

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

Issues and Response Report

Version 2

This report (Version 2) captures the issues raised by stakeholders during the Scoping Phase towards the proposed construction of two coal-fired power stations in the Waterberg area. Meetings were held on 26 November 2008 at the Mogol Club in Lephhalale and on 24 January 2009 at Steenbokpan to present the Draft Scoping Report. Comments made and questions asked during these two meetings have also been captured in this report.

This report will be appended to the Final Scoping Report which will be placed in the public domain, and can be reviewed. The Final Scoping Report 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 are also be appended to the Scoping Report.

CONTENTS

Issues related to the following matters are listed:

SECTION	PAGE
A. BIOPHYSICAL ISSUES	1
B. PROCESS ISSUES.....	6
C. SOCIAL ISSUES	29
D. ECONOMIC ISSUES.....	30
E. ISSUES RELEVANT TO THE LAND NEGOTIATION PROCESS	35

REF	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE	RESPONSE
A. BIOPHYSICAL ISSUES				
A1	More power stations will have a negative impact on the environment.	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the open house held on 26 November 2008 at the Mogol Club	Eskom responded that power stations will have an impact on the environment but, with appropriate mitigation, such impacts are minimised. Also all aspects related to the project must be taken into account, such as the need for electricity for future economic growth of the country. The cumulative impact of these two power stations, other existing power stations and developments that exist will be evaluated in the EIA.
A2	Where will the water for the two proposed power stations come from?	Pieter Lamprecht, Matjiesfontein	Comments during the open house held on 26 November 2008 at the Mogol Club	The Department of Water Affairs and Forestry (DWAF) is investigating options to augment the water in the Crocodile River System to ensure sufficient water supply for the proposed power stations and other proposed developments in the area, for the future. A Basic Assessment in this regard has been initiated. More information can be obtained from Donovan Henning of NEMAI Consulting on (011) 781 1730.
A3	Will groundwater resources be used for the proposed developments? The mines are already using groundwater and this may deplete water for farming practises.	Pieter Lamprecht, Matjiesfontein	Comments during the open house held on 26 November 2008 at the Mogol Club	Eskom does not intend to use groundwater.
A4	Can the country afford to have another highly polluted area like the Witbank area?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the open house held on 26 November 2008 at the Mogol Club	Eskom said the trade-off between environmental impacts and development are challenging. Feasibility studies have shown the Waterberg to be the best area for

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				additional power stations due to the presence of a large coal resource. Eskom investigated, for example, the options to construct power stations at the coast where sea water could have been used for cooling purposes but the cost of transporting coal that far was too high. The new generation power stations planned in the Waterberg emits far less emissions than the power stations found in the Witbank area. Eskom investigates many options to improve the efficiency and reduce the environmental impact of their power stations on the environment.
A5	What is the difference between the old and new power stations?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the open house held on 26 November 2008 at the Mogol Club	The new power stations are more efficient and therefore release less emissions per kilowatt hour (kwh) sent out. They will be dry cooled and will also have Flue Gas Desulphurisation (FGD) which reduces the emissions by approximately 90% Post meeting note: An additional scenario of 60 % FGD will be investigated in case of drought situations.
A6	FGD technology uses more water; does Eskom plan to investigate fluidised bed combustion (FBC), a technology that uses far less water?	Mr Ockie van den Berg, DWAF	Comments during the public meeting held on 26 November 2008 at the Mogol Club	FBC was investigated, it uses less water but greenhouse gases are slightly higher. The option was discarded for this project due to the higher costs per unit of electricity sent out. Further only sub critical FBC units of around 300 MW have been proven. FGD will be used to

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				reduce emissions even though it uses more water.
A7	Are the transmission lines to the east 132 kV?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the public meeting held on 26 November 2008 at the Mogol Club	The transmission EIA is assessing lines of 765 kV.
A8	Where do you plan to put the transmission lines for the new power stations?	Mr Pieter Lamprecht, Matjiesfontein	Comments during the public meeting held on 26 November 2008 at the Mogol Club	Eskom is in the process of investigating the matter and are looking at three existing corridors.
A9	Could Eskom provide a written guarantee that once it is decided where the lines are it will not change nor will additional lines be required in the future?	Mr Pieter Lamprecht, Matjiesfontein	Comments during the public meeting held on 26 November 2008 at the Mogol Club	The planned 6 x 765 kV line corridor will accommodate the planned generation capacity at this stage. In the longer term future if additional power stations are required there will be a need for more lines, new impact assessments will be required to investigate the routes for these..
A10	The map of the typical power station layout showed a dam. What will the effect be of the dam on groundwater sources?	Ms Sylvia Jordaan, landowner Dwars-in-de-Weg	Comments during the public meeting held on 26 November 2008 at the Mogol Club	The groundwater specialist study will be undertaken to determine possible impacts and provide appropriate mitigation to avoid or minimise any potential impacts.
A11	Mr Lamprecht expressed his concerns that groundwater levels can drop due to over exploitation by developments. He also expressed his concerns for groundwater pollution impacts and requested that it should be studied thoroughly.	Mr Pieter Lamprecht, Matjiesfontein	Comments during the public meeting held on 26 November 2008 at the Mogol Club	A groundwater specialist study has been commissioned and will investigate the groundwater in detail.
A12	The environmental destruction from coal mining and from electricity generation in Mpumalanga are of concern to the Wildlife and Environment Society of South Africa (WESSA), and we demand that the best available new technologies are used in the Waterberg to mitigate pollution from the power stations, to extract coal in a far more environmentally-sensitive way, and to improve mine closure techniques so that	Mr Luke Perkins, Limpopo Office, WESSA	Email in response to the Draft Scoping Report, 20 January 2009	The technology proposed for the power stations would be designed to meet South African's new proposed air quality standards (not yet promulgated). The technology used in the mining of the coal will be decided by the

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	chemical spills post-closure do not pose a threat to the environment as has been the case in Gauteng and Mpumalanga (and please note, continues to be the case, and that certain leaching effects post-closure cannot be halted and will continue indefinitely).			chosen supplier. It is anticipated that the technology will be determined by, <i>inter alia</i> , air quality standards and water consumption and requirements of the EIA undertaken for the mining activities.
A13	The Wildlife and Environment Society of South Africa (WESSA) believes that the sooner South Africa moves towards sustainable energy use, the better. We support the moves that ESKOM has already made in researching and developing alternative energies. ESKOM should take note that Germany's generation capacity from wind alone is equivalent to South Africa's <u>entire</u> generation capacity. Therefore, while these proposed "old technologies" are under construction, we request at least a doubling of funding to the wind and solar development that ESKOM has already embarked on, and a rapid roll-out of these technologies to provide electricity into the future.	Mr Luke Perkins, Limpopo Office, WESSA	Email in response to the Draft Scoping Report, 20 January 2009	The highest total installed capacity of wind energy is Germany at 22 200 MW. This however is not equivalent to the total Eskom installed generation capacity of 40 000 MW. Eskom is actively pursuing sustainable energy alternatives although these options are more expensive than electricity produced from coal. Eskom has submitted an application to build a 100 MW wind energy facility in the Western Cape. Once approval is obtained from Eskom board and Nersa this project will go ahead. The approval to construct and operate alternative energy options will be obtained from Nersa and determined by SA policies and funding.
A14	Where does the prevailing wind come from?	Mr Archie Leitch, Witkop	Comments during the public meeting held on 24 January 2009 at Steenbokpan	The prevailing wind is east north east.
A15	An open cast coal mine will pollute the whole region up to the Botswana border – the impacts of polluted winds will affect a much larger area.	Mr Archie Leitch, Mtinyani Boerdery	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Noted. An EIA will be undertaken for the coal mine, which will evaluate impacts and shall require appropriate mitigation measures to ensure that such impacts are minimised.
A16	If water is transferred from the Vaal River system up to Lephalale, will water users along the route not	Mr Kobus Malan, Kobus Malan Attorneys, Northam	Comments after the public meeting held on	Initial studies by DWAF showed that sufficient water will be

