

Environmental Impact Assessment Environmental Impact and Waste Management License Application for the proposed Extension of the Ash Disposal Facility and Associated Infrastructure at Camden Power Station

(DEA Ref No 12/12/20/2300 and NEAS Ref No: DEA/EIA/0000399/2011)

Comments and Responses Report

Version 5

This report (Version 5) captures the issues raised by stakeholders during the Environmental Impact Assessment (EIA) process and Waste Management License Application for the proposed extension of ash disposal facilities and associated infrastructure at Camden Power Station.

As part of the announcement, a Background Information Document (BID), with a comment and registration sheet was posted and distributed by hand during May 2011. Letters of notification were also sent out by registered mail in May 2011 to all landowners within a 10 km radius of the Camden Power Station. An advertisement was placed in various newspapers and site notices were also put up in the area of the proposed development during May 2011.

An open house and public meeting to discuss the Draft Scoping Report was held at the Indawo Game Lodge, Ermelo on 27 July 2011. This event was announced by advertisements in various newspapers and letters of invitation were also sent out to stakeholders. Issues and comments raised at this meeting as well as comments received during the public review period from 18 July to 22 August 2011 were added as Version 2 of this report to the Final Scoping Report before it was submitted to the Department of Environmental Affairs (DEA).

Two public meetings were held on 17 April 2013 at Indawo Game Lodge, Ermelo one at 10:00 and another at 18h00 to present the Draft Environmental Impact Report (DEIR) to the public. The event was advertised in various community and public newspapers. Each stakeholder on the database also received a letter of invitation either via post or email to encourage them to attend any one of the public meetings and also to participate in the public participation process. All comments received during the public review period from 14 March to 24 April 2013 of the DEIR, public review period from Monday 29 September 2014 to Friday 07 November 2014, are included in this version (Version 5) of the report and is included as Appendix F of the FEIR which was submitted to the DEA.

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	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
1. AUTHORITY COMMENTS				
1.1. Mpumalanga Department of Tourism and Parks Agency				
1.	MTPA has no objection to the proposed development or the sensitivity of the site. The preferred site 1 is supported for the new ash disposal facility and a proper liner with a lifespan longer than 30 years is recommended. Furthermore we thank Zitholele for the professional reporting plans.	EKSTEEN, J Acting Senior Manager SS MDTPA	Fax received on 12 April 2013	Comment acknowledged, and responded to on 27 May 2013 Warren Kok, EAP
1.2. Department of Agriculture Forestry and Fisheries (DAFF)				
1.	DAFF raised the comment that Eskom will have to apply for a separate permit for the subdivision of agricultural land. The permit needs to be obtained from DAFF.	MOGALE, Mary DAFF	Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	Should an EA be granted, Eskom will apply for all relevant permits. Warren Kok, EAP
2.	One of the major problems facing agricultural sector is the loss of high potential agricultural land and water pollution. The study area is dominated by agricultural potential land and grazing land. The proposed areas (Alternative 1, 2 and 3) have agricultural activities taking place. The following has been raised:	MJADU, PN Deputy Director: Water Management Department of Agriculture, Forestry and Fisheries	Letter: 07 November 2014	
2.1.	<ul style="list-style-type: none"> On page 42 it is mentioned that there was a discussion with farmers on both Southern sites, who indicated that they do not want development within their farming land, but there is no mention of a discussion of this kind with the farmer(s) on the North, Site 1. 			Zitholele Consulting can confirm that the previous landowner of Uitkomst 292 IT, portion 18 (Site 1), Mr Chris du Toit, was notified and consulted regarding this proposed project. When Site 1 was selected, through the environmental assessment process, as the preferred site for this proposed development, Eskom

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				<p>Holdings SOC Ltd initiated discussions with Mr du Toit and his legal representative, Mr Karel Smit, Smit & Van Wyk Attorneys, based in Hendrina. During the consultation process in September 2014, Zitholele Consulting was informed by Mr Du Toit that he sold the property to Mr John Lloyd in early 2014. Both Mr Lloyd and Mr Du Toit have been consulted with regarding this proposed project (refer to Appendix A).</p> <p>In addition, Mr Lloyd, new owner of Uitkomst 292 IT, portion 18 (Site 1) confirmed (refer to email attached, Appendix B) that he does not currently undertake any agricultural activities on this farm. He indicated some cattle, not belonging to him, might be grazing on this farm portion. Although the land has agricultural potential, there will be no loss in active farming land. Crop cultivation takes place on the adjacent farms, but no commercial cattle farming in the immediately surrounding area.</p> <p>Tania Oosthuizen, Zitholele Consulting</p>
2.2.	<ul style="list-style-type: none"> The RDEIR under impact identification, the impact on livestock around or in the vicinity of the proposed site was not considered. Ash is known to be one of the dangerous airborne pollutants and when or if it comes to contact with pasture/ cattle feed it can cause disorder in cattle, characterized by chronic diarrhoea, reduced growth and weight loss (Vikas Eknath Mahajan et al, 2012). Are there 			<p>There are currently no farming activities by the land owner taking place on Site 1. Crop cultivation takes place on the adjacent farms, but no commercial cattle farming in the area immediately surrounding the proposed new ADF.</p> <p>The article referred to in your question assesses the overall impact of caused by power stations, and not specifically the</p>

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	<p>any plans to be put in place to address this, e.g.: provision of alternative grazing area?</p>			<p>impacts from the ADF. Please bear in mind, the Camden EIA under review is focussed on assessing the impacts associated with the extension of the life of the existing power station, by developing a new ADF. There will be no increase in production by the power station. The proposed new ADF will be used when the existing ADF when it reaches the end of its operating life.</p> <p>Although the power station itself is not part of the Camden EIA under review, it is worth noting that unlike the power plant in India used in the article, Camden Power Station has fabric filter plants installed which are effective in removing fly ash from the flue gas.</p> <p>Air quality mitigation, management and monitoring measures are proposed to minimise the impacts of airblown dust from the newly proposed ADF on the receiving environment. The air quality impacts and mitigation measures are contained in Sections 11.2.8; 11.3.8 and 11.4.8 and 11.5.8 of the FEIR.</p> <p>Camden power station undertakes monthly air quality monitoring at a monitoring station located to the East of the power station to ensure that their impacts are within the acceptable limits of the National Air Quality Standard. Camden's measurements are also audited once a year. The latest</p>

