# **ANNEXURE B** Specialist review of Draft Scoping Report





Ninham Shand George

Dear Brett,

Environmental Impact Assessment of Eskom's proposed coal fired power station & associated infrastructure in the Witbank geographical area: review of the Ninham Shand Draft Scoping Report

I have considered the above draft report and my comment is included below. At the time of writing, the Issues Trail was not complete and comments made by stakeholders were therefore not available to me. The review considered the Draft of the Executive Summary and Chapters 1-8 of the draft report.

## Handling of issues relating to the strategic background for the project

The strategic background to the project is well presented. The relationship between the EIA study and Eskom's strategic planning in which many broad alternatives are considered is clearly spelled out. In my opinion, the position taken by the consultants in respect of these issues and the starting point of the EIA is appropriate.

### 2. Alternatives considered and carried through into the EIA

The approach to the selection of site alternatives is clearly set out. The report does not, however, provide any information about the methods that were used by Eskom to reach conclusions about the preference for the two sites that have been selected for investigation in the EIA and the acceptability of this starting point therefore depends on the robustness of Eskom's site selection study. It is understood that this study will be made available for stakeholder review.

The process alternatives that will be considered in the report are clearly described and are a good example of a thorough approach to alternatives analysis in an EIA.

## 3. Adequacy of public participation in the scoping phase

The advertising inviting comment on the project has been extensive and there do not appear to be any significant limitations or flaws in the public participation process that has been followed to date. Once the Issues Trail is available for review, this opinion will be updated.

#### 4. Definition of key issues and study terms of reference

The report says little about issues and the reader is presumably left to infer from the Issues Trail (not yet available to the reviewer) what concerns there are and how these will be addressed. For example, air quality is an important existing issue in the area, but it is not discussed in the chapter on the existing environment (Chapter 4) nor in the chapter on identified impacts (Chapter 5). Instead, in Chapter 5, Ninham Shand proceeds directly to the terms of reference for the air quality specialist study. This applies, to a large extent, to the other specialist studies as well.

There is some difficulty, therefore, in tying the scope of the specialist studies to specific identified issues. Nevertheless, the scope of most of the studies is extensive and this minimizes any risk that could arise from the lack of discussion around issues in the Scoping section of the report. Consequently, I do not regard this is a serious limitation in the report although I believe it would be a an example of best practice if there was a more comprehensive description of the receiving environment in Chapter 4 and a more incisive consideration of issues in Chapter 5.

Yours faithfully,

Mark Wood