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	have less water available than now?		24 January 2009 at Steenbokpan	available without affecting existing water users. This will be covered in more detail in the EIA.
A17	The failure of the project to deal with the emission of greenhouse gases ("GHG's") may be decisive. The Draft Scoping Report concludes that, because there is no obligation imposed by the Kyoto Protocol on South Africa as a non-annexure I country to reduce GHG's there is no obligation to consider the effects of this project and climate change in the EIA. It is submitted that this is legally incorrect.	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Written submission on 30 January 2009 in response to the Draft Scoping Report.	While the report acknowledges that South Africa is not obligated to reduce emissions under the Kyoto Protocol it goes on to note that Eskom is working with DEAT to realise South Africa's own objectives, principles and proposals of the National Climate Change Response Strategy. Eskom's six-point plan is summarised in Section 1.2.5 (d) of the report. Furthermore, the Terms of Reference for the Air Quality Specialist Study specifically includes evaluating emissions in terms of global warming potential, within the context of South Africa's last reported contribution to greenhouse gases (refer to section 6.2.3 of the Scoping Report).
A18	The nature of the receiving environment must be emphasised. The area under threat from the project comprises the bushveld as well as the Waterberg, which is an international biosphere.	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Written submission on 30 January 2009 in response to the Draft Scoping Report.	The description of the receiving environment will be elaborated on in the EIA and the impacts on the environment will be determined through the suite of specialist studies that will be undertaken.
A19	By Eskom's own admission, the Medupi EIA did not properly address all the issues such as isolating the environmental impact. The Environmental Authorisation to construct Medupi instructed Eskom to further develop environmentally defensible solutions to these very real issues. Yet, in defending Eskom's insistence to have the Delta substation at Zandnek and not right next to Medupi, Eskom argues that it expects the environment around Medupi to 'pay	Mr R McLachlan for McLachlan & Co Inc. on behalf of 21 affected landowners.	Written submission on 30 January 2009 in response to the Draft Scoping Report.	The EIA will consider the impacts of the proposed power stations beyond the sites. For instance the air quality specialist study will model various scenarios which include the effects of ashing and emissions. The Medupi EIA followed due

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	<p>the price' of pollution while they want a fresh area some 20 km away that they can sterilise for other economic use. They admit that they intend trashing the area around Medupi to such an extent that they have little choice but to locate Delta out of harms way.</p> <p>Will the Coal 3 and 4 EIA also simply brush over these factors that will destroy the environment for many kilometres south west/down wind of Coal 3 and 4? The EIA consultants will need to carefully look at dispersion models, ashing solutions and emissions in general.</p> <p>The Medupi EIA was rushed through in 'national interest' with little regard for the environment – does the Coal 3 and 4 planned timeline suggest the same approach? It is submitted that detailed studies will be necessary to come up with an environmentally defensible emission , dust and ash disposal solution and appropriate conditions be imposed on Eskom in the Environmental Authorisation (Record of Decision).</p>			<p>process as required in terms of the Environment Conservation Act and DEAT considered all the impacts of the project as well as the need for the project. Eskom state that they are making every effort to protect the environment during construction and will continue to do so during operation. The placing of the substation was also evaluated and the preferred option approved by the authorities based on the motivation provided in the transmission EIA. Constant monitoring of environmental performance around Medupi power station is carried out and evaluated by independent parties.</p> <p>Detailed studies will be undertaken in the assessment phase of the EIA. Specialists will make recommendations for mitigation measures and where appropriate these will be incorporated into the project and become conditions of authorisation, should the project be approved.</p>
B. PROCESS ISSUES				
B1	Is the EIA for the proposed project still going ahead?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the open house held on 26 November 2008 at the Mogol Club	There is a need for electricity in South Africa. The proposed project is in its feasibility stage, thus studies such as EIAs are being undertaken (the EIA is currently in its scoping phase). Once the feasibility studies are finalised, the Eskom board will make an

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				investment decision on the project which will determine whether the project continues or not.
B2	What is the status of the EIAs for the transmission lines?	Mr Hardus Steenkamp, landowner	Comments during the public meeting held on 26 November 2008 at the Mogol Club	Eskom has received environmental authorisation for 3 x 400 kV lines (Rustenburg/Northam), but the decision is being appealed by stakeholders. The final report for the EIA for the 6 x 765 kV lines still has to be submitted to the Department of Environmental Affairs and Tourism (DEAT) for a decision. An EIA for a 2 x 765 kV line corridor (Mokopane/ Marken) is currently being undertaken.
B3	The planning of super load transportation is not being investigated. Will road degradation during construction also be investigated? Will there be any road crossings?	Mr Mike York-Hart, South African National Road Agency Limited (SANRAL)	Comments during the public meeting held on 26 November 2008 at the Mogol Club	AW said a traffic specialist study is proposed that will include comment on the effect of traffic on the road surfaces. The Medupi transport study for the transportation of large loads will be revisited and updated if necessary for the purpose of this project. Any proposed road crossings will be discussed with SANRAL and other involved authorities.
B4	What happens if the specialists say that the development will ruin the environment? Does this stop the development? Did any of the Medupi specialist studies come up with a negative answer and if so what did Eskom do in such a case?	Mr Fred Jordaan, landowner Dwars-in-de-Weg	Comments during the public meeting held on 26 November 2008 at the Mogol Club	If any of the specialist studies comes up with a red flag, the specialist looks at mitigatory measures or alternatives. Red flags are also evaluated through a holistic approach on their significance to the overall project. Mitigatory measures can include offsets, such as the re-establishment of a plant species or a wetland on another site, outside the area of the proposed

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				development.
B5	Who is the authorising authority and can they turn an EIA down?	Mr Fred Jordaan, landowner Dwars-in-de-Weg	Comments during the public meeting held on 26 November 2008 at the Mogol Club	The authorising authority is DEAT. The DEAT takes the decision on whether the project receives environmental authorisation or not. Yes, they can give a negative decision, or a decision with specific conditions.
B6	Did Eskom do an EIA for the Matimba power station that was built in the late 1970s/early 1980s?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the public meeting held on 26 November 2008 at the Mogol Club	A specific EIA was not conducted, since EIAs only became a legal requirement in 1997. Eskom has been conducting environmental specialist studies much earlier than 1997 to assess the impact of proposed developments on the environment. It was noted that the studies were done for Medupi power station.
B7	Why was this meeting not held at Steenbokpan?	Ms Sylvia Jordaan, landowner Dwars-in-de-Weg	Comments during the public meeting held on 26 November 2008 at the Mogol Club	A special focus group meeting was held in Steenbokpan on 4 October. This meeting was to give an opportunity to all stakeholders in Lephalale who would like to contribute to this process. Another meeting with the landowners in the Steenbokpan area is proposed in January 2009, where the contents of the DSR would also be presented. It was noted that stakeholders have many opportunities to respond to the DSR – not just by attending a meeting, as meetings are just one of the methods employed to receive comments from stakeholders. Stakeholders can also respond via written or telephonic

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				communication.
B8	Depending on what developments materialise, the water usage of the Lephalale area could increase from the 25 million cubic metres per annum to 260 cubic metres per annum. It was agreed with DEAT that the Lephalale area needs an Environmental Management Framework to guide proposed impacts on the broad area. Proposals towards such framework are being investigated by the authorities.	Mr Ockie van den Berg, DWAF	Comments during the public meeting held on 26 November 2008 at the Mogol Club	Eskom is aware of this proposal and they will provide their co-operation for such an assessment.
B9	I understand that DWAF is monitoring a number of deep boreholes (50 -100 m) in the area. Can we (landowners) have access to the information that the DWAF is currently gathering through their assessments (drilling exploration)?	Mr Pieter Lamprecht, Matjiesfontein	Comments during the public meeting held on 26 November 2008 at the Mogol Club	Ockie van den Berg (OvdB) (DWAF) said his Department is currently monitoring groundwater levels during dry and wet seasons. He requested the contact information of Mr Lamprecht for further discussions between them. They agreed to speak to each other after the meeting.
B10	Mr Steenkamp voiced his concern that the EIA is not approached in a holistic fashion. He said that he is aware of five EIAs that are being conducted and each project only looked at its own specific area. Eskom should work towards integrating the various EIAs and specialist studies being done. For example, one EIA investigating 7 000 new stands to be developed recommended groundwater as the water source and the question is whether this is viable against the background of all the other proposed developments.	Mr Hardus Steenkamp, landowner	Comments during the public meeting held on 26 November 2008 at the Mogol Club	Cumulative impacts of more than one development will be investigated as part of this EIA process. For example, the air quality study for the proposed two power stations will include Sasol's proposed Coal-to-liquids (CTL) facility in its model to determine pollution.
B11	Does the EIA also investigate the future of farm workers that may be impacted upon? He mentioned that some of them have been working on the farms for 60 years and all they are skilled in is game or cattle farming. How can they be accommodated in the process?	Mr Hardus Steenkamp, landowner	Comments during the public meeting held on 26 November 2008 at the Mogol Club	The social impact assessment will look at the future of the farm workers. The social specialist will engage with the farm workers once consent has been provided by the relevant landowners. By law, Eskom must, and does, assist farm workers as they are considered to be unregistered rights holders. A

