



Applications for Postponement of the Minimum Emissions Standards for Eskom’s Medupi and Matimba Coal-fired Power Stations

Public Participation – Issues and Responses Report

Comments	Contact details	Response
<p>What impacts will the cumulative emissions have on the people in Steenbokpan?</p>	<p>Elana Greyling-0828638696</p>	<p>The cumulative impacts of Matimba and Medupi’s emissions on Steenbokpan have been modelled in sections 5.1.6, 5.1.7 and 5.1.8 of the <i>Assessment of the Ambient Air Quality Implications of Eskom’s Application for Postponement of the Compliance Timeframes for the SO₂ MES</i>. Steenbokpan is located to the west of the Matimba and Medupi Power Stations, in the downwind region. However, the modelled scenarios show that Steenbokpan is to the west of the areas of exceedance, and for all scenarios modelled Steenbokpan’s air quality is predicted to be within the NAAQS. Accordingly, the impact at Steenbokpan is predicted to be within levels that are deemed acceptable in terms of the NAAQS. The highest predicted SO₂ 1hr levels modelled were between 211 – 280 µg/m³ for when both Matimba and Medupi Power Stations are running at 4000 µg/m³. This is an absolute worst case scenario where by all 6 of Medupi’s units are online, and is only predicted to occur for two years between Medupi being fully operational and the switch over to FGD technology. See section 5.1.8 of the AIR Appendix and</p>

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		subsequent figures (namely Figure 5.21 – Figure 5.23).
<ul style="list-style-type: none"> • What are the sensitive receptors on the maps? 		The sensitive receptors shown on the maps are a combination of schools, hospitals and clinics that have been identified as such on the updated maps included in the AIR.
<ul style="list-style-type: none"> • Informative session information brought across as well. 		Thank you
<ul style="list-style-type: none"> • The Mokolo crocodile water scheme issue, which is critical for the 1st & 3rd FGD units at Medupi the project must consider engaging with the MCWAP2 team for alignment purposes since the project delivery date is October 2023 and the postponement is up to 2025. 	Jacques Snyman-0825741590 jaquess@macgroup.co.za Lephalale Development Forum	The FGD project team is very much aware of the need for additional water from the MCWAP2 process in order to run FGD on all six units at Medupi, and this is indeed one of the key planning parameters for the Medupi FGD project. The Minimum Emission Standards permit at most a 5-year postponement, so assuming this postponement is granted it will only be until 2022.
<ul style="list-style-type: none"> • Has a cumulative assessment been done? 		<p>The Atmospheric Impact Report submitted in support of this postponement application has considered the cumulative impact of Matimba and Medupi Power Stations (in sections 5.1.6-5.1.8 of the <i>Assessment of the Ambient Air Quality Implications of Eskom's Application for Postponement of the Compliance Timeframes for the SO₂ MES</i>).</p> <p>A cumulative assessment including other sources in the area has been undertaken as part of the <i>Waterberg-Bojanala Priority Area Air Quality Management Plan: Baseline Characterisation</i> (Department of Environmental Affairs, October 2014). The 13 Listed Activity sources included in this assessment in the Waterberg District Municipality include:</p>



