

**Environmental Impact Assessment for the proposed construction of two coal-fired power stations  
(Coal 3 and 4) in the Waterberg area, Limpopo (DEAT Ref No.12/12/20/1255)**

**Issues and Response Report**

**Version 1**

This report (version 1) captures the issues raised by stakeholders during the announcement in the Scoping Phase towards the proposed construction of two coal-fired power stations in the Waterberg area (referred to as Coal 3 and 4). As part of the announcement a Background Information Document (BID) with a comments and registration sheet was distributed, an advertisement was placed in various newspapers (September 2008) and site notices were put up in the area of the proposed development. Several stakeholders responded to the invitation to raise their concerns and the table below represent those comments. This report also covers issues raised and comments made during focus group meetings that were held with the local, district, provincial and national authorities and landowners and the agricultural sector respectively on 3 and 4 October 2008 (refer to Chapter 5 of the Scoping Report for more details).

This report will be updated as the EIA process unfolds. This report will be appended to the Draft Scoping Report which will be made available for public review. Once the Scoping Report has been finalised it will be submitted to the Department of Environmental Affairs and Tourism (DEAT) for decision-making purposes.

Written submissions of stakeholders are summarised in this report – the full versions of the submissions will also be appended to the Scoping Report.

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Issues related to the following matters are listed:

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	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
<b>A. BIOPHYSICAL ISSUES</b>				
01	Will waste management for this proposed project have an effect on residents?	Ms ZS Mbense, Sandwana Industries, PO Box 11434, Hatfield, 0028	Written submission in September 2008 in response to the BID	No. Eskom has internal waste management procedures and systems. The ash and gypsum will be co-disposed on site at the ash disposal facility, and general waste will be disposed of at a licensed landfill site. Hazardous waste will be transported to an appropriately registered hazardous waste disposal facility (probably to the Holfontein facility in Gauteng).
02	How much waste will be produced?	Ms Meisie Manthata, Lephalale Municipality, Private Bag X136, Lephalale, 0555	Written submission in September 2008 in response to the BID	Estimates per power station: Ash – 6.5 million tonnes per annum Gypsum – 1.7 million tonnes pa General waste – ~300 m <sup>3</sup> /pa Operational General waste – 2200 m <sup>3</sup> /pa Construction phase Hazardous waste - ~300 m <sup>3</sup> /pa Operational General waste – 2200 m <sup>3</sup> /pa construction phase
03	How and where will the waste be disposed of?	Ms Meisie Manthata, Lephalale Municipality, Private Bag X136, Lephalale, 0555	Written submission in September 2008 in response to the BID	Refer to response to A1.
04	Conduct an air quality assessment impact on the surrounding areas before the start of the project and during the project. State the envisaged increase (cumulative) in air pollutants.	Mr Thapelo Mathekga and Mr Steve Makua, Limpopo Department of Economic Development, Environment and Tourism	Written submission in September 2008 in response to the BID	An air quality specialist, Airshed Planning Professionals, has been appointed to undertake an air quality study. See Section 6.2.3 of the Draft Scoping Report (DSR) for the

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		(LEDET), Private Bag X 9484, Polokwane, 0700		specialist Terms of Reference. As per the Regulations, a Plan of Study for EIA (Chapter 7) must be approved by the DEAT and provides the list of specialist studies to be investigated at the EIA phase.
05	Conduct air quality monitoring and modelling.	Mr Thapelo Mathekga and Mr Steve Makua, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in September 2008 in response to the BID	See response to Point A4 above.
06	Conduct an assessment of site alternatives and rate them accordingly. List the criteria used for eliminating other sites.	Mr Steve Makua, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in September 2008 in response to the BID	The site selection process and criteria used have been documented in Chapter 3 of the DSR. The three candidate sites currently under investigation will be comparatively assessed during the EIA process, and two preferred sites selected, based on the environmental, technical and financial considerations.
07	Conduct an assessment of other alternative sources of energy or power as well as criteria used for their elimination.	Mr Steve Makua, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in September 2008 in response to the BID	This EIA will only cover project alternatives, and not strategic alternatives. The Alternatives considered are described in Section 4.3 of the DSR.  Renewable energy in the form of wind and solar energy are not alternatives to the proposed power stations, as these energy sources are not able to supply the base load required by South Africa. Eskom is however developing renewable

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				energy sources such as wind and solar energy, in the western and northern Cape. Assessment of alternative sources of energy is not within the scope of this EIA, it is a strategic decision.
08	Report on the current status of waste (both general and hazardous) management and how the new development will have an impact on it.	Mr Steve Makua, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in September 2008 in response to the BID	See response to Point A1 above. Eskom is responsible for the management of its waste.
09	State the current capacity of sewage systems and how this development will impact on these systems.	Mr Steve Makua, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in September 2008 in response to the BID	As part of the power station, a sewage treatment facility would be developed to handle the waste water from the power station. The power station would not rely on the sewage treatment capacity of Lephalale. As more information on the location of the construction accommodation becomes available, the Municipality will be engaged.
10	State your Water Conservation initiatives and Water Demand Management plans which should include the quality of water.	Mr Steve Makua, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in September 2008 in response to the BID	Eskom will employ dry cooling technology, thus limiting the water use. Eskom will install water treatment plants to treat the water to the required quality.  Eskom also employs a zero liquid effluent discharge policy, which entails extensive recycling and reuse of water at its power stations.
11	State the availability of water in the area, the sources of water that you are going to use and how this development will impact on these resources.	Mr Steve Makua, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in September 2008 in response to the BID	See Section 6.2.2 of the DSR. This will be commented on further in the Environmental Impact Assessment

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				Report (EIR).
12	We encourage you to look at proactive actions to reduce the emission of green house gases.	Mr Steve Makua, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in September 2008 in response to the BID	See Section 4.2 of the DSR regarding the proposed atmospheric emission reduction measures.
13	We must look towards solar and wind energy instead of using coal.	Mr Frederick Jordaan, Portion 5 of Dwars-in-de-weg, PO Box 1438, Wingate Park, 0153	Written submission in October 2008 in response to the BID	While the major energy source will remain coal in the foreseeable future, Eskom plan to reduce coal's current approximately 90% share of the energy mix to below 70% by 2026. To achieve this, a much higher proportion of nuclear energy (currently 4%) is envisaged by 2026, while additional renewable energy options (about 2% by 2026) will also be pursued. Eskom already has environmental and other approvals for a Wind Energy Facility on the West Coast, and a 100 MW Concentrated Solar Thermal plant in the Northern Cape is in the approval stages. In addition, pumped-storage schemes and gas-turbine power stations will be built to meet peak demand, while electricity imports from neighbouring countries (to a maximum of the reserve margin) will also be negotiated.
14	The proposed project will increase mercury (Hg) emissions to the environment. Which measures will be taken to ensure that such emissions does not result in the deterioration of the air quality in the region? The negative impacts that may arise from mercury emissions should be determined.	Mr Calvin Mamabolo, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in October 2008 in response to the BID	The impact of mercury emissions will be assessed in the air quality study. See Section 6.2.3 of the DSR for the specialist Terms of Reference.