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				number of options are available and the final choice depends on the outcomes of negotiations with farm workers.
B12	This EIA should investigate the proposed impact of, for example, the development of new townships, its water use, etc, since a proposed development such as the power stations has many indirect impacts that should also be investigated.	Mr Luke Perkins, WESSA	Comments during the public meeting held on 26 November 2008 at the Mogol Club	The facilitator said this will be done by the specialist studies during the Impact Assessment phase. OvdB added that when DWAF plans for a proposed development such as these power stations, it factors in water for a coal mine, township extension, schools, shopping centres, etc – thus the proposed water planning includes the broad impact. He said that it was his opinion that another town is likely to be developed since Lephalale is too far from the proposed power stations.
B13	Would the EIA take into account other developments?	Ms Anelle Odendaal, facilitator	Comments during the public meeting held on 26 November 2008 at the Mogol Club	The EIA would take into account Sasol's proposed CTL but could not take into account developments that they were not aware of or were too far in the future to consider.
B14	It was suggested that the Environmental Management Forum of Eskom look at these developments and its proposed impacts holistically.	Mr Adam Gunn, Routledge Modise, Johannesburg	Comments during the public meeting held on 26 November 2008 at the Mogol Club	Noted. Stakeholders will receive notice of the Environmental Management Forum meeting proposed in December 2008.
B15	Why is a representative of the DEAT never at these meetings?	Mr Hardus Steenkamp, landowner	Comments during the public meeting held on 26 November 2008 at the Mogol Club	The specific case officer of this EIA was present at the authority focus group meeting held on 3 October 2008. The EIA team plans to meet again with the DEAT on 28 November on matters pertaining to this study.
B16	When will DEAT take a final decision on the environmental authorisation of this EIA?	Mr Hardus Steenkamp, landowner	Comments during the public meeting held on	A decision is expected before the end of 2009. The first phase,

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			26 November 2008 at the Mogol Club	scoping is still underway and that the specialist studies are still to be conducted.
B17	Adam Gunn read a statement on behalf of his clients, Lephhalale Environmental Action Forum. The full statement is available in the comments attached to the Final Scoping Report	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the public meeting held on 26 November 2008 at the Mogol Club	Noted.
B18	The Wildlife and Environment Society of South Africa (WESSA) recognises the need for increased electricity production if economic opportunities are to be provided for the disadvantaged in the country.	Mr Luke Perkins, Limpopo Office, WESSA	Email in response to the Draft Scoping Report, 20 January 2009	Noted.
B19	The construction of these two proposed new coal-fired power stations will very likely result in the formation of a new town along the lines of Lephhalale. The EIA must take into account the full likely impact of such a new town in the Waterberg, with increased population, increased water usage, sewage, solid waste disposal, landfills etc.	Mr Luke Perkins, Limpopo Office, WESSA	Email in response to the Draft Scoping Report, 20 January 2009	DWAF's water strategy for the area has allowed for numerous developments such as new mines, power stations and CTLs as well as the work force to operate them, Other issues such as waste disposal etc would need to be considered in a separate EIA when it was known where the town would be located. With respect to infrastructure already identified for improvement, Eskom will engage and participate with responsible department/offices to provide support for the required capacity improvements to such infrastructure.
B20	Eskom must liaise with the Limpopo Water Catchment Management Agency and seek input from them on the likely impact on water resources in the catchment area. ESKOM must calculate what the likely water usage will be, both of the power stations and of the supporting infrastructure for the power stations, and communicate this information to the CMA and to DWAF. After this the likely impact on	Mr Luke Perkins, Limpopo Office, WESSA	Email in response to the Draft Scoping Report, 20 January 2009	Eskom has provided its water requirements for future development in the area to DWAF. DWAF has already allowed for a number of power stations in the area and has proposed how to supply water to the area in its augmentation scheme (see section

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	agriculture, on the water table and on the broader environment must be assessed and this assessment must be communicated by Eskom to the competent authority that will be making the final decision on the go-ahead for these power stations.			6.2.2 of the Scoping Report). The impact on agriculture will be assessed by the agricultural specialist study and the impact on groundwater will be assessed by the groundwater specialist study. Where there are links between the studies the findings of each linked study will be made available to the other.
B21	We want to know what Eskom's long-term planning are in order to do our own planning.	Ms Esmé van der Merwe, Zinyathi Lodge, Vaalboschhoek	Written submission on 24 January 2009 in response to the Draft Scoping Report	A road show session was scheduled for the 11 December 2008 at Lephalale and Thabazimbi, to share Eskom's long term planning with the landowners. Another session will be scheduled for March 2009. Landowners will be advised and invited to such a session.
B22	If we look at the electricity demand for 2025 then Eskom must tell us now where all the power stations will be built to reach this goal. We want to know how many more power stations are planned after the two we are discussing today. (Asked during the presentation of Ms Herbst)	Mr Jaco de Bruyn	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Ms Deidre Herbst responded Eskom could use a combination of coal, nuclear and any other feasible technology to reach the 2025 demand. Eskom will have to build more power stations after the two under discussion if there is more demand for energy. Studies to determine specific sites are only carried out for capacity required in the next 10 to 15 years. The decision on building nuclear will influence the timing of future coal fired power stations. There is a high likelihood that if additional coal-fired power stations are required they would be located in the Waterberg area, because of the large coal resource.

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B23	Eskom categorically told us three years ago that no further power stations were planned for this region. And further to this you tell us just now that the nuclear option has been stopped.	Mr Jaco de Bruyn	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Eskom was aware of the possibility of future coal-fired power stations in the Waterberg, this is evident in the minutes of the Medupi EIA meetings. However, the locations of these proposed power stations were only established in 2008 once Ninham Shand were appointed to carry out the EIA and complete site selections. In terms of the demand profile Eskom will require a large base load option in 2016 and a nuclear power station could not be delivered by this time. Two factors influenced the lead times of nuclear power stations. Firstly there is a very strong lobby against nuclear which results in delays in the regulatory approvals. Secondly the cost of nuclear is higher than coal, which is influenced by the more stringent safety requirements. However costs of coal fired power stations and nuclear become closer if one implements all the environmental mitigation measures such as flue gas desulphurisation and reduction of carbon dioxide. Nuclear is also a low carbon technology which contributes to climate change mitigation.
B24	Eskom announced that nuclear power stations were approved now they are stopped and we are confused that you tell us now that a combination of nuclear and coal fired power stations will be needed to meet the 2020 – 2025 goals.	Mr Jaco du Bruyn	Comments during the public meeting held on 24 January 2009 at Steenbokpan	No nuclear power stations were approved. The nuclear power stations referred to were in the stage of the planning process, the same as the proposed Coal 3 and 4 power stations. Once all the studies are complete, authorisations and

