitoring results.	Email dated 8 February 2007.	Noted. This can be reported accordingly to indicate both internal and external verification. As per the RoD conditions of the previous approval, Eskom is required to provide an audit report to DEADP within six months of the completion of the construction phase. Eskom however has endeavoured to undertake audits every three months, with the first audit being undertaken in December 2006. The results of this audit will be shared with the ELC and DEADP.

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20			The assessment of the cumulative Air Quality, Noise, and Stormwater impacts must include a thorough analysis of the reliability, accuracy, potential variability, and upset conditions, etc of the PetroSA site.	Email dated 8 February 2007.	While the need for assessing cumulative impacts is acknowledged, and the specialists have been tasked to consider broader baseline conditions, the present EIA is specific to Eskom's proposed development.
21			Due to the fact that the site is located at the gateway to the Garden Route, in depth attention should be paid to potential mitigation measures for the visual impact, irrespective of cost.	Email dated 8 February 2007.	This was addressed as part of the previous process. However a visual impact assessment will be undertaken to identify the most appropriate mitigation measures. See Section 5.7.1 of the draft EIR.
22			A stormwater management plan, including a monitoring and reporting protocol, is required for the OCGT. This should include participation of I&APs.	Email dated 8 February 2007.	Noted. This will be addressed in the operational management plan. See Annexure F of the draft EIR.
23			Concerns regarding the increased volume of traffic were raised at the ELC meeting.	Email dated 8 February 2007.	Noted. Traffic lights have now been installed at the Dana Bay intersection. See Section 5.5.2 of the draft EIR.
24			Economic "driver" for Mossel Bay was identified as building and construction industry, but this is countered with the argument that this boom is driven by local, national and international tourism. If unbridled heavy industrial development such as the OCGT plant is allowed to continue, tourists and residents will move elsewhere with the potential to cause significant negative socio economic impacts.	Email dated 8 February 2007.	This was dealt with during the previous EIA process.
25			Impacts associated with the supply of millions of litres of fuel by PetroSA including, shipping, transportation, storage, pumping and production, as well as the diversion of fuel from the national customer base, should also be assessed.	Email dated 8. February 2007	The fuel contract negotiations include the assessment of the sustainability of fuel supply in South Africa, to ensure that there is a balanced utilisation of the national resources. This includes potential impact on the environment, shipping, transportation, storage, pumping, production, security of supply and safety.

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26			The EIA should include a clear statement from Eskom and the State that no additional generating capacity (over and above the six turbine units) will be established on the site and in the Mossel Bay area.	Email dated 8 February 2007.	The decision for the capacity increase is informed by the national electricity demand and growth. Should there be indications that there is a requirement for increased capacity, Eskom will endeavour to explore other feasible locations for additional plant.
27			The OCGT plant EIA is complicated by the operations of PetroSA and it would be almost impossible to accurately model most of the cumulative emission impacts. It is therefore considered imperative that the actual cumulative emission impacts generated by the OCGT plant and PetroSA be monitored after the completion of the projects in order to verify the EIA assumptions made.	Email dated 8 February 2007.	Appropriate monitoring of operational conditions will be undertaken for the OCGT plant, as a task distinct from PetroSA's monitoring. Differentiation between the impact of the OCGT and PetroSA on the environment should thus be possible. Such monitoring of the OCGT plant is likely to be a condition of the RoD, should a positive RoD be issued. See Annexure F of the draft EIR.
28	Alan Miller		Concerned with the kinds of gases, the quantities thereof and the particle mass to be released into the atmosphere.	Email of 1 February 2007.	This information will be made available in the EIR. See Section 5.6.4 of the draft EIR.
29	Tonia Schonken	Mossel Bay OCGT ELC	ELC will comment on specialist studies when available, and will strive to include all communities in all their activities at all times.	Email of 15 February 2007.	Noted.