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				<p>monitoring report is included in Appendix M. Eskom plans to initiate a dust fallout monitoring programme in 2015.</p> <p>Tania Oosthuizen, Zitholele Consulting</p>
2.3.	<ul style="list-style-type: none"> On page 54 of the Biophysical Report under Additional impacts it is mentioned that once operational the contaminated water could seep into freshwater bodies and impact the health of plants and animals. What are the mitigation plans to be put in place to minimize this. 			<p>The newly proposed ADF will be lined with a Class C barrier system, as the ash is classified as Type 3 waste according to the Department of Environmental Affairs (DEA) Regulations. Meetings have been held with the Department of Water and Sanitation (DWS) engineering division in which the liner design was approved in principle. The liner is designed to minimise the risk of seepage to water resources. Refer to Section 11 of the FEIR for the mitigation measures per environmental aspect and project phase and to or Appendix R for the Environmental Management Programme Report (EMPr).</p> <p>Tania Oosthuizen, Zitholele Consulting</p>
2.4.	<ul style="list-style-type: none"> In relation to water pollution, with the fact that Vaal River is about 5km away, the DEAR does not consider pollution into the Vaal River which might be contributed by tributaries and streams via the Witpunt spruit, and therefore, it is recommended that monitoring of water quality is also conducted in the Vaal River. 			<p>Section 11 of the EIR addresses the impacts and associated mitigation measures per environmental aspect per project phase. The surface water and wetlands impacts and mitigation measures are contained in Sections 11.2.4; 11.3.4 and 11.4.4 and 11.5.4 and the groundwater impacts and mitigation measures are contained in Sections 11.2.5; 11.3.5, 11.4.5 and 11.5.5</p> <p>Camden Power Station undertakes routine water monitoring. Refer to Section 4 of Appendix R (EMPr) for details on the monitoring undertaken. There are surface</p>

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				water and biomonitoring points located on the Witpunt Spruit. Tania Oosthuizen, Zitholele Consulting
3.	The Department of Agriculture, Forestry and Fisheries (DAFF) acknowledges the need for continuous electricity generation to meet the growing demand, however in doing so Eskom should optimize on management plans to ensure that the current agricultural practices are not compromised.			Comment noted. One of Eskom's strategic objectives is to reduce its environmental footprint, and this is achieved through certification with systems like the ISO 14001 EMS. Nicolene Venter, Public Participation Practitioner
4.	The Department would like to apologise for the inconveniences caused as the incorrect comments were submitted to Zitholele Consulting (letter dated 04 November 2014) Those comments must not be taken into consideration.	MOGALE, MD Resource Auditor Directorate: Land Use and Soil Management DAFF	E-mail: 27 November 2014	The withdrawal of the previous comments is noted Nicolene Venter, Public Participation Practitioner
	The Directorate: Land Use and Soil Management does not have any comments.		04 November 2014	Comment acknowledged. Tricia Njapha, Zitholele Consulting
1.3. Department of Water and Sanitation (DWS)				
1.	One of the alternatives is to address the exclusion of watercourses.	ACKERMAN, Pieter Chief Landscape Architect DWS	E-mail: 30 September 2014	The exclusion of water courses was used as one of the criteria for site selection. The preferred site (Site 1) does not directly impact on any watercourses, although the pipeline complex traverses the modified wetland. The ADF and AWRD also occur within the 500 m buffer of the wetland. But, they are not within a wetland or 1:100 year floodline. Tania Oosthuizen, Zitholele Consulting
2.	Please address water use authorization.	ACKERMAN, Pieter Chief Landscape Architect DWS	E-mail: 3 November 2014	A water use licence application will be submitted for this project. Tania Oosthuizen, Zitholele Consulting

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1.4. Department of Defence (DOD)				
1.	All future correspondence regarding the EIA for the proposed continuous ADF for Camden Power Station must be addressed and submitted to Brig.Genl. Mbuli.	Department of Defence	Planning Meeting 25 August 2014	<p>The information was noted and agreed that all correspondence regarding the Integrated Environmental process will be communicated as requested.</p> <p>Tania Oosthuizen, Zitholele Consulting</p> <p>It can be confirmed that Zitholele Consulting has communicated all EIA relevant aspects through Brig Gen Mbuli on the following dates:</p> <ul style="list-style-type: none"> • Revised DEIR courier (27 August 2014) • Minutes of Planning Meeting held on 25 August 2014 • Site Visit coordination and logistics (e-mail 17 September 2014) • Minutes of Site Visit held on 03 October 2014
2.	Regarding communication and consultation with the Department of Public Works, it was confirmed by the DOD that the staff from the Department of Public Works are illegal occupants in the Camden Village and therefore no communication and/or consultation with them would be required.	MNGADI, Brig.Genl.	Planning Meeting 25 August 2014	<p>Took note of the information provided regarding the illegal occupants, however, the Department of Public Works are on the project database and will therefore receive all public notifications.</p> <p>Tania Oosthuizen, Zitholele Consulting</p>
3.	What caused the delay in the EIA process.			<p>Some of the key aspects of the project scope had changed since the Draft Environmental Impact Report (DEIR) went out for public review. These changes needed to be finalised before the Final Environmental Impact Assessment Report (FEIR) can be updated and they are:</p> <ul style="list-style-type: none"> • the shape of the ADF needed to be amended to avoid the need to deviate existing power lines; and

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				<ul style="list-style-type: none"> the lifespan of the ADF as well as the decision to construct it in a phased approach has altered the original conceptual design. <p>Nevin Rajasakran, Chief Engineer, Zitholele Consulting</p>
4.	The concern was raised that the new ADF will increase the existing air pollution currently experienced by the residents of Camden Village, especially on a very windy day.			<p>The design team for the ADF incorporated the 750m buffer zone, as prescribed by the Air Quality Specialist Study, which will ensure that the residents at Camden Village will not be impacted negatively by fly ash.</p> <p>It was further confirmed that the ADF has been positioned as recommended by the Air Quality Specialist to avoid any possible impact on Camden Village</p> <p>Edwin Setei, Eskom Holdings SOC Limited and Nevin Rajasakran, Chief Engineer, Zitholele Consulting</p>
5.	Who are the stakeholders on this proposed project's database?.			<p>There are a number of Government Departments / Officials on the project database as well as interested and affected parties.</p> <p>A copy of the project database was forwarded to the Department of Defence.</p> <p>Nicolene Venter, Public Participation Practitioner</p>
6.	The project team to note that the DOD initiated a project whereby the DOD Kimberley school will be relocated to the Camden Village.			<p>Information acknowledged and noted.</p> <p>Nicolene Venter, Public Participation Practitioner</p>
7.	Are the Air Quality Study is in line with the requirements as outlined by the Occupational Health & Safety Advisory Services (OSHAS)?	Mashike, Maj.		<p>Eskom will adhere to the requirements of OSHAS.</p> <p>Nevin Rajasakran, Chief Engineer, Zitholele Consulting</p>
8.	What is the lifespan of the Camden Power			<p>The Camden Power Station was</p>

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	Station?			mothballed in 1990 and was re-instated in 2001. The Power Station is designed to be operational until 2033. Edwin Setei, Eskom Holdings SOC Limited
9.	For clarification purposes, whether the large stockpile of soil adjacent to the Camden Village is part of Camden Power Station's existing ash dump?	Liebenberg, Capt.		The stockpile is not part of Camden Power Station's ash facility but is that of Usutu Mine's soil from their open cast mine. Nevin Rajasakran, Chief Engineer, Zitholele Consulting The stock pile has been attended to and has been rehabilitated. Brig. Genl. Mngadi, Department of Defence
10.	The question was raised as to whether a meeting with the residents of Camden Village is required and if so, what is the correct protocol to follow.	Nicolene Venter Public Participation Practitioner Zitholele Consulting		It was identified that there is a slight misunderstanding between Zitholele Consulting and the DOD. Regarding the proposal to move the Camden Village does not form part of EIA process for the ADF Site Alternatives that were presented. Department of Defence Officials At the onset of the project the option of relocating the Village was investigated where this was mentioned in a meeting between DOD and Eskom. However, this option was not pursued further for inclusion in the EIA assessment for the ADF, as the environmental impacts on the Camden Village was considered to be acceptable. Ms Goody Ntuli, Eskom Holdings SOC Limited A meeting with the residents of Camden