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				permits obtained and a business case is approved approval to construct could be obtained. The nuclear option has been delayed not stopped completely – the combination of coal fired power stations and nuclear remains an option that Eskom is pursuing for base load.
B25	<p>With the Medupi project, nothing was done right. We do not want to hear Eskom's "sweet talk" – we want to hear the facts and want information such as:</p> <ul style="list-style-type: none"> - Where the roads would be constructed? Where the water would come from? Where exactly would the power stations be constructed? Where the railway lines would be? How and from where would the coal be transported? Which roads will be tarred? Which new roads will be built? <p>We want detailed information timeously on the proposed projects. We are not interested in attending an electricity demand and supply meeting – we want hard facts on the proposed projects as we requested at the last meeting in October 2008.</p>	Mr Jaco du Bruyn	Comments during the public meeting held on 24 January 2009 at Steenbokpan	The environmental impact assessment (EIA) is currently being done for both Coal 3 and 4 to determine the best alternatives (position, supply, etc) for the questions being raised by the participant. To this end, a layout plan is being developed, and during the EIA process the aspects mentioned will be studied and discussed with I&APs. The EIA study's findings will recommend the best access roads, the best layout for the power station, etc.
B26	During the Medupi and associated transmission lines EIAs, we were told at public meetings that no further Eskom developments were planned (he mentioned that the minutes of those meetings can show that). If there are possible projects planned for the Waterberg region, then Eskom should share it with the attendants.	Mr Willie Brits, Akasia Boerdery	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Eskom only started planning the projects under discussion after the Medupi planning process was finalised. Ms Herbst referred back to the Eskom planning process as was explained in her presentation and again emphasised that information is shared with stakeholders from the early stages of pre-feasibility of projects. Ms Herbst also noted that during the

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				transmission line EIA process, it had been erroneously stated that no further power stations would be planned for the Waterberg area. The potential for further power stations developed in the region was correctly stated during the Medupi EIA process and is reflected in those minutes. However the site selection process for Coal 3 and 4 was only initiated in 2008.
B27	So, we can expect at least seven more power stations in this area? Medupi is in early stages of construction and already Eskom is in the EIA phase for two more power stations. It seems that Eskom has stopped maintaining their current power stations so that they will let them run down and replace them with new power stations in the Waterberg.	Mr Pieter Peacock, Witvogelfontein farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan	There is a possibility for more power stations in this area, but that depends on whether the nuclear options go ahead or not, the demand for electricity, and if Eskom could use options such as hydro-electricity from huge power generating sources like Grand Inga or not. In essence it depends on many variables. She added that Eskom will not decommission assets prematurely. Studies had been initiated to determine whether the life of operating stations could be extended.
B28	Eskom must provide more funds to do comprehensive investigations in this region – it is unacceptable for Eskom to put our lives on hold, just because they do not want to do more research.	Mr Jaco du Bruyn, Transvaalse Landbou Unie (TLU) SA	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Noted. Eskom's processes do not prevent the landowners from continuing with their planned developments, but Eskom will engage with the landowners whose land becomes necessary to procure for the project. Such a process is a separate process which is also being undertaken for the Waterberg area.
B29	What are the time frames for these projects – when	Mr Chris van Niekerk,	Comments during the	Mr Leonard van der Walt

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	will the first sod be turned?	Zyferbult farm	public meeting held on 24 January 2009 at Steenbokpan	responded that the current plan was for construction of the first power station to begin at the end of 2010 or beginning of 2011 and for the first unit to be commissioned by end 2015 or beginning 2016.
B30	The basis for the mistrust experienced between Eskom and the landowners is misinformation that was shared by Eskom to landowners during previous public meetings with respect to no further power stations in the area (Transmission line EIA process for the Mmamabula-Delta substation). He suggested that this be noted for the record. He also suggested that the historical influence should not cloud a positive input by the landowners in these development studies.	Mr Hein Boegman, Mooipan farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Noted.
B31	How did Eskom decide on the selection of the farms in the three alternative sites?	Mr Pieter Peacock, Witvogelfontein farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan	The site selection process was based on a) its geographical location which is off-coal, b) proximity to the coal resource within a feasible transportation distance by conveyor belt (some 30 km from the coal), c) minimum 5 000 ha footprint, d) existing boundaries (roads, railways, major power lines and farm boundaries), buffer zones around residential areas and other infrastructure.
B32	Mr Brits asked that his comments on the Mmamabula transmission line be found, since his issues and concerns raised during that process would be valid for this project as well.	Mr Willie Brits, Akasia Boerdery	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Noted. These comments will be sourced and where relevant considered in this process.
B33	Why did you have a meeting in Lephalale on 26 November 2008 during the week – it looks like window-dressing since the most important stakeholders are staying in the Steenbokpan area.	Mr Willie Brits, Akasia Boerdery	Comments during the public meeting held on 24 January 2009 at Steenbokpan	The meeting was held in Lephalale since there are also interested and affected stakeholders in the Lephalale area and from away as far away as Pretoria and Polokwane who attended the

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				meeting. The current meeting is at Steenbokpan as stakeholders requested a meeting to be held in Steenbokpan.
B34	The minutes of the meeting held in October 2008 was sent out six weeks after the meetings. Some of the content of the minutes was incorrect. If we as landowners are the most important party in this project then we ask for correct minutes. Since the public review period ends on Friday, 30 January 2009, we would like to review and comment on the minutes before then as well.	Mr Hein Boegman, Mooipan farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan	All efforts will be made to distribute the minutes to stakeholders before 30 January 2009, as requested.
B35	Mr Boegman requested that the findings of previous EIAs in the area be reconciled with the findings of the current EIA. He mentioned that in a previous EIA it was recommended that no development should take place in the area which Eskom is currently investigating for the construction of the power stations. He asked that a reconciliation of the findings and decisions be undertaken. He mentioned that a previous study recommended that the area north of the fault line be used for industrial development and the area south of the fault line (where the current alternative sites are) be used for eco-tourism.	Mr Hein Boegman, Mooipan farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan	The previous studies regarding the use of the area south of the Eenzamheid Fault for eco-tourism would be examined.
B36	Mr Boegman noted that discussions should take place between Eskom and the landowners regarding the appointments made by the specialists to see the farms. He said that certain incidences had occurred which had not been agreed to. The matter will be discussed between Eskom and the landowners outside the meeting. A list of the incidences (regarding missed appointments, time of calls, water quality testing, notification period, illegal entry) as mentioned above was later received from Mr Boegman via e-mail.	Mr Hein Boegman, Mooipan farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan, e-mail dated 26 January 2009	Noted. This is regarded as serious and will be taken up with the specialist consultants.
B37	During the Medupi public participation process very few farmers participated – I see the same problems arising in this process. The neighbours of the farms	Mr Hardus Steenkamp, Doornfontein farm	Comments during the public meeting held on 24 January 2009 at	The meetings were broadly advertised, all stakeholders on the database were sent invitations. All

REF	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE	RESPONSE
	within the candidate sites should also be invited and participate in the EIA process.		Steenbokpan	<p>participants are requested to please distribute information by word of mouth since it is the intention to have all interested and affected parties participating in the EIA. It is requested that people put forward the names of their neighbours in order to keep them informed of the process. Every effort will be made to ensure that all interested and affected parties have an opportunity to participate.</p> <p>Post meeting note: All surrounding landowners are included on the database.</p>
B38	If stakeholders read the final report (EIR) will they be able to see the exact location of the power station, where the ash dump will be situated? Will the mine from which coal will be supplied be identified and where transmission lines will be constructed?	Mr Bertus Steenkamp, Leliefontein farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Some of the detail will be included in the EIR (like power station layout, and service corridors), however not everything would be available. The coal supplier for example has not yet been appointed. The coal supplier will only be announced in the latter part of this year – negotiations are still underway. It will be the mine's responsibility to build the conveyer belt from the mine to the station boundary, and the mine will therefore conduct a separate EIA on the alternatives for the conveyer belt outside of the sites.
B39	Mr Steenkamp said that DEAT is invisible and are never seen at these meetings. He asked if DEAT can take an informed decision if they do not attend the meetings.	Mr Hardus Steenkamp, Doornlaagte farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan	It is not common practice for DEAT to attend public meetings. They are however very involved in the process and receive presentations from the consultants and Eskom along with other relevant