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15	As survey of rare and endangered species must be undertaken during the appropriate season and vegetation should be retained through selective clearing.	Mr Calvin Mamabolo, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in October 2008 in response to the BID	A terrestrial fauna and flora specialist study will be undertaken early in 2009. A desktop study will also be done to ensure that any rare and endangered plants not flowering at this time but known to occur in the area will be documented.
16	What technology will be employed to reduce the discharge of pollution into the atmosphere – both gaseous and particulate? In particular will any attention be paid to the implementation of flue-gas desulphurisation to remove sulphur dioxide and oxides of nitrogen?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	As noted in the project description, in Section 4.2 of the DSR, particulate matter (ash) will be removed from the flue gas (via electrostatic precipitators or bag filters) and sent to an ash-dumping facility.  The power stations would include air quality abatement technology to remove oxides of sulphur (SO <sub>x</sub> ) from the flue gases (flue gas desulphurisation), using a lime or limestone sorbent. Oxides of nitrogen (NO <sub>x</sub> ) would be controlled through the installation of low NO <sub>x</sub> burners, which reduce concentrations of NO <sub>x</sub> emitted to the atmosphere.
17	What efforts have been made to reduce the need to generate more pollution in South Africa? It was recently reported that only 20 households in Gauteng had been granted solar water heating subsidy by Eskom. Yet the power stations would not be required at all if greater use was made of this obvious, clean and renewable resource! What percentage of its annual expenditure is Eskom investing on clean power?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	Refer to the point above for an explanation of how pollution from the proposed power stations would be addressed.  With respect to investment in clean energy, Eskom is currently expanding its wind generation capacity as well as investigating a concentrating solar energy project.

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18	Regarding greenhouse gas emissions, what technology will be used for the capture of CO, CO2 and CH4 gasses? Is carbon sequestration or carbon capture being considered by the applicant as a viable option?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	There is currently no commercially proven technology to facilitate carbon capture and sequestration. An Eskom/DEAT Technical Working Group is being established to investigate technical issues around "carbon-capture-ready power plants".
19	What emission monitoring instrumentation will be employed? E.g. continuously recorded differential optical absorption spectroscopy. Will this be independently calibrated and monitored and the results publicly available on-line?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	Eskom currently uses Continuous Emission Monitors at most of its power stations, and the same philosophy would apply to the proposed new power stations. It is standard practice to calibrate these monitors as per requirement and keep the calibration records. This is then verified through audits, e.g. data integrity audits or ISO 14001 audits.
20	Where will the water for cooling and other uses at the power stations come from? What will the impact on water resources be? Both in terms of quantity and quality.	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	DWAF has committed to providing water to the Waterberg area for further development. They are currently conducting a feasibility study for providing water to the area, in particular for additional industrial developments such as power stations, coal to liquids refineries and the additional domestic supply that accompanies this type of development. DWAF will conduct a separate EIA to assess the impacts of its preferred scheme. The

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				potential impacts on groundwater and surface water will be assessed in the E IR.
21	What other technologies have you considered using to minimise the impact on the environment.	Mr Leonard Sole, Lephhalale Local Municipality (LM)	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Eskom is proposing to use super critical technology (as opposed to current installed fleet which is sub-critical) for the new power stations. This means better efficiency (less coal used to generate the same amount of electricity) Furthermore, alternative cleaner technology options like nuclear power, wind farms and solar energy are also being investigated and implemented.
22	What will the water use be of the new power station, and what will be done towards water conservation?	Mr Richard Tredway, Waterberg District Municipality (DM)	Comments during the authority focus group meeting, 3 October at Machauka Lodge	The power stations will each need about 12 - 15 million cubic metres (m <sup>3</sup> ) of water per year. Eskom has reduced its water use considerably over the years. The older generation power stations need 1.5 litres of water to generate one kilowatt (kW) hour while the new generation power stations such as the ones proposed need around 0.35 litres per kW hour.
23	Have you considered the wind direction in your site selection process?	Mr Leonard Sole, Lephhalale LM	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Yes the wind direction was considered during the site selection process and it will again be investigated in the air quality specialist study during the impact assessment phase.
24	Is there enough water to support another two power stations and its associated infrastructure and township?	Mr Leonard Sole, Lephhalale LM and Cllr Fanie Modimola of	Comments during the authority focus group meeting, 3 October at	Mr Werner Comrie representing the DWAF national office noted that DWAF is busy with a pre-feasibility

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		Lephalale	Machauka Lodge	study to supply water to the Waterberg region which will be completed in December 2008. The DWAF has made allowance for future developments in their planning, and include 3 more power stations and two Coal To Liquid (CTL) facilities as well as associated infrastructure to support these developments. The DWAF is confident that there will be enough water for the proposed developments
25	Will the proposed ash dumps be rehabilitated?	Ms Meisie Manthata Lephalale LM	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Yes, it is a continuous rehabilitation process on site, which includes the application of top soil and revegetation of the ash dump.
26	Does Steenbokpan have the infrastructure to handle general or hazardous waste?	Mr Waldo Last, Waterberg DM	Comments during the authority focus group meeting, 3 October at Machauka Lodge	The waste site in Lephalale is not licensed and therefore Matimba power station is planning on taking its general waste to Thabazimbi. Matimba's hazardous waste is disposed of in Gauteng (Holfontein). Eskom proposes to apply for a combined general waste site with temporary hazardous waste storage for the Matimba, Medupi power, and these proposed stations – the EIA process for this is due to commence soon.
27	How does the size of the proposed power stations compare to Matimba power station?	Unknown participant	Comments during the authority focus group meeting, 3 October at Machauka Lodge	It is slightly bigger. Matimba is a 6X665 MW unit station; these are proposed as 6X(800-900) MW units each.

