
**RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU-NATAL
COMMENTS AND RESPONSES REPORT**

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COMMENTS RECEIVED ON THE SCOPING REPORT

No.	Comment/Issue	Issue Raised By	Response
ORGANS OF STATE ACKNOWLEDGMENTS AND REQUESTS FOR INFORMATION			
1.	Do you have a locality plan depicting the proposed activities versus Transnet Freight Rail properties so that we are able to comment comprehensively?	Futhi Mathebula National Capacity Planning & Strategy Transnet Real Estate Transnet Ltd Email: 21-08-2017	A locality map was sent to Futhi Mathebula of Transnet via email on 24 August 2017.
2.	Please send me the Background Information Document (BID) or a locality map.	John Geeringh Senior Environmental Consultant Eskom SOC Ltd Email: 22-08-2017	The BID and locality map was sent to John Geeringh of Eskom via email on 22 August 2017. No further comments have been received to date.
3.	Your EIA process notice forms part of our approval from the South African Civil Aviation Authority (SACAA) with regard to CCPP project refers. There is a SACAA process whereby permission is applied for with regards to obstacles which could pose an aviation hazard. More information can be obtained at http://www.caa.co.za . Click on information for industry 'Obstacles' on the LHS. Forms, Part 139-27 and submit on the form itself. <ul style="list-style-type: none"> Kindly provide a .kml (Google Earth) file reflecting the footprint of the proposed development site including the proposed 	Lizell Stroh Obstacle Inspector Procedures for Air Navigation Services- Aircraft Operations Air Navigation Services South African Civil Aviation Authority (SACAA) Email: 22-08-2017	SACAA's requirements have been submitted to the applicant. The applicant will apply for the SACAA approvals once the CCPP designs are finalised. SACAA will be consulted in November 2017 to determine the process to follow.

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	<p>overhead electric power line route that will evacuate the generated power to the national grid.</p> <ul style="list-style-type: none"> • Also indicate the highest structure of the project & the Overhead electric power transmission line. • Note that there may be other wind farms and PV farms in the area. Unique names are preferable. • Please always use the proposed PV farm name in the Subject box when corresponding via email with this office and indicate the name & address which should appear on the CAA approval/decline letter. • There is an assessment fee of R820 per application. • For billing purposes: company name VAT nr. and postal details. • Kindly ensure that all the above data is forwarded. Incomplete data causes unnecessary delays. 		
4.	<p>Thank you for notifying Amafa. Comment will be published on the SAHRIS facility on www.sahra.org.za once we have received proof of payment (currently R700) and site photos/case images. The payment details are on the cover sheet of the Need and Desirability Form (NID-Notice of Intention to Develop Form) available on the Amafa website www.heritagekzn.co.za.</p>	<p>Bernadet Pawandiwa Senior Heritage Officer Archaeology Compliance/Permits</p> <p>Amafa Heritage KwaZulu-Natali</p>	<p>The Scoping Report was uploaded on the SAHRIS website (Case Reference: 11535) on 21 August 2017. A completed Need and Desirability Form and proof of payment was submitted to SAHRIS and Amafa Heritage on 04 September 2017. No further comments have been received to date.</p>

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		Email: 22-08-2017	
5.	<p>The South African National Roads Agency SOC Ltd (SANRAL) hereby notifies you that all Scoping Environmental Impact Assessment Reports submitted to this office for comments shall conform to the following requirements:</p> <ol style="list-style-type: none"> 1) All reports must be submitted as a hard copy via courier or normal mail. 2) Submissions must be A4 – DIN size (210x297mm) and be bound on the left side. 3) Cover letter fully describing the purpose of the submission. 4) Executive Summary including a description of the proposed development or activity. 5) Clearly annotated Locality Map – A3-Din size (297x420mm) folded to A4 size. 6) Clearly annotated Development/Site Layout plan – A3 Din size (297x420mm) folded to A4 size. 7) Associated Town Planning Proposal 8) Listed Activities. 9) Road infrastructure provision and the associated Traffic Impact Assessment 10) Comments from other relevant Transport Authorities e.g. Provincial Departments of Transport, Municipality etc. 11) Storm water management <p>All ancillary information must be included on a</p>	<p>Jabu Zondo Statutory Control – Eastern Region</p> <p>SANRAL</p> <p>Email: 25-08-2017</p>	<p>SANRAL's requirements with regards to the submission of Scoping and Environmental Impact Assessment Reports are noted. A Scoping Report was submitted to SANRAL on 21 August 2017. It must be noted that a Traffic Impact Assessment will be undertaken during the EIA Phase of the project.</p>

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	<p>Compact Disc (CD) for further reference.</p> <p>12) All submissions to be addressed to: The Regional Manager – Eastern Region 58 Van Eck Place Mkondeni Pietermaritzburg 3201 Attention: Statutory Control Department</p> <p>13) Every effort must be taken by the applicant to ensure that only relevant and concise information is included to prevent unnecessarily large or voluminous submissions.</p> <p>Your cooperation in this regard will be appreciated and you are to note that any submission in an electronic (soft copy) format or a submission that does not conform to the above standard requirements will not be processed from hereon. Furthermore, SANRAL reserves the right to request any additional information it deems relevant in its consideration of any submission in this regard.</p>		
TRAFFIC IMPACTS			
6.	<p>From the drawing supplied it is not clear if you will be near a National Route our comments are set out below in the event that it does traverse or run parallel to a National Route.</p> <p>Any powerline and associated infrastructure that</p>	<p>Judy Marx Statutory Control – Eastern Region</p> <p>South African National Roads Agency SOC Ltd</p>	<p>» The routes which are located within close proximity to the project site include the Regional road (R34) located approximately 900m south of the project site and the National road (N2) located approximately 4.5km to the west of the project site.</p> <p>» The project site and the associated infrastructure does not</p>

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	<p>crosses or runs parallel to the National Road or placed within SANRAL's (The South African National Roads Agency SOC Ltd) building restriction area which is 60 metres from the Road Reserve Boundary needs SANRAL's approval.</p> <p>Once a route has been approved and finalised and falls within 60 metres parallel or crosses the National Road a wayleave will have to be submitted to SANRAL's Eastern Region for approval.</p> <p>Formal application shall be made to this office on an encroachment form which can be made available at the time of application and must be completed by the service owner.</p>	<p>(SANRAL) Letter: 15-08-2017</p>	<p>traverse the National road, therefore approval from SANRAL will not be required in this regard. It should be noted that the grid infrastructure to connect the CCPP to the national grid, or any other linear infrastructure associated with the project, will be assessed under a separate application for environmental authorisation.</p> <ul style="list-style-type: none"> » The roads associated with the development of the Richards Bay CCPP will not be located within 60m of a National road, therefore no wayleave application will be required to be approved by SANRAL's Eastern Region. » A formal application for encroachment is not required due to the location of the project site in relation to the N2, which is located approximately 4.5km to the west.
7.	<p>How will the impacts on traffic be managed if diesel or gas is required to be trucked in.</p>	<p>Franz Schmidt SHREQC Manager Richards Bay Alloys Public Meeting: 31-08-2017</p>	<p>A Traffic Impact Assessment will be undertaken in the EIA phase of this project, and will also address issues related to transportation of the fuel. Traffic impacts will be assessed and appropriate management measures proposed and presented in the Traffic Impact Assessment and in the EIA Report. Gas will not be trucked in but will be supplied by a gas supplier via its pipeline to the Eskom connection point at the boundary fence of the plant. Only diesel (used as back-up) will be trucked in.</p>
8.	<p>What modes of transport will be moving in and out of the proposed power plant?</p>	<p>Vuyo Keswa Environmental Manager Transnet Freight Rail Meeting:</p>	<p>A gas pipeline will be used to supply gas to the power plant as the primary fuel. Fuel tankers will be used occasionally should diesel be required to operate the facility as a back-up (this is all during operation of the power plant). During construction there will be construction vehicles moving in and out of the site on a regular basis</p>

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9.	Has a Traffic Impact Assessment been undertaken?	31-08-2017	A Traffic Study was undertaken as part of the Environmental Screening and Site Selection Study and a Traffic Impact Assessment will be conducted during the EIA phase.
PUBLIC PARTICIPATION PROCESS AND I&AP REGISTRATIONS			
10.	<p>I noted with surprise in the Zululand Observer (dd: 25/08/2017) that Public Meetings are to be held for what I can only assume to be the same project as this one, but this time round for a facility 10 times the size, i.e. 3000MW vs. the original 300MW. We have not heard from you whatsoever since the communication hereunder, and also find that curious?</p> <p>I shall be attending the Public Meeting on Thursday, 31/08 at 09h00 at the Richards Bay Public Library. I look forward to receiving substantially more information on this project, as well as the planned routing of the LNG Gas from the source and/or the Port of Richards Bay. I can only assume that this EIA process actually include the route?!</p> <p>I do have various issues with the deemed locality for the facility and would share that at the Meeting. Please do ensure that we are added to the database on this project to ensure we do receive future correspondence, notices, etc.</p>	<p>Frans van der Walt QS2000 Plus (Quantity Surveyors & Project Managers) Email: 28-08-2017</p>	<p>The proposed 3000MW Richards Bay Combined Cycle Power Project (CCPP) is a different project to the Gas Power Plant proposed by Richards Bay Gas Power 2 (Pty) Ltd, an independent power producer (IPP) and to which the previous correspondence, referred to by Frans Schmidt, related to. The EIA process for the Gas Power Plant (proposed by Richards Bay Gas Power 2) project was completed in 2016. The project received environmental authorisation in October 2016.</p> <p>The EAP confirms that Frans Schmidt has been registered as an Interested and Affected Party (I&AP) on the Richards Bay CCPP project's database. Correspondence distributed from the CRM system did not reach Frans Schmidt due to technical issues which have subsequently been resolved.</p> <p>Please note that the LNG gas pipeline will be subjected to an EIA process under a separate application which will be undertaken by a separate entity.</p>
11.	Kindly add Motla Consulting Engineers (specifically George Lotter) via email rbadmin@motla.co.za to your database. We are electrical consulting	George Lotter Electrical Engineer	George Lotter of Motla Consulting Engineers has been registered as an I&AP on the project's database.

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	engineers.	Motla Consulting Engineers (Pty) Ltd. Email: 29-08-2017	
12.	The DEA will request comments from DWS on the Scoping and EIA reports. We will submit our comments to the environmental consultant and to DEA directly.	Masala Nemubura Environmental Officer Department of Water and Sanitation Meeting: 30-08-2017	Comments on the draft SR dated 17-09-2017 were received from the DWS.
13.	It is recommended that you consult Mondi. Mondi has previously blocked activity on the proposed project site. I have noted that air quality has been identified as least preferable in terms of the selected site. Air pollution works both ways and one would need to take cognisance of the air pollution impacts that Mondi would have on the project site and determine what mitigation measures could be implemented to reduce these impacts.	Franz Schmidt SHREQC Manager Richards Bay Alloys Public Meeting: 31-08-2017	A one-on-one meeting was held with Candice Webb the Environmental Manager at Mondi on 30 August 2017. Potential air quality impacts caused by Mondi have been raised and Eskom has taken note of these.
14.	The site is in close proximity to Mondi. Have any incompatibilities with those land users been assessed (i.e. the pulp mill).	Sandy Camminga Chairperson – EIA Committee Richards Bay Clean Air Association Meeting:	A meeting has been held with Mondi and further discussions will be held in this regard and comments on the DSR are expected to be submitted.