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				<p>Village would not be necessary as the DOD leaders present will ensure that the Camden Village residents (DOD) are informed through their internal communication processes. The Camden Village consists of residents from the DOD as well as from Department of Public Works.</p> <p>Department of Defence Officials</p> <p>The decision was taken that a public meeting during the review period of the Revised DEIR will not be required.</p> <p>Department of Defence Officials</p>
11.	<p>As it was confirmed that the existing ADF was established in 1962, it is believed that a study and/or tests have been done to confirm whether the existing ADF has a health impact on humans in close proximity to the ADF.</p>	Hlongwa, Col. SG	<p>Site Visit: Camden Power Station 03 October 2014</p>	<p>Taking out the environmental point of view and focussing on the social economic viewpoint, Camden Power Station (CPS) does have air quality sampling points around CPS and some are closer to Camden Village and CPS submit quarterly fugitive emissions reports to the Gert Sibande district municipality (Municipal health services).</p> <p>A forum has been established between the CPS and stakeholders where issues and/or concerns raised regarding dust fall-out or health matters are discussed. It is through this forum that CPS addresses issues of concern raised by community members.</p> <p>Mr Harvey Jaraj, Camden Power Station</p> <p>The current monitoring being undertaken by CPS has not been expanded to the point / level as requested by Col Hlongwa i.e. specific health impacts on people in the surrounding area. It can be confirmed that</p>

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				<p>to date, no health issues have been reported during CPS' stakeholder engagement forum. Mr Thabiso Mpongo, Camden Power Station</p>
12.	<p>The reason why the question and concern is going back to the current ADF is due to the fact that one cannot discuss the new ADF if one is not informed about the existing ADF's impacts. It is believed that by now Eskom should have done studies/research of the possible negative health impact the ADF has on humans.</p> <p>It was further reiterated that, as mentioned by the consultants, the location of the new ADF has been moved back to 750m for safety reasons, and it is this shifting that is prompting the questions regarding health impacts on humans.</p>			<p>The purpose of the site visit is to focus and discuss the EIA process and impact associated with the proposed new ADF at CPS and not the existing ADF infrastructure. It is recommended that the discussions move forward to the proposed new ADF. Mr Harvey Jaraj, Camden Power Station</p>
13.	<p>As the DOD is responsible for the training of between 500 to 700 soldiers, the DOD must be aware and informed of any possible health impacts that the soldiers could experience. It is the people on the ground that ask the questions about air pollution in the area, what effect will the ash in the area have on them, etc. and it is the DOD's responsibility to provide answers.</p> <p>If impacts of the existing ADF are not addressed then problems will escalate with the new ADF.</p>			<p>In 1962 there was no environmental legislation and the information provided by CPS is that they do monitoring to establish whether there are any negative impacts. The legislation promulgated is very strict and the EIA being undertaken for the proposed new ADF will inform whether there are issues of concern, and if so how it needs to be addressed and/or mitigated.</p> <p>The DOD will review the Report and specialist studies and determine whether the mitigation measures recommended complies with the various legislations and/or minimum standards i.e. monitoring, ADF distance from residential areas, etc. Capt. Liebenberg, DOD</p>

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14.	<p>To summarise the concerns raised by the DOD is:</p> <ul style="list-style-type: none"> • what impact will the ADF have on human health: • was there any studies done to determine / confirm the health impact on humans? and • Has studies been done to determine the kind of illnesses (short of long term) that are associated with an ADF, especially living near an ADF. 	Mngadi, Brig. Gen.	<p>Site Visit: Camden Power Station 03 October 2014</p>	<p>Responses provided by the team are all correct and one needs to also take into consideration the design of the existing ADF and that of the proposed new ADF as the design also address mitigation measure of any possible negative impact.</p> <p>The question, as Eskom understands it, is the level of exposure that Camden Village might experience and what associated risk has been identified. It is believed that Zitholele Consulting’s air quality specialist report identified and addressed these impacts Tobile Bokwe, Sustainability Division: Eskom</p> <p>The air quality specialists have reported that the proposed new ADF impact on air quality will be minimal after mitigation. The impact has been rated as “very low”, but did point out that there are cumulative impacts that are not only associated with the ADF but also the various coal mining activities in the area. They therefore believe that people in the surrounding area be negatively impacted from an air quality point of view.</p> <p>Various mitigation measures are recommended to avoid and/or reduce any possible air quality impacts associated with the proposed new ADF.</p> <p>It was recommended, and confirmed by Mr Mpongo, that CPS’ monitoring results as tested against the national air quality standards set, be shared with the DOD.</p>

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				<p>Tania Oosthuizen, Zitholele Consulting</p> <p>Gert Sibande District Municipality initiated a study regarding the impact of ash and coal mining activities on air quality and the outcome of this study is available on their website.</p> <p>Thabiso Mpongo, Camden Power Station</p>
15.	Recommend that proper studies/test is done to determine how many people got sick over the years due to the existing ADF. The DOD has the responsibility to protect its soldiers in the same manner that Eskom protect their infrastructure which is classified as a National Key Point	Hlongwa, Col. SG	Site Visit: Camden Power Station 03 October 2014	<p>Although the existing ADF was designed in 1962, CPS ensure that they comply and manage its facility in terms of current and new legislations.</p> <p>Mr Harvey Jairaj, Camden Power Station</p>
16.	It was mentioned that studies were done to determine the possible health impact and asked whether the study was based on someone that is a natural healthy person or someone who is asthmatic. As the soldiers need a clean bill of health, the DOD will need to have their paper work in order to prove that the soldiers, when arriving at Camden Village, were healthy.	Kleinjan, Lt Col E	Site Visit: Camden Power Station 03 October 2014	<p>An Air Quality study was conducted and not a health impact study. There is a difference between these studies as the air quality specialist will indicate whether a health impact study is required or not if there is a risk of a health impact. Based on the proposed ADF being moved a safe distance away from the Camden Village, as recommended by the Air Quality Specialists, there are no health risks foreseen.</p> <p>Following the site visit and meeting of the DOD, the air quality specialist was asked to further elaborate on the potential health risk of the project on the Camden Village. The following information is extracted from the Air Quality Report.</p> <p>Based on the US.EPA screening model</p>