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28	What does super-critical mean? [This was asked in terms of the presentation by Mr Leonard van der Walt on the overview of the proposed project].	Unknown participant	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Super-critical refers to higher steam temperatures and pressures as opposed to Sub-critical. This implies higher efficiencies (less coal used to generate the same amount of electricity).
29	Will the proposed power stations use the same technology as Medupi?	Unknown participant	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	The design work must still take place but it is envisaged that the same technology will be applied. However, refinements for improvement and better efficiency will be implemented wherever possible.
30	Why do you need so many hectares for a power station	Unknown participant	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	The size of sites as shown in the process this far is not a true reflection of the actual required size. Hence, with progress on the EIA process and other processes, the actual size will be determined/ refined. The required size is to ensure that all station components, including associated infrastructure, are covered in a single study. Some activities, e.g. the ash dump site of a power station, grow continuously throughout the life of the station, and hence the process has to allow for 50 years worth of ash – the proposed life of a power station.
<b>B. PROCESS ISSUES</b>				
01	Eskom and the DE AT must work out a comprehensive plan for all the various projects in the area instead of having individual projects for each small section of Eskom's developments.	Mr Willie Brits, Akasia Boerdery, P O Box 92539, Mooikloof, 0059	Written submission in September 2008 in response to the BID	Noted.
02	Applications must be lodged for approval by the Roads Agency Limpopo for any encroachment on provincial roads reserves that might take place during the implementation phase of the project.	Mr M T Shivambu, Roads Agency Limpopo, Private Bag X 9554, Polokwane, 0700	Written submission in September 2008 in response to the BID	The requisite approvals would be applied for at the appropriate time.

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03	We have repeatedly in the past asked for Eskom's long term plan and were always told that the current project is the last. The media even reported that Medupi would be the last coal-fired power station that would be approved in South Africa.	Mr Jaco de Bruyn, PO Box 964, Lephalale, 0555	Email sent on 8 October 2008 and again on 27 October 2008.	Eskom is in the process of setting up the Waterberg Environmental Management Forum, in order to engage and communicate with affected communities. Stakeholders are invited to a meeting on 11 December in Lephalale and Thabazimbi where Eskom's long term electricity plan (generation, transmission and distribution) will be presented and the establishment of the forum discussed. Stakeholders who are interested in the 'bigger picture' are encouraged to attend Eskom's information sharing session.
04	We believe that Eskom and the Department of Environmental Affairs and Tourism (DEAT) take decisions even before the EIA process has started, because no matter what the outcome is of the EIA, their decisions stay the same.	Mr Jaco de Bruyn, PO Box 964, Lephalale, 0555	Email sent on 8 October 2008	Eskom will not implement a project if there are potential environmental fatal flaws and if the activity is not authorized by DEAT or approved by other necessary authorities.
05	How is it possible that the DEAT has already approved the construction of a new power station before all affected landowners have been contacted? What is the purpose of public meetings if the DEAT has already taken a decision?	Mr Jaco de Bruyn, PO Box 964, Lephalale, 0555	Email sent on 8 October 2008	No decision on the proposed project has been made by DEAT, as no submissions have been made on the project. Only after the final EIR is submitted to DEAT will a decision be made. All potentially directly affected landowners were contacted telephonically and by mail and invited to a focus group meeting on 4 October 2008, to discuss the initiation of the EIA process and to gather issues and concerns for inclusion in the EIA process.

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06	Eskom is again only telling half of the story, because at the meeting of 4 October we were told that the two power stations will generate around 10800 MW, yet a little while later, at the same meeting, we were told that South Africa will need around 40 000 MW by 2025. That means an extra seven power stations will have to be built to fulfil that need. When is Eskom going to play open cards and stop telling lies? Share your long term planning with us.	Mr Jaco de Bruyn, PO Box 964, Lephalale, 0555	Email sent on 8 October 2008	Refer to response for B3 above.  The 40 000 MW will be needed by 2025, it was explained to be the estimated additional capacity needed from 2005-2025 based on an electricity growth of 4% (that being based on a projected Accelerated and Shared Growth Initiative growth of 6%). At the same meeting the project funnel was also shared, showing the various options which are being investigated to supply the 40 000 MW (and beyond). Part of the 40 000 MW is already in construction phase. If coal (Coal-n as indicated on the project funnel under opportunity screening phase) remains an option in Eskom's supply mix going forward the Waterberg will be a favourable option for further power stations due to the availability of Coal.

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07	Why don't Eskom share the total scope of its future plans with us? The community is not unwilling to cooperate with Eskom, but Eskom should respect the constitutional rights of the landowners.	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Email sent on 8 October 2008	The development of projects is driven by the need and demand for electricity and the timeliness and the cost to develop the projects. The need drives what capacity must be made available. Eskom then look at the development times and lead times of various alternatives to decide by when which options should be tabled for development. Project specific information can only be shared once the relevant Eskom governance/approval body has made a decision to develop the specific option. Thus, these two proposed stations are tabled now as site specific options.
08	I realise we cannot prevent this project from going ahead, but it is a prerequisite that the constitutional rights of landowners are respected. There is legislation protecting the rights of landowners. When we have another meeting and the necessary respect is shown to the community and landowners, then maybe we could have respect for you.	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Email sent on 8 October 2008	Your comment is noted. Refer to B4.
09	An Eskom meeting does not simply mean we have to listen to what Eskom has to say. We also have something to say.	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Email sent on 8 October 2008	The meetings held over the EIA process are explicitly to communicate the results of the EIA and to encourage interested and affected parties (I&APs) to raise their issues and concerns; All comments are noted and responded to in the Issues and Responses Report.

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10	I ask again that Eskom share its long term planning with us including the following: <ul style="list-style-type: none"> <li>• power stations;</li> <li>• coal mines;</li> <li>• water pipelines</li> <li>• dams</li> <li>• transmissions lines;</li> <li>• town planning; and</li> <li>• roads.</li> </ul>	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Email sent on 8 October 2008	Refer to B6 & B7 above.  Planning with respect to infrastructure such as mines, roads and water pipelines, and town planning are beyond Eskom's scope of control.
11	It is not necessary to threaten us with expropriation. Landowners understand the legislation dealing with expropriation very well.	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Email sent on 8 October 2008	At the focus group meeting on 4 October 2008, Eskom expressly noted that it wanted to negotiate with landowners. Eskom has a policy of applying the "willing buyer, willing seller" concept, and therefore endeavours to purchase land wherever possible in consultation and negotiation with the relevant landowners. Expropriation would only be considered after all other means of negotiation have failed.
12	When we find out so late in the process that Eskom is interested in our farms, we have the problem that nobody else will buy it. This is totally unfair and we will not tolerate this selfish behaviour by Eskom.	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Email sent on 8 October 2008	The proposed candidate sites were identified at the start of the EIA process. Immediately before the project was announced all landowners were contacted telephonically to inform them of the initiation of the EIA process.