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15.	The presentation should have included more detailed information on the power plant processes.	Sharin Govender PM: Environmental Management City of uMhlatuze Municipality Meeting: 31-08-2017	The presentation provided a summary of the infrastructure required for the power plant and the technology being investigated. Detailed information is presented within the Scoping Report.
VISUAL IMPACTS & SITE LOCATION			
16.	Is the proposed site the same even that Pulp United undertook an EIA on?	Candice Webb Environmental Manager'	The project is proposed on Portion 2 and Portion 4 of Erf 11376, the same site that was considered for the Pulp United plant.
17.	Mondi's primary concern is the potential impact the power plant or power plant processes would have on the quality of our product. Only potable water is utilised within our process to ensure the brightness and whiteness of our product. The proposed power plant will face Mondi's warehouse and this is a concern for us.	Mondi Meeting: 30-08-2017	Mondi's concern regarding the potential impacts to their product considering the location of the warehouse in relation to the proposed power plant site is noted. Eskom and the air quality specialist will consider this concern in their layout design, and the most optimal layout will be provided in the Draft EIA.
18.	What will the power plant's visual impact be? The power plant's proximity to the John Ross Highway must be considered.	Frans van der Walt QS2000 Plus (Quantity Surveyors & Project Managers)	Afzelia Environmental Consultants have been appointed to undertake a Detailed Visual Impact Assessment. The Scoping report provides detail on the visual receptors in the area that would be impacted by the development. At this stage, the visual impact is considered to be medium-low subject to a detailed assessment being undertaken in the EIA phase.
19.	This power plant will be a Major Hazardous Installation (MHI). The location of the power plant in close proximity to the John Ross Highway, a	Public Meeting: 31-08-2017	A MHI assessment is being conducted and will form part of the EIA report. The potential impact of the facility on the John Ross Highway will be considered in the MHI assessment.

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	critical arterial to the Richards Bay Port, must be considered.		
20.	I am not supportive that Phase 1D is being considered as the site for the development of the proposed power plant due to the potential visual impacts and that it will be a MHI. This project will have a negative impact on the proposed Richards Bay Port expansion. More appropriate sites should be considered, for example, sites within Phase 2 of the IDZ might be better suited for the development of a power station.		Afzelia Environmental Consultants have been appointed to undertake a Detailed Visual Impact Assessment. The Scoping report provides detail on the visual receptors in the area that could be impacted by the development. At this stage, the visual impact is considered to be medium-low subject to a detailed assessment being undertaken in the EIA phase. Eskom identified six potential sites within the greater Richards Bay area for the development of the proposed power plant. Four sites were taken forward into an environmental screening study. The process followed in determining which sites were most preferred is outlined in Chapter 3 of the Scoping report. Phase 1D is considered to be the most preferred alternative for consideration in the environmental screening and site selection study. The area surrounding the project site is inclusive of open fields, industrial activities, and pockets of commercial activities. The proposed development is, therefore, compatible with the surrounding land uses. No fatal flaws from an environmental perspective were identified. Mitigation in terms of air quality through appropriate design of the facility will however be required.
21.	That specific location concerns me. A much better site would be next to the Athene Transmission Station in Empangeni because of its proximity to the Sasol pipeline. The power station can also connect to the Athene Transmission Station. This site would make more sense as there would be limited visual and air quality impacts.		As Savannah Environmental indicated in the presentation, Eskom commissioned a Site Screening and Selection Study to identify the most preferred site for the power plant. The Site Screening and Selection Study details the methodology used and the factors considered in selecting this site as the most preferred alternative. The Scoping report provides further details in this regard.

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PROJECT NEED AND DESIRABILITY			
22.	What is the reason for developing this project? It seems as though 3000MW is more than Richards Bay requires in the future with the development of other energy related projects.	Franz Schmidt SHREQC Manager Richards Bay Alloys Public Meeting: 31-08-2017	The purpose of the project is to reduce transmission losses from generation facilities supplying KwaZulu-Natal, by having a generation centre in KwaZulu-Natal. Also, the project is planned to aid in reducing Eskom's carbon footprint per Unit of electricity produced, as power plants using natural gas emit approximately half the carbon of coal-fired power plants while using considerably less water, thus supporting Government's commitment to reduce carbon emissions. It should be noted however, that Eskom are still undertaking feasibility studies to determine whether the development of such a power plant will be viable. Eskom will decide whether to proceed with the implementation of this power plant once the permitting requirements and regulatory compliance requirements have been met.
23.	Is the intention of this power plant to be part of the primary generation of Eskom or will it be a standby plant that will only be used if necessary. Is the plant going to run fulltime or on a standby basis?	GA Lotter Engineer Motla Public Meeting: 31-08-2017	The plant is a mid-merit plant that will operate for 16 hours per day for 5 days per week.
PROJECT TECHNICAL DETAILS			
24.	Why is the gas pipeline being assessed under a separate EIA process?	Candice Webb Environmental Manager Mondi Meeting: 30-08-2017	Eskom will need to enter into a gas sales agreement (GSA) with potential gas suppliers. The entity supplying the gas will be responsible for undertaking the EIA for the gas pipeline. However, the pipeline inside the power plant or at the boundary fence (connection point) of the gas power plant will be assessed in this EIA. Eskom is in discussions with Transnet and other stakeholders to determine possible routing options for the gas pipeline.

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25.	<p>Where will the fuel for this power plant be sourced from? Will the fuel be supplied via the Mozambique gas pipeline, via LNG containers being delivered, via an FSRU or a land-based storage facility? How can an EIA for the gas power plant be undertaken without having completed an EIA for the fuel pipeline?</p> <p>Details pertaining to the supply of fuel must be included in this EIA assessment as this aspect of the project will have a monumental impact on transportation routes, safety, etc. One has to take fuel supply into consideration in this EIA.</p>	<p>Dion Wilmans Director</p> <p>Richards Bay Gas Power 2</p> <p>Public Meeting: 30-08-2018</p>	<p>The application for environmental authorisation only applies to the power plant itself. In terms of Eskom's mandate, it is not authorised to develop or construct gas pipelines. Eskom is a power generation, transmission and distribution company. A partnership with the relevant service provider would need to be established to determine the routing of the pipeline and the supply of gas. This partnership will be responsible for the permitting of the pipeline and gas supply and storage. It should be noted, however, that Eskom considered aspects relating to fuel supply when the site was selected. The project is being developed in phases and the project's operational requirements will be met when all the phases and aspects of the project have been considered.</p> <p>Eskom has experience from two plants requiring the supply of fuel in the Western Cape and therefore, understand the requirements and what the impacts are. Furthermore, Eskom has in-house knowledge, expertise and capability to mitigate and manage those impacts.</p>
26.	<p>I assume that this power plant will start up on diesel instead of gas. Will the plant be fully operational on diesel fuel alone?</p>	<p>Franz Schmidt SHREQC Manager</p> <p>Richards Bay Alloys</p> <p>Public Meeting: 31-08-2017</p>	<p>The primary fuel stock for this power plant is gas. The plant will have dual fuel capabilities; however, the intention is to have the power station supplied by gas full time. The plant will only operate on diesel as a backup for emergency situations.</p>
27.	<p>The same site was subjected to an EIA for Pulp United. A number of environmental challenges were identified during that process. I am glad that you are aware of these challenges. Too often we</p>	<p>Frans van der Walt</p> <p>QS2000 Plus (Quantity Surveyors & Project</p>	<p>Savannah Environmental are fully aware of the challenges faced with regards to the Pulp United EIA that was previously conducted. Phase 1D is approximately 107ha in extent. The project study site is 71ha, as the off-set area has to be avoided. The footprint of the</p>

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	<p>find that outside consultants are unaware of other environmental assessments undertaken in the area.</p> <p>What is the full extent of that site? My concern is that there will not be sufficient space to develop the project due to the environmental sensitivities identified on the site.</p>	<p>Managers)</p> <p>Public Meeting: 31-08-2017</p>	<p>power plant is likely to be less than 71ha depending on the environmental sensitivities on the site. The entire power plant may require approximately 60ha.</p>
28.	<p>The gas pipeline will require an EIA. The pipeline route is critical as it may impact the Richards Bay Port expansion project.</p>		<p>A partnership needs to be established with other state-owned companies or with private companies to establish the gas pipeline. This entity will be responsible for the permitting required for the pipeline. More work needs to be undertaken in this regard from a technical and commercial point of view.</p>
29.	<p>Where will the product be stored and where is your strategic reserve going to be stored. This needs to be considered within the EIA. Is the storage going to be included within the footprint that you are referring to or will it be at another location?</p>		<p>The current planning is that only diesel will be stored on the site.</p>
30.	<p>My sentiment is that this EIA cannot be approved until you have clarified the routing of the transmission lines and the pipelines.</p>		<p>Comment noted.</p>
31.	<p>Why are the EIAs for the various project components being undertaken separately?</p>	<p>Retha van Niekerk Director</p> <p>Urban Plan</p> <p>Public Meeting: 31-08-2017</p>	<p>Eskom is unable to undertake the EIA for the fuel supply pipeline as the gas supplier will conduct this. A partnership needs to be established with other state-owned companies or with private companies to establish the gas pipeline. This entity will be responsible for the permitting required for the pipeline. More work needs to be undertaken in this regard from a technical and commercial point of view. Eskom's transmission department will be initiating the EIA for the transmission lines which will commence once a consultant has been appointed (envisaged to be in the</p>

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			<p>fourth quarter of 2017). Once this is completed the EIA for the powerlines will commence. It should be noted that Eskom is not developing the power plant in isolation from its other critical components. Consultation with various stakeholders and state-owned companies are ongoing.</p> <p>In terms of the project lifecycle for generation project, the Transmission EIA lags the facility EIA (generation). Eskom's transmission department will be initiating the EIA for the transmission lines which will commence once a consultant has been appointed (envisaged to be in the fourth quarter of 2017). Desktop and conceptual studies were undertaken from Eskom's transmission, generation and technical engineering departments. This information was used to inform the Site Screening and Selection Study. Eskom's transmission department will be initiating the EIA for the transmission lines which will commence once a consultant has been appointed (envisaged to be in the fourth quarter of 2017). Eskom has to select three corridors and a few substations close to the site are being considered. Also, Eskom is taking due consideration of future developments planned within the IDZ. Eskom is working very closely with the IDZ as well as Transnet and other key state-owned companies. It is expected that the Scoping Report for the transmission lines will be available in due course.</p>
32.	<p>This project must take cognisance of other developments such as the relocation of the airport and the expansion of the port. With all due respect to Eskom, we have been involved in EIAs in Richards Bay where the same mistake was made. Applicants separated the transmission lines from the</p>	<p>Frans van der Walt QS2000 Plus (Quantity Surveyors & Project Managers)</p>	<p>Eskom is not working in isolation. Key stakeholders and government departments are being consulted and we are aware of other developments taking place in Richards Bay.</p> <p>It should be noted that some of the sites considered within the Site Screening and Selection Study were considered no-go areas for</p>

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	substation EIAs and then it failed. It is tax payers' money that Eskom is wasting by using this approach. Rather undertake a Scoping Study on the preferred sites and investigate more sites and present realistic solutions. Undertaking an EIA on this site is premature if you do not know what your source of supply is and where your source of supply is going to be stored. The UVS site would have been optimal for this development but was dropped to environmental concerns.	Public Meeting: 31-08-2017	development due to water related issues. The UVS site (Site 4a) is not preferred from an environmental perspective as the impacts on the aquatic ecology and wetlands may present an impact of high significance in these areas which cannot be avoided.
33.	The City of uMhlatuze Municipality is concerned that this project is not being planned holistically as the gas pipeline, the LNG import terminal and the liquefaction plant are excluded from this EIA. It is the Municipality's sentiment that this project needs to be dealt with from a cumulative perspective.	Sharin Govender PM: Environmental Planning City of uMhlatuze Municipality Meeting; 31-08-2017	This project is being developed in a development phased approach where the project is considered holistically. The pipeline and transmission power lines are being considered by Eskom even though separate EIA processes are being undertaken for these project components. Eskom is in the process of appointing an EIA consultant to undertake the environmental assessment required for the transmission line infrastructure. This process will not lag far behind the EIA for the power plant. With regards to the gas pipeline, Eskom's commodities department is responsible for sourcing potential gas supply through various stakeholders. The gas supplier will be responsible for the permitting requirements of this project component, therefore a separate EIA will be undertaken by the entity responsible for the gas. It must be noted that Eskom will not present a business case for this power plant if all the project components are not in place.
34.	The Richards Bay Clean Air Association is concerned that there is no gas available to supply a gas power plant in Richards Bay. We will not	Sandy Camminga Director	The Richards Bay CCPP will be operated on gas with diesel as a back-up in case there is an emergency situation. It would not be feasible to operate the power plant solely on diesel as this is too