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				<p>(TScreen), which is used to “flag” the “worst case” concentration that might occur, the health (cancer) risk due to windblown element ~700 m from the ADF due to mitigated or unmitigated operations is predicted to be very low.</p> <p>It is recommended that single dust fallout buckets be installed downwind of the ADF in order to monitor the impacts from this source.</p> <p>Tania Oosthuizen, Zitholele Consulting</p>
17.	<p>The prevailing wind direction of the area must be confirmed and taken into consideration to identify any possible air quality impacts on the Camden Military Base and the Camden Village. The prevailing wind direction in the direction of either one of the above facilities will impact on the health and quality of life of the personnel and residents.</p>	Liebenberg, Capt	Letter: 06 November 2014	<p>According to the Air Quality Specialist Report (Appendix M of the FEIR), the predominant wind direction is east to east-southeasterly with more than ~10% frequency of occurrence. Winds from the south are relatively infrequent occurring <3% of the total period. Calm conditions (wind speeds < 1 m/s) occur for 14% of the time. Refer to Figure 1 for the wind roses.</p> <p>The proposed new ADF is located roughly to the west of the military base and village, and therefore the wind will blow predominately from the Camden Village and Military Base towards the proposed ADF, and not from the ADF to the Village and Military Base.</p> <p><i>Copy of letter attached in Appendix D4 included in the FEIR</i></p> <p>Tania Oosthuizen, Zitholele Consulting</p>
18.	<p>Dust suppression measures must be implemented, irrespective of wind direction.</p>			<p>Air quality mitigation, management and monitoring measures are recommended to</p>

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				<p>minimise the impacts of windblown dust from the proposed ADF on the receiving environment. The air quality impacts and mitigation measures are contained in Sections 11.2.8; 11.3.8 and 11.4.8 and 11.5.8 of the FEIR.</p> <p><i>Tania Oosthuizen, Zitholele Consulting</i></p>
19.	Air quality monitoring measurements must be implemented and monitored at both military areas and must be contained for the duration of the lifespan of the proposed ash disposal facility.			<p>Camden Power Station undertakes monthly air quality monitoring at a monitoring station located to the east of the Power Station to monitor the station's air quality performance with respect to the National Air Quality Standards. They also have a dust monitoring programme with points situated around the facilities and near sensitive receptors. This programme started in 2011. Please refer to Section 4 of the EMPr for the monitoring programme. The air quality reports are contained in Appendix M of the FEIR.</p> <p><i>Tania Oosthuizen, Zitholele Consulting</i></p>
20.	The required measures must be implemented and monitored to ensure that the leaching of effluent water does not impact negatively on the water quality in and around the area.			<p>The proposed ADF will be lined with a Class C barrier system, as the ash is classified as Type 3 waste according to the Department of Environmental Affairs (DEA) Norms and Standards for waste disposal at landfill. Meetings have been held with the Department of Water and Sanitation (DWS) engineering division in which the liner design was approved in principle. Refer to Section 11 of the FEIR for the mitigation measures per environmental aspect and</p>

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				<p>project phase and to Appendix R for the Environmental Management Programme (EMPr).</p> <p>Camden Power Station undertakes routine groundwater and surface water monitoring. Refer to Section 4 of Appendix R (EMPr) for details on the monitoring undertaken. The monitoring programme will be extended to include the impacts of the proposed ADF.</p> <p>Tania Oosthuizen, Zitholele Consulting</p>
1.5. Gert Sibande District Municipality (GSDM)				
1.	<p>GSDM has raised the following matters of concern for them:</p> <ul style="list-style-type: none"> • The correct starting date and effectiveness of the RO plant on the PS. • Eskom does not inspire confidence that they will be able to manage the new return water dams effectively. De Jager's pan is overflowing, even while the RO plant is working. • Eskom's inability to effectively manage the water level in De Jager's, indicates that Eskom will also not be able to effectively manage and maintain any new dams. The new proposed dam is situated close to a wetland, and if the return water in the new facility overflows, it could lead to severe environmental pollution. • GSDM recommend that Eskom make available accurate information and data regarding the commencement and effectiveness of the RO plant. 	MPOFU, Wisdom Senior Manager: Planning and Economic Development GSDM	Letter dated 24 April 2013, GSDM ref 11 September 2013.	<p>The Zitholele project director acknowledged the comments made and issues raised. The letter was forwarded to Eskom for comment.</p> <p>Zitholele, agrees with the recommendation made by GSDM, the data needs to be made available to the public.</p> <p>Warren Kok, EAP</p>

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1.6. South African National Biodiversity Institute (SANBI)				
1.	<p>Please note that SANBI only participates in applications for Environmental Authorization as an I&AP if the application is for a development on a SANBI property or a property adjacent to a SANBI property, or if the application would impact on an area that has been highlighted as a priority implementation areas within one of SANBI;s Bioregional Programs.</p> <p>SANBI thus kindly declines to participate in this application as an I&AP at this point in time.</p>	<p>MANUEL, J Deputy Director: Biodiversity Planning and Policy Advice SANBI</p>	<p>Letter: 05 November 2014</p>	<p>Note is taken that SANBI will not participate as an I&AP for this proposed project. However, SANBI will remain on the project database to ensure that they receive project related information as and when available.</p> <p>Nicolene Venter, Public Participation Practitioner</p> <p>The comment is noted. The biodiversity specialists made use of the available resources, including those from SANBI. Refer to Appendix G – I for the biodiversity related specialist studies</p> <p>Tania Oosthuizen, EAP, Zitholele Consulting</p>
2.	<p>SANBI is a public entity mandated to act in an advisory or consultative capacity on matters relating to biodiversity to the Department of Environmental Affairs (i.e. the “competent authority”). The Department and its provincial counterparts are welcome to engage SANBI for advice and/or comment on specific matters related to biodiversity information relevant to this application, if such input is required. Such advice or comment is not equivalent, however, to the comment required as per the NEMA regulations from commenting authorities. SANBI restricts its comment to the accuracy and relevance of the biodiversity information that should inform the Environmental Assessment.</p>			<p>The comment is noted. The biodiversity specialists made use of the available resources, including those from SANBI. Refer to Appendix G – I for the biodiversity related specialist studies</p> <p>Tania Oosthuizen, EAP, Zitholele Consulting</p>
3.	<p>SANBI thus also declines to participate as a commenting authority in this application. For comment on the biodiversity impacts of the</p>			<p>We can confirm that the provincial conservation agency, DETEA, who is also the competent authority for this proposed</p>

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
	development, please consult the relevant provincial conservation agency.			project, are part of the consultation process. Nicolene Venter, Public Participation Practitioner
4.	I also encourage you to visit our web portal http://biodiversityadvisor.sanbi.org for free access to special biodiversity information relevant for the land use planning and decision making processes.			The biodiversity specialists made use of the available resources, including those from SANBI. Refer to Appendix G – I for the biodiversity related specialist studies Tania Oosthuizen, EAP, Zitholele Consulting
5.	Referencing the special biodiversity resources found on the Biodiversity Advisor in the early stages of project development can support informed planning and decision making while helping to timeously “iron out” obstacles that might otherwise result in delays and additional costs to the project proponent. Such a proactive approach can:			The biodiversity specialists made use of the available resources, including those from SANBI. Refer to Appendix G – I for the biodiversity related specialist studies Tania Oosthuizen, EAP, Zitholele Consulting
6.	<ul style="list-style-type: none"> Show the decision-making authority that potential conflict between biodiversity priorities and other land uses has been identified and resolved by well-informed project planning; 			
7.	<ul style="list-style-type: none"> Allow the proponent to take an informed decision about the biodiversity (and administrative and, by implication, financial) risks of proceeding with a particular project; and 			
8.	<ul style="list-style-type: none"> Identify the scope, type and intensity of environmental assessment that is likely to be required if an application were to proceed. 			
9.	This approach also supports best practice in environmental assessment and planning by:			
9.1.	<ul style="list-style-type: none"> Ensuring that a project is consistent with the “Duty of Care” principle (i.e. that the 			