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				Government departments. DEAT are planning on developing an Environmental Framework for this area and will engage with the public.
B40	Eskom only concentrates on studies pertaining to the specific area of their proposed development – and the impact of their development is much broader. How much funds will Eskom have available to compensate for social disruption?	Mr Danie van Niekerk, Rooiboklaagte farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan	<p>The EIA team always looks beyond the specific area of a development when an EIA is done. An example in this regard is the air quality study.</p> <p>Eskom have also requested the consultants to evaluate the social aspects in detail and provide some recommendations to avoid negative impacts and identify opportunities for positive impacts.</p>
B41	Who is responsible for the overall strategic planning for this region to ensure that Eskom, Sasol and the mines planning are coordinated?	Mr Bertus Steenkamp, Leliefontein farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Strategic studies would normally and preferably be carried out by an independent party such as the Department of Environmental Affairs and Tourism (DEAT). There has been some initial discussion with DEAT regarding the need and undertaking of a strategic assessment for the entire area, however, no clear indication is as yet available. Eskom undertakes to continue engaging with DEAT and Sasol on this issue.
B42	What do you know of Sasol's plans for this area, since you have been including proposed impacts of the Sasol Coal-to-Liquid (CTL) plant in your presentation?	Ms Elana Greyling, Agri-SA	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Sasol's possible future plans are included and considered in order to assess the worst-case scenario in terms of impacts in this EIA. For example, that Sasol's Coal to Liquid plant will be considered as a potential source of pollution in the air pollution model, whether it will

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				<p>be built or not.</p> <p>The Eskom team is liaising with Sasol. Eskom understands that Sasol is much further behind in the process, since they have not as yet commenced with their EIAs for proposed developments. Furthermore, Eskom cannot give any assurance on whether Sasol will continue with the development or not.</p>
B43	This is the only solid piece of land without coal or mineral rights. Sasol said in a recent meeting that they will need 20 000 ha of land for their proposed development and if Eskom only builds two power stations, will the third alternative site be provided for Sasol's developments?	Mr Archie Leitch, Witkop	Comments during the public meeting held on 24 January 2009 at Steenbokpan	This is not in Eskom's current plans.
B44	When will construction of the power stations start, because our international clients (overseas hunters) would want to know – how long can we still operate our businesses and farms? When do we have to leave our farms?	Ms Esme van der Merwe, Vaalboshoeck, Zinyathi Lodge	Comments during the public meeting held on 24 January 2009 at Steenbokpan	<p>Landowners can stay on their farms until construction starts. After Eskom have bought the farms, the farms can be leased back to the current owners who can continue using it right up to the date when construction starts – however these arrangements will be negotiated between Eskom and each individual landowner, and would depend on the construction programme.</p> <p>Further studies must be done after the initial studies done during the EIA process this will require greater access to the land.</p> <p>The property valuer will start visiting farms for valuations from 26</p>

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				January 2009. Landowners will be contacted to set up individual meetings and an agricultural economist will also visit farms from February 2009 as part of the land purchase process.
B45	There are a number of conflicting statements made by Eskom regarding whether the coal-fired stations will in fact proceed. As recently as 27 January 2009, the CEO of Eskom, Mr Jacob Maroga is quoted in the press as saying that Eskom, might proceed with coal-fired stations. Please provide us with the Eskom board resolution whereby the proposed developments of the two proposed power stations (Coal 3 and 4) are approved.	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Written submission on 30 January 2009 in response to the Draft Scoping Report.	See Section 1.5.2 of the report. The planning for the proposed power stations is at a feasibility level for the first of the two stations, and a pre-feasibility level for the second one, As such the final investment decision has yet to be made by the Eskom Board.
B46	The decision by Eskom to construct the next of its base-load power stations as a coal-fired station is a massive one affecting not only South Africa and many of its citizens, due to the environmental impact, but also the entire world because of its effects on climate change and global warming. Nowhere in this EIA have we seen any evidence to suggest that this policy decision has in fact been debated and that a sound, well-reasoned decision has been taken to motivate the decision behind building this base-load coal fired power station.	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Written submission on 30 January 2009 in response to the Draft Scoping Report.	Eskom's decision to construct more coal-fired power station is explained in Section 2.2.4 of the report. This section describes Eskom's strategic planning for additional power supply and the alternative technologies proposed to supply this power.
B47	The manner in which the EIA is conducted is not appropriate to a project of this nature for the following reasons: 1. The way in which the EIA is structured is very much the way in which a mine or other large infrastructure project would be undertaken. However, this project cannot be compared to a mine or other large infrastructure project because of its size and because of its massive impact on the environment, South Africa's economy and the global impact due to the effect of the emission of greenhouse gases on the	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Written submission on 30 January 2009 in response to the Draft Scoping Report.	The structure of the EIA is in accordance with the requirements and guidelines as stipulated by the competent environmental authority, DEAT. The content of the EIA will address the pertinent issues relating to affected environment, and will therefore be specific to the proposed power stations. As stated in Section 1.5.2 of the report the environmental impacts

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	<p>Earth's climate.</p> <p>2. It is submitted that the only legally correct way to deal with this project is to examine the total combined impact that this project will have. The precise figures of how much coal will be burnt, exactly where this coal will be mined, how much fauna and flora needs to be destroyed in order to mine this coal, what the impacts of the mining of this coal as well as the impacts that the transportation, if necessary, of the mined coal will have on the environment must be set out in the EIA.</p> <p>3. The current Draft Scoping Report gives the false impression that the major impact of a coal fired station is in fact the impact of the station itself, which is its footprint, its air emissions and its water usage. This is completely false. Massive impacts are associated with the coal mining, which is an integral part of the supply of coal to the power station. The same could be said of the water impacts of the mines.</p>			<p>associated with a new coal mine to feed the proposed power station cannot be considered due to, <i>inter alia</i>, uncertainties with respect to the coal supplier and the location of the coal source, A separate EIA will be required for the coal mine as required by NEMA and the Minerals and Petroleum Resources Development Act, MPRDA..</p> <p>See above comment. The EIA report will discuss the cumulative impacts at a high level, where the impacts of the coal mine will be highlighted. The details on the mine may not be known though, as the process of authorisation and investigative environmental studies have not commenced for the mine. The mine EIA processes will incorporate impacts identified in this EIA, for cumulative assessment.</p>
B48	<p>The need for increased supply of electricity is firmly based on the Integrated Strategic Electricity Programme ("ISEP"), as calculated and published by Eskom, and the National Integrated Resource Plan ("NIRP"), as calculated and published by the National Energy Regulator of South Africa ("NERSA"). There are however two problems associated with this:</p> <p>1. Firstly, both strategic plans not only deal with the total increase of supply of energy that is necessary, but also deal with the energy mix that is required for South Africa to achieve a sustainable supply of energy. Both the NIRP and the ISEP are based on the assumption that nuclear energy will still be a part of South Africa's energy mix in the medium-term.</p>	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Written submission on 30 January 2009 in response to the Draft Scoping Report.	Noted. While notice has been given that Eskom will not consider the Nuclear 1 project in the short to medium term, Nuclear continues to form part of the Eskom Generation mix. This is supported by Government Policy. Eskom will also continue to pursue all forms of mature generation technology (commercially proven technology) to ensure security of supply. The comments made in the Scoping Report with respect to the reduction of greenhouse gases are factual

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	<p>2. Secondly, in December 2008 Eskom indicated that nuclear power will not form part of Eskom's short- or medium-term plans. Therefore, all of the information presented by these plans and presented by Eskom as part of this process is fictitious and outdated as the real planned energy mix in the short- and medium-term no longer includes nuclear energy. This has the effect of distorting the data presented in the draft scoping report. For example, Eskom has pointed out that Green House Gas emissions will decrease because of the introduction of more nuclear power into the base-load grid. This is no longer the case and the absolute percentage of coal fired energy in the grid will increase and, as a result, this will lead to an increase in GHG emissions (either as a percentage or on an absolute basis). These errors have not been corrected in the Draft Scoping Report.</p>			<p>and would be the case should Eskom decide at some stage in the future to re-consider the nuclear option.</p>
B49	<p>The Draft Scoping Report is also based on the presumption that coal is the preferred option for South Africa and that it is the cheapest source of energy. Please supply the figures and calculations that indicate that this has been conclusively considered and proved by Eskom.</p>	<p>Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)</p>	<p>Written submission on 30 January 2009 in response to the Draft Scoping Report.</p>	<p>The current EIA is based on the presumption that coal-fired technology is appropriate for base load electricity supply, and for the Waterberg region due to the extensive coal resource. However, as explained in the Eskom project funnel, a suite of generation technology options are being pursued by Eskom for South Africa, which include gas, wind and solar electricity generation.</p>
B50	<p>As indicated above, the EIA does not explore alternatives at all as is required by the National Environmental Management Act, 107 of 1998 ("NEMA").</p>	<p>Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)</p>	<p>Written submission on 30 January 2009 in response to the Draft Scoping Report.</p>	<p>The Scoping Report does address alternatives, as is required by the EIA Regulations at this level. Activity alternatives are discussed at a strategic level through the extensive policy and planning level investigations undertaken by DME, NERSA and Eskom in Chapter 2 of</p>