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	support a gas power plant which will be operated using diesel because there is no gas available.	Richards Bay Clean Air Association	expensive and harmful to the environment. Eskom is currently engaging with various stakeholders to source gas. There is a possibility that gas could be imported from Mozambique via a pipeline.
35.	There is no EIA process underway for the gas supply. My sentiments are that the EIA for the power plant is being undertaken prematurely. The critical component of this project is the supply of gas and this need to be put in place prior to the power plant being approved. We do not want a gas power plant operating on diesel in Richards Bay. Will the Air Quality Impact Assessment investigate the worst-case scenario which is a power plant that runs entirely on diesel? This is an assumption that the Richards Bay Clean Air Association is going to make until there is an LNG facility in Richards Bay.	Meeting: 31-08-2017	Eskom's governance will not approve the business case for this power plant if the fuel source is not available. Eskom is mandated to source the gas from potential gas suppliers and Eskom would be unable to proceed with the project if the gas is not sourced. Eskom will not run this plant on diesel as its primary source of fuel. The power plant will operate on a mid-merit basis of 16 hours a day for 5 days a week on gas. It will not operate at baseload, although the EIA will assess the impacts for both mid-merit and baseload cases.
36.	It is understood that the gas pipeline, the LNG import terminal and the liquefaction process plant will be operated by different entities. It is important to understand that the National DEA is in the process of undertaking a Strategic Environmental Assessment on the gas network and it is assumed that this assessment will include LNG aspects. However, it is imperative that I&APs are provided with a holistic understanding of this project.	Sharin Govender PM: Environmental Management City of uMhlatuze Municipality Meeting; 31-08-2017	Eskom is engaging with the Department of Energy on an ongoing basis. Eskom forms part of the committee that is working on the SEA.
37.	Is this plant considered a Major Hazardous Installation (MHI)?	Sandy Camminga Director Richards Bay Clean Air	The power plant is considered to be a MHI and an MHI assessment will be undertaken in the EIA phase.

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		Association Meeting: 31-08-2017	
38.	What kind of waste would be generated by the power plant?	Issue raised at the meeting held with the Richards Bay IDZ ERC Committee on 31-08-2017	The waste which would be generated would include sewage, waste from the reverse osmosis plant.
39.	Phase 1D consists of 3 portions and the portion being investigated are Portion 2 and Portion 4 of Erf 11376. Portion 3 of Erf 11376 will likely be traversed by infrastructure such as access roads. It must be noted that any infrastructure linking to the site would need to bypass the off-set area. We would need an understanding of what infrastructure will need to traverse Portion 3 of Erf 11376.	Sandy Camminga Director Richards Bay Clean Air Association Meeting: 31-08-2017	The detailed layout will be presented in the EIA report. Eskom will ensure that the offset areas are avoided.
SITE SELECTION PROCESS			
40.	How were the sites selected? I am not entirely convinced that the other three sites options which were assessed were even viable to begin with.	Sandy Camminga Director Richards Bay Clean Air Association Meeting: 31-08-2017	KG: The sites along the coast were chosen based on the technology that Eskom wanted to use for the power plant, which was wet cooling technology and planned to use sea water for cooling. The two inland sites were chosen based on their availability for power generation following discussions with the landowners. Eskom's project selection criteria does not consider technology only. Transmission studies and the cost of the project are considered as well. Eskom undertook a pre-site selection screening exercise prior to these four sites being selected. Richards Bay is

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			<p>identified as the best locality for this project as the Department of Energy (DoE) plans to implement a gas-to-power programme in Richards Bay which would include the supply of gas to the port. Three of the sites were not selected based on cost factors. Eskom commissioned an Environmental Screening and Site Selection Study which was undertaken by Savannah Environmental prior to the commencement of the Scoping Study. The site selection report was concluded and approved in March 2017.</p>
41.	<p>Was there any consultation with the City of uMhlathuze Municipality during the Environmental Screening and Site Selection Study.</p>		<p>The City of uMhlathuze Municipality was consulted during the Environmental Screening and Site Selection Study. It is Eskom's intention to continue to liaise and engage with the Municipality during the EIA process and during the entire life cycle of the project.</p>
42.	<p>It is true that site 4a, 5 and 6 are deemed unfeasible for various reasons. These sites should not be presented as alternative sites in the EIA as they are deemed unfeasible.</p>	<p>Sharin Govender PM: Environmental Planning City of uMhlathuze Municipality Meeting; 31-08-2017</p>	<p>These sites were assessed in the Environmental Screening and Site Selection Study that was undertaken prior to the EIA process being initiated. Site 4a, 5 and 6 are not presented as alternative sites in the Scoping report.</p> <p>It is important to demonstrate how the site was selected prior to the Scoping study being initiated, therefore, the process undertaken for the Environmental Screening and Site Selection Study is detailed in the Scoping Report. A motivation as to why these sites were not preferred has been included in the Scoping report.</p>
43.	<p>With all due respect you cannot present unfeasible sites as alternative sites. It is disingenuous if you present four sites as alternatives which are deemed unfeasible from the commencement of this process.</p>		<p>There are two processes which were undertaken prior to the Scoping study being undertaken. First, Eskom undertook an assessment of six potential sites from an engineering and cost perspective. Technical and landowner issues reduced the potential sites to four. Second, Savannah Environmental was commissioned to undertake an Environmental Screening and Site</p>

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			<p>Selection Study. Four sites were assessed within this study. The result of this study was that Site 7 is considered to be the most preferred alternative considered within this Environmental Screening and Site Selection Study. No fatal flaws from an environmental perspective were identified at this stage in the process. A Scoping and EIA study are now being undertaken on Site 7. The other sites are not being considered as alternative sites within the EIA.</p>
44.	<p>It is important to note within the Scoping and EIA report that an initial Environmental Screening and Site Selection Study was undertaken and that the sites assessed are not being assessed within the EIA.</p>		<p>The Environmental Screening and Site Selection process is detailed in Chapter 3 of the Scoping report.</p>
GRID CONNECTION INFRASTRUCTURE			
45.	<p>Where will the proposed power station connect to the Eskom grid? The transmission lines will be subject to an EIA. Why is this aspect of the project not included within this EIA?</p>	<p>Frans van der Walt QS2000 Plus (Quantity Surveyors & Project Managers) Public Meeting: 31-08-2017</p>	<p>Eskom has undertaken desktop level studies in relation to the transmission lines. Three corridor alternatives have to be selected and assessed within an EIA. This project is being developed in a phased approach and the permitting of the transmission lines will be undertaken once Eskom has completed the required options analysis and technical studies with respect to the transmission lines. Since the current site is the only site deemed most feasible, all Transmission corridors being investigated are leading to this site.</p>
46.	<p>Do you have your plans in place already in terms of where the application area will be?</p>	<p>Retha van Niekerk Director Urban Plan Pubic Meeting: 31-08-2017</p>	<p>Transmission studies have been undertaken on a desktop level, and some corridors were identified.</p>

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LAND CLAIMS			
47.	<p>We acknowledge receipt of your enquiry received on 11 August 2017 and advise that our records indicate that no claims for restitution in terms of the provisions of the Restitution of Land Rights Act, 22 of 1994 (as amended) have been lodged in respect of the properties described as Portion 2 and Portion 4 of Erf 11376, Richards Bay.</p> <p>Whilst great care is taken to verify the accuracy of the information regarding all claims, the Regional Land Claims Commission will not be held responsible for any damage or loss suffered as a result of information furnished in this regard as there are claims lodged with the Commission which are not yet captured in our database as they are not yet published in the relevant government gazette.</p>	<p>Mr N Mdluli Manager: Information and Records Management Commission of Restitution of Land Rights Letter: 22-08-2017</p>	<p>It is noted that the Commission of Restitution of Land Rights' records indicate that no claims for restitution in terms of the provisions of the Restitution of Land Rights Act, 22 of 1994 (as amended) have been lodged in respect of Portion 2 and 4 of Erf 11376 located within Richards Bay, at this stage.</p>
AIR NAVIGATION IMPACTS			
48.	<p>Interest in the project: Aviation safety with regards to traffic operating with the Richards Bay airspace.</p> <p>Questions, views or concerns: 1) Position of the proposed CCPP 2) Height of the tallest structure 3) Footprint of the CCPP</p>	<p>Oscar Nzima Richards Bay Airport Manager Indiza Airport Management Reply Form: 28-08-2017</p>	<p>The proposed CCPP is to be developed on Portion 2 and 4 of Erf 11376 which is located in the Richards Bay Industrial Development Zone.</p> <p>The tallest structures will be between 40 and 60 meters and includes the bypass stack and the exhaust stack for the CCPP.</p> <p>The development footprint of the CCPP is approximately 60ha in extent.</p>
49.	<p>My interest in this project is the potential impact of the project on aviation. The IDZ is positioned in line</p>	<p>Oscar Nzima Richards Bay Airport</p>	<p>Eskom has received correspondence from the CAA. Eskom is liaising with Lizell Stroh, Obstacle Specialist – Aviation Obstacle and</p>

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	<p>with the runway of the Richards Bay Airport. It is approximately 4.5 miles from the runway threshold. Any development in line with the runway might affect aircraft operation and the decent gradient onto the runway. From an advisory point of view, Eskom needs to take this into consideration and consult the Civil Aviation Authority (CAA) so that an obstacle evaluation assessment can be undertaken.</p>	<p>Manager Indiza Airport Management Public Meeting: 31-08-2017</p>	<p>GIS, and she has advised that the application for obstacle evaluation assessment should be submitted once the project is in an advanced stage, once the heights have been determined.</p>
IMPACTS TO AGRICULTURAL POTENTIAL			
50.	<p>1. GENERAL</p> <p>1.1.The Provincial Department of Agriculture and Rural Development: Agriculture Resource Management Land Use Regulatory Unit acknowledges receipt of the above mentioned application.</p> <p>1.2.The submitted application requests that the Provincial Department of Agriculture and Rural Development to provide inputs on the Environmental Impact Assessment Process (EIA).</p> <p>1.3.The EIA is conducted as Eskom proposes to develop a Combined Cycle Power Plant (CCPP) and associated infrastructure.</p> <p>2. BACKGROUND</p> <p>2.1.The proposed CCPP will be located on Portion 2 and Portion 4 of Erf 11376 in the Richards Bay Industrial Development Zone</p>	<p>P. Mans Deputy Director: Land Use Regulation KwaZulu-Natal Department of Agriculture and Rural Development Letter: 01-09-2017</p>	<p>COMMENTS ON PROPOSAL:</p> <p>1. It is noted that the development of the proposed CCPP will have limited impact on the agricultural land of the Province. The agricultural potential of the project site has also been identified by the Soils and Agricultural Potential Scoping Study (Appendix H) as Class III land, which is considered to pose moderate limitations to agriculture with some erosion hazard, and would require special conservation practice and tillage methods for agricultural production.</p> <p>2. The proposed development has an impact on surface and ground water and soil and land capability, however the significance of the impacts on surface and ground water and soils and land capability will be considered, assessed and quantified during the EIA Phase. It is noted that the proposed project is within the well-developed site that has been permanently transformed. The project site will be subjected to further detailed assessments during the EIA phase in order to confirm that agricultural potential of the site will not be impacted upon.</p>