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		<ul style="list-style-type: none"> - Power generation (Matimba Power Station) - Cement production - Mineral processing - Brick production - Animal feed production - Asphalt production - Platinum mining - Meat production <p>Annual emissions from these sources compare as follows:</p> <p>Table 4-1: Emissions distribution (in tpa) across industrial sectors in the Waterberg DM</p> <table border="1"> <thead> <tr> <th>Industry Sector</th> <th>SO₂</th> <th>PM₁₀</th> <th>NO_x</th> </tr> </thead> <tbody> <tr> <td><i>Cement production</i></td> <td>2 350</td> <td>2 970</td> <td>2 208</td> </tr> <tr> <td><i>Power generation</i></td> <td>350 807</td> <td>5 878</td> <td>55 528</td> </tr> <tr> <td><i>Mineral processing</i></td> <td>105</td> <td>223</td> <td>8.6</td> </tr> <tr> <td><i>Brick production</i></td> <td>318</td> <td>105</td> <td>61</td> </tr> <tr> <td><i>Animal feed production</i></td> <td>3.6</td> <td>1.2</td> <td>0.7</td> </tr> <tr> <td><i>Asphalt production</i></td> <td>212</td> <td>201</td> <td>17</td> </tr> <tr> <td><i>Platinum mining</i></td> <td>109</td> <td>36</td> <td>21</td> </tr> <tr> <td><i>Meat production</i></td> <td>0.3</td> <td>0.04</td> <td>0.8</td> </tr> <tr> <td>Total</td> <td>353 905</td> <td>9 414</td> <td>57 845</td> </tr> </tbody> </table> <p>In addition, the assessment considered:</p> <ul style="list-style-type: none"> - Residential fuel burning (based on energy use data in the 2011 census) - Motor vehicle emissions 	Industry Sector	SO ₂	PM ₁₀	NO _x	<i>Cement production</i>	2 350	2 970	2 208	<i>Power generation</i>	350 807	5 878	55 528	<i>Mineral processing</i>	105	223	8.6	<i>Brick production</i>	318	105	61	<i>Animal feed production</i>	3.6	1.2	0.7	<i>Asphalt production</i>	212	201	17	<i>Platinum mining</i>	109	36	21	<i>Meat production</i>	0.3	0.04	0.8	Total	353 905	9 414	57 845
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		<ul style="list-style-type: none"> - Biomass burning - Mining <p>In addition, a Threat Assessment was conducted for the Waterberg-Bojanala Priority Area. A large number of planned developments, many of which it now appears will not go ahead, were considered. These developments include:</p> <ul style="list-style-type: none"> - Matimba and Medupi Power Stations - Grootegeluk Coal Mine expanded - Morupule B Power Station - Morupule Coal Mine expanded - Morupule A Power Station - IPP: Thabametsi Power Station - Thabametsi Coal Mine - Sekoko Coal Mine - IPP: Boikarabelo Power Station - Boikarabelo Coal Mine - Mookane Coal Mine expanded - Mmamabula Power Station - Mmamantswe Power Station - Mmamantswe Coal Mine - And several other as yet unnamed power stations <p>Please refer to <i>The Waterberg-Bojanala Priority Area Air Quality Management Plan: Threat Assessment</i> (Department of Environmental Affairs, October 2014) for more information on how these proposed developments will affect ambient air quality.</p>
WWAO is saying no to Eskom	Francina Marapong-0728779972	Eskom takes note of the objection. However, it should be noted that



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<p>postponement of the minimum emissions standards. Section 24 of the constitution is not applied. Waterberg is a high priority area. Think about our lives please.</p>	<p>francinaemlynkosi@gmail.com wwao@webmail.com Francina Waterberg Women Advocacy Organization & Wamua</p>	<p>there is currently compliance with ambient SO₂ standards in the Waterberg Priority Area, and the requested postponements will not result in non-compliance with ambient SO₂ standards in areas of dense settlement. Hence Section 24 of the Constitution will not be violated.</p>
<p>We are not safe with the air dust sometimes there is vibration from power station when air comes out</p>	<p>Tebogo</p>	<p>This postponement application is only requesting for leniency from the SO₂ emission standards. Both Matimba and Medupi operate in compliance with the particulate matter emission standards and are not responsible for elevated levels of particulate matter.</p>
<p>Let us know about any job opportunities or learner ships</p>	<p>Kgadi Tlhako-0798448740 Marapong Ext 4 2818</p>	<p>Unfortunately this project team cannot advise on job opportunities. Please contact the power stations directly for job information.</p>
<p>We are very offended and worried about the effects of this air quality affecting us. The temperature is too high always regardless of the season it's hot and extremely worse in summer. We are at high risk of getting skin cancers and other diseases that are more likely to cause by this unhealthy climate we are experiencing. We are requesting humbly to our state or Eskom to act upon this issue of air quality as is affecting us as human beings and other animals. We are living under unlawful conditions for our health.</p>	<p>Tirelo 1197 Tshepe street Marapong Ext 1 Mphahleletire10144@gmail.com</p>	<p>The climate in Marapong is to mostly determined by its altitude (around 880 m above sea level), distance from the sea, and latitude (23°40'S). Marapong is hot and sunny because it is almost aligned with the Tropic of Capricorn in the subtropics, and so relatively close to the equator and associated anticyclonic air flow (high pressure systems) and sunny weather. The frequent sunny weather and the relatively high exposure to the sun occurs because of the prevailing anticyclonic conditions and associated dry and cloud-free conditions. Local climate is not significantly altered by the power station and thus not associated with reduced cloud cover and increased exposure to solar radiation.</p>
<p>I would like to know that what assurance do you give to the community of Marapong that if you increase SO₂ to 4000 we will be safe and did you prove that the method you are going to use will work.</p>	<p>Shibambo Esther -0767395317</p>	<p>Details on the atmospheric dispersion modelling methodology are provided in the accompanying Atmospheric Impact Report and its Appendix. The model used for dispersion modelling is an internationally and nationally accepted model, namely the Calpuff model, and it has been applied in line with Regulations Regarding Dispersion Modelling (R533 of 2014) as published by the DEA which also included extensive</p>