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				the Scoping Report. Three sites have been identified to serve as site location alternatives and the process of the identification of the sites is explained in Chapter 3. Process and site layout alternatives are considered in Chapter 4 of the Scoping Report.
B51	Based on the Background Information Document, our client submitted certain comments for consideration in the EIA process. Many of these issues have not yet been addressed. We attach a copy of this correspondence for your ease of reference and trust that these queries will be addressed going forward in the EIA process (Annexure "A").	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Written submission on 30 January 2009 in response to the Draft Scoping Report.	Responses to LEAF's comments are given in the Comments Response Report Version 1 which were included in the DSR (Annexure F, Section A16, 17, 18, 19, 20, B18, 19, 20, 21, D3, 4, and 5). Further issues raised will be covered as far as possible and required in the EIA.
B52	It seems as if Eskom's planning in respect of its expansion programmes is done on an <i>ad hoc</i> basis. Instead of following a holistic approach, Eskom seems to plan its generation and distribution [sic] requirements on a piece-meal basis, and subsequent developments are often contradictory with its own prior planning. A case in point is the planning of the route of the Mmamabula-Delta power lines before the location of the Delta substation has been decided upon. While planning the Mmamabula - Delta substation Eskom would have been in the process of planning Coal 3 and 4. However, the planning decisions seem at odd with each other.	Mr R McLachlan for McLachlan & Co Inc. on behalf of 21 affected landowners.	Written submission on 30 January 2009 in response to the Draft Scoping Report.	Eskom has a long term plan which determines what capacity is required. However, locating power stations is determined through a more detailed process. The site identification for the two proposed power stations is described in Chapters 2 and 3 of the Scoping Report. The positioning of the power station and load centres then determine the routing of transmission and distribution lines.
B53	As part of the EIA, clear consideration of the compounded effects of all the known or potential developments should be taken into account. Simply looking at the two proposed power stations in isolation without proper assessment of the role this will play in the whole, will not only be the responsibility of the Department of Environmental Affairs and Tourism, but also Eskom. While it is	Mr R McLachlan for McLachlan & Co Inc. on behalf of 21 affected landowners.	Written submission on 30 January 2009 in response to the Draft Scoping Report.	Other developments known in the area, such as Sasol's proposed CTL and Mmamabula power station will be considered and have been included in the specialist terms of reference where required appropriate i.e. the air quality assessment and social impact

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	known that other developments in the area are under consideration, e.g. the Sasol plant, these developments are ignored. In the end the authorities will be faced with an impossible task of balancing conflicting needs without the benefit of holistic planning.			assessment.
B54	The economic necessity and the responsibility of Eskom to increase its electricity generation, is accepted. However, the lack of co-ordination leaves uncertainty as to whether the chosen options are the best options. In particular, the question remains whether the damage that will be caused to the environment in this almost pristine area has been properly balanced against the need for developing additional power stations.	Mr R McLachlan for McLachlan & Co Inc. on behalf of 21 affected landowners.	Written submission on 30 January 2009 in response to the Draft Scoping Report.	Noted. The EIA process is a tool used by government to evaluate the environmental acceptability of such projects. Furthermore, DEAT is considering undertaking a strategic evaluation of the Waterberg region in order to inform other future developments.
B55	What is the value of your public meetings? The meeting of 24 January 2009 was a duplication of the meeting we had on 4 October 2009. You just have these meetings to comply with the legal requirements.	Mr Jaco de Bruyn	Written submission on 26 January 2009 in response to the Draft Scoping Report.	The first meeting on 4 October 2009 was held to announce the project and to explain how the sites were selected. The purpose of the second meeting on 24 January 2009 was to present the contents of the Draft Scoping Report – the issues that will be investigated during the EIA phase of the study.
B56	The meetings have no value, because no relevant information is given to the public. We want specific answers such as the exact locations of the roads, pipe lines, railway lines, transmission lines, etc. Exactly on what farm will the power stations be built and how will this be decided? How big will the buffer zone be?	Mr Jaco de Bruyn	Written submission on 26 January 2009 in response to the Draft Scoping Report.	The purpose of the initial meetings was to introduce the project and to allow the public an opportunity to give input to the proposed detailed investigations. The results of the specialist studies will only be available in the Environmental Impact Report once these studies have been completed. The information requested will be made available as the EIA phase and Conceptual Design progress.
B57	It was again noticeable at the meeting of 24 January 2009 that there is a huge mistrust towards	Mr Jaco de Bruyn	Written submission on 26 January 2009 in	Noted.

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	Eskom and these meetings only increase this mistrust. There is no sense in explaining Eskom's problems to us. We are not interested and it has got nothing to do with us. Negotiate with us on matters that affect us and do not negotiate with a hidden hand.		response to the Draft Scoping Report.	
B58	We were told that the meeting will be in both English and Afrikaans. Yet all the presentations were done in English.	Mr Jaco de Bruyn	Written submission on 26 January 2009 in response to the Draft Scoping Report.	Apart from the Eskom presentation, the other presentations were projected in Afrikaans and delivered in English. The attendees were also invited to ask questions in whichever language they felt most comfortable with and many attendees asked their questions in Afrikaans. It was also established upfront that all attendees will be able to follow the presentations that was made in English. We believe that language was adequately catered for.
B59	<p>It is the contention of the WWF-SA that the Draft Scoping Report has not adequately identified alternatives that should be assessed in the EIA.</p> <p>We recognise the great national strategic importance of the project and the implications for the way in which the EIA should be undertaken, inter alia in light of the on-going development of national climate change response policy and efforts to increase private investment in energy and electricity supply infrastructure. The leading objectives of this submission are to:</p> <ul style="list-style-type: none"> • Secure the consideration of additional alternatives in the EIA process; and • Ensure that the impacts on existing service providers and customers are assessed. <p>It is our contention that the absence of information on</p>	Mr Richard Worthington Manager: Climate Change Programme, World Wide Fund (WWF), - South Africa	Written submission on 30 January 2009 in response to the Draft Scoping Report.	See response to B50. Eskom is pursuing a suite of energy alternatives (renewable and conventional), however none of these technologies have been commercially proven at the scale of the proposed power stations (i.e. 5 400 MW). Eskom continues to undertake research and development.

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	<p>and assessment of project / activity-level alternatives in the Scoping Report would fatally undermines the potential for informed decision-making and public participation within this EIA process.</p> <p>It is our contention that there are reasonable and feasible activity-level alternatives for meeting the need that this project proposes to meet – i.e. meeting increasing energy service demand - that should be covered by this EIA process from the outset. Failure to do so would undermine and compromise the process (although this may be most demonstrable by the time of the full EIR).</p> <p>To limit the scope of an EIA to a discussion of site and impact remediation options of an activity pre-determined by the project proponent, without consideration of the several alternatives for meeting increasing energy service demand that are currently being considered in South Africa's energy and development planning processes, would be a fatal flaw in this process.</p>			
B60	<p>Given the very large scale (more than a quarter of current national generation capacity), long life-span of the proposed plants (to be operational beyond 2050) and their huge footprint (particulate pollution from existing coal-fired plant has been tracked as far as the Serengeti Plains and acidification impacts noted in neighbouring countries), there is a need to look well beyond site-specific issues and to fully consider cumulative impacts, including in the socio-economic dimension.</p>	<p>Mr Richard Worthington Manager: Climate Change Programme, World Wide Fund (WWF), - South Africa</p>	<p>Written submission on 30 January 2009 in response to the Draft Scoping Report.</p>	<p>As outlined in Chapter 6 of the Scoping Report, a suite of specialist studies will consider impacts beyond the site boundary where necessary. For instance the agricultural study will consider the region impact of the loss of agricultural land, the socio-economic study considers the regional socio-economic impacts and the air quality study considers the impact on the air quality to the extent that these impacts can be felt.</p>
B61	<p>It is essential that consideration of what is reasonable and feasible takes place in the broader context of</p>	<p>Mr Richard Worthington Manager: Climate</p>	<p>Written submission on 30 January 2009 in</p>	<p>All three items mentioned are being studied by Eskom.</p>