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	<p>(IDZ) Phase 1D.</p> <p>2.2. Portion 2 and 4 are located 6km south west of Richards Bay and 4km south west of Alton.</p> <p>2.3. Portion 2 and 4 are within uMhlathuze Town Planning Scheme and as part of uMhlathuze Local Municipality.</p> <p>2.4. Portion 2 and 4 are 71 hectares in total combined.</p> <p>2.5. The proposed project is aimed at reducing transmission losses from generation facilities supplying KwaZulu-Natal.</p> <p>2.6. The project is also aimed in reducing Eskom's carbon footprint per unit of electricity produced as power plants using natural gas emit approximately half the carbon of coal-fired power plants while using considerably less water.</p> <p>2.7. CCPP will use a gas turbine generator to generate electricity and the waste heat will be used to make steam to generate additional electricity via a steam turbine.</p> <p>2.8. Associated infrastructure will include the following:</p> <ul style="list-style-type: none"> • Gas turbines • Heat recovery steam generators • Steam turbines for the generation of additional electricity • Condensers for conversion of steam 		<ol style="list-style-type: none"> 3. The footprint of the project site is approximately 71 ha, which is considered to be sufficient to accommodate the CCPP with a development footprint of ~60ha. Layout design and planning will be undertaken by the developer will consider the environmental sensitivities and constraints in order to avoid or minimise impacts on sensitive environmental features. It must however be noted that a biodiversity offset area is located directly adjacent to the project site for the conservation of the vegetation and coastal wetland system present within the project site and the surrounding area. 4. Maintenance and operational requirements to ensure that the development will not have a detrimental impact on the environment will be included as part of the Environmental Management Programme within the EIA phase. This will ensure the proper operation and maintenance of the water treatment plant. 5. As part of the EIA Phase an Environmental Management Programme will be compiled to include all the appropriate and required mitigation measures to ensure that the construction, operation and decommissioning of the Richards Bay CCPP is undertaken such that it will not lead to detrimental impacts on the environment. 6. It is noted that information regarding the pipelines to be constructed as part of the project needs and the location thereof needs to be made available. However, the gas pipeline associated with this development will be undertaken as part of a separate application for environmental authorisation. 7. Impacts on wetlands within the project site will be investigated

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	<p>back to water</p> <ul style="list-style-type: none"> • Bypass and exhaust stacks • Water treatment plant for treatment of potable water and production of demineralized water • Water pipeline and tanker • Dry cooled systems or once-through cooling system technology • Closed fin fan coolers to cool lubrication oil for the gas and steam turbines • A gas pipeline and gas pipeline supply conditions process facility • Diesel offloading facility and storage tanks • Ancillary infrastructure including access roads, warehousing and buildings, storage facilities, generators and 132kV and 400kV switchyards. • A power line to connect the Richards Bay CCPP to the national grid for the evacuation of generated electricity. <p>3. COMMENTS ON PROPOSAL</p> <p>3.1.The proposed development has limited impact on reducing available agricultural lands within the Province as it is within an area that is already been under local municipality control.</p>		<p>in detail by a qualified specialist during the EIA phase. The outcome of the assessment of impacts on wetlands will be included in a Wetland and Aquatic Ecology Impact Assessment Report as well as in the environmental impact assessment report (EIAR).</p> <p>RECOMMENDATIONS</p> <p>» A detailed EIA Report will be submitted to the KwaZulu-Natal Department of Agriculture and Rural Development in due course. The requirements stated by the Department will be considered during the compilation of the EIA Report and EMPr.</p> <p>CONCLUSION</p> <p>» It is noted that the KwaZulu-Natal Department of Agriculture and Rural Development supports the development of the Richards Bay CCPP within the proposed project site. A detailed EIA Report will be submitted to the Department for their consideration and comment.</p>

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	<p>3.2. Even though the proposed development is foreseen as the project that will highly have impact on surface and ground water and impact on soil and land capability.</p> <p>3.3. The proposed project is within the well-developed site, which is an area that is permanently transformed so there are no foreseen agricultural activities that will be impacted upon by the proposed development.</p> <p>3.4. Generally, it is important that the available land is enough for all proposed operations to avoid possible negligence of important parts that might lead to greater degradation of natural resources within the area.</p> <p>3.5. Proper maintenance is essential as to meet discharge standards of water treatment plant</p> <p>3.6. Environmental management plan for such projects is important. The office notes that this is still the beginning of the whole process.</p> <p>3.7. There should be a correct allocation of pipes in terms of distances from the rivers.</p> <p>3.8. Wetlands also need to be observed and delineated as to avoid possible pollution.</p> <p>4. RECOMMENDATIONS</p>		

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	<p>4.1. A detailed report that is still to be submitted to this office, it is important that the following areas be addressed as to have a sound project view:</p> <p>4.1.1. Type of dam and method that will be used for construction of a dam for the proposed water treatment plant.</p> <p>4.1.2. Types and construction methods of underground tanks for fuel tanks.</p> <p>4.1.3. Clarity where the gas will be sourced and its disposal plan.</p> <p>4.1.4. Water Use License Application is lodged and addressed as per National Water Act, 1998 (Act No 36 of 1988) for the proposed development.</p> <p>4.1.5. Proper mitigation measures are implemented and adhered to.</p> <p>4.1.6. Proposed development and associated infrastructure is not affecting our Natural Resources which is ground water, surface water and soils.</p> <p>4.1.7. Conservation of Agricultural Resources Act 43 of 1983 should be taken into consideration with application to Paragraph 6 and 18 Subsection 1.</p> <p>4.1.8. Re-vegetating and rehabilitating plan of the areas that will be affected by the construction phase.</p>		

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	<p>4.1.9. Proper storm water management plan is also adhered to as to prevent possible soil erosion.</p> <p>4.1.10. The office request that detailed information and a report is sent to us with information that will clearly indicate:</p> <ul style="list-style-type: none"> • Depth of ground water on site • Distance from project site to the coast <p>5. CONCLUSION</p> <p>5.1. Please be advised that the Provincial Department of Agriculture and Rural Development: Land Use Regulatory Component's is in support of the project but the approval is on basis of submission of a detailed report with a detailed environmental management programme.</p>		
COMMENTS FROM THE NATIONAL DEPARTMENT OF ENVIRONMENTAL AFFAIRS			
51.	<p>The draft Scoping Report (SR) dated August 2017 and received by this Department on 22 August 2017 refers.</p> <p>This Department has the following comments on the abovementioned application:</p> <ul style="list-style-type: none"> • <u>Public Participation Process (PPP)</u> <ul style="list-style-type: none"> o Please ensure that all issues raised and 	<p>Olivia Letlalo Control Environment Officer: Strategic Infrastructure Developments</p> <p>Thando Booi: Environmental Officer Specialised Production:</p>	<p><u>Public Participation Process</u></p> <p>» All issues raised and comments received by I&APs have been collated and responded to in the Comments and Responses Report (Appendix C8). Copies of the Scoping Report were submitted to Wilma Lutch of the DEA's Biodiversity Section and Thulie Khumalo of the DEA's Air Quality Management Directorate on 21 August 2017 (refer to Appendix C4 for evidence of this submission). Follow-up emails requesting comments from Olga Chauke and Kent Buchanan were sent</p>

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	<p>comments received during the circulation of the SR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section and Air Quality Section: Contact person Ms Olga Chauke at 0123999161 ochauke@environment.gov.za or Kent Buchanan at 0123998868 or kbuchanan@environment.gov.za) in respect of the proposed activity are adequately addressed in the final SR.</p> <ul style="list-style-type: none"> o Proof of correspondence with the various stakeholders must be included in the final SR, should you be unable to obtain comments, and proof should be submitted to the Department of attempts that were made to obtain comments. o The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended. <ul style="list-style-type: none"> • <u>Description of the identified Alternatives</u> <ul style="list-style-type: none"> o Please provide a description of the identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment 	<p>Strategic Infrastructure Developments Department of Environmental Affairs Letter: 15-09-2017</p>	<p>on 20 September 2017, following receipt of the DEA's letter dated 15 September 2017.</p> <ul style="list-style-type: none"> » Proof of correspondence with I&APs and proof of attempts made to obtain comments are contained in Appendix C4 and C5 of the final Scoping Report. » The Public Participation Process undertaken for the Richards Bay CCPP, is included in Chapter 4: Approach to undertaking the Scoping Phase, is in line with Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended in April 2017. <p><u>Description of the identified Alternatives</u></p> <ul style="list-style-type: none"> » All alternatives which were assessed as part of the Scoping phase are included in Chapter 3, Section 3.4 of the final Scoping Report. Alternatives considered as part of the project included technology alternatives and the 'do-nothing' alternative. The advantages and disadvantages expected to be associated with the development of the Richards Bay CCPP is included in Chapter 3, Section 3.2 and chapter 6 of the final Scoping Report. » A motivation for not assessing site alternatives is provided in Chapter 3, Section 3.4.1. » Appendix 2 of GN R326 has been fully considered and complied with within the Scoping Report, which was submitted for review and the final Scoping Report submitted to DEA for their consideration. At the start of each Chapter, requirements as per Appendix 2 of the 2014 EIA Regulations are included to illustrate in each Chapter which requirements have been met. Please refer to the following sections in the report which indicate the requirements that have been met in each chapter

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	<p>and on the community that may be affected by the activity as per Appendix 2 of GN R.982 of 2014 as amended.</p> <ul style="list-style-type: none"> o Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2. <ul style="list-style-type: none"> • This Department requests the EAP to familiarise themselves with the requirements of Appendix 2 of GNR 982 of the EIA Regulations, 2014 as amended and ensure that the final SR submitted to this Department for consideration meets the requirements in terms of identifying, assessing and providing mitigation measures of the impacts on the alternative and preferred sites. <p>In addition to the above, please ensure that the climate change impact assessment study is undertaken and be incorporated in the final SR.</p> <ul style="list-style-type: none"> • <u>General Comments</u> <ul style="list-style-type: none"> o Please provide three (3) cd copies and one (1) hard copy of the final scoping report. o You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of 		<p>and where in the chapter the requirement is addressed; Sections 1.1, 2.1, 3.1, 4.1, 5.1, 6.1, 7.1 and 8.1.</p> <ul style="list-style-type: none"> » The Climate Change Impact Assessment will be undertaken and will form part of the EIA report. The terms of reference has been included in the Plan of Study for EIA (Chapter 8 of the final Scoping Report). <p><u>General Comments</u></p> <ul style="list-style-type: none"> » Three CD copies and one hard copy of the final Scoping Report will be submitted to the National Department of Environmental Affairs for their consideration. » The final Scoping Report complies with the requirements of Appendix 2 of the 2014 EIA Regulations, as amended. Refer to sections 1.1, 2.1, 3.1, 4.1, 5.1, 6.1, 7.1 and 8.1 for an indication of the requirements and where in the report the requirements have been met. Regulation 21(1) has also been met through the submission of the application for Environmental Authorisation, the undertaking of the 30-day review period, which was from 21 August 2017 – 20 September 2017, and the submission of the final scoping report which considers all comments and issues raised during the review period. The Scoping process was undertaken within 44 days of submission of the Application for Environmental Authorisation to the National Department of Environmental Affairs. » Regulation 45 is noted and the timeframes as per the 2014 EIA Regulations (as amended) will be adhered to. » It is noted that no activity may commence prior to an environmental authorisation being granted by the National

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	<p>Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the amended EIA Regulations 2014 (as amended).</p> <ul style="list-style-type: none"> o Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7). <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.</p>		<p>Department of Environmental Affairs as stipulates in Section 24 F of the National Environmental Management Act, Act No 107 of 1998, as amended.</p>
WATER USES AND WATER USE LICENSE APPLICATION PROCEDURE			
52.	Were wetland delineation studies undertaken?	<p>Masala Nemubura Environmental Officer</p> <p>Department of Water and Sanitation</p>	<p>Desktop Wetland and Aquatic Ecology and Geo-hydrology studies have been undertaken and are appended to the Scoping Report. A wetland delineation study will be undertaken during the EIA phase.</p>
53.	What are the plans to compensate for the expected loss of water features on the site?	<p>Meeting: 30-08-2017</p>	<p>A preliminary layout would be looked at in terms of where the infrastructure would be placed. It is our intention from an environmental perspective to try and avoid and minimize impact if we can on the water features. The layout will be configured to avoid water features. In areas where this is not possible we will recommend mitigation measures.</p> <p>Eskom has met with KZN Ezemvelo Wildlife to understand their</p>

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			concerns and some of the work regarding the biodiversity offset agreement between them and the Municipality.
54.	This meeting will be considered a pre-application meeting required as part of the Water Use License (WULA) submission process. A Water Use License will be required to be submitted. The conceptual designs can be submitted with the WULA. The detailed designs can be submitted at a later stage once they are finalized.		The WULA is planned to be submitted during the EIA phase. The WULA is planned to be submitted once Eskom has completed the conceptual design in October or November 2017.
55.	The Integrated Water and Waste Management Plan (IWWMP) document provides details of what information is required to be submitted to DWS as part of the WULA. I will send this to you.		The EAP is aware of the requirements that need to be met in order to submit the WULA.
56.	You will be required to submit a letter from the DEA acknowledging that an application for environmental authorisation has been lodged as part of the WULA.		The DEA's acknowledgment letter will be included in the WULA.
57.	The maximum timeframe for the issuing of a WULA is 300 days.		It is noted that the WULA will take a maximum of 300 days to process.