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		model verification as set out in the Atmospheric Impact Report and its Appendix. The predictions of this model show that, even if both Matimba and Medupi operate continuously with SO ₂ emissions of 4000 mg/Nm ³ , there will still be compliance with ambient SO ₂ standards in Marapong.
If Matimba can produce much coal (coal) or Exxarro then why you create the job?.I think Matimba do something which is good for people but other people are stuck because of job	Molesiwa -0729711020 Phuthanditshata Ext 2	Unfortunately this project team cannot advise on job opportunities. Please contact the power stations and Exxarro directly for job information.
In our area of Marapong we are not safe at all. Sometimes we do inhale the air from the climate and we are not working if we were getting a chance to work in future we are going to get sick.	Reginald-0791748431 87 Phosa street Marapong r.mahanuke@gmail.com	Unfortunately this project team cannot advise on job opportunities. Please contact the power stations directly for job information.
Air quality is a key concern for community members who complain bitterly about the increase incidence of respiratory diseases associated with coal mining. Quality is further compromised by Sulphur dioxide emissions of coal-fired power plants exacerbating health risks. These Sulphur dioxide emissions can be managed using flue gas (FGD) systems. The installation of FGD system using Improved technologies that reduce water usage is critical particularly in Medupi where the installation of system is only planned between 2021-2025. Communities are demanding that its installation be urgently prioritized and that its fully functional by the time all six planned power plant boilers	Francina-0728779972 francinaemlynkosi@gmail.com wwao@webmail.com Waterberg Women Advocacy Organization	Thank you, your concern is noted. Medupi's flue gas desulphurization project is proceeding as rapidly as possible. The installation of FGD at Medupi is scheduled to start in 2021 (six years after the first unit started operating commercially). Dispersion modelling results indicate that in the period within which Medupi units are commissioned and when FGD units are installed, the SO ₂ levels for Marapong will be in full compliance with the ambient SO ₂ standards.



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<p>are in operation.</p> <p>We are saying stop coming here and waste our time to come and say something that we are not agreeing on and extension of the project. We have our people that are beaten by Ventascholar guards in 2010 Eskom did nothing about that so we need you to leave and go because you are not helping the community about anything. No extension you will be given by us as the local community of Marapong. You guys must stop stressing us please. You must come with employment for permanent job not that one you come with it now please.</p>	<p>Timan-0737345055</p>	<p>Eskom regrets that you would prefer that we do not host a meeting, but it is a legal requirement for the public to be consulted, and we consider the Marapong residents to be important stakeholders.</p> <p>Unfortunately this project team cannot advise on job opportunities. Please contact the power stations directly for job information.</p>
<p>Through my knowledge SO₂ it can be increased because is going to help us with electricity to take our economy high and the more economy reach target is where we are going to get more things in our community from Eskom.</p>	<p>Kesentsengsina Manyako 1727 Phudufeidu street Extension 2 Marapong 0556 kesentsengsinach@gmail.com</p>	<p>Thank you. We agree that the electricity from Matimba and Medupi Power Stations is vital to sustain our economy.</p>