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
	project proponent has taken reasonable measures to prevent significant degradation of the environment);			
9.2.	<ul style="list-style-type: none"> Emphasizing the fundamental role of alternatives in selecting the best practicable environmental option; 			
9.3.	<ul style="list-style-type: none"> Giving effect to the mitigation hierarchy, i.e. the sequential avoidance, minimizing, mitigating and remedying of impacts that may result in loss of biodiversity or disturbance to ecosystems; and 			
9.4.	<ul style="list-style-type: none"> Supporting the principle that environmental management must pay specific attention to planning procedures pertaining to sensitive, vulnerable, highly dynamic or stressed ecosystems. 			
2. ENVIRONMENTAL PROCESSES				
1.	<p>May stakeholders comment at any time during the environmental impact assessment (EIA)? We had previous experiences with EIAs when we were not given the opportunity to comment.</p>	Mr Johan Celliers, Weltevreden, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	<p>Yes, stakeholders may comment anytime during the whole process and these comments will become part of the various reports used in the EIA process. All comments will be recorded in an Issues and Response Report (IRR) which will be submitted to the DEA.</p> <p>EAP</p>
2.	<p>Once a decision has been taken, to whom must we address our appeal?</p>		<p>Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011</p> <p>and</p> <p>Public meeting during DEIR public review</p>	<p>The appeal in this case must be address to the Department of Environmental Affairs.</p> <p>EAP</p>

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
			period, Indawo Game Lodge, Ermelo on 17 April 2013	
3.	It was asked whether there are any other environmental aspects that the attendees believed should have been assessed other than what was presented	Mr Warren Kock Zitholele Consulting	Landowner Focus Group Meeting 4 June 2014 Hendrina	It was confirmed that all associated environmental impacts in terms of the Ash Disposal Facility (ADF) have been identified and assessed. Mr Karel Smit (Smit & Van Wyk Attorneys) & Mr Chris du Toit (Landowner)
4.	It was commented that it is an advantage that the Environmental Assessment Practitioner (EAP) is independent as the Department of Environmental Affairs (DEA) will be able to make an informed decision	Mr Karel Smit Smit & Van Wyk Attorneys		The comment was noted. Warren Kok, EAP
5.	It was added to the above-mentioned comment that it is notable that Zitholele Consulting had done their homework regarding the environmental impacts associated with the ADF	Mr Chris du Toit Landowner: Uitkomst		
6.	It was commented that there could be a legal risk which is more associated with the negotiations than the EIA. A cadastral map was requested indicating Mr Du Toit's property and how the proposed ADF will fit onto portion 18 of the farm.	Mr Karel Smit Smit & Van Wyk Attorneys		Reference was made to the cadastral map that is included in the Draft Environmental Impact Assessment Report (DEIR) as Figure 7-3 (Landowner map). Warren Kok, EAP
7.	The project team was that, as discussed with Mr Du Toit that they fully understand Zitholele's independency, the compilation of the environmental report and that in the end the Department will make a decision. KS said that he and CdT are not experts in this field, and it would be after the Environmental Authorisation has been granted, that they and Eskom will start their discussions and			It was confirmed that the assumption regarding the date of the Environmental Authorisation is correct. Warren Kok, EAP

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
	negotiations. The timelines as provided by WK above can be summarised that by the end of October / November 2013 the Environmental Authorisation would be issued by the DEA.			
8.	The project team was informed that from an environmental point of view, that he and Mr Du Toit does not have any noteworthy comments to submit on the DEIR and the environmental studies. They will await the DEA's decision and believe that at that stage Eskom will approach them regarding negotiations and compensation for Portion 18 of the farm for the ADF.			Zitholele value local knowledge i.e. mining rights, mining activities in the area, etc. Warren Kok, EAP
3. ALTERNATIVE SITES				
1.	Alternatives 2 and 3 of the proposed ash disposal facility consist of highly productive soil. Soya and maize are planted and these lands produce some of the highest yields per hectare in the district year after year. Alternative 3 lies on a hill. Alternative 1 looks like the best option. This is the most productive part of my farm and I will oppose any development on Alternatives 2 and 3.	Mr Lood de Jager, Uitkomst, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Acknowledged that site 1 is the preferred stakeholder alternative. EAP
2.	Alternative 3 will pose other problems as well, because a water pipeline towards Kriel runs through it and a 400kV transmission line as well as the Richards Bay railway line.		Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011 and Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17	Acknowledge, will study during our impact phase. EAP

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
			April 2013	
3.	What will happen if you cannot find a site for a new ash disposal facility?	Mr Kenneth Venter, Moreson, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Kuzelj said then Camden Power Station will have to shut down once the existing ash facility is full. EAP
4.	Common sense should be used in this process to determine which alternative will be used.	Mr Lood de Jager, Uitkomst, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Noted. EAP
5.	What about old underground mines? I think alternative 4 is on top of an old mine.	Mr Jan van Staden, Uitkomst, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Babst said an ash disposal facility may not be built on top of an old mine. This would need to be confirmed. Post-meeting note: An ash disposal facility cannot be established on an old mining area due to stability problems and for this technical aspect the establishment of an ash disposal facility on an old mining area will not be investigated.
6.	There are mineral rights on my farm which could influence alternative 3		Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Kuzelj said Eskom could look at the possibility to buy out a mining right once a preferred site has been identified and recommended by the EIA process.
7.	Alternative 1 looks like the best option for the ash disposal facility. Alternative 2 and 3 are highly productive agricultural land that can provide food for many years to come. There are also old graves on 2 and 3 that have been there for many years. Eskom transmission lines as well a water pipeline are also running through 2 and 3 that will be very costly to move.	Mr Johan Celliers, Chairperson, TLU, Ermelo	Final Scoping Report Comment Form and Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	Acknowledged. The preferred site will be announced after the impact phase.

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
	A major concern is the potential pollution problems of a development of this scale, irrespective of where it is constructed. What will be very important is proper maintenance and management of this ash disposal facility to prevent further pollution of surface water such as what happened between May and August 2011. This cannot happen again.			
8.	The proximity of the Richards Bay railway line to site 3, should serve as a basis to fatally flaw the site.	Mrs Tshilidzi Masalesa, Transnet Environmental Department, Mpumalanga.	Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	The facilitator acknowledged Mrs Masalesa's comment and concern, and said that the issue will be further investigated. Especially in regards to regulations on to work with Railways, and in particular keystone railways.
4. BIOPHYSICAL COMMENTS				
4.1. Heritage				
1.	There are San rock paintings and figures near the area of the alternatives.	Mr Kenneth Venter, Moreson, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	The facilitator said the specialist studies have not yet been undertaken and that a heritage assessment will be done and this person will contact Mr Venter to discuss these paintings. Specialist studies done for the EIR phase found no heritage or archaeological sites of importance on or around the proposed sites.
4.2. Water-related matters				
1.	Waste water from the existing ash dam flows into the nearby stream.	Mr Sam Hallatt, Postnet Suite 495, Private Bag X 9013, Ermelo, 2350	Letter on 3 June 2011 in response to the announcement and Public meeting during	The reverse osmosis plant has been charged, drawing water from De Jagers Pan, and is now running at full capacity at 3.5ML per 24hr day. Due to the extreme high level of the De Jagers Pan, a gradual slow decrease in the De Jagers Pan level over the next few months will be observed.