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58.	<p>Reference is made to the above-mentioned document received by the Department of Water and Sanitation (Department) on 23 August 2017.</p> <p>This Department has the following comments with regards to the proposed development which must be addressed and form part of subsequent environmental assessment process: The final document must include responses to issues raised which must be submitted to this Department for further review and comments.</p> <p>A) SPECIFIC COMMENTS</p> <p>1. Water Uses and Water use Authorisations</p> <p>1.1. It is indicated on page 3 of the SR that the proposed facility will include the following infrastructure:</p> <ul style="list-style-type: none"> a) Water Treatment Plant for the treatment of potable water and the production of demineralised water; b) Storage facilities for fuel, gas, diesel and chemicals; c) Water storage facilities for process water and firefighting purposes; d) A gas pipeline and a gas pipeline supply conditioning process facility; e) Internal roads. 	<p>Ms Nokwanda Mkhize Institutional Establishment</p> <p>Department of Water and Sanitation</p> <p>Letter: 18-09-2017</p>	<p><u>Specific Comments</u></p> <ul style="list-style-type: none"> » It is noted that the Applicant is required to apply for a Water Use Authorisation (WUA) in terms of Section 21 of the National Water Act, No. 36 of 1998 (NWA) prior to commencement due to the development of infrastructure planned to take place within a watercourse. » It is noted that the Department requires proof of a Service Level Agreement with the Water Service Authority for the development. The Service Level Agreement or an equivalent will be included in the EIAR. It is also noted that taking water from a water resource constitutes a Section 21 water use and must be authorised accordingly. » A layout map and environmental sensitivity map of the facility will be provided in colour in the EIAR for the Department's consideration. » It is noted that any activity within a 500m radius from the boundary of a wetland requires a water use licence in terms of Section 21 of the NWA. » During the EIA phase a Wetland and Aquatic Impact Assessment will be undertaken to delineate all wetlands located within the project site. The Department of Water and Sanitation's guideline and other applicable regulatory tools will be applied. » The Wetland and Aquatic Ecology Impact Assessment will determine the impacts that will be posed by the proposed development on the wetlands located within the project site. The study will be undertaken during the EIA phase. » An Environmental Management Programme, including appropriate mitigation measures for the management of

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	<p>1.2. Reference is made to Table 4.1 of the Listed Activities on page 42 of the SR:</p> <p>a) GN 327, Activity 12: The development of infrastructure or structures with a physical footprint of where such development occurs within a watercourse and;</p> <p>b) GN 327, Activity 19: The infilling or depositing of material of more than 5 cubic meters into a watercourse.</p> <p>The above statements indicate that the proposed development activities constitute water uses. The Applicant is therefore required to apply for a Water Use Authorisation (WUA) in terms of Section 21 of the National Water Act, No. 36 of 1998 (NWA) prior to commencement.</p> <p>1.3. According to page 31 of the Scoping report it is indicated that the source of water for the proposed development will be from the uMhlathuze Municipal Water Works. It is further indicated that "no agreement or confirmation for the above services has been obtained as yet". This Department would like to request a Service Level Agreement with the Water Service Authority as it is of crucial importance. The Applicant must note that taking water</p>		<p>impacts on wetlands will be compiled during the EIA Phase.</p> <p>» It is noted that the Applicant must identify all water uses applicable to the activity in terms of Section 21 of the NWA and ensure that all applicable water uses are authorised. A meeting was held with the Department of Water and Sanitation on 30 August 2017 as part of the process to obtain the required water use license.</p> <p><u>Other issues to be addressed</u></p> <p>» It is noted that the Department requires proof of the Services Level Agreement (SLA) with the Municipality for the disposal of waste and that proof of such disposal must be recorded and made available when required. The Service Level Agreement will be included in the EIAr .</p> <p>» It is noted that temporal or permanent toilet facilities must not be situated within 100m of a watercourse or within the 1:100 year floodline (whichever is the greatest). Mitigation measures will be included on the EMPr to ensure that no form of secondary pollution arises from the disposal of refuse or sewage from temporal or permanent toilets.</p> <p><u>General Comments</u></p> <p>» All comments and requirements regarding solid waste are noted and will be considered in the EIAr and EMPr.</p> <p>» All comments and requirements regarding sewage and waste water management are noted and will be considered in the EIAr and the EMPr.</p> <p>» All requirements regarding stormwater management for the Richards Bay CCPP are noted and will be considered in the EIAr</p>

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	<p>from a water resource constitutes a Section 21 water use and must be authorised accordingly.</p> <p>1.4. It is indicated on page 43 that the proposed development will occur within 500m of a wetland feature. In light of this, the Applicant is required to provide this office with a legible colour Layout Map for this development (preferable an A2 size or bigger). Such a map should, amongst others:</p> <ul style="list-style-type: none"> i) Show all water courses within and around the site of interest; ii) Show the 1:100 year floodline of all watercourses (in and around the site) or 100m distance (whichever is greatest); iii) Show all wetlands (in and around the site), their delineated boundaries as well as buffer zone(s) to be applied for this development; iv) Superimpose all the activity area/project as well as infrastructure (temporary & permanent) which forms part of this development. <p>Furthermore:</p> <p>1.1.1.The Applicant must note that any activity within a 500m radius from the</p>		<p>and EMPr during the EIA phase of the project.</p> <ul style="list-style-type: none"> » The concerns regarding erosion control are noted. Appropriate mitigation measures to ensure the management of erosion will be considered by the specialists and included in the EMPr. » It is noted that no unacceptable impacts should occur with the development of the Richards Bay CCPP due to spillages on site. The concerns raised by the Department regarding the matter is noted and appropriate mitigation measures for the management and avoidance of spillages will be included in the EMPr to ensure that spillages do not impact on the water resources within the area. » The EMPr to be compiled as part of the EIAR will include mitigation measures to ensure that all water resources within the area will be protected from pollution and degradation. Appropriate buffer areas for the protection of the resources will be recommended by the relevant specialists in the EIA phase that will need to be adhered to. » Areas identified and considered to be sensitive from an ecological perspective, as well as the recommended associated buffers will be considered by the developer during the design of the layout for the facility in order to ensure that the features will not be degraded due to activities associated with the development of the Richards Bay CCPP. » Permitted and appropriate contractors will be appointed for the disposal of sewage and refuse to ensure that secondary pollution is avoided. » It is noted that DWS has the right to inspect the project site without prior notification to ensure that all requirements of the Department are met.

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	<p>boundary of a wetland requires a water use licence in terms of Section 21 of the NWA;</p> <p>1.1.2.A Wetland Delineation study must be conducted for all wetlands occurring on site. The delineations of the watercourse, riparian habitat and wetlands must be done according to this Department's guideline and other applicable regulatory tools;</p> <p>1.1.3.The Applicant must conduct an impact assessment to determine the impacts that will be posed by the proposed development on the wetland of importance;</p> <p>1.1.4.Mitigation measures must also be included, outlining how the impacts will be mitigated and managed so as to not pose detrimental impact on the wetland.</p> <p>1.5. It is the responsibility of the Applicant to identify all water uses applicable to the activity in terms of Section 21 of the NWA and to ensure that all applicable water uses are authorised as such. Should the Applicant engage in any water use activity without the necessary Water Use Authorisation, it will be regarded as an unlawful water use. The Applicant will thus be guilty of an offence and</p>		<p>» It is noted that the Department reserves the right to revise/withdraw comments and request further information regarding the project should any other information that contradicts the above come to light.</p> <p>» It is noted that all sources or potential sources of pollution from the undertaking of the proposed development must be identified and appropriate measures must be recommended to prevent any pollution of the environment. The need to comply with the National Water Act requirements are also noted.</p>

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	<p>liable for a fine or imprisonment as stipulated in Section 151 of the NWA. It is therefore advised that a Pre-Water use Authorisation Application meeting be scheduled with Ms. Zamashenge Hadebe of the Water Use Authorisation Unit on (031) 336 2700/2767.</p> <p>2. <u>OTHER ISSUES TO BE ADDRESSED</u></p> <p>2.1. It is indicted on page 31 of the SR that “all waste material generated from the development will be collected by a contractor and that the waste will be disposed of at a licensed waste disposal site off site. This service will be arranged with the municipality when required”. This Department would like to request a Services Level Agreement (SLA) with the said Water Service Authority and proof of such disposal must be recorded and safe disposal certificates must be kept on record and made available to this Department when required.</p> <p>2.2. It is further indicated on Page 31 of the SR that “during construction, all sewage waste will be collected by a contractor to be disposed of at a licensed waste disposal site. This service will be arranged with the municipality when required. During operation, the facility will be</p>		

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	<p>connected to the municipal sewer system". This Department would like to emphasize that temporal or permanent toilet facilities must not be situated within 100m of a watercourse or within the 1:100 year floodline (whichever is the greatest). Furthermore, no form of secondary pollution should arise from the disposal of refuse or sewage from temporal or permanent toilets. Any pollution problems arising from the above are to be addressed immediately by the Applicant.</p> <p>3. GENERAL COMMENTS</p> <p>3.1. Solid Waste</p> <p>3.1.1. The requirements of this Department with respect to solid waste must be strictly enforced and complied with</p> <p>3.1.2. The applicant should note that contaminated soil or other hazardous material must be disposed of at a permitted hazardous landfill site that is authorized to accept the said material and proof of his must be made available to this Department when required.</p> <p>3.1.3. Should private contractors be used, all solid waste must be disposed of</p>		

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	<p>at a permitted landfill site and proof of this must be made available to this Department when required.</p> <p>3.1.4. This Department would like to put an emphasis that binds and/or skips should be provided at convenient intervals for disposal of waste within the construction camp. Furthermore, these refuse bins must be stored in a designated storage /or collection area prior to being safely disposed of and must not cause any surface and groundwater pollution, or pose any health hazards.</p> <p>3.1.5. The recycling of suitable material is encouraged by this Department, provided it is properly managed.</p> <p>3.2. Sewage and Wastewater Management</p> <p>3.2.1. Washing, refuelling, maintaining of vehicles or the transfer of hazardous substances must be conducted within a bunded area. All drainage arising from the bunded area must be treated as a water containing waste and disposed of safely.</p> <p>3.2.2. The following is applicable should wastewater be generated during</p>		

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	<p>the construction phase:</p> <ul style="list-style-type: none"> • Water containing waste must not be discharged into the natural environment and; • Measures to contain the water containing waste and safe disposal thereof must be implemented. <p>3.3. Stormwater Management</p> <p>3.3.1. It is imperative that there is proper management of storm water at the project site.</p> <p>3.3.2. The Engineer or Contractor must ensure that only clean stormwater runoff enters the environment.</p> <p>3.3.3. Drainage must be controlled to ensure that runoff from the project area does not culminate in off-site pollution, flooding or result in any damage to properties downstream of any stormwater discharge point(s).</p> <p>3.4. Erosion Control</p> <p>3.4.1. This Department therefore recommends that erosion control measures must be put in place to minimise erosion along the proposed construction areas. Extra</p>		

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	<p>precautions must be taken in areas where the soils are deemed highly erodible.</p> <p>3.4.2. Soil erosion onsite must be prevented at all times, i.e. pre, during and post construction activities. Erosion control measures must be implemented in areas prone to erosion such as near water supply points, edges of slopes, etc. These measures could include the use of sand bags, hessian sheets, bidim, retention or replacement of vegetation.</p> <p>3.4.3. Where the land has been disturbed during construction it must be rehabilitated and re-vegetated back to an acceptable state after construction.</p> <p>3.4.4. Stockpiling of soil or any other materials used during the construction phase must not be allowed on or near steep slopes, near a watercourse or water body. This is to prevent pollution or the impediment of surface run-off. The applicant must control and establish suitable mitigation measures to prevent the erosion of residue</p>		