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13	If an appeal against the construction of the coal fired power station is lodged, how will it be handled?	Mr Calvin Mamabolo, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in October 2008 in response to the BID	If an appeal is received against an environmental decision, the Minister of Environmental Affairs and Tourism will have to review and rule on the appeal, taking into account any information that is presented. Eskom and the appellant will have the opportunity to respond to the appeal. The Minister then makes a decision on the appeal based on the available information.
14	What measures are in place to ensure that public comments are considered?	Mr Calvin Mamabolo, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in October 2008 in response to the BID	An extensive public participation process has already been initiated (see Chapter 5 of the DSR for more details). Public participation is required in terms of the EIA Regulations (2006) promulgated under the National Environmental Management Act (No. 107 of 1998). This requires, <i>inter alia</i> , that records are kept of all comments received and comments are responded to. Comments are documented and responded to in the form of this IRR. The public have the responsibility of reviewing the IRR and ensuring that their comments have been considered and responded to in an appropriate manner. Also, the public can check through information on the documents during the review period, and during submission to authorities.

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15	Eskom must provide timelines for each phase of the development.	Mr Lou Hoffman, landowner, Farms Haakdoornhoek and Doppersfontein, PO Box 79, Delmas, 2210	Written submission in October 2008 in response to the BID	Potential timelines for implementation of the proposed phases of the projects will be provided after approval by Eskom's board.
16	Landowners need documents with the exact coordinates of the development.	Mr Lou Hoffman, landowner, Farms Haakdoornhoek and Doppersfontein, PO Box 79, Delmas, 2210	Written submission in October 2008 in response to the BID	A map of the candidate sites and a list of the affected farms have been included in the Background Information Document and DSR.
17	Invitations with a proper agenda must be sent out well in advance of meetings	Mr Lou Hoffman, landowner, Farms Haakdoornhoek and Doppersfontein, PO Box 79, Delmas, 2210	Written submission in October 2008 in response to the BID	Once I&APs have indicated to the public participation consultants that they will be attending a meeting they are sent the meeting agenda.
18	Has the DEAT approved the EIA to cover two projects in one EIA process?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	DEAT has been notified of the assessment of the two projects within one EIA. They have noted that they will consider this in the review of the EIA. The EIA Regulations of 21 April 2006 allow for the combination of two projects of the same type within a province. A single EIA process will best assess the additive and cumulative impacts and the proposed siting (location) of the two power stations. This approach would also encourage a more transparent process and allow key stakeholders and I&APs to comment on all available information.