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	<p>Integrated Environmental Management, particularly in light of the fact that the Integrated Energy Planning process that would have informed decisions on how best to meet growing energy services demand, as required by the White Paper on Energy Policy for RSA (1998), was suspended by the Department of Minerals and Energy in September 2006 and remains 'in abeyance'.</p> <p>We suggest that the three leading reasonable and feasible activity/project-level alternatives that merit detailed assessment, including the option of a combination of the first and second, are:</p> <p>a) Energy Efficiency and Conservation, including solar water heating (beyond the target of the National Energy Efficiency Strategy);</p> <p>b) Renewable Energy Technologies, with an emphasis on solar thermal technologies (beyond the 2013 target of the White Paper on Renewable Energy); and</p> <p>c) Alternative coal technologies, particularly coal gasification.</p>	<p>Change Programme, World Wide Fund (WWF), - South Africa</p>	<p>response to the Draft Scoping Report.</p>	<p>a) Government and Eskom are placing a big emphasis on the Power Conservation Program, which aims to achieve a 10% reduction in electricity usage. Eskom has also implemented various power saving initiatives, including solar water heating and swop out of incandescent lamps with compact fluorescent lamps.</p> <p>b) Eskom has a 100 MW wind farm at feasibility stage and a 100 MW concentrating solar plant at research phase.</p> <p>c) Eskom has an Underground Coal Gasification project which is at research phase.</p> <p>In addition to the above-mentioned approaches/alternatives there is a need for additional base load power.</p>
B62	<p>What can be done to ensure that the project location is identified correctly? Geographically speaking, the project is simply not in the Waterberg Mountains. As for municipal boundaries, yes, the project is in the Waterberg District Municipality, but that is a very large area, extending well northeast of Lephalale, well south of Bela-Bela and well east of Modimolle. The name Waterberg is not appropriate, actually inaccurate, and doesn't help to identify the location of the project. How about some other name, such as: Western Bushveld Project, Limpopo Western Bushveld Project, Western Limpopo Project or Lephalale Project.</p>	<p>Mr John Miller Chairman, Waterberg Nature Conservancy PO Box 975 Vaalwater, 0530</p>	<p>Written submission on 17 December 2008 in response to the Draft Scoping Report.</p>	<p>The project location is given in detail in the literature and in the maps provided. As noted the Waterberg is a broad area and should not be assumed to only include the Waterberg Mountains, The coal field in the same general area as the power stations and from which coal would be obtained for the proposed power stations is named the Waterberg coalfield. The appropriate naming of the power station will be undertaken by Eskom, through a consultative process, later, as part of Eskom's</p>

REF	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE	RESPONSE
				naming process.
B63	Eskom is a statutory body and is therefore excluded in terms of Section 2 of the Subdivision of Agricultural Land Act, Act 70 of 1970, from the provision of the said Act. You can therefore approach the Register of Deeds to register the Servitudes without the Minister's Consent.	Land Use and Soil Management, Department of Agriculture	Written submission on 25 February 2009 in response to the Draft Scoping Report.	Noted. Eskom will approach the register of deeds in due course.
C. SOCIAL ISSUES				
C1	Will there be a need for housing and what are the proposed plans towards that?	Mr Maree Aucamp, Exxaro, Lephralale	Comments during the open house held on 26 November 2008 at the Mogol Club	A study will commence in January 2009 to determine the housing needs of the proposed development. In principle Eskom develops housing in existing townships or if required in new developments.
C2	The Wildlife and Environment Society of South Africa (WESSA) recognises the need for increased electricity production if economic opportunities are to be provided for the disadvantaged in the country.	Mr Luke Perkins, Limpopo Office, WESSA	Email in response to the Draft Scoping Report, 20 January 2009	Noted.
C3	What is the future of farm workers? Farm workers may find it difficult to find employment in other sectors since they are trained specifically for the cattle and game farm industries.	Mr Johan Burger, Gifboschpan farm	Comments during the public meeting held on 24 January 2009 at Steenbokpan	Noted. Farm workers are addressed in terms of legal requirements and Eskom's processes which ensure that they are not left worse off. Various options will be explored with the farm workers as a group.
C4	We request that the Draft Scoping Report is submitted to our office for our comments. We also request that an HIA be conducted as part of the EIA process.	Vhonani Ramalamula, South African Heritage Resources Agency (SAHRA)	Written submission on 30 March 2009 in response to the Draft Scoping Report	A copy of the Final Scoping report will be forwarded to SAHRA, as will the HIA in due course.
C5	Please forward Dr J van Schalkwyk's HIA to us for comment. WE trust that you will submit such report in due course to avoid inconveniences that may be caused as a result of delay.	Vhonani Ramalamula, SAHRA	Written submission on 30 March 2009 in response to the Draft Scoping Report	A copy of the HIA will be forwarded to SAHRA in due course.

REF	COMMENTS, QUESTIONS AND ISSUES	COMMENTATOR(S)	SOURCE	RESPONSE
D. ECONOMIC ISSUES				
D1	Capricorn Business Forum expressed their interest in the development of possible business opportunities for their members.	Mr Solly Ngoepe and Mr Tshepo Phukubye, Capricorn Business Forum, Polokwane	Comments during the open house held on 26 November 2008 at the Mogol Club	Eskom will take a similar approach as with Medupi - the development of a stakeholder forum followed by a supplier development workshop to enable businesses to become registered Eskom vendors. Eskom will forward the necessary information to the representatives of the Capricorn Business Forum.
D2	Why does Eskom not use railway transport of coal to power stations close to the cities where power is needed the most?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the open house held on 26 November 2008 at the Mogol Club	Eskom does use rail and road to transport coal; however this puts an additional burden on infrastructure. Further the price of electricity would increase significantly if this model was employed as it is cheaper to transport electricity for long distances than coal.
D3	How is it possible that mines find it profitable to transport coal to countries as far away as China?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the open house held on 26 November 2008 at the Mogol Club	The mines export high quality coal, which is considerably more expensive than the poorer quality coal used at Eskom power stations. The price of this imported coal is very expensive and this is reflected in the price of electricity in such countries.
D4	Where will the electricity be used that is generated by the new power stations?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the open house held on 26 November 2008 at the Mogol Club	It will be fed into the national grid and delivered where it is needed – even as far as Cape Town.
D5	What is the status with the nuclear power generation option?	Mr Adam Gunn for Routledge Modise on	Comments during the open house held on 26	Eskom and the Government are investigating Nuclear as an option.

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		behalf of the Limpopo Environmental Action Forum (LEAF)	November 2008 at the Mogol Club	Eskom reported that EIAs are being done on three sites in the Western and Southern Cape and environmental authorisation is expected sometime during 2009. Funding and licensing as with coal fired power stations will still need to be in place prior to the construction starting.
D6	What is being done to promote renewable energy sources and the use thereof to decrease the dependency on coal-fired power stations?	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Comments during the open house held on 26 November 2008 at the Mogol Club	Eskom has a strategy to investigate and implement renewable technologies. Plans are in place to build a 100 MW wind facility during 2009/10. Eskom also hope to demonstrate a 100MW Concentrated Solar Power plant in the Northern Cape. Various programmes are in place to work with other parties on smaller renewable options such as biomass.
D7	What about the neighbours of the proposed power stations that will be indirectly affected by this proposed development? Will they be compensated for proposed impacts, such as groundwater contamination 30km away or visual impacts on lodges a kilometre away from the power station?	Mr Pieter Lamprecht, Matjiesfontein	Comments during the public meeting held on 26 November 2008 at the Mogol Club	Some of the specialist studies, such as fauna, would only look at the proposed sites but others, such as groundwater and air quality, would look further afield. For instance the groundwater study would look at where any pollution would spread to if there was a pollution event, which would be effected etc. More than half of the specialist studies will look at the proposed impacts on the broader area and not just at the alternative sites.
D8	Mr Lamprecht asked about compensation should Eskom affect the groundwater.	Mr Pieter Lamprecht, Matjiesfontein	Comments during the public meeting held on 26 November 2008 at	Compensation would be determined after an impact occurred, which will be dependent