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	<p>stockpiles.</p> <p>3.5. Spillages Management</p> <p>3.5.1. There must be no unacceptable impact on the quality of both surface and groundwater in the area. If pollution of any surface or groundwater occurs, it must be immediately reported to this Department and the appropriate mitigation measures must be employed. In addition, should the proposed development impact on any groundwater and/or surface water users, then water of equal quality and quantity must be provided to the affected users.</p> <p>3.5.2. Storage of material, chemicals, fuels etc. must not pose a risk to the surrounding environment, and this includes surface and groundwater. Temporary bunds must also be constructed around chemical or fuel storage areas to contain possible spillages. Such storage areas must be located outside the 1:100 year flood-line of the water source and must be fenced to prevent unauthorized access into the area.</p>		

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	<p>3.5.3. It is important that any significant spillage of chemicals, fuels, etc. during the construction phase and/or operation phase is reported to this Office and other relevant authorities. In the event of a spill, the following steps can be taken:</p> <ul style="list-style-type: none"> • Stop the source of the spill; • Contain the spill; • All significant spills must be reported to this Department and other relevant authorities; • Remove the spilled product for treatment and authorised disposal; • Determine if there is any soil, groundwater or other environmental impact; • If necessary, remedial action must be taken in consultation with this Department and; • Incident must be documented. <p>3.6. This Department notes the content and recommendations made on the following studies:</p> <p>3.6.1. The Wetland and Aquatic Ecology, dated 28 April 2017, prepared by The Biodiversity Company;</p> <p>3.6.2. Hydrology and flood Line Study,</p>		

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	<p>dated 15 February 2017, prepared by Raws Consulting Engineers</p> <p>3.6.3. Geo-Hydrology Study, dated 02 May 2017, prepared by Geo Hydraulic and Environmental Technology (Pty) Ltd</p> <p>3.7. Adequate measures must be put in place to protect all water resources that flow adjacent to, as well as through the proposed project area, from being polluted and/or degraded. Visible markings showing/demarcating the buffers must be provided on site during the construction phase. If pollution of any surface or groundwater occurs, it must be immediately reported to this Department and the appropriate mitigation measures must be employed.</p> <p>3.8. Ecological sensitive areas and their appropriate buffers must be protected and should not be degraded by the activities arising from the proposed development.</p> <p>3.9. No form of secondary pollution should arise from the disposal of sewage and refuse. The contractor must be clearly briefed on the method of disposal of such waste and compliance must be ensured/or monitored.</p>		

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	<p>Any pollution problems arising from the above project is to be addressed immediately by the Applicant.</p> <p>3.10. This Office reserves the right to inspect the site without prior notice in order to ensure that its requirements, as mentioned above, are adhered to. Should any problems be noted, measures must be undertaken immediately to rectify the situation.</p> <p>3.11. This Department reserves the right to revise/withdraw these comments and request further information from the applicant should any other information that contradicts the above comes to light.</p> <p>3.12. Notwithstanding the above, the responsibility rests with the Applicant to identify all sources or potential sources of pollution from the undertaking of the proposed development and to take appropriate measures to prevent any pollution of the environment. Failure to comply with the requirements of the NWA could lead to legal action being instituted against the Applicant.</p>		
WATER CONSUMPTION REQUIREMENTS AND WATER AVAILABILITY			
59.	What are the water consumption volumes requirements for the proposed power plant?	Candice Webb Environmental Manager	The project will require approximately 37 290 m ³ for the construction period of 36 months. Approximately 1 825 000m ³ will

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60.	From a cumulative impact the industry in Richards Bay has made noteworthy efforts to reduce the need and demand on the water that is left. New industry must be on board in making efforts to reduce water demand.	Mondi Meeting: 30-08-2017	be required annually during the operational phase. Eskom is certainly aware of the scarce water resource South Africa is facing and is always investigating innovative ways to save water. Currently there is a public participation project with the Richards Bay Municipality with regards to water supply and Eskom is well represented in this regard.
61.	This area is a severely water-stressed area. Recent rains have caused the dam levels to rise slightly. In August 2016 dam levels were at 17% and many of the industries in Richards Bay were facing closure due to no water being available. How much water will this power plant require and where will the water be sourced from?	Dion Wilmans Director Richards Bay Gas Power 2 Public Meeting: 20-08-2017	Water is planned to be sourced from the uMhlatuze Local Municipality. The Municipality has informed Eskom that they are investigating the option of using effluent from other industries in the Empangeni area. Such effluent will be treated and then used to supply the power station.
62.	We are aware that the Municipality is undertaking a technical advisory on the potential recycling of effluent. However, this process has not been concluded. Do the water volumes provided by the Municipality meet the water consumption requirements of the power station? The report must include a comparison of what the minimum and maximum water requirements are when using ACC technology when compared to water-cooled technology. A balance of the water consumption needs must be provided in terms of what the municipality can provide and where the shortfall will be sourced from.		Eskom is currently preparing the power station's basic design and that will tie in with the Municipality's plan. Eskom will provide the Municipality with the first opportunity to supply water and then look to other water providers if the power station's water requirement needs cannot be met. Eskom sits on a working group which is investigating the possibility of recycling water from industries in Richards Bay and Empangeni. Eskom is considering the best practice figures internationally and we cannot provide accurate water consumption figures at this stage. Accurate figures will be provided during the EIA Phase. Eskom has identified and acknowledged that water scarcity is a major risk to this project.
63.	Are there any plans to construct a desalination plant? Will water recycling plants be considered to		The working group is investigating the development of a desalination plant which could provide water in the future. Eskom

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	provide the water for the power plant?		aims to conclude the basic design of the CCPP project by the end of 2017. The water use consumption figures will be detailed in the EIA report. A Water Use License Application will be submitted by Savannah Environmental during the EIA phase.
64.	Was access to sea water cooling one of the criteria for this development?	Darryl Hunt Consultant Cheniere Public Meeting: 31-08-2017	Access to sea water cooling would have been a criterion if the project site was located along the coast.
65.	What are the water consumption requirements for the power plant? There is no water available for this project at this stage.	Sandy Camminga Director Richards Bay Clean Air Association Meeting: 31-08-2017	The project will require approximately 37 290 m ³ for the construction period of 36 months. Approximately 1 825 000m ³ will be required annually during the operation phase. Two cooling technology alternatives are being considered for the project namely dry cooling and once-through cooling. KC: Eskom is aware of the water constraints in the region and Eskom has representation in working group that has been established to investigate various water supply options for the region. Options being considered include the utilisation of treated effluent from other industries in the area, a desalination plant and a water treatment plant on the site.
66.	Will rain water be harvested at the proposed power plant?		Onsite rainwater harvesting will be implemented. Eskom's policy is to have a zero discharge so all rain water is harvested. This water could be used for domestic use and in the cooling process.
TREATMENT AND DISPOSAL OF EFFLUENT			
67.	What type of process will be used for effluent treatment?	Candice Webb Environmental Manager	Eskom is considering installing a reverse osmosis treatment plant. Eskom's transmission department will be initiating the EIA for the

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		Mondi Meeting: 30-08-2017	transmission lines which will commence once a consultant has been appointed (envisaged to be in the fourth quarter of 2017) and confirmation of this will be finalised as the engineering designs progress from concept to basic designs.
68.	Would the effluent be treated so that you could feed the treated water back into the plant or are you planning on disposing effluent via the marine outlet?	30-08-2017	It is likely that effluent would be discharged via the sea outlet.
69.	Is effluent discharge going to go into uMlathuze Effluent Pipeline and out to sea?	Sandy Camminga Chairperson – EIA Committee Richards Bay Clean Air Association Meeting: 31-08-2017	Effluent will be discharged to sea via the uMhlathuze Effluent Pipeline.
AIR QUALITY IMPACTS			
70.	Eskom must note that Mondi has an impact on air quality from a nuisance point of view. Odour is inherent in our process and although stringent odour abatement processes are adhered to, the power plant site will be impacted by nuisance air quality impacts. Mondi do not wish to find themselves in a situation where complaints are lodged against them regarding this nuisance impact. Eskom will need to decide whether it is acceptable to deal with this air quality impact.	Candice Webb Environmental Manager Mondi Meeting: 30-08-2017	This will be investigated by the air quality specialist study, which is part of the current EIA process. Following the installation of the plant, appropriate monitoring will be undertaken by Eskom, as Mondi is also expected to continue its monitoring processes.
71.	Eskom will need to consider the air quality impacts		The impact assessment for air quality will include the following:

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	<p>from any other processes that could have an impact on air quality in the region to avoid impacts to our process and quality of the end product.</p>		<ul style="list-style-type: none"> » The compilation of a baseline emissions inventory for existing facilities within Richards Bay based on measured emissions in the RBCAA inventory; » The establishment of an emissions inventory by referring to NMES and emission factors for combustion processes, fuel storage and fugitive dust (construction); » Atmospheric dispersion simulations using the US EPA CALPro suite (CALMET and CALPUFF); and » A human health risk and nuisance impact screening assessment based on dispersion simulation results.
72.	<p>Richards Bay is reported to have the second worst air quality in South Africa, second only to Secunda, due to the high concentration of heavy industry. There are numerous industries contributing to air emissions in Richards Bay including Mondi (who have taken steps to reduce their own emissions), a cement factory, a smelter, a fertilizer manufacturing plant, a chrome smelter and two titanium smelters all contributing to the second worst air quality in the Country. Surely a regional air emissions study has to be completed rather than a site specific one due to the excessive impact of these industries in Richards Bay. What is your proposed methodology for assessing air emissions on a cumulative scale.</p> <p>The wind does blow in both directions and if the wind does blow in a certain direction it will blow the emissions over sugar cane and forestry lands as well</p>	<p>Dion Wilmans Director</p> <p>Richards Bay Gas Power 2</p> <p>Public Meeting: 20-08-2017</p>	<p>The appointed air quality specialist, AirShed Planning Professionals, is in contact with the Richards Bay Clean Air Association and their data is being considered in the air quality assessment. The EIA will assess cumulative impacts as well as localised impacts. The air quality impacts of all industries within a 30 – 50km radius of the proposed site will be assessed. The assessment of cumulative impacts is a requirement of the EIA Regulations, 2014 (as amended), and the EIA Report will include a chapter on cumulative impacts.</p>

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	as a few rural communities. However, if the wind blows in the opposite direction it will take the emissions over highly concentrated residential areas.		
73.	The Scoping report does not make reference to sulphur dioxide. Sulphur dioxide emissions are a key concern in Richards Bay as many industries contribute to sulphur dioxide emissions.	Franz Schmidt SHREQC Manager Richards Bay Alloys Public Meeting: 31-08-2017	The Scoping report identifies sulphur dioxide as a source of air pollution within the region. A detailed Air Quality Impact Assessment will be provided in the EIA Report.
74.	In terms of the air quality would it be possible for you to present the impact on residential areas in Richards Bay?	Retha van Niekerk Director Urban Plan Public Meeting: 31-08-2017	Air quality impacts to residential areas in Richards Bay will be detailed in the Air Quality Impact Assessment which will be undertaken in the EIA phase.
75.	Does the Air Quality Impact Assessment investigate air quality impacts on the facility operating on gas or the facility operating on diesel?	Sandy Camminga Director	The Air Quality Impact Assessment considers air quality impacts with the facility operating on gas as the primary fuel and diesel as a backup.
76.	The term "back-up" needs to be clearly defined in the Scoping and EIA reports.	Richards Bay Clean Air Association Meeting: 31-08-2017	The term "back-up" will be quantified and clarified in the report. Diesel will not be used to operate the plant for 16 hours a day for 5 days a week (only natural gas will be used for this purpose). Diesel will only be utilised in extreme worst-case scenarios. The quantities of diesel will be small.
77.	The Scoping report does not make reference to abatement technologies that will be used in case the plant is required to operate on diesel.	Siyabonga Zigubu Air Quality Inspection	The requirement for emissions for diesel is that they should be within the air emission limits. No _x and So _x emissions would need to fall within these limits.

