

**INWONERSVERENIGING VAN DANABAAI BEWAREA
RESIDENTS ASSOCIATION OF DANA BAY CONSERVANCY**



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Enquiries: J du Preez

Verw. Nr. Datum:
Ref. No. Date: 23 April 2007

Ninham Shand Consulting Services
P.O Box 509
George 6530

Dear Mr. Brett Lawson,

**OCGT Mossel Bay: Additional Units
Comments on Draft Environmental Impact Report**

The Residents Association of Dana Bay Conservancy's (Residents Association) previous comments on the EIA process for the development of the first phase of the Open Cycle Gas Turbine Power Plant (OCGT Plant) dated 10 June 2005 and the Final Scoping Report for the Additional Units dated 8 February 2007, refers.

The Residents Association firmly believes that the State's constitutional duty to protect the environment is seriously compromised by having to simultaneously fulfill the roles of developer, legislator, judge, jury, and policeman. Public involvement and input, one of the cornerstones of the constitution and NEMA, were, and are, no more than a public relations exercise in the Mossel Bay OCGT EIA process. Serious comments and reservations about the location of the original OCGT Plant from the Residents Association, for example, were wiped of the table by a poor quality in-house site screening process conducted by State Owned Eskom and approved by DEA&DP.

Ten months after the EIA of the original OCGT Plant was approved Eskom decided to double up on the originally envisaged capacity. The initial EIA should be declared invalid as it is clear that the public and I&AP's were blatantly misled and that Eskom always knew that the capacity would be doubled up. The fact that two 400kV transmission lines with enough capacity to handle the generation capacity of the original and additional units were erected as part of the first phase supports the fact that the public, and I&AP's, were misled and that the EIA process should be declared invalid.

Based on our experience with the OCGT EIA process the Residents Association is very concerned that Eskom, with the assistance of the State, will continue with its programme of major incremental expansion projects on a site that should not have been approved in the first place. The Residents Association therefore requires a commitment from Eskom that the present site, and municipal area of Mossel Bay, will not be used for any additional energy/electricity generating projects. Eskom's commitment should be included in DEA&AP's Record of Decision and conditions of approval to proceed with the proposed additional turbine units.

The Residents Association has scrutinised the Draft Environmental Impact Report and have the following comments:

1. Air Quality Assessment

PetroSA's emissions used in the study to estimate cumulative impacts are based on values determined in 2004. The Residents Association is concerned that the calculated values based on work done in 2004 are inaccurate / incorrect and therefore not acceptable for use in the Air Quality Assessment Model.

"Upset" conditions causing highly polluted emissions from the PetroSA plant occur on a regular basis (photographic evidence of a typical upset emission event forwarded to Ninham Shand previously). PetroSA upset conditions were not considered in the air quality prediction model of the DEIR.

2. Visual Impact Assessment

Due to the unfortunate location of the OCGT Plant alongside the N2 at the gateway to the Garden Route the Residents Association recommends that more attention be paid to potential mitigation measures. A single or double line of trees along the fence forming the N2 road reserve will, for example, greatly reduce most of the negative visual impacts associated with the OCGT / PetroSA Plant operations.

3. Ecological Assessment

Given PetroSA's proven inability to properly manage highly polluted discharges from its site into the Blinde River and into the ocean it is considered important that the OCGT Plant develop a separate stormwater management system.

4. Socio-Economic Impacts

The natural beauty and scenic vistas offered by Mossel Bay attract the tourists and existing and prospective residents to Mossel Bay. 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.

The impact of heavy industrial development such as the OCGT Plant on nearby property values and the sustainable development potential based on tourism of Mossel Bay and the Garden Route should dominate an evaluation of the socio-economic impacts. Based on these higher order issues the Residents Association believes that, contrary to the DEIR findings, the overall negative socio-economic impacts associated with the OCGT Plant cannot be mitigated.

5. PetroSA Impacts

The additional impacts associated with the supply of millions of liters of fuel to the OCGT Plant, especially during the extended OCGT Plant operating periods anticipated due to the national shortage of electricity generating capacity during the next four years should be included in the EIA. Without the inclusion of these major potential impacts and risks the EIA will be incomplete.

6. Risk Assessment

The risk assessment is based on the major hazards associated with the OCGT Plant. The Residents Association is concerned that the combined risk associated with the PetroSA and OCGT Plants have not been assessed.

The Residents Association of Dana Bay Conservancy trust that the State, Eskom, DEA&DP and the consultants will consider and implement the recommendations included in this letter.

Yours faithfully,

Johan du Preez

Chairman: Residents Association of Dana Bay Conservancy

From: Brett Lawson
To: patrick.killick@shands.co.za
Date: 2007-03-20 10:48:55 AM
Subject: Fwd: OIB OOPSIKLUSGASTERBIENE BY MOSSELBAA

For your attention.
Brett

>>> "Jacob Graaff" <graaffj@worldonline.co.za> 2007/03/20 10:35:44 AM >>>
Meneer

Hiermee versoek die Boggomsbaai Belastingbetalersvereniging dat ons as 'n belangegroep geregistreer word vir die deelnameproses vir die OIB van die Ooplugsiklusgasterbiene te Mosselbaai. Ons besonderhede en kontakte is soos hieronder aangetoon.

Ons sal die konsep verslag verkry by die webtuistes soos aangedui maar sal waardeer indien ons direk op hoogte gehou kan word van toekomstige verwickelinge. Ons neem ook kennis van die openbare vergadering van 28 Maart.

Baie dankie

J Graaff

From :

Jacob Graaff

(Voorsitter)

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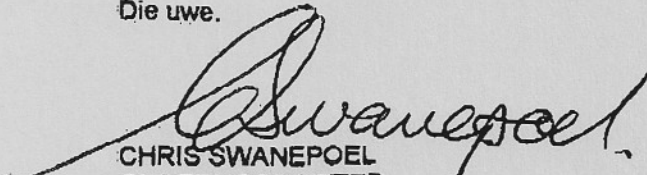
20/03/2007

Vir Dringende aandag van Brett Lawson / Charles Norman.

DEELNAME: GASTURBIENE KRAGSTASIE: MOSSELBAAI.

1. Na aanleiding van u advertensie in die Mosselbaai Advertizer van 16/03/2007, word u hiermee vriendelik versoek om ons as 'n belanghebbende party te registreer.
2. Geliewe voortaan alle toepaslike dokumentasie en kennisgewing van vergaderings ens, aan ons te voorsien.
3. By voorbaat Dankie.

Die uwe.


CHRIS SWANEPOEL
ONDERVOORSITTER

No:	7.613	File:	
Date:	20 MAR 2007		
To:	Seen:	Action:	
BL			