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<ul style="list-style-type: none"> I'm concerned about the consultation because they have not given people to raise the question. They put the graphs on the wall and explain to the people what is on the graphs. Eskom told not to give us enough time to read minutes of the last meeting. As a WWAO member we are still saying no to postponement to FGD technology because we are affected by the smell, I as person am suffering from the sinuses and headaches from the smell that for from Matimba power station. 	<p>Molatelo Portia-0762756537 WWAO francinaemlynkosi@gmail.com</p>	<ul style="list-style-type: none"> The Marapong engagement started with an "open house", where small groups of people were guided to look at the posters, and the posters were explained, by members of the project team. Thereafter, a meeting was held, with a formal question and answer session, in response to a request from the community. The minutes of the last meeting were made available on our website and at the Marapong and Lephalale public libraries and a message informing the community was sent out in this regard. No comments were received on the minutes, which are thus deemed to be a fair reflection of the issues raised during those meetings. We acknowledge that WWAO does not support the postponement application. However, please note that power stations generally do not smell, and many of the smells you have been experiencing are probably not from Matimba Power Station.
<p>I'm not happy the way the second public meeting went and the way they conducted it was not proper</p> <ul style="list-style-type: none"> they never read to us previewing minutes of the first meeting that was held here in Ditheku Primary there's a difference between consultation and public participation this way consultation we force them to make communities quotations we demand another public consultation participation 	<p>Andries Mozheko Marapong location 754 Nts Wej.forum@gmail.com</p>	<p>We stand by our "open-house" process and still believe that it is a far more effective process for people to become informed than a public meeting. The open-house approach allows stakeholders to work through the information in the public domain in their own time and to ask whatever questions they want taking as much time as they need individually. The dispersion modeling is complex and although a number of people in the Marapong community understand that complexity, there are many others who do not. The minutes of the previous meeting were made available in the public domain and there was a specific poster dedicated to the public participation process that provided details of that process, at the open-house. In addition comment sheets were provided that could be completed by individuals or they could request assistance in completing the comment sheet.</p>



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		<p>It must also be recognized that when the Waterberg Environmental Justice Forum complained about the format of the engagement at the open house, we immediately agreed to a meeting and the meeting was then constituted. Having constituted the very meeting that was requested, the WEJF then staged a walkout in protest. The WEJF are perfectly entitled to such protest action, but of course if they do walk out, then they forgo the opportunity provided for engagement. That notwithstanding, the protest against the requested postponement by the WEJF, is in itself an important statement that must be considered by the authorities in their decision-making process.</p>
<p>I have noticed that consultants they just do what they wish because we went through robust engagement with you about the way you have consulted our communities you have changed consultation processes without consulting communities. We didn't go through the last meetings minutes before you conduct phase two of your consultation which is a last stage. This was incorrect public consultation .Please consult with community ID a good way.</p>	<p>Nlabiwa Jim Letlhaka Wej.forum@gmail.com Marapong ext 04 2447</p>	<p>A pre-engagement session was held with community leaders prior to the previous public meeting held in February 2017. The community leaders requested that Eskom announce the public engagement, using loud hailing, which was done prior to the engagement. In addition, when the concern about the open-house was raised, we immediately responded by arranging a formal meeting as requested by the participants at the meeting. The minutes were available in the public domain and no comments were received on those minutes so we assume them to be a fair reflection of the issues raised in the first round of the public participation. While we fully accept that there was dissatisfaction with the method used for engagement from the communities which resulted in a walk out in protest, we reject any suggestion that the approach used was at odds with the legal or indeed good practice requirements. We also reiterate our view that the open-house format is a far more effective method of engaging with the community and explaining the findings contained in the assessment with community members one-on-one.</p>
<p>As a mother our concern about my kids health because my mother is having asthma even my 9 years girl have asthma attack so what if Eskom increases the SO₂</p>	<p>Elsie Matlakala Ngosi-0729397441 Marapong Ext 2 Rebone 2088</p>	<p>Thank you for raising your concern. The dispersion modelling shows that there will be compliance with ambient SO₂ standards in Marapong and Lephalale, even when Matimba and Medupi operate continuously at 4000 mg/Nm³.</p>