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		City of uMhlathuze Municipality Meeting: 31-08-2017	
CONSULTATION WITH THE RICHARDS BAY CLEAN AIR ASSOCIATION			
78.	<p>COMMENT ON DRAFT SCOPING REPORT (DSR)</p> <p>The comments provided below are based on the Richards Bay Clean Air Association's (RBCAA) review of the Draft Scoping Report (DSR), prepared by Savannah Environmental, dated August 2017, and Appendices.</p> <p>PROJECT INFORMATION:</p> <p>Eskom Holdings SoC Ltd proposes to develop a Combined Cycle Power Plant (CCPP) and associated infrastructures, with a generating capacity of up to 3000MW. The Project site is located in Richards Bay Industrial Development Zone (IDZ) Phase 1D. The purported purpose of the project is to;</p> <p>a) Reduce transmission losses from generation facilities supplying KwaZulu-Natal, by having a generation center in Kwazulu-Natal.</p> <p>b) Aid in reducing Eskom's carbon footprint per unit of electricity produced, as power plants using natural gas emit approximately half the</p>	<p>Sandy Camminga Chairperson – EIA Committee</p> <p>Richards Bay Clean Air Association</p> <p>Letter: 27-09-2017</p>	<p><u>COMMENTS</u></p> <p>3.1 In order to ensure that the development of the Richards Bay CCPP is undertaken within a site that is both feasible from a technical and environmental perspective, Eskom in consultation Savannah Environmental and independent specialists, undertook an Environmental Screening and Site Selection process. As included in Section 3.4.1, Eskom identified 6 potential sites in the greater Richards Bay area for the development of the proposed CCPP which were considered to be feasible from a technical perspective. Following consideration of various technical and landowner issues associated with the sites, four sites were taken forward into the environmental screening study namely Site 4A; Site 5, Site 6 and Site 7. The four sites selected by Eskom which formed part of the Environmental Screening and Site Selection process were considered to be feasible from a technical perspective. Technical requirements considered were the location of a site in relation to the sea level (performance related), the proximity of a cooling source (performance related) and the proximity to the fuel supply. This could have been located anywhere along the Richards Bay coast however sites 5 and 6 were identified as the most feasible sites along the coast from a technical and locality perspective. However, sites 5 and 6 were not favourable from a</p>

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	<p>carbon of coal-fired power plants while using considerable less water.</p> <p>The DSR lists the main infrastructure associated with the facility to include the following;</p> <ul style="list-style-type: none"> » Gas Turbines for generation of electricity through the use of natural gas or diesel. » Heat recovery steam generators (HRSG) to produce steam. » Steam turbines for the generation of additional electricity through the use of steam generated by the HRSG. » Condensers for the conversion of steam back to water. » Bypass stacks associated with each gas turbine. » Exhaust stacks. » A water treatment plant for the treatment of potable water and the production of demineralized water. » A water pipeline and water tank. » Dry-cooled system or Once-Through-Cooling system technology. » Closed Fin-fan coolers to cool lubrication oil for the gas and steam turbines. » A gas pipeline and a gas pipeline supply conditioning process facility. » Diesel off-loading facility and storage tanks. » Ancillary infrastructure including access roads, warehousing and buildings, storage facilities, 		<p>transmission and power evacuation perspective. Sites 4A and 7 were identified on the same criteria however Air Cooled Condensers were considered as the cooling technology.</p> <p>It should be noted that the findings of the Screening and Site Selection Process identified that none of the sites were fatally flawed, however some of the sites presented some social and environmental factors which made the sites less favourable from an environmental perspective for the development. On this basis, these sites were considered as not being preferred for the development due to the envisaged significance of the potential issues that would occur. The screening process is considered to be a full-rounded process which provided Eskom with the necessary information regarding the proposed sites and which has led to the preferred site being identified. It must be noted that all four sites were considered feasible from a technical perspective, however due to environmental constraints identified in the screening process the least environmentally sensitive site was identified and assessed as part of the EIA process (i.e. Site 7).</p> <p>3.2 The Air Quality Assessment indicated that the potential impact is likely to be high due other industries located near the site (industries such as Mondi Richards Bay (next door) and other industries in Richards Bay such as Lafarge, TATA Steel and Pulp United). The location of the site in relation to other sources of pollution – likelihood for cumulative SO₂ and PM₁₀ ambient concentrations - were also taken into consideration. As indicated above, the site was not fatally flawed. The Air Quality impact assessment will undertake a detailed assessment for the worst case</p>

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	<p>generators and 132kV and 400 kV switchyards.</p> <ul style="list-style-type: none"> » A power line to connect the Richards Bay CCPP to the national grid for the evacuation of the generated facility. (Note* The DSR states that "The development of the power line does not form part of this EIA process") <p>The DSR goes on to state that;</p> <ul style="list-style-type: none"> » The Richards Bay CCPP will be a baseload or mid-merit plant. » The natural gas is to be supplied via a gas pipeline to the CCPP from the supply take-off point at the Richards Bay Harbour, and that; » The LNG Terminal at the Port does not form part of this assessment. <p>3. COMMENT</p> <p>3.1 Site Alternatives:</p> <p>It is the opinion of the RBCAA that, from an environmental perspective, 3 of the 4 sites considered were unfeasible from the outset. The site selection process is therefore automatically skewed in favour of the preferred site. This issue was raised and discussed at the presentation made to the Industrial Development Zone Environmental Review Committee (IDZ ERC), of which the RBCAA is a member. The response given to the Forum was</p>		<p>scenario during the EIA Phase.</p> <p>During the scoping phase it was identified that the construction of the Richards Bay CCPP has the potential to impact on the ambient air quality of the area through elevated daily PM10 concentrations due to background PM10 and the proximity of the project site to other particulate emission sources. During the operation phase, the Richards Bay CCPP is likely to contribute NOX, CO, and VOCs to the existing baseline concentrations (including greenhouse gasses). Based on the findings of the scoping Phase the impact is expected to be of a medium-low significance. It should be noted that the project is subjected to further detailed specialist assessment which will provide the significance of the air quality impacts, as well as provide feasible mitigation measures which will aid in the management and/or reduction in the impacts. The Air Quality specialist will address the worst case operating model (baseload and mid-merit plant)</p> <p>3.3 Eskom will need to enter into a gas sales agreement (GSA) with potential gas suppliers. The entity supplying the gas will be responsible for undertaking the EIA for the gas pipeline. However, the pipeline inside the power plant site, from the boundary fence (connection point) of the gas power plant will be assessed in this EIA. Eskom is in discussions with Transnet and other stakeholders to determine possible routing options for the gas pipeline. It should be noted that a corridor for locating the gas pipeline infrastructure within the project site will be assessed within this EIA Process.</p> <p>3.4 The Supply Conditioning Process Facility is a facility within the</p>

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	<p>that "The sites had been assessed from a technical perspective and not an EIA perspective". This assertion appears to be contradicted on page 32, Section 3.4.1 which states that "..., 4 sites were taken forward into an environmental screening study."</p> <p>3.2 Preferred Site 7:</p> <p>It is noted with extreme concern that the selected preferred site, located in IDZ 1D, has been deemed to be not acceptable from an air quality perspective.</p> <p>3.3 Gas Pipeline:</p> <p>The gas pipeline is listed in the report as forming part of the main infrastructure associated with the facility; however the construction of the pipeline does not form part of this application.</p> <p>The RBCAA does not support this approach. The location and construction of the pipeline will contribute directly to the impacts of the proposed facility, and can therefore not be excluded from the current process.</p> <p>3.4 Gas Pipeline Supply Conditioning Process Facility (LNG Facility)</p>		<p>power station to condition the natural gas supplied by a third party to meet the gas turbine inlet process conditions required. This is not a LNG regasification facility. The source of the natural gas is still not known however Eskom is in discussions with potential gas suppliers and it currently seems likely that LNG at the Richards Bay port is the most favourable solution. Eskom would not be able to obtain an approved business case if the natural gas supply GSA is not signed.</p> <p>3.5 The volumes and impacts of effluent discharge as part of the development will be included and considered in the EIA Phase and Report.</p> <p>3.6 The Traffic Impact Assessment will be undertaken during the EIA phase and the terms of reference has been included in the Plan of Study for EIA (refer to Chapter 8 of the Final Scoping Report).</p> <p>3.7 Clarification regarding the storage tanks and the holding capacity and amount of tanks required will be clarified in the EIA report.</p> <p>3.8 The Chapter within which Table 4.3 is included refers specifically to the approach undertaken during the Scoping Phase. Please note that the Climate Change Impact Assessment will only be undertaken during the EIA Phase, the terms of reference has been included in the Plan of Study for the EIA Phase (refer to Chapter 8). The specialist details have been included in chapter 8.</p> <p>3.9 The terms of reference for the EIA phase for Air Quality has been updated in the Plan of Study for the EIA (Chapter 8 of the</p>

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	<p>While references are made to a possible LNG facility within the Port of Richards Bay, there is no commitment to the construction of such a facility. Section 2.2.10 (page 15) of the report states that; "It is envisaged that by the time construction of the proposed development is complete, more gas infrastructure will be available, such as the LNG import terminal at the Richards Bay Port." And goes on to say "... the gas-fired power station in Richards Bay could acquire local gas cheaply if the infrastructure to obtain it is developed. However, as identified, the lack of said infrastructure is currently a constraint."</p> <p>Section 3.3 (page 29) of the DSR states that; "The natural gas is to be supplied via a gas pipeline to the CCPP from a supply take-off point at Richards Bay Harbour. The LNG terminal infrastructure at the port does not form part of the scope of this assessment."</p> <p>Clarity is requested regarding the above statement, as the IDZ ERC was informed that the source of the natural gas is still unknown.</p> <p>The RBCAA does not support the approach of proceeding with the application for a CCPP, without an established and confirmed source of</p>		<p>Final Scoping report), and reflects this recommendation.</p> <p><u>RECOMMENDATIONS</u></p> <ol style="list-style-type: none"> 1. The project is under development, of which the EIA is part, and the finalisation of the gas supplier is a function of a commercial process and a negotiation, since there are various possible suppliers. The contracted gas supplier will be responsible for permitting processes associated with their infrastructure. Eskom is responsible for the said pipeline within the power station up to the boundary of the site (this is part of the associated infrastructure assessed within this EIA process). The corridor to be assessed for gas transportation allows for ease of approach and connection by any of the potential gas suppliers. 2. Availability of gas is guaranteed, but a commercial process and a negotiation process must be finalised. Therefore, there is no risk of gas unavailability for the project. 3. The primary fuel stock for this power plant is gas. The plant will have dual fuel capabilities; however, the intention is to have the power station supplied by gas full time. The plant will only operate on diesel as a backup for emergency situations. Therefore the Air quality assessment will assess the impacts associated with the facility mainly operating on gas and operation on diesel as a backup. 4. The terms of reference for the EIA phase for Air Quality has been updated in the Plan of Study for the EIA (Chapter 8 of the Final Scoping report), and reflects this recommendation. 5. The terms of reference and the details of the independent specialist that will be undertaking the Climate Change impact

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	<p>natural gas.</p> <p>3.5 Effluent Discharge: The impact of discharging effluent into the marine outfall pipeline must be quantified.</p> <p>3.6 Traffic Impact Assessment: The report is silent on traffic impacts. A Traffic Impact Assessment must be included in the scope of Specialist Studies.</p> <p>3.7 Diesel Storage Tanks: The report speaks of "storage tanks" which will hold a capacity for eight (8) hours operation. It is unclear as to how many tanks will be constructed, and whether the 8 hour capacity is per tank or the cumulative holding capacity. Please may we request clarification in this regard.</p> <p>3.8 Climate Change: The RBCAA notes and supports the statement on page 105 that "A Climate Change Impact Assessment will be undertaken as during the EIA phase." However we note with concern that Table 4.3 (Page 52) which lists the Specialist Consultants does</p>		<p>Assessment has been included in the Plan of Study for the EIA (refer to Chapter 8 of the Final Scoping Report).</p> <p>6. A Traffic Impact Assessment will be undertaken as part of the EIA Phase and the terms of reference has been included in the Plan of Study for EIA (refer to Chapter 8 of the Final Scoping Report).</p>

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	<p>not include a Specialist Consultant on Climate Change.</p> <p>3.9 Air Quality Impact Assessment – Scoping Report (Airshed Planning Professionals): Terms of Reference for the EIA Phase should include the assessment of;</p> <ul style="list-style-type: none"> a) Worst Case Scenario. Dispersion simulations for worst case scenario, which would be the plant operating solely on diesel. b) Fugitive Emissions. c) Odour. <p>4. RECOMMENDATIONS:</p> <p>The RBCAA strongly recommends that;</p> <ul style="list-style-type: none"> 1. The Gas Pipeline form part of this application. 2. CCPP application not proceed until a guaranteed source and supply of natural gas is confirmed. 3. The Air Quality Impact Assessment (AQIA) include worst case scenario, which is the plant operating solely on diesel. 4. The AQIA include the assessment of fugitive emissions and odour during operation. 5. A Climate Change Specialist be included in the list of Specialist Consultants. 6. A Specialist Traffic Impact Assessment be undertaken. 		