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19	Does the applicant believe that it is complying with its legal obligations both in terms of South African domestic law and international obligations such as the Kyoto Protocol by building 10 800 megawatts of coal fired energy generation?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	Eskom will be required to comply with domestic laws governing various aspects of the project e.g. air quality standards, noise regulations, etc. In terms of South Africa's Kyoto commitments, South Africa, as a Non-Annex 1 country, does not have to make any comparable cuts/reductions, and no commitments to cuts/reductions have been made. Eskom's climate change strategy, in terms of its commitments to South Africa's National Climate Change Response Strategy, is summarized in Section 1.2.5 (d) of the DSR.
20	The applicant is required by law to consider alternatives in the EIA process. What alternatives have been considered for this project? Specifically, have renewable energy sources been thoroughly considered?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	The Alternatives considered are described in Section 4.3 of the DSR, Renewable energy in the form of wind and solar energy are not alternatives to the proposed power stations, as these energy sources are not able to supply the base load required by South Africa. Eskom is however developing renewable energy sources such as wind and solar energy, in the western and northern Cape. Please also see the comment in A7 on this.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
21	Regarding the location of the station, is it really an assessment of alternatives to assess sites within very close proximity (1 or 2 km) of each other? In the case of coal fired stations where the impact on air emissions and water are particularly severe, should other more remote sites not have been carefully considered?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	The motivation for the area within which sites were identified is given in Chapter 3 of the DSR. The potential impacts such as air quality will be assessed in the report and will inform the selection of the preferred sites. There are measures in place to minimise air and other forms of pollution. See responses A10 to A14 and A16 responses on water and air emissions.
22	Is there sufficient infrastructure to provide water and does that form part of this EIA?	Mr Percy Ngidi, Department of Environmental Affairs and Tourism (DEAT)	Comments during the authority focus group meeting, 3 October at Machauka Lodge	As part of the pre-feasibility study an estimation of infrastructural needs are determined. Any future water infrastructure development will undergo normal procedures such as EIAs – these are not included in this specific EIA, but will be administered by DWAF when required. However, Eskom will receive raw water from a point (“X”) to be defined. The water supply infrastructure from the point “X” will be covered in this EIA.
23	Who is responsible for transporting water from one point to another?	Mr Percy Ngidi, DEAT	Comments during the authority focus group meeting, 3 October at Machauka Lodge	The transporting of water is the responsibility of DWAF. Eskom provides DWAF with its planning scenarios and DWAF incorporates these future plans into its planning. DWAF will confirm the availability of sufficient water when the pre-feasibility study has been completed.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
24	Could the DEAT please receive the Draft Scoping Report of this study for commenting by the various relevant divisions within DEAT?	Mr Percy Ngidi, DEAT	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Yes, draft reports will be made available to DEAT.
25	A representative of DWAF reminded all stakeholders about the Lephalale Water Summit held in July 2008 where it was recommended that a task team be established to coordinate integrated planning that will, amongst others, assist with commenting on EIAs. Another recommendation from the summit was that an Environmental Management Framework be compiled to deal with the future planning of Lephalale and the surrounding district.	Ms Allison Matthys, DWAF and Mr Werner Comrie, Ninham Shand on behalf of DWAF	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Lephalale LM responded that interaction with the provincial environmental authorities is taking place to implement the proposed recommendations.
26	The local knowledge of the area and its people is important for the EIA. DEAT would like to see the local circumstances and the proposed impacts to it well reflected in the EIA studies.	Mr Percy Ngidi, DEAT	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Noted.
27	Lephalale LM is currently reviewing its Spatial Development Framework. In terms of proposed development – the proposed developers, its consultants and the District and Local Municipality should be in continuous contact to ensure, for example, that the same information (such as population statistics) is used throughout all the various studies.	Mr Leonard Sole, Lephalale LM	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Noted.
28	Lephalale LM is confident that they can face all challenges ahead that will be provided by the proposed developments, however, the municipality must be included in planning so that proper integration and municipal planning can take place.	Mr Leonard Sole, Lephalale LM	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Noted.
29	The public participation office will contact Lephalale LM and Waterberg DM to get a list of relevant officials in the relevant divisions to become involved in this EIA.	Ms Anelle Odendaal, Zitholele Consulting	Comments during the authority focus group meeting, 3 October at Machauka Lodge	These municipalities undertook to provide this information.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
30	Why is the DEAT not attending this meeting since they are the decision-making authority	Mr Willie Brits, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	A meeting was specifically held with the authorities on 3 October 2008, which was attended by the case officer of the DEAT, Mr Percy Ngidi. The purpose of today's meeting is focused on the comments/concerns and needs of the landowner/ agricultural sector. A public meeting, to which all interested and affected parties will be invited, is planned for November 2008
31	What are you going to do with the third site if the current EIA scope comprises two power stations?	Mr Archie Leitch, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Eskom is proposing buying options on the farms on all three candidate sites and could use the third site for a third power station if demand requires it. The number of stations to be proposed and constructed is informed by Eskom's planning processes.
32	What is Eskom's planning for the next 50 years?	Mr Jaco de Bruyn, PO Box 964, Lephalale, 0555	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Planning has to be very comprehensive is contingent on many variables and Eskom cannot say, at this stage, how many more power stations will be required in the area. The Lephalale coal is however very affordable since open cast mines can be used, which makes the region attractive for additional coal-fired power stations.
33	When was the planning road map (funnel of planning presented by Mr Leonard van der Walt) developed?	Mr Hein Boegman, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	The planning road map is adjusted all the time and changes regularly, responding to changes in demand and supply. The funnel shown is the August 2008 version.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
34	When did Eskom decide to investigate the option of building two power stations ?	Mr Hardus Steenkamp, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Eskom knew that more power stations were needed, but did not know where these will be constructed. Eskom issued a Request For Information (RFI) for offers of coal to supply new coal fired power stations, the RFI closed at the end of March 2008. From the responses on the RFI Eskom then decided that the Waterberg options should be further developed, as a suite of coal suppliers offered coal suitable for power stations in the area.
35	We asked exactly the same questions at our previous meeting with Eskom concerning Eskom's planning with regard to more power stations for this region. We were told no more power stations were planned for the area. We are questioning Eskom's integrity since it appears that either Eskom is not competent to do their planning or information was deliberately withheld a year ago.	Mr Hein Boegman, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
36	We do not want to attend a meeting in another year's time and discuss the next two power stations – we want Eskom to share their long-term planning with us.	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
37	All power stations need transmission lines – why are the proposed transmission lines not included in this EIA – why can Eskom not make that information available to us at this stage?	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	This information is not yet available as the routes for the transmission lines (transmission integration) are still being investigated. The proposed routes of the transmission lines for Coal 3 and 4 would be available early next year.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
38	Last year an EIA was conducted on behalf of Eskom for the transmission lines from Medupi power station and my farm specifically fell outside the planned route – but the route was changed later during the process and I am now an affected party.	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
39	Eskom must plan power stations and its associated transmission lines in the same process and liaise with us on all this information, and not prior to the availability of such information.	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
40	The minutes of previous meetings between Eskom and some of the participants at the meeting were quoted that no further power stations were planned for the area. Eskom therefore lied at these meetings and can not be trusted. Eskom uses euphemisms such as “affected parties”, but withholds facts – all cards are not on the table. Today we would like to know how many more cards Eskom has behind their backs. I have seven or eight examples of previous minutes where Eskom said no future power stations are planned – I cannot believe that Eskom did not know about Coal 3 and Coal 4 a year ago.	Mr Hein Boegman, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
41	Eskom does not have any integrity and the level of mistrust is unbelievable. Landowners are interested in Eskom’s full planning which includes the integration of planning for power stations and transmission lines. When can Eskom make this information available for Coal 3 and Coal 4?	Facilitator	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	The information can be shared as soon as the relevant studies (transmission integration studies) are done. Indications are this information will be available early 2009.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
42	Some stakeholders have spent a lot of money on legal costs in previous processes with Eskom. However, it seems that even the DEAT is in the bag with Eskom since recommendations previously made by external consultants were not followed.	Mr Archie Leitch and other landowners	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
43	Could you please include financial and social studies in the EIA – do not only look at the animals, but also study the impact on people as well. Some of the people have been living here for 70 years and longer and some farms have been in families for generations.	Mr Van Niekerk, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	A social-economic specialist study as well as a social impact assessment will be undertaken as part of the EIA process.
44	We have been living with EIAs for years and have come to the conclusion that EIAs are worth nothing. We understand that the country needs electricity – tell us exactly what Eskom plans – do not lie to us. We feel that Eskom will do exactly what they have done in the past – just ignore us and do what they want to do, regardless of the EIA recommendations.	Mr Johan Burger, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
45	Stakeholders need to understand everything with regards to the proposed projects, i.e where is the coal coming from, where is the water coming from, where the routes of the transmission lines will be, and about all future power stations after Coal 3 and 4.	Mr Jaco du Bruyn, Mr Johan Burger and others.	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