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<p>for Lephalale what would happen to people like my family ? Are they going to suffer more of this air pollution .My concern is can Eskom or Medupi teach people about how to live in this air</p>		<p>Please note that, in addition to power station emissions, there are many other sources of air pollution which can aggravate asthma, such as emissions from cooking with paraffin, coal or wood; dust from roads; and emissions from local waste burning. Please ensure you try to use clean energy in your house (such as electricity or liquid petroleum gas), and close your windows and doors to keep the pollution out during dusty or smoky periods.</p>
<ul style="list-style-type: none"> We cannot allow Eskom to increase the amount of SO₂.The only thing that Eskom is doing and is good at is destroying our lives, killing us. We are dying for nothing. Stop asking for postponement and forget about increasing SO₂. You are asking us a permission to kill us and you but you don't care about our environment our health and a simple thing we are not working so we can't die for nothing 	<p>Lucy Make-0780074105 House 871 Marapong 0556</p>	<ul style="list-style-type: none"> Eskom acknowledges your concerns. However, electricity production is necessary for the delivery of nearly all goods and services and underpins the South African economy and in that way contributes positively to the lives of people. Unfortunately this project team cannot advise on job opportunities. Please contact the power stations directly for job information.
<p>“nekepa gore polantha edirwe kabonako gore e fokothe mothe” - I want you to finish building the plant so it reduces smoke Translated by Beverley</p>	<p>Caroline Malebone P O Box 4459 Ekelbelt</p>	<p>Noted.</p>
<p>“ke kgopela gobotsisa ka mosi wa power ya matimba gore kage elegale renna mo</p>	<p>Daniel Molepo 0785279637</p>	<p>Noted. Deterioration in eyesight has not been shown to be due to exposure to SO₂, but it is of course recognized that smoke (particulate</p>



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<p>ekaba gare iwaie. Kyotsa re ka bona ke eng gore gare iwate. Ke kgopela gore gale ke reile thuso e leka rethusa ka yona retlo tseba dang. Gona thuso yotseya nako e kana. Nkang ka gore rebise re ya ohema. Gantsi phefo etla kamo bathing. Ke kopela yo botsisa gore o tlo bona ka eng gore mosi o owareboiaya. Goya doctany baka go bontsa gore musi o odira eng no mmeleng wa motho. Gona nkaya pele le tlisa dlakarabo naa kage ele kgale renna mo. Ke kgopela le kwane le makgantsheke a refe dikarabo.” - Its effecting our health and smoke is affecting our eyesight Translated by Beverley</p>		<p>matter) which is not the subject of this assessment, does cause eye discomfort.</p>
<p>“ Die steam van powerstation was more steem, hy kom diekant by location. End die steam was kom by locatiom dae mense vnnnnnnnnnnnnnnnnnnnn as, TB was siek by malahla. Hy was naby met die mense. End den, baie mense was souk die jop. Maar dae mense was werk by matimba was vat die buur van yeller. Baie mense was nie verk nie. Hy vaas bley by die heis.” The steam from PowerStation comes to the location .There are residence which have asthma, TB. People require jobs in Matimba translated by Candice</p>	<p>Christina Debakker Ext 2 House 2052 Marapong</p>	<p>Noted. Both the dispersion modelling and wind measurements show that Marapong is usually upwind of Matimba Power Station. Also, please note that TB is caused by bacteria which spread from one person to another, and not by power station (or any other type of) emissions.</p> <p>Unfortunately this project team cannot advise on job opportunities. Please contact the power stations directly for job information.</p>
<p>As an individual of Marapong I am sick and tired of the air pollution that I’m getting</p>	<p>Sylvia Sebina 0715088944</p>	<p>We are of the view that the air pollution ‘problem’ is principally a function of domestic fuel use in Marapong. Monitoring data shows that</p>