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	<p>Thank you for affording the Richards Bay Clean Air Association (RBCAA) the opportunity to comment on the above proposed project.</p> <p>The RBCAA reserves the right to amend and/or provide further comment.</p>		
ECOLOGICAL IMPACTS			
79.	<p>Extensive studies were undertaken within Phase 1D of the IDZ in 2003/204. Kwambo Grassland (<i>Kwambonambi Hygrophilous Grassland</i>) was identified as an endangered plant species. Does the Scoping report identify Kwambo Grassland as endangered?</p>	<p>Franz Schmidt SHREQC Manager Richards Bay Alloys Public Meeting: 31-08-2017</p>	<p>The <i>Kwambonambi Hygrophilous Grassland</i> has been identified as an endangered species in the Scoping report. Further detail on how impacts to this plant species will be mitigated or managed will be provided in the EIA report.</p>
80.	<p>It must be noted that as much as Phase 1D is being made available for purposes of gas development there are issues that need to be tested through an environmental process. These issues relate to terrestrial, ecological and hydrological impacts identified in the Environmental Screening and Site Selection Study.</p>	<p>Sharin Govender PM: Environmental Management City of uMhlatuze Municipality Meeting: 31-08-2017</p>	<p>The terrestrial, ecological and hydrological impacts will be further assessed in the EIA phase and detailed impact assessments will be provided in the specialist studies and EIA report.</p>
81.	<p>The agreements regarding the biodiversity offset between KZN Ezemvelo wildlife and the City of uMhlatuze Municipality will remain in place.</p>	<p>Dominic Weiners Principal Planner Ezemvelo KZN Wildlife</p>	<p>The agreements regarding the biodiversity offset between KZN Ezemvelo wildlife and the City of uMhlatuze Municipality will remain in place.</p>

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IMPACTS TO TRANSNET ACTIVITIES AND INFRASTRUCTURE			
82.	Is Eskom aware of the Port Expansion Programme. This programme is being developed in phases and implementation is likely to commence in 2050.	Vuyo Keswa Environmental Manager Transnet Freight Rail Meeting: 31-08-2017	Eskom is aware of the Port Expansion Programme and are engaging with the Transnet Port Authority and the Richards Bay IDZ in this regard. It should be noted that the Richards Bay CCPP lifespan is approximately 20 years and the plant is likely to come online by 2023. Therefore the power plant is likely to be decommissioned before 2050.
83.	Transnet infrastructure and servitudes are not affected by the proposed development. Transnet will require a better understanding of how the gas pipeline and the transmission lines would impact on Transnet infrastructure.	Thulani Fakude Depot Engineer – Infrastructure Transnet Freight Rail Meeting: 31-08-2017	It is noted that the power plant project does not impact on Transnet's servitudes or infrastructure. A separate EIA applications will be undertaken for the transmission lines. The potential gas supplier whom Eskom will enter into consider a Gas Sales Agreement (GSA) will conduct an EIA for its gas pipeline corridor from the power plant to Eskom's connection point at the boundary fence of, and the power plant. The gas pipeline from this connection point to Eskom's power plant is part of service provider will be responsible for authorisation processes from the associated infrastructure included in this EIA.
SOCIOECONOMIC IMPACTS			
84.	How many people will be based on the site during the construction and operation phases?	Vuyo Keswa Environmental Manager Transnet Freight Rail Meeting: 31-08-2017	Approximately 800 – 1000 people will be on site during the construction phase and 80 – 100 people during the operation phase.

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CONSULTATION WITH THE RICHARDS BAY IDZ			
85.	<p>I am aware the commenting period for the Scoping Report closed on the 20th of September, nonetheless I would like to submit the following input –</p> <ol style="list-style-type: none"> 1. The RBIDZ welcomes the proposed gas-to-power plant in the Richards Bay area. We are equally excited about future arrival of LNG and its benefits for industry, businesses and households in the Zululand area, and to the rest of the Province. 2. I would urge Eskom to work closely with the local municipality and Transnet as hosts of the natural gas project for Richards Bay. 3. I would also urge Eskom to work closely with Ezemvelo KZN Wildlife and the Department of Water and Sanitation on ecological/biodiversity and wetland issues in the R Bay area, respectively. 4. Having attended the 2nd public meeting held at the public library and later hosting your team at our ERC meeting on the same day, the Impact Assessment phase will need to address the following matters: <ol style="list-style-type: none"> a. The need and desirability of diesel as a backup fuel for the CCGT (the ambient air quality in R Bay has challenges due to existing heavy industries) 	<p>Percy Langa SHEQ Manager</p> <p>Richards Bay Industrial Development Zone</p>	<ol style="list-style-type: none"> 1. The support from the RBIDZ for the development of the Richards Bay CCPP is noted. 2. Eskom and Savannah Environmental have been in consultation with the local municipality and Transnet and will also continue to do so during the EIA Phase. The local municipality and Transnet were invited to provide comment and raise any potential issues regarding the development of the Richards Bay CCPP (refer to Appendix C of the Final Scoping Report), all comments raised will form part of the EIA reporting. 3. During the Scoping Phase Ezemvelo KZN Wildlife and the Department of Water and Sanitation have been consulted and invited to provide comment and raise any potential issues regarding the development of the Richards Bay CCPP (refer to Appendix C of the Final Scoping Report). Consultation will be continuous throughout the remainder of the EIA process and all comments raised will form part of the EIA reporting. 4. It is noted that Percy Langa attended the 2nd public meeting and the RBIDZ ERC meeting for the Richards Bay CCPP. <ol style="list-style-type: none"> a. The need and desirability for the use of diesel as a back-up fuel will be included and considered in the EIA Report during the EIA Phase. <ol style="list-style-type: none"> i. A Traffic Impact Assessment will assess all traffic impacts related to the construction and operation of the Richards Bay CCPP during the EIA Phase (refer to the Plan of study for EIA, Chapter 8 of the Final Scoping Report) b. Diesel will be utilised to operate the Richards (in case of emergencies) Bay CCPP in situations where gas is not

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	<ul style="list-style-type: none"> i. Related matter: Traffic impact of diesel supply to the CCGT b. Given that that the CCGT will be a mid-merit power plant (16 hours-a-day, 5 days-a-week), is there a justified need for a diesel backup component? <ul style="list-style-type: none"> i. It makes sense that Eskom needs to manage the risk associated with the reality that, for whatever reason, LNG or natural gas supply to the CCGT could be unavailable or affected – and therefore resulting in the CCGT standing idle until the gas supply is restored. Would additional storage tanks for natural gas (either at the CCGT or the LNG Import Terminal at the Port) not provide mitigation against this? c. Incorporate a summary of the Site Selection study for the CCGT into the Impact Assessment Report. d. Key missing pieces in the current EIA: transmission powerlines for power evacuation and incoming natural gas pipeline. e. Other pieces in the current EIA: <ul style="list-style-type: none"> i. Incoming bulk infrastructure/services (water, 		<p>available for use. This will be investigated further in the EIA Report.</p> <ul style="list-style-type: none"> i. This project is being developed in a phased approach where the project is considered holistically. The transmission power lines are being considered by Eskom even though separate EIA processes are being undertaken for these project components. Eskom is in the process of appointing an EIA consultant to undertake the environmental assessment required for the transmission line infrastructure. This process will not lag far behind the EIA for the power plant. c. A summary of the Site Selection and Screen Process has been included in Chapter 3 of the Scoping Report. d. This project is being developed in a phased approach where the project is considered holistically. The pipeline and transmission power lines are being considered by Eskom even though separate EIA processes are being undertaken for these project components. Eskom is in the process of appointing an EIA consultant to undertake the environmental assessment required for the transmission line infrastructure. This process will not lag far behind the EIA for the power plant. e. Other comments on the scoping report: <ul style="list-style-type: none"> i. Specific details regarding the bulk infrastructure or services will be made available for consideration in the EIA Report. In this regard, an infrastructure/service corridor will be assessed as part of this EIA process. This will be undertaken within the project site. ii. Specific details regarding the outgoing bulk

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	<p>whether it be portable, raw or industrial)</p> <p>ii. Outgoing bulk infrastructure/services (wastewater, effluent?, hazardous waste?, etc.)</p> <p>f. The transfer of CCGT-related and LNG-related knowledge and skills (technical and other) to the local communities, in particular youth and women.</p> <p>g. The current EIA process must also undertake to educate the general public on safety, health and environmental benefits of natural gas.</p> <p>h. Lastly, we would be happy to engage with your environmental specialists to either provide information or discuss any other relevant matter.</p>		<p>infrastructure or services will be made available for consideration in the EIA Report. In this regard, an infrastructure/service corridor will be assessed as part of this EIA process. This will be undertaken within the project site.</p> <p>f. Details regarding skills transfer processes as part of the development of the Richards Bay CCPP will be included in the EIA Report for consideration.</p> <p>g. Comment noted. This will be addressed during the EIA phase and appropriate stakeholder management and consultation with local communities will be undertaken.</p> <p>h. Comment noted. Should the need arise for consultation between the RBIDZ and the independent specialists engagement between the parties will be arranged.</p>
GENERAL			
5.	<p>Cheniere supports any gas to power initiative in South Africa irrespective of whether those projects are being developed by Eskom or by the private sector. Gas power is a strategic market since coal and nuclear power generation options have numerous challenges. Gas is viewed as a key part of South Africa's secure power supply. We welcome any initiative that can sustainably move the Country forward in an environmentally friendly way.</p>	<p>Darryl Hunt Consultant</p> <p>Cheniere</p> <p>Public Meeting: 30-08-2017</p>	<p>The support for the project is noted.</p>

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6.	The Scoping Report states that the gas power plant's load factor is assumed to operate for 16 hours per day for 5 days per week (mid merit basis). The impacts should be assessed for both mid-merit and baseload options so that the EA is not constrained in the event that the plant is required to operate at baseload.		Comment noted. During the EIA phase both mid-merit and baseload options will be considered in order to ensure that the environmental Authorisation is applicable to both options.
7.	It is advised that Eskom join the Richards Bay Clean Air Association which will provide access to a network of updated and relevant information.	Franz Schmidt SHREQC Manager Richards Bay Alloys Public Meeting: 31-08-2017	This recommendation is noted by the applicant.
8.	The Vortum Energy Project and the Accelor Mittal Thermal Plant located in Saldanha in the Western Cape recently received environmental authorisation from the Department of Environmental Affairs (DEA) which also excluded the grid connection and pipeline infrastructure. DEA has approved the impact of the power plant in isolation, with the condition that the remaining project components must receive environmental authorisation within two years.	Darryl Hunt Consultant Cheniere Public Meeting: 31-08-2017	Comment noted.
9.	I hope that the EIAs being undertaken by the private sector will continue. NERSA is the deciding factor and will make the decision based on rate. Eskom cannot develop a plant like this in competition and price wise then it should go to the	Frans van der Walt QS2000 Plus (Quantity Surveyors & Project Managers)	Comment noted.

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	private sector. The sad thing is that in this instance the tax payers are funding this EIA. IPPs should be assisted by our government to do these studies because at the end of the day this is all to the benefit of the Country.	Public Meeting: 31-08-2017	
10.	Are there any other combined cycle power plants in South Africa?	Sandy Camminga Chairperson – EIA Committee Richards Bay Clean Air Association Meeting: 31-08-2017	There are no combined cycle power plants in South Africa currently.