46	Why are another new team of consultants on board? Why are we not meeting with the previous consultants (Margen) that we knew? Is it perhaps that Eskom was not satisfied with their recommendations?	Mr Jaco du Bruyn and Mr Tienie Bamberger	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Eskom appoints consultants via a tender process for every new EIA process. The previous consultants worked on the EIA process for transmission lines and that was a completely different process to this EIA process.
47	Eskom is again lying – Eskom says that it is not in the property market – yet Eskom indicated that they want to buy all farms on the three alternative sites. The question remains – what is it then that Eskom is really planning?	Mr Jaco du Bruyn and other landowners	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
48	The urgent notice sent out to all interested and affected parties about the second power station proposed is an excellent example of Eskom's poor planning.	Mr Hein Boegman, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
49	Someone asked why we were doing another EIA process, when the previous EIA for the transmission lines was just completed recently.	Unknown participant	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	In terms of legislation, an EIA needs to be done for each development that is a so-called "listed activity", hence the EIA process being mentioned was for transmission lines, while this current one is for power stations – EIAs must be done to look at alternatives and to find the best solution from an environmental angle.  The current EIA is for a power station. It must be noted that the EIA for Medupi power lines did include some lines that will be used for one of the proposed power stations, but the exact location of the lines from the station to Delta substation is not known at this stage.
50	Eskom has not followed the recommendations made in the previous EIA about the transmission lines – why will they follow best recommendations now?	Mr Willie Brits, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
51	As landowners we feel we have no inputs into the process – why do you consult us then?	Mr Jaco de Bruyn, PO Box 964, Lephalale, 0555	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
52	<p>Why can the previous EIA studies not be used? Sasol is also now doing a pre-feasibility study – all the EIAs are taking place in the same area. This is ridiculous.</p> <p>All farms and the whole area have been covered by specialists in EIAs – there is no sense in doing it again.</p>	Mr Archie Leitch and Prof Jan Meiring	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	For each new proposed project an EIA is to be conducted – this is a requirement of law. Also, available information on the Sasol development indicates that it does not cover the area under consideration for this project.
53	There is a huge lack of trust between developers (Eskom, Sasol, etc) and the landowners/agricultural sector of the area.	Mr Brett Lawson, Ninham Shand and others	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
54	Several comments were made about the previous EIA conducted by Margen on the route of the transmission lines. It seems that the recommendations that were made by the EIA and independent consultants appointed by the landowners were not considered by the DEAT/ Eskom. This resulted in further mistrust between the landowners and Eskom.	Mr Hardus Steenkamp, Mr Hein Boegman and other landowners	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	DEAT makes an independent decision based on facts presented by Eskom, independent consultants and landowners. The recommendations from studies undertaken by Margen will be applied to the transmission lines as the consultant was doing work for the transmission lines. Ninham Shand is contracted to undertake studies for the two proposed power stations. In general, Eskom will implement all approved recommendations from all these studies, as the recommendations are applicable to the developments.
55	All the proposed alternative sites are on areas off coal. Why can some land (it cannot be more than 4 to 5%) not be forfeited on the coal reserves for the construction of power stations?	Prof Jan Meiring, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	The coal reserves are controlled by the Department of Minerals and Energy, and are considered to be strategic resources. It is therefore a strategic decision to avoid sterilising coal reserves, as they are an important resource for South Africa.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
56	The farms on the alternative sites can also be seen as strategic, because we bring in foreign currency into South Africa through overseas hunters.	Prof Jan Meiring, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
57	Why is site A in such a funny shape?	Mr Marius Burger, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Site A is divided into two portions to ensure that a portion of the site falls within the "area of intersection", which is the area within 30 km of any of the coal resources, and furthermore, to avoid other proposed and existing infrastructure, like transmission lines and the proposed delta substation.
<b>C. SOCIAL ISSUES</b>				
01	Will the standard of living of the affected residents be improved through job creation?	Ms ZS Mbense, Sandlwana Industries, PO Box 11434, Hatfield, 0028	Written submission in September 2008 in response to the BID	This will be investigated in the socio-economic and social impact assessments. The findings of these studies will be reported in the draft and final EIRs.
02	The education system in the area is already very stressed with no visible plans for the future by the Department of Education.	Mr Louis Campbell, Private Bag X205, Lephalale, 0555	Written submission in September 2008 in response to the BID	Noted.
03	What is the availability of skills in the local communities and do you have plans to develop such skills to increase their employability at the power stations.	Mr Steve Makua, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in September 2008 in response to the BID	At other projects of a similar nature, Eskom has undertaken a review of the skills available, and has, in certain instances, commenced with the provision of training and development.
04	We suggest that you do extensive consultation with the local communities such as Marapong and Shongwane as well as NGO's and the farmers.	Mr Steve Makua, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in September 2008 in response to the BID	An intensive public participation process has been initiated and the process to date is described in Chapter 5 of the DSR.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
05	My farm is on the eastern border of Site A and I am very worried about veld fires. Proper care must be taken to prevent fires during the construction process and once the power stations are in operation.	Mr T Sauer, Farm : Enkeldraai, PO Box 69, Dwaalboom, 0319	Telephonic conversation on 14 October 2008	Eskom has a comprehensive Fire Management Plan that must be adhered to at all time, including contractors during construction. Furthermore, a comprehensive Environmental Management Plan would be compiled, which the contractors would have to comply with. This plan would have further fire-management measures.
06	We have never had any burglaries on the farm. What will Eskom do to prevent crime during the construction process when there will be hundreds of workers?	Mr T Sauer, Farm : Enkeldraai, PO Box 69, Dwaalboom, 0319	Telephonic conversation on 14 October 2008	The possibility of an increase in crime will be investigated in the social impact assessment. On other projects, Eskom works closely with policing forums to assist with strategies to combat crime.
07	Our family took nearly 16 years to find this pristine piece of land that encompassed everything we were looking for. When we bought the land we had no intention of ever selling it again and we still have the same feelings five years later. We have done extensive improvements on the farm that we plan to retire on at the end of this year.	Mr Frederick Jordaan, landowner, Farm Portion 5 of Dwars- in-de-weg, PO Box 1438, Wingate Park, 0153	Written submission in October 2008 in response to the BID	Noted.
08	Even with Eskom paying a market-related price for our land, we will not be able to afford another farm like this due to the astronomical increase in farm prices the past few years.	Mr Frederick Jordaan, landowner, Farm Portion 5 of Dwars- in-de-weg, PO Box 1438, Wingate Park, 0153	Written submission in October 2008 in response to the BID	The land negotiation process will factor in issues such as land improvements, loss in income etc. which should enable affected land owners to purchase land of a similar nature elsewhere.
09	Landowners must be notified.	Mr Calvin Mamabolo, LEDET, Private Bag X 9484, Polokwane, 0700	Written submission in October 2008 in response to the BID	Directly affected landowners were notified of the commencement of the EIA process on 15 September 2008, provided with copies of the Background Information Document and invited to a focus group meeting on 4 October 2008.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
10	Where will Eskom develop a new township – on site of the proposed new power stations or in Lephalale town? This question is asked due to the housing shortage currently experienced in Lephalale.	Mr Leonard Sole, Lephalale LM	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Eskom does not know at this stage where a proposed township will be built. This has not as yet been decided; however it will be taken into consideration during the impact assessment phase. It should be noted that Lephalale is about 50 km away, thus a township on site might be more feasible as 600-800 people work at a power station during the station's operational life. Should Sasol decide to proceed with their Mafutha project it may also be an option to share a township with them.
11	Will Eskom build a clinic?	Mr Waldo Last, Waterberg DM	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Eskom provides clinics and similar facilities at all its power stations. These clinics are for use by Eskom employees only.
<b>D. ECONOMIC ISSUES</b>				
01	We conduct extensive exploration in this area and as such have extensive exploration rights which we want to protect.	Mr Francois Grove, SHE Officer, Anglo Vaal Coal Gas Projects, PO Box 457, Lephalale, 0555	Written submission in September 2008 in response to the BID	Noted. The project team would like to contact you to gather further information on Anglo Coal's exploration and how it relates to the sites under consideration.
02	How will the adjacent farm to the alternative sites be influenced by this development.	Mr Lou Hoffman, landowner, Farms Haakdoornhoek and Doppersfontein, PO Box 79, Delmas, 2210	Written submission in October 2008 in response to the BID	Impacts on the surrounding areas will be identified and assessed in the specialist studies that are to be undertaken in the EIA Phase, where appropriate.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
03	Please provide a breakdown of where the energy produced by the proposed stations would be used. Is it primarily to be used by smelters or is it for the benefit of the broader population? Has the applicant considered rationing power to the huge energy consumers such as the aluminium smelters (which provide very little benefit to the people of South Africa) and have massive negative environmental impact?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	The energy would feed into the national grid, and is distributed to where it is required. As such it would be utilised by all sectors of society, including domestic and industrial users. Government is implementing an Energy Conservation Scheme (ECS) (also referred to as Power Conservation Programme (PCP)) to reduce and optimise the use of electricity. Eskom has agreements/schemes in place with bulk customers to reduce consumption during certain times. .
04	What is the estimated cost of the power stations and which financial institutions are being approached for funding? Do these financial institutions comply with the Equator Principles or any other environmental standards?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	The costs will be finalised during the feasibility studies. Funding would be arranged by Eskom Treasury, not necessarily based on a single project but on the generic Eskom funding requirements. Most financial institutions will require that the project should comply with the Equator Principles before funding is approved.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