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<p>from the power station it's very difficult for me to breath and now Eskom thinks not enough about their pollution they want to extend the pollution what do they think of our lives here</p> <p>I said NO to their proposal.</p>	<p>smsebina@gmail.com</p>	<p>there is compliance with the National Ambient Air Quality Standards for SO₂ and NO_x, the key power station emissions, while ambient PM air quality does not comply with the standards. In addition peak concentrations of PM are seen in the early morning and late afternoon/early evening, while the maximum SO₂ concentration is seen during the day. We argue that atmospheric stability traps pollution that is emitted at ground level (viz. domestic fuel and other burning emissions) and that same stability prevents the plume that is emitted from the stacks from reaching ground level. Plumes from the power stations only reach ground during the day at diluted concentrations when there is instability in the atmosphere and resultant mixing.</p>
<p>No comment</p>	<p>Jeffrey 87 Phosa street Marapong 0781606779 jeffrapatsa@gmail.com</p>	
<p>Medupi and Matimba are benefiting the communities far from them. When I don't think it was like that on their social labour plan if they could give us jobs if could be better than we could be able to take our families to the medical consulted regularly.</p>	<p>Romeo Modika Marapong Ext 3 Mamalela Park Modikar@gmail.com</p>	<p>Unfortunately this project team cannot advise on job opportunities. Please contact the power stations directly for job information.</p>
<ul style="list-style-type: none"> The limit of 3500 is the good limit but where it contains more it will damage the environment of Marapong people. This is something that happens every where the next restrain is that the they must improve the doctor here in Lephalale 	<p>Solly Ndlovu 0718459430 bafamamkateko@gmail.com</p>	<p>Based on the assessment conducted, it is unlikely that the emissions at 4000 mg/Nm³ will result in non-compliance with the NAAQS on the upwind side of Matimba Power Station.</p> <p>Unfortunately Eskom is mandated to provide electricity, and not medical facilities. Please contact your local clinic.</p>



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<p>“ke kgopela gole tsibisa yore ku nako yabo six ya maitsiboa le ya phakeba goba le mosi o oleng mo Marapong go fitlha kotase oo bonalang okare ke phoka. Mosi o odirang power station ya matimba banale goethesta entshemolora o weke mo Marapong. Ntwe ediragala yaogetsiswa mmereko wa shedawn. Ekanna gabedi mo ngwageng. Ekaba tekano ya matsatsi a mararo ka tetelano. Matlho a rena a gobatse ke mosi reobobang ka matlho ka yore retsamaya mogoona re kgopela dikarabo ka nako esafediseng pelo.” Every day at around 6pm in the evening the Marapong area is filled with smoke. This smoke is affecting our health specifically our eyes. Translated by Zanele</p>	<p>Itumeleng Selina Mokeona Marapong Ext 4 4 house 2979 0787174554</p>	<p>It is very unlikely that the smoke in Marapong in the evenings comes from the power stations. The atmosphere becomes stable again in the late afternoon, and the power station emissions cannot come to ground. It is much more likely that the smoke in Marapong at 6 pm in the evening is due to local fuel- and waste burning activities, traffic-generated dust from gravel roads and surfaced roads that are not cleaned of sand and silt and other detritus.</p>
<p>“Go umakiwa fore TB e teng mo Marapong ka bontsi ka baka la mosi seo ke nnete?” There are talk of a TB outbreak in Marapong and the TB is being caused by the smoke are the rumors true? Translated by Zanele</p>	<p>Paulina Marapong Ext 2 1903 Alfred N20 0727477110</p>	<p>The Mayo Clinic states that: ‘Tuberculosis is caused by bacteria that spread from person to person through microscopic droplets released into the air. This can happen when someone with the untreated, active form of tuberculosis coughs, speaks, sneezes, spits, laughs or sings’ (www.mayoclinic.org/diseases-conditions/tuberculosis/symptoms-causes/dxc-20188557)</p> <p>The TB is probably caused by bacteria, and not by the smoke in Marapong.</p>
<p>“Bolhata mo mathimaba ga bo go sere kopang ke tlhokego ya me somo” The smoke is killing us Translated by Zanele</p>	<p>Frans Mokoti Phuthaditshaba Ext 2 0762087136</p>	<p>Both the dispersion modelling and the ambient measurements in Marapong show that it is very unlikely that SO₂ emissions from power stations are killing Marapong residents, since there is compliance with ambient SO₂ standards. However, it is recognized that smoke (PM)</p>