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
			DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	
2.	The pan (De Jagers pan) next to the ash disposal facility started flooding last year and all this contaminated water is running east polluting the water resources of Messrs Sam Hallett and Leon Strydom as well as other neighbours. This water is even running through Camden Power Station.	Mr Leon Strydom, Witpunt, and Mr Johan Cilliers, Weltevreden, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Acknowledged. Surfaced and ground water will be studied during the Impact phase.
3.	When I was young we caught fish in the pan (De Jagers pan) next to the existing ash disposal facility. There was still fish in the pan until a few years ago, but pollution from the ash disposal facility has killed everything in the pan.	Mr Kenneth Venter, Moreson, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Acknowledged. The surface and groundwater in the area will be studied during the Impact phase.
4.	Will the new ash disposal facility be lined? What will happen to rain water? Will it not leak into the surrounding soil?	Mr Johan Cilliers, Weltevreden, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011 and Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	Yes, the whole proposed facility of 120 ha will be lined to prevent leakages. There will be a water recovery dam where the excess water and rain water will be stored. This water will be used to transport the ash to the disposal facility.
5.	Where do you measure water quality and what about the sewage problem in Camden Village?	Mr Kenneth Venter, Moreson, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011 and	Mr Kuzelj said water samples are taken all around the power station and especially towards the east, because that is the natural flow of water in this area. This groundwater monitoring information is sent to the Department of Water Affairs, as

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
			Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	is required by law. Discussions have been held regarding the sewage problem in Camden Village. Camden Power Station also treats the sewage of the military base next to it. Camden power station has ISO accreditation, which ensures that they must have an Environmental Management System in place. Stakeholders and community members can log a complaint, and the EMS will stipulate specific protocols on how the power station has to work with it. Once the complaint has been logged Eskom then needs to source the appropriate representative internally to respond to and address the complaint.
6.	I am also a member of an Ermelo conservation organisation. Will it be possible for us to study your groundwater data?	Mr Johan Cilliers, Weltevreden, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Thabiso Mpongo, environmental officer at the Camden Power Station, said he can be contacted for this information.
7.	The quality of the water in the De Jagers pan has deteriorated due to seepage from the ash disposal facility. What happened?		Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011 and Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	Mr Kuzelj said the ash disposal facility receives three times more ash than before due to the low quality of coal being burnt. This has caused the facility to expand very fast, which is the reason why another ash disposal facility is needed. Another problem was that the whole ash transport system was upgraded while the power station was in full operation. More ash is also being deposited, because the scrubbers in the stacks capture ash that would have polluted the atmosphere.
8.	Where does Camden Power Station get its clean water from?		Open house to discuss Draft Scoping Report, Indawo Game Lodge,	Mr Kuzelj said it comes from Jericho Dam. This water is used for cooling and a small quantity is used for 'ashing' – where water is

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
			Ermelo on 27 July 2011	used to transport the ash to the ash disposal facility.
9.	What pollutants can be found in De Jagers pan?		Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Kuzlej said tests have shown sulphates, nitrates, sodium, chlorine, some magnesium and a little boron to be present in the pan.
10.	Will you take the flood lines into consideration for the new ash facility?	Mr Kenneth Venter, Moreson, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Warren Kok said the 1:50 and 1:100 flood lines will be studied during the EIA.
4.3. Air Pollution				
1.	Dust suppression must be done. People suffering from asthma live within 5 km of the Camden power station.	Mr Kenneth Venter, Farmer, PO Box 903 Ermelo, 2350	Fax on 19 May 2011 and Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	An irrigation system has been considered previously but was not implemented due to the ash dam already being saturated with large amounts of water used for ashing and dusting. However, a dust suppression system on the sides of the ash dam is to be installed in the very near future.
2.	The ash of the current ash facility blows onto our thatched roof buildings.	Mr Frik du Plooy, Indawo Game Farm, PO Box 2825, Ermelo, 2350	Telephonic comment on 11 May 2011	
3.	The power station has a direct influence on my farm and farming activities due to the dust from the ash facility, which is a problem.	Mr Sam Hallatt, Postnet Suite 495. Private Bag X 9013, Ermelo, 2350	Letter on 3 June 2011 in response to the announcement and Public meeting during DEIR public review period, Indawo Game	

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
			Lodge, Ermelo on 17 April 2013	
4.	How many tons of sulphates are emitted by Camden Power Station? Do you monitor the air quality at the station?	Mr Johan Cilliers, Weltevreden, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Kuzelj said the stacks (chimneys) of the power station are so high that their emissions cannot be monitored at the station itself. The air quality monitors do, however, pick up emissions from Sasol if the wind blows in the right direction.
5.	What about the dust problem?	Mr Kenneth Venter, Moreson, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011 and Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	Mr Kuzelj said dust from the existing ash disposal facility is a problem to neighbours. The dust does not come from the top, but the sides of the ash dump. A short-term solution is to put soil on the sides to prevent the dust from blowing away. A 4,5 km sprinkler system has been constructed for dust-suppression. The issue has been escalated to the Camden Environmental Division. Current dust management techniques will be reviewed.
6.	The value of a property will decrease if it is suddenly next to an ash disposal facility. Who will compensate a farmer who suddenly has a decrease in the annual yield per hectare due to dust from the ash facility?	Mr Johannes Klopper, Mooiplaats, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Kok said this will be investigated during the specialist studies. The impact on crop yield is dependent on the chemical composition of the dust, as well as the frequency of exposure. However, it is fair to conclude that there will be an impact on crop yield and crop quality. Airshed Planning Professionals

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
5. SOCIO-ECONOMIC COMMENTS				
5.1. Social				
1.	Will there be work for local contractors on this project?	Mr Kenneth Venter, Moreson, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Kuzelj said it is Eskom policy to use local contractors if the relevant skills are available.
2.	The extension and expansion of the ash facilities are not supported. The Proposed Site 2 and 3 neighbours my property, and is too close to my farm. We are developing accommodation facilities on the farm, and the ash facility will have a negative impact on it. Another comment is that Eskom needs to investigate possible alternative uses for the ash, for example brick manufacturing, charcoal, etc.	Mr Mandla Ndlovu, Witpunt, Ermelo	Emails dated: 24 April and 25 April 2013	Warren Kok the EAP on the project responded as follows: Many thanks for your comments, which will be appropriately registered in the Comments Response Report and reported as part of the official record of the project. In response to your enquiry "Why you don't employ other measures to reduce ash waste like to use it to make other products/material,i.e Bricks, Charcoal,etc" I can respond by indicating that Eskom do have initiatives ongoing for the investigation and implementation of projects for reuse of the ash generated at their power stations. Unfortunately the volume of ash is just too high to dispose of all of it in this manner. Currently Eskom manage to re-purpose about 5% of the ash generated at power stations across South Africa. Thus ash disposal / storage facilities will still be required.
3.	It was enquired from Mr Smit and Mr Du Toit whether they are aware of any land claims against the property, and confirm that Eskom will confirm the information as well.	Ms Goody Ntuli Eskom	Landowner Focus Group Meeting 4 June 2014 Hendrina	As far as they are aware, there are no formal land claims lodged against the property. Mr Karel Smit, Smit & Van Wyk