05	Has the option of railing coal to other parts of the country closer to the source of the demand been considered? Although this may not alleviate the air emissions problems it would generate substantial savings in the need for transmission lines and the huge environmental impact associated therewith.	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	Studies have been done on the transportation of coal by rail in the past. The railing of coal is a very expensive option with its own environmental impacts, which could translate into higher electricity prices for consumers. The most economical way to operate coal-fired power stations in Eskom's experience is to have it situated close to the mine with the electricity being distributed by transmission lines.
06	Have you interacted with other stakeholders such as Sasol and PetroSA that are also interested in our coal fields?	Mr Leonard Sole, Lephale LM	Comments during the authority focus group meeting, 3 October at Machauka Lodge	Eskom and Sasol have regular meetings and Eskom is aware of the proposed Mafutha coal-to-liquids refinery. Sasol and PetroSA are however still busy with pre-feasibility studies for their proposed developments in this area, whereas Eskom is already undertaking an EIA process. Eskom will establish relations with Sasol and PetroSA for sharing of information to support each others' projects.
07	Most of the farmers of this area are fifty years and older, we cannot put our lives on hold. We cannot wait for ten years while Eskom decides whether or not to buy our farms. We need clarity now on whether we should sell or continue farming. Eskom's planning is very bad.	Prof Jan Meiring, Mr Steenkamp and others	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
08	Eskom does not pay enough.	Prof Jan Meiring, Mr Steenkamp and others	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted. Eskom pays the market value as determined by an independent professional valuer. This payment would also include actual realised financial losses to be incurred by the landowner.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
05	Has the option of railing coal to other parts of the country closer to the source of the demand been considered? Although this may not alleviate the air emissions problems it would generate substantial savings in the need for transmission lines and the huge environmental impact associated therewith.	Mr Adam Gunn for Roulledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	Studies have been done on the transportation of coal by rail in the past. The railing of coal is a very expensive option with its own environmental impacts, which could translate into higher electricity prices for consumers. The most economical way to operate coal-fired power stations in Eskom's experience is to have it situated close to the mine with the electricity being distributed by transmission lines.
09	What about the farms neighbouring the new development? Does Eskom plan to buy them out as well?	Mr Marius Barnard	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	There is currently no intent from Eskom to buy the neighbouring farms.
10	The potential effect of the proposed project will also directly affect associated industries such as taxidermists and professional hunters.	Mr Hardus Steenkamp, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	The socio-economic and social impact specialist' studies would take this into consideration.
11	Other than an employee who loses his/her job, farmers lose everything if they have to sell their land.	Mr Jaco de Bruyn, PO Box 964, Lephale, 0555	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
05	Has the option of railing coal to other parts of the country closer to the source of the demand been considered? Although this may not alleviate the air emissions problems it would generate substantial savings in the need for transmission lines and the huge environmental impact associated therewith.	Mr Adam Gunn for Roulledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF), PO Box 78333, Sandton City, 2146	Written submission in October 2008 in response to the BID	Studies have been done on the transportation of coal by rail in the past. The railing of coal is a very expensive option with its own environmental impacts, which could translate into higher electricity prices for consumers. The most economical way to operate coal-fired power stations in Eskom's experience is to have it situated close to the mine with the electricity being distributed by transmission lines.
<b>E. ISSUES RELEVANT TO THE LAND NEGOTIATION PROCESS</b>				
01	Farmers said that it is unfair to buy farms at agricultural land value and then rezone it to industrial which has a much higher value. Farmers want to be paid the value for industrial land.	Mr Hein Boegman, Mr Archie Leitch and other landowners	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	It was noted that in order to change the land value from agricultural to industrial zoning, capital would have to be invested and a process followed. Eskom would have to make the investment in order to realise the industrial value of the land, but the farmers had not made the investment, and therefore would not be compensated at the value of industrial land.
02	An example was quoted that if Pick 'n Pay wanted to buy a house/plot to extend its operations they pay R10 million for a house valued at R2 million. The farmers queried why Eskom could not pay farmers more for their land.	Prof Jan Meiring, Mr Johan Burger	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Pick 'n Pay is a private company and can pay what they see fit. Eskom is a parastatal and bound by law (Public Finance Management Act and others) to pay market related prices.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
03	The farms in the alternative sites can be seen as strategic scarce resources for Eskom, since it is off coal and Eskom is specifically interested in these sites due to their location. Therefore Eskom should pay more for the land than just the agricultural value of land. Eskom should pay the price for strategic scarce resources and not for agricultural land.	Mr Van Niekerk, Prof Jan Meiring and other landowners	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted. See response to points E 01 and E 02 above.
04	If a landowner owns two adjacent farms with one within an alternative site, will Eskom buy both farms?	Ms Anna van Niekerk, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Eskom will agree to buy both farms if it is farmed as one economic unit, and the loss of the one farm will make the entire unit commercially unviable for the farmer.
05	What process will Eskom follow to buy the farms on the alternative sites?	Mr Hein Boegman, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Eskom proposes that the agreed option money be paid to landowners within thirty days after signing the option to purchase their land. This option will be valid for two years. Eskom will pay the current market value of the land, plus pay for all improvements and for income losses for a reasonable time. The CPIX inflation figure for agricultural land will be taken into account from the day the option was signed until such time that the property is bought in order to take inflation into consideration. The option money will be calculated as a percentage of the value of the land. This is yet to be determined by Eskom Board Investment Committee.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
06	What if farmers do not want to sell their farms to Eskom?	Mr Tienie Bamberger	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	The negotiation process is a long process and if all studies show that it is in national interest to buy the farms, then Eskom has to buy those farms. Eskom will exhaust all avenues in the negotiation process. Eskom does however have the right to expropriate land as a last resort if it is in the national interest.
07	How will Eskom determine the value of farms in this area? Will the sale of farms in the area in the next couple of months have an influence on the market related value of land?	Mr Hardus Steenkamp, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Yes, however an independent property valuator will most likely look at average prices that were paid for land.
08	What arrangement will be made with farms that are leased?	Mr Van Niekerk, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Eskom will have to buy out the lease agreement.
09	Why does Eskom want to take out options on the farms in the alternative sites?	Mr Willie Brits, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Eskom would like to ensure that farmers do not sell their land to a third party in the interim period, and they wish to speed up the land negotiation process, so that the process of finalising land can be concluded quickly once a final decision on the power stations have been taken.
10	Eskom wants to pay the landowners as little as possible. Pay the landowners a decent price. Landowners are not negative about the proposed developments, but if we are not paid a decent price, we will fight the process.	Mr Johan Burger, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
11	When seen against the total cost for the proposed two power stations, the cost of buying land is a small fraction of the total budget.	Mr Johan Burger, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
12	Farmers were paid very low prices for their land that was bought for the Medupi power station.	Mr Johan Burger, Mr Hein Boegman, Mr Hardus Steenkamp and other landowners.	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
13	It is our constitutional right to be paid a decent price for our land.	Mr Johan Burger, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
14	The Eskom valuator must take into consideration that eco-tourism is a major source of income, with high value and is generally practiced here in this area.	Mr Hein Boegman, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	All improvements, such as lodges on farms will be taken into consideration.
15	We question the independence of the Eskom evaluator.	Mr Hein Boegman, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Mr Edward Baleni is a consultant and an independent professional valuator, paid by Eskom per hour for his services.
16	It was alleged that mining companies (Exxaro) pay more for land than Eskom. It seems that landowners get the worst deal if Eskom is interested in their land.	Mr Hardus Steenkamp, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
17	It seems that the longer we delay the EIA process, the better prices we will get for our land.	Mr Hardus Steenkamp, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
18	I do not want a valuator on my farm. Eskom can offer me a price without needing to know in detail any of the improvements on my farm. Normal practice is for a potential buyer to make an offer and for the potential seller to accept or reject that offer.	Mr Willie Brits, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
19	How will loss of income be calculated? Should a similar farm be bought after Eskom has bought my land, it will take 5 – 10 years to get a proper, viable operation running again.	Mr Tienie Bamberger	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Every transaction differs. Eskom will negotiate with each farmer individually to calculate his/her potential loss of income, and provide the appropriate compensation for losses in income and re-establishment time.
20	A farmer from Thabazimbi shared his experience in terms of land negotiations and expropriation. The following points were made: <ul style="list-style-type: none"> <li>• Opposing land acquisition and negotiations can be a lengthy and costly process;</li> <li>• Expropriation can result in land being purchased for as low as 75% of the market value of the farm;</li> <li>• Farmers should stand together and find an independent and experienced land valuator to assist them; and</li> <li>• Negotiate with Eskom as a group.</li> </ul>	Mr Dana Smit	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
21	Does the valuator receive commission on the money he /she saves Eskom when acquiring farms?	Mr Archie Leitch, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	The valuator provides a professional consulting service and is paid per hour for his consulting services rendered. Commission is not paid.