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<p>Eskom is not legally entitled to apply to postpone compliance with the existing plant MES. Such application was required to be made by 31 March 2014 at the latest. It was, in fact, made, and correctly rejected by the National Air Quality Officer. Eskom fails to explain what steps were (and will be) taken to ensure compliance with the 2015 SO₂ MES, and the basis on which it take the view that it is permitted to re-apply for postponements which we already refused over two years ago</p>	<p>Life After Coal Campaign (letter submitted on 29 June 2017)</p>	<p>concentrations in Marapong (which are not the subject of Eskom’s application) are not in compliance with the NAAQS implying a potentially significant health risk.</p> <p>Eskom contends that the legislation does not forbid Eskom from applying again for another postponement of the Minimum Emission Standards. Section 5.4.3.3 of The 2012 National Framework for Air Quality Management in the Republic of South Africa (29 November 2013) requires that ‘The application must be submitted to the National Air Quality Officer at least 1 year before the specified compliance date.’ However, since the National Framework is a policy document and is not prescriptive, we understand the 1-year deadline to allow the National Air Quality Officer enough time to make a decision on the postponement application. The National Framework does not say that an application submitted after the ‘1-year before the specified compliance date’ cannot be considered, and indeed there is precedence of later applications being considered.</p> <p>In the motivation accompanying this application for postponement of the SO₂ Minimum Emission Standards, Eskom explains what options have been considered to reduce SO₂ emissions and comply with the 2015 emission limit. In particular, the mine has commenced mixing high Sulphur coal with lower Sulphur coal at Eskom’s request. Unfortunately Eskom does not have any other options to reduce SO₂ emissions in the short- to medium-term. The development of flue gas desulphurization for Medupi Power Station is also underway - this will bring Medupi into compliance with the 2020 SO₂ emission limit for ‘new plants.’</p>
<p>Eskom’s decision to re-apply for such postponements, in circumstances where the MES have already been in place for almost 2 years; and its prior applications for these postponements have already</p>		<p>Eskom disagrees with this statement. In contrast, Eskom is making every possible practicable endeavor to reduce SO₂ emissions. Eskom has been transparent about its intentions and is making every effort to operate legally within the constraints of the spending that is allowed by the prevailing electricity tariff.</p>



Comments	Contact details	Response
<p>been rejected, clearly constitutes an abuse of process and an attempt to illegally obtain exemption from the existing plant MES</p>		
<p>Eskom has previously advised that its intention, in respect of certain MES, is to seek “rolling postponements” until the stations are decommissioned</p>		<p>Correct. Eskom has been transparent about its compliance plans.</p>
<p>It is not legally permissible for Eskom to apply for such “rolling postponements” and its failure to meet these standards constitutes non-compliance with the MES and the National Environmental Management: Air Quality Act, 2004 (AQA), and must be dealt with as such in accordance with the procedures that govern non-compliance (which is also a criminal offence)</p>		<p>The statement that Eskom’s “rolling postponements” is not legal is not justified in terms of any legislation. Eskom submits that “rolling postponements” reasonably applied for are legal where approved by the relevant authority.</p>
<p>continuing to emit SO₂ in exceedance of the existing plant/2015 MES would amount to a breach of the s24 right enshrined in our Constitution, which guarantees everyone the right to an environment which is not harmful to their health or</p>		<p>Ambient air quality modelling in Lephalale, Marapong and other populated areas downwind of the power stations shows that there is currently compliance with ambient SO₂ standards everywhere in the vicinity of the power stations. Moreover, the dispersion modelling conducted for the Atmospheric Impact Report shows that there will still be compliance with ambient SO₂ standards in Marapong and Lephalale, even if the postponement is approved. The Life After Coal Campaign fails to provide any evidence that the section 24 right in the Constitution</p>



