

ANNEXURE V

Review of Issues Trail 2

Kamal Govender - Comment on the Scoping Phase of the Project

From: "Mark Wood" <Markwood@global.co.za>
To: "Kamal Govender" <Kamal.Govender@shands.co.za>
Date: 2006/09/28 01:03 PM
Subject: Comment on the Scoping Phase of the Project
CC: <brett.lawson@shands.co.za>

Dear Kamal,

I have gone through the minutes of the meetings, the Revised Issues and Response Report and the Site Location Study. Some track changes have been made in these documents for your consideration. I have already reviewed the Draft Scoping Report and have not considered this further.

I have the following comments to make:

- (i) The site selection report is now a far more robust and defensible document. While I would have liked to have seen more background information presented which provides insight into how the team applied the rankings, the use of the sensitivity screening is an excellent means of verifying that the options that have been chosen are reasonable.
- (ii) The concerns expressed about strategic issues (mainly by WESSA) are appropriately noted and responded to in the Issues and Response Report.
- (iii) Questions about the linkage between the power station EIA and the mining EIA are valid. At an earlier meeting with Eskom, it was agreed that a specific effort would be made to interface with the mine EIA consultants and to ensure that the two studies are integrated. This could be to the extent of summarizing the findings of the each others studies in EIAs for each of the projects, if the timing permits this. How far have efforts to liaise with Oryx Environmental progressed?
- (iv) I have some reservations about the capability of the team to handle health impacts and the downstream impacts of poorer air quality. Airshed has limited experience of this. While a health risk assessment is probably not warranted, it may be worth keeping the possibility open for expert advice on ingestion pathways in the event that the air quality study shows this to be necessary. There have been several recent cases of assessments where projects were delayed by stakeholders claiming that air quality (and noise) impacts would affect stock farming production.
- (v) The period available for comment and the general pressure related to the study time frames is obviously an issue with a number of people. Eskom significantly increases the risks of later delays by short changing people in the comment period. We have rarely found that it pays to do this – time saved at the start is invariably time plus lost at the end. In the event that appeals are lodged after the EIA is submitted on the grounds of EIA process, it can cost Eskom many months in delays, even if the appeals are eventually overruled.

Kind regards,

Mark Wood