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			the Mogol Club	<p>on the outcome of an investigation into the matter and that it can be proven that Eskom is responsible for affecting the groundwater.</p> <p>Almost half of the specialist studies to be conducted will also focus on the impacts of the proposed development on people. She mentioned for example the socio-economic, economic, risk assessment and social impact assessments. Stakeholders were requested to provide support by co-operating with the specialists by providing correct information about their circumstances, fears and opportunities.</p>
D9	<p>Many hunters from overseas come to farms in this area to hunt and farmers spend between R60 000 and R120 000 per year overseas to market their farms, this area and what is being offered. Our clients come to this area because of the attractiveness of the place and to be in the bush. We cannot just pack up and leave because we will lose millions of Rand to start a game farm from scratch – we have invested millions of Rand in this area and one cannot just develop a place like this – pure bushveld – overnight. Tourism may be affected by the proposed industrial development.</p>	Ms Elana Greyling, Agri-SA	<p>Comments during the public meeting held on 24 January 2009 at Steenbokpan</p>	<p>Noted.</p> <p>Post meeting note: The socio-economic study will consider the investment made by game farmers and this will be discussed in the EIR.</p>
D10	<p>The bigger problem is the impact that the proposed development may have on the livelihood of the neighbours – they are the real losers in the process. Eskom must ensure that there is sufficient land around the ash dump so that an American hunter, for example, does not see it while hunting on a neighbouring farm. The proposed area of development is in the middle of the bushveld where</p>	Mr Johan Burger, Gifboschpan farm	<p>Comments during the public meeting held on 24 January 2009 at Steenbokpan</p>	<p>Noted.</p> <p>Post meeting note: The specialist studies will consider impacts beyond the site where necessary. In the case of visual impacts the majority of these will be beyond the site.</p>

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	hunting is a major source of income. Eskom did not allow for this buffer area with Matimba and Medupi in this regard. I hope that the standard of the current EIA process is much higher and will take this matter into consideration.			
D11	Inaccurate and rushed decisions could therefore lead to inappropriate and wasteful decisions being made. Due to the magnitude of these projects, if an error such as this is made then the resultant waste of public funding could be enormous and the consequences far-reaching.	Mr Adam Gunn for Routledge Modise on behalf of the Limpopo Environmental Action Forum (LEAF)	Written submission on 30 January 2009 in response to the Draft Scoping Report.	The decision making process related to such large projects is very carefully considered through various different mechanisms and parties. The decision to proceed with each phase of a project is not made lightly and hence a phased approach to licensing and approving the business case.
D12	<p>If there is one positive vision that gains consensus of all South Africans it is that tourism is or should be a mainstay of the South African economy. The natural environment is one of South Africa's strongest marketing assets and Government policy has recognized that visitor satisfaction is closely connected with the nation's physical and social heritage. It has afforded equal acknowledgement to tourism as a powerful source of job creation which, in turn, plays a pivotal role in contributing to economic growth. This is particularly true in areas such as Steenbokpan that are economically challenged and where historically disadvantaged communities may benefit from what is the heritage of all in that region.</p> <p>The area north east of the Matlabas River, west of the Mogol River and up to the Botswana boundary has been one of the last remaining truly remote bushveld areas, which has managed to escape large scale development and industrialisation. The area is sparsely populated and is ideal for game farming and conservation. For many years visitors and families alike came to the area to share and experience the solitude provided by the unique, simple beautiful</p>	Mr R McLachlan for McLachlan & Co Inc. on behalf of 21 affected landowners.	Written submission on 30 January 2009 in response to the Draft Scoping Report.	This is noted. The impact of the lack of electricity on not only the economy but also the people of South Africa needs to be weighed up against the impact of the proposed power stations in the Waterberg. This will be considered in the EIA.

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	area. Since the development of the first power station in Lephalale the solitude of this areas has slowly but surely been eroded. Somehow the Steenbokpan area managed to escape this development and remained as one of the last truly remote typical bushveld retreats that, once destroyed, can never be replaced. Unfortunately development will inevitably destroy the essential remoteness and wilderness of the area.			
D13	There can be no doubt that the building of two power stations, with attendant features such as coal yards and ash dumps in the heart of the Bushveld will be an eye-sore in the area, and will destroy the essential character of the area forever. It is submitted that should permission be granted to Eskom to proceed with its proposed power stations, it is the responsibility of the authorities granting such permission to limit the damage by imposing suitable obligations on the applicant.	Mr R McLachlan for McLachlan & Co Inc. on behalf of 21 affected landowners.	Written submission on 30 January 2009 in response to the Draft Scoping Report.	Noted. Post meeting note: A Visual Impact Assessment (VIA) will be undertaken as part of the EIA and this will assess the visual impacts of the power station. Mitigation measures will be proposed within the VIA.
D14	It can be accepted that the power stations will attract diverse development and one can envisage a creeping industrialisation in the area. This will add to the destruction of the bushveld. The area south of the Eenzaamheid fault was recently considered in the context of Eskom's application consent to erect the Mmamabula-Delta power line and the development of the Delta distribution station. In the Margen Industrial Environmental Impact Assessment Report dated October 2007 (p 34 Section 6.1) the following is stated: "A key outcome of the Mmamabula-Delta 4 X 400 kV power line EIA study is that the future potential of the different areas of the study areas needs to be preserved as much as possible". The recommendations and concluding remarks on p	Mr R McLachlan for McLachlan & Co Inc. on behalf of 21 affected landowners.	Written submission on 30 January 2009 in response to the Draft Scoping Report.	Noted. The report referenced and decisions previously made will be investigated further, and the results reflected upon in the EIA Report.

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	<p>44 Section 8 of the same document included the following: "Eskom has accepted the need to preserve the eco-tourism area south of the Eenzaamheid fault line".</p> <p>The DEAT and Eskom readily accepted that the area south of the Eenzaamheid fault must be preserved for eco-tourism and be kept intact for its development as a wildlife management area and to ensure that it develops its eco-tourism potential.</p>			
D15	<p>In the Draft Scoping Report some mention is made of a buffer zone around the residential areas of Steenbokpan. It is felt, however, that this provision is not sufficient to limit the damage to be done by Coal 3 and 4.</p> <p>Since Eskom will be destroying a major nature area and resource, Eskom should consider it to be its duty to isolate its intrusive power stations from the much larger bushveld area by creating a suitable buffer zone around the power stations and works, in which no development should be allowed. To prevent creeping industrialisation, the buffer zone must be declared a protected nature area.</p> <p>Eskom should be compelled to acquire adjacent land to ensure that such land can be used for no purpose other than natural development. Such area should be big enough to minimise the visual impact of the proposed works. The land should be declared a nature conservancy protected by legislation in this regard. In this way the land damaged by the power stations will be isolated from the rest of the bushveld and the damage limited.</p>	Mr R McLachlan for McLachlan & Co Inc. on behalf of 21 affected landowners.	Written submission on 30 January 2009 in response to the Draft Scoping Report	Comment is noted. The buffer zone around Steenbokpan was suggested in the selection of the proposed sites. The buffering of a power station from a visual perspective would require vast areas, as the power station may be visible from far distances – the visual impact study will advise on this impact. Potential mitigation measures to reduce the impacts on the surrounding areas will be developed and presented in the Draft Environmental Impact Assessment Report.
E. ISSUES RELEVANT TO THE LAND NEGOTIATION PROCESS				
E1	Will Eskom buy only two of the alternative sites?	Dr Johan van Tonder, Taaiboschpan	Comments during the public meeting held on	Eskom is currently proposing to buy the farms of all three alternative

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			24 January 2009 at Steenbokpan	sites. The directly affected landowners requested that Eskom purchase the land on all three sites upfront, rather than taking options against the land, and then only exercising the options once they had authorisation for two sites.
E2	<p>We do not want to sell our land as we wish to retire there. It is relatively good agricultural land and we could farm sufficiently to live by the proceeds/produce. We are currently improving the property through home improvements and it is much used by our family and highly valued.</p> <p>zWe would rather exchange the land for a similar piece of land with similar facilities and without any land claims within 20 km of Lephalale</p>	Mr J van Baalen, Witkop	Written submission on 3 April 2009 in response to the Draft Scoping Report	Mr van Baalen's letter has been provided to Eskom's land and rights for further consideration in the land negotiation process.