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
				Attorneys
4.	The project team was informed that there are three families living on the farm who they know and accept their right in terms of the Extension of Security of Tenure Act (ESTA). They do not stay on Portion 18 and believe this would not be a concern regarding the EIA preferred site.	Mr Karel Smit Smit & Van Wyk Attorneys		Should these families live within 500m of the proposed ADF, it is important to note as they could be impacted by the dust fall out from ADF. He confirmed that these families will have to be consulted with and that Eskom will undertake the consultation process. Warren Kok, EAP
5.	It was further mentioned that the families have been living on the farm for the last 13 years and they are all pensioners.	Mr Chris du Toit Landowner: Uitkomst		
6.	It was enquired whether there are any workers working for CdT on the farm.	Ms Goody Ntuli Eskom		
5.2. Land Use				
1.	How do you work out compensation for a land owner whose property is needed?	Mr Kenneth Venter, Moreson, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011 and Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	Mr Kuzelj said accredited assessors are used to calculate the price of a property. Various factors will be taken into consideration such as improvements done to a property and a final price will be negotiated with the land owner. The facilitator added that Eskom is not interested in expropriating land from anybody and will always try to negotiate a result that is beneficial to all parties.
2.	What happens to the land owner who suddenly gets an ash disposal facility next to	Mr Johannes Klopper, Mooiplaats, Ermelo	Open house to discuss Draft	Mr Kok said the specialist studies will also look at the effect of the facility on

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
	him? What will happen to his ground water resources? Does he get compensated?		Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	neighbours as well as groundwater. The facilitator added that neighbours do not get compensated by Eskom.
3.	<p>Ons wil net weer onder julle aandag bring dat ons by Mpumalanga Landbou besorg is oor die nadelige effek wat Eskomaktiwiteite en die totale steenkoolbedryf op die omgewing en op die volhoubare voedselproduksie deur die landbousektor het.</p> <p>Ons het begrip vir die geweldige druk op Eskom vir die voorsiening van krag aan die land. Ons versoek egter dat daar nie nog van ons hoë potensiaal landbougrond in beslag geneem moet word vir die uitbreiding van die veydering van as en gepaardgaande uitbreiding van infrastruktuur nie.</p> <p>Ons hoop regtig dat die bestaande spasie tot Eskom se beskikking eers optimaal benut sal word alvorens die aankoop van nuwe grond oorweeg sal word. Die bestuur van as moet in elk geval op so n hoë standard wees dat die negatiewe impak daarvan op die ekologie minimaal sal wees.</p> <p>Die ineenstorting van 'n steenkoolsilo die afgelope naweek by Majuba kragstasie het die vraag opnuut weer laat ontstaan of Eskom daartoe instaat is om die kragentrales behoorlik in stand te hou.</p> <p>Dit maak die publiek ook bekommerd dat die afvalbestuur waarskynlik ook nie op standard is nie. Daar kan dus met reg kommer bestaan oor die vermoë van Eskom om energie in balans met die omgewing en met volhoubare</p>	DAVEL, Robert Assistant Manager Mpumalanga Agriculture	Email: 03 November 2014	<p>Email acknowledged and informed Mr Davel that a copy of the CRR will be sent to him with responses to the concerns raised. Nicolene Venter, Public Participation Practitioner (03 November 2014)</p> <p>The EIA process is undertaken to select a feasible site for the ADF which will have the least impact on the total environment.</p> <p>The preferred site (Site 1) is situated directly adjacent to the existing ADF, thereby keeping the impact footprint as small as possible.</p> <p>There are currently no farming activities by the land owner taking place on Site 1. Crop cultivation takes place on the adjacent farms, but no commercial cattle farming in the area immediately surrounding the proposed new ADF.</p> <p>Tania Oosthuizen, EAP, Zitholele Consulting</p> <p><i>Eskom Camden power station holds certification of ISP 14001 EMS, which ensures that waste, among other impacts, is properly managed, in line with recognised legislation. Furthermore, Eskom operations are managed in terms of Zero</i></p>

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
	<p>voedselproduksie te kan verskaf.</p> <p>Mpumalanga Landbou versoek opnuut dat Eskom hulle verantwoordelikheid t.o.v. die bewaring van die omgewing en die landbousektor gelyklopend met hulle opdrag om energie te verskaf sal nakom.</p> <p>Translation: We would like to bring to your attention that Mpumalanga Agriculture's concern about the adverse effect that Eskom's activities and the total coal industry have on the environment and the sustainable food production of the agricultural sector.</p> <p>We understand the tremendous pressure that Eskom is under to supply power to the country. We request, however, that no more of high potential agricultural land should be used for the expansion of the ash disposal facilities and its associated infrastructure.</p> <p>We really hope that the existing space to Eskom's disposal would be used to its maximized before purchasing new land are being considered. Management of the ADFs must be of such a high standard that the negative impact on the ecology would be minimal.</p> <p>With the collapse of a coal silo over the weekend at Majuba power station, the question is asked anew of whether Eskom are able to properly maintain their power plants to maintain.</p> <p>It makes the public also concerned that the waste management probably is not up to</p>			<p>Liquid Effluent Discharge (ZLED)</p> <p>The issue of the challenges at Majuba power station can be taken up with Majuba power station. Further, the issue at Majuba power station is not a waste issue.</p> <p>Tobile Bokwe, Manager: SEA/EIA Centre of Excellence, Eskom</p>

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
	<p>standard. There can thus be a true full concern about Eskom's ability of providing energy in balance with the environment and the sustainable food.</p> <p>Mpumalanga Agricultural request again that Eskom regarding their responsibility in terms of the preservation of the environment and the agricultural sector concurrently with their mission to provide energy.</p>			
5.3. Economics				
1.	<p>We request that an additional study be done with specific focus on the long term economic and agronomic impact on landowners as well as the loss in food security. This study should be done by an expert with an agricultural background.</p> <p>Our motivation for this study is as follows: The viewpoint of the EIA that since agricultural land is no longer in its natural state, then it may well be converted into an ash disposal facility is wrong. With this I do not want to reduce the importance of natural grazing. The agricultural land in question has a high yield and we have a growing population in South Africa. The land in question has been planted for over 50 years and continues to produce deliver a high yield due to good soil management by the farmers.</p> <p>No compensation paid out to a farmer will make up for the long term loss of production. The current owners are only custodians of the land and it will be needed by future</p>	Mr Johan Cilliers, Environmental Management, TLU, Ermelo	<p>Email on 23 February 2012</p> <p>and</p> <p>Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013</p>	<p>The EAP considered the need for such a study and concluded that there was no need for the study because the sites are uniformly the same. The study will not help to differentiate one site from another.</p> <p>The impact on soils and land capability was taken into account as part of the Biophysical specialist assessment.</p> <p>Therefore, the only mitigation measure possible to reduce this impact is to place the site off of deep arable soils, and to reduce the footprint of the site as far as possible. It was determined in the Biophysical specialist study that it is impossible not to impact arable soils at all, as each of the sites have arable soils present. Site 1 was recommended as it has the smallest area, and smallest impact on arable soils.</p>