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
22	Instead of being paid out, the ideal would be to swap a farm for a farm. Land in Klasserie and Koedoeskop are much more expensive than Lephallale.	Mr Willie Brits, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
23	No-one will buy any farms in the Steenbokpan area due to the uncertainty of Eskom's proposed future plans.	Prof Jan Meiring, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
24	If a farm is valued at R10 million and the landowner has to pay capital gains tax on the sale, will Eskom compensate the farmer for the loss due to taxes?	Mr Archie Leitch, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Capital gains tax was considered to be a financial loss, and therefore Eskom would compensate for that loss.
25	The whole game industry in this area will be destroyed if this block of farms is sold to Eskom. The neighbouring farms will suffer most due to the impact.	Mr Johan Burger, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.
26	Farmers were requested to sign consent forms to give Eskom permission to undertake the EIA study on their land and for permission to access their land for investigations by specialists. Eskom requested farmers to provide their contact details for further discussions, even if they do not complete the forms.	Mr Jan de Klerk, Eskom	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Landowners requested electronic copies of the consent form to be sent to them, to enable forwarding the forms to co-land owners or land owners absent from the meeting.  Landowners urged each other not to sign the forms at the meeting, but to first discuss it amongst themselves. It was agreed during discussions after the meeting that the landowners will respond to Eskom at a specific date - 30 October 2008

	<b>COMMENTS, QUESTIONS AND ISSUES</b>	<b>COMMENTATOR(S)</b>	<b>SOURCE</b>	<b>RESPONSE</b>
27	Eskom does not want to use the legislative avenues available, but prefers to negotiate with landowners.	Mr Jan de Klerk, Eskom	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted
28	I urge the farmers to stand together in the negotiations with Eskom.	Mr Willie Brits, landowner	Comments during the landowner and agricultural sector group meeting held on 4 October 2008 at Steenbokpan	Noted.