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<p>well-being. It would also amount to a flagrant violation of the AQA and the National Environmental Management Act, 1998</p>		<p>would be violated.</p>
<p>We reiterate that, should Eskom persist in making such applications (notwithstanding that it is legally impermissible to do so), we call upon it to ensure full compliance with the remainder of the legal requirements for such postponement applications, set out in the List of Activities and the Framework. These include that no postponement application can succeed unless ambient air quality standards are in compliance and it is demonstrated <i>“that the industry’s air emissions are not causing any adverse impacts on the surrounding environment”</i>.</p>		<p>Three monitoring stations show that there is currently compliance with ambient SO₂ standards in the region (Marapong, Medupi and Lephalale ambient air quality stations respectively). Both Eskom and the Department of Environmental Affairs will continue ambient air quality monitoring.</p>
<p>We dispute the accuracy and completeness of any modelling that demonstrates that Eskom’s emissions are not causing - and will not continue to cause - adverse environmental impacts. Such results would contradict a wealth of research, including research conducted by Eskom itself</p>		<p>Life After Coal Campaign fails to provide any basis for disputing the modelling conducted for the Atmospheric Impact Report. The modelling is conducted with an internationally and locally recognized model, and in accordance with the national Guidelines for Atmospheric Dispersion Modelling. In addition there is good agreement between the modeling results and the ambient air quality monitoring which serves as further validation of the modeling results.</p>



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<p>However, Eskom’s own modelling done to assess the implications of granting the requested postponements⁷ makes clear that this request must be refused. The report provides that: "<i>predicted non-compliance with the NAAQS for SO₂ seriously questions the acceptability of the requested emissions by Eskom. Based on the work done to date, what is implied is that the power stations operating at the requested limits will likely result in non-compliance with the NAAQS for SO₂ downwind of the power stations.</i>"</p>		<p>Eskom contends that there will still be compliance with ambient SO₂ standards in densely populated areas. The areas of non-compliance occur in areas with low population density. Please note that Eskom does not do their “own modelling”. The modelling is conducted by independent consultants.</p>
<p>In other words, Eskom’s own supporting documents do not support their request. There is already non-compliance with ambient air quality standards (AAQS) in the Waterberg-Bojanala Priority Area, with this situation predicted to worsen, largely as a result of the significant proposed expansion of energy-based and mining projects.⁸ It is also worth pointing out that South African AAQS for SO₂ are far more lenient than WHO guidelines (WHO 24h guideline is 20 ug/m³ compared with SA standard of 125 ug/m³), and that health impacts occur in areas even if in compliance with the SA AAQS</p>		<p>The contention that “there is already non-compliance with ambient air quality standards (AAQS) in the Waterberg-Bojanala Priority Area” is not justified, and in fact is disputed by monitoring conducted in Marapong, Lephalale and downwind of the power stations. We stand by our contention that the NAAQS define tolerable levels of risk and have never argued that the standards are absolute statements of no health risk.</p>



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<p>We continue to call upon the relevant decision-makers to reject the postponement applications in order to protect constitutionally-protected rights and the advancement of environmental and social justice in South Africa</p>		<p>Noted. Eskom calls on the relevant decision-makers to approve the postponement applications, since the impact of the SO₂ on human health is negligible, and Matimba and Medupi need to continue operating to supply electricity needed for the economy.</p>