	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE(S)	RESPONSE(S)
	generations to produce food. There is the example of a piece of land in Rothamstead, England that has been producing wheat every single year since 1843.			
6. OTHER ISSUES				
1.	Who supplies Camden Power Station with coal?	Mr Johannes Klopper, Mooiplaats, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Anthony Kuzelj, Camden Station Manager, said coal is currently sourced from eight different suppliers. Some of the coal is supplied from as far as 130 km. Eskom must source coal that is economically viable. Camden was supplied by coal from neighbouring mines before it closed down. Once it was started up again, it was not possible to get a contract with one of the neighbouring mines for a variety of reasons. Eskom's head office procures contracts with coal suppliers.
2.	Is all your coal transported by road?	Mr Johan Cilliers, Weltevreden, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011 and Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	Mr Kuzelj said Camden needs 4, 6 million tons of coal per year of which about 50 % is transported by rail. Eskom has a policy to reduce coal trucks on the road and is looking at alternatives to reduce trucks. One of the options that are being investigated is a conveyor belt to transport coal to the power station.
3.	Why do you transport the coal from so far away? You can buy it next to you from Coal for Africa.	Mr Johannes Klopper, Mooiplaats, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Kuzelj said Eskom buys coal with specific specifications and Eskom cannot buy coal that is too expensive. All the Camden coal contracts are short term

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				contracts and long terms contracts are being investigated. Most of the coal mined around Camden is being exported.
4.	Does Eskom know about the De Jagers pan overflowing into water resources towards the east? What caused the overflow?	Mr Johannes Klopper, Mooiplaats, Ermelo and Mr Johan Cilliers, Weltevreden, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011 and Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	Mr Kuzelj said Eskom is aware of this “overflow” problem towards the east of the De Jagers pan. Eskom built a water treatment plant (using reverse osmosis technology) next to De Jagers pan and the ash disposal facility to purify waste water. This plant has been in operation since the beginning of July 2011 and it will be another two months before the seepage will be under control. The plant cost R38 million to construct and took two years to construct. The main problem was that more water was being pumped from the current ash disposal facility into De Jagers pan and too little water was being pumped out. Eskom has solved this problem by balancing the water being extracted from the pan with the water being pumped back to the pan.
5.	Who uses the 1600MW generated by Camden?	Mr Johannes Klopper, Mooiplaats, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Kuzelj said it is not possible to give an exact allocation, because Camden power station (like all other stations) feeds the 1600 MW into Eskom’s national grid that distributes the electricity all over southern Africa.
6.	Can the ash be used for something?	Mr Johannes Klopper, Mooiplaats, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Kuzelj said ash is used: <ul style="list-style-type: none"> • in cement; • as a filler for rubber; • in bricks • as a filler in toothpaste; and

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		Mr Mandla Ndlovu, Witpunt, Ermelo	and Emails dated: 24 April and 25 April 2013	<ul style="list-style-type: none"> as a substitute for lime by maize farmers. Camden Power Station will be advertising an open tender process later in the year to start selling some of the ash. The problem is that very low volumes are sold and the buyer must use it close to the power station or else the transportation costs do not make it economically viable. <p>Post meeting note: Eskom has contracted a waste specialist who is investigating other responsible uses of ash.</p>
7.	Can this facility be built on an incline?	Mr Johan Cilliers, Weltevreden, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Mr Kobus Babst from Eskom said it can be built on an incline with no seepage taking place, because the incline will be taken into consideration during the planning and construction phases.
8.	Will this not interfere with the proposed 400kV Camden-Theta line? How far is the EIA on that project?	Mr Johannes Klopper, Mooiplaats, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	This ash facility will not impact on the Camden-Theta line. The Final Environmental Impact Report of this process is currently with the Department of Environmental Affairs awaiting decision.
9.	It is very difficult to download the Eskom Vendor List.	Johan van der Meulen, Adrianople, Ermelo	Open house to discuss Draft Scoping Report, Indawo Game Lodge, Ermelo on 27 July 2011	Point noted and will forward to Eskom for their attention.
10.	Is there a particular reason why Eskom chooses to use coal of a lower quality? If coal of a better quality were used, there would have been no need for the new ash disposal facility.	Mr Johan Cilliers, Weltevreden, Ermelo, Chairperson, TLU.	Public meeting during DEIR public review period, Indawo Game Lodge, Ermelo on 17 April 2013	Comment from Eskom required.
11.	The project team was informed that there are	Mr Karel Smit	Landowner Focus Group	The mining group's activity and

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	some construction activities taking place in the area, but seems to be quite a distance away from Site 1. He said that it is important for the team to note that a mining group is utilising a portion of the farm to park vehicles and a site office has been established. He enquired whether this could impact the footprint of the ADF	Smit & Van Wyk Attorneys	Meeting 4 June 2014 Hendrina	infrastructure as mentioned, would not be a concern. Warren Kok, EAP
12.	The project team was informed that when he and Mr Du Toit visited the farm they were met by the mining group's legal representatives and commented that it is interesting that the farm Uitkomst has no registered mining rights or being undermined.			<p>The project went through an extensive due diligence process i.e. looking at conditions on Site 1 and from an environmental point of view the team will be going forward with a strong case recommending Site 1 to the DEA.</p> <p>The process forward after the discussions held with Mr Du Toit and Mr Smit is to:</p> <ul style="list-style-type: none"> • The review period for the DEIR ends on Friday 07 June 2013; • Update the Final Environmental Impact Assessment Report (FEIR) with comments received on the DEIR from interested and/or affected parties, including that minuted at the meeting; • It is envisaged that the FEIR will be updated and submitted to the DEA by Friday 14 June 2013; • The FEIR will be made available for public review for a 20 day review and comment period; • After approximately 105 days (from Friday 14 June 2013) the DEA will make a decision regarding the EIA and the Waste Management License Application;

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				<p>The Environmental Authorisation will then be put out for the Appeal Process. Warren Kok, EAP</p>
13.	<p>The project team was informed that extensive prospecting had taken place over the past few years but the results had shown that the coal quality is very low and not worth mining.</p>	<p>Mr Chris du Toit Landowner: Uitkomst</p>		<p>In terms of the Geology Report the area identified for the ADF is not ideal for mining. Warren Kok, EAP</p> <p>Although the Geology Report indicate the coal reserve as such, that the Department of Mineral Resources (DMR) might differ. She reiterated that the team needs to obtain confirmation from the DMR regarding mining rights. Goody Ntuli, Eskom</p> <p>It was confirmed that Eskom will obtain the requested information from the DMR. Warren Kok, EAP</p>