

Impact Phase

COMMENTS RECEIVED ON RE-SUBMISSION  
NOTIFICATION



## **Interim Comment**

### **In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the KwaZulu-Natal Heritage Act (Act 4 of 2008)**

**Attention:** Eskom Holdings SOC Limited  
Limpopo Operating Unit  
Land Development and Environment Section

**Project Name:** Richards Bay Combined Cycle Power Plant (CCPP) **Applicant:** Eskom Holdings SoC Ltd (Eskom) **Location:** The development is proposed on Portion 2 and Portion 4 of Erf 11376 which is situated within Phase 1D of the Richards Bay Industrial Development Zone (RIDZ) located approximately 6km south west of Richards Bay and 4km south west of Alton. The project site is situated in the City of uMhlathuze Local Municipality which falls within jurisdiction of the King Cetshwayo District Municipality, KwaZulu-Natal Province. **Proposed Activity:** The development of a Combined Cycle Power Plant (CCPP) with a generating capacity of up to 3000MW on a project site with an extent of 71ha. The development footprint will be up to 60ha in extent.

Thank you for the opportunity to comment on this development proposal as outlined above. The Archaeological Scoping Report by Jan van der Walt and the field-based Paleontological Report by Elize Butler have been considered. While the Paleontologist did not find any fossiliferous material on the development footprint, it is noted that both the paleontological study and the archaeological desktop study confirm that the area is generally sensitive in terms of heritage values. For this reason a field based Heritage Impact Assessment is required. While the field-based paleontological study did not record any surface finds, the possibility of sub-surface finds cannot be ruled out in the dune area and therefore a protocol for finds should be submitted as part of the Heritage Impact Assessment Report to be conducted during the EIA phase. The field-based survey that covers a comprehensive history of occupation of the area and living heritage aspects should be submitted as part of the HIA report as the general area has yielded such sites.

The HIA Study should cover:

- Identification of all heritage resources in the development area and its surroundings -50m
- Assessment of the impact of the development on such heritage
- Evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development
- Results of consultation with communities affected by the proposed development and other interested and affected parties regarding the impact of the development on heritage resources.
- Consideration of alternatives if heritage resources are affected by the development
- Mitigation plans for any adverse effects during and after completion of the project
- Table of all heritage resources identified. This should show Heritage resource type, description, location, significance and reasons for this rating.



# Richards Bay Combined Cycle Power Plant (CCPP)

Our Ref: SAH17/11535

Enquiries: Bernadet Pawandiwa  
Tel: 033 394 6543  
Email: bernadep@amafapmb.co.za  
CaseID: 11535

Date: Wednesday March 14, 2018

Page No: 2



Please download our list of Heritage Practitioners from our website [www.heritagekzn.co.za](http://www.heritagekzn.co.za).

Amafa will therefore provide further comment on the field-based full Heritage Impact Assessment Report once its submitted.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Bernadet Pawandiwa  
Senior Heritage Officer  
Amafa/Heritage KwaZulu Natal

James van Vuuren  
Deputy Director: Support Services, Technical  
Amafa/Heritage KwaZulu Natal

## ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/406986>  
(DEA, Ref: )

## Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to Amafa immediately.
3. Amafa reserves the right to request additional information as required.



Amafa AkwaZulu-Natali  
Heritage KwaZulu-Natal  
Erfenis KwaZulu-Natal

PO Box 2685, Pietermaritzburg 3200  
Tel: 033 394 6543, Fax: 033 342 6097  
Email: amafaddps@amafapmb.co.za  
Website: [www.heritagekzn.co.za](http://www.heritagekzn.co.za)

## Savannah Public Process

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**From:** Sharin Govender  
**Sent:** Monday, March 4, 2019 2:29 PM  
**To:** nicolene@savannahsa.com; Savannah Public Process; shaun@savannahsa.com  
**Cc:** Almè du Plessis; Diaan Roode; Percy Langa  
**Subject:** Richards Bay Combined Cycle Power Plant Project: IDZ 1D

Good day Savannah colleagues

You may be aware that there is a feasibility study underway for the Oil and Gas development in Richards Bay. In lieu of 1D being of strategic significance in this regard, please provide a link with all the specialist studies that have been released in the public domain.

Regards

**Sharin Govender**  
Projects Manager : Environmental Planning  
Department: City Development  
City of uMhlatuze

>>> Savannah Public Process <publicprocess@savannahsa.com> 2/19/2019 2:31 PM >>>

### **RICHARDS BAY COMBINED CYCLE POWER PLANT AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU-NATAL PROVINCE**

**DEA Ref.No.: To be issued**

Dear Stakeholder,

Eskom Holdings SoC Ltd (Eskom) proposes to develop a Combined Cycle Power Plant (CCPP) and associated infrastructure with a generating capacity of up to 3000MW. The proposed project is to be known as the Richards Bay Combined Cycle Power Plant (CCPP). The Project site is to be located on Portion 2 and Portion 4 of Erf 11376 in the Richards Bay Industrial Development Zone (IDZ) Phase 1D, approximately 6km south west of Richards Bay and 4km south west of Alton which falls within the jurisdiction of the City of uMhlatuze Local Municipality and the King Cetshwayo District Municipality, KwaZulu-Natal Province.

This e-mail serves to inform you as a registered Interested and Affected Party (RI&AP) and/or the organisation which you represent, that it is Eskom's intent to re-submit the application for Environmental Authorisation to continue at the initiation of the Environmental Impact Assessment Phase.

The attached letter will provide you with more information regarding the re-submission of the application for Environmental Authorisation.

Please do not hesitate to contact us should you require any additional information at this stage.

Kind regards,

**Nicolene Venter**

COMMENTS RECEIVED DURING THE ENVIRONMENTAL  
IMPACT ASSESSMENT REPORT REVIEW AND COMMENT  
PERIOD



# agriculture, forestry & fisheries

Department:  
Agriculture, Forestry and Fisheries  
**REPUBLIC OF SOUTH AFRICA**

F ☎: 033 342 8783	📁 DAFF	✉ Mr. T. Sibozana
T ☎: 033 392 7721	Forestry Regulations & Support	01 April 2019
✉	P/Bag X9029	
	Pietermaritzburg	
	3200	

**First Floor Block 2, Woodlands Drive Office Park  
Cnr Woodlads Drive & Western Service Park Road  
Woodmead  
2191**

Attention: Ms Nicolene Venter

**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORT FOR THE  
PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP)  
AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU-  
NATAL.**

This letter serves as a notice of receipt for the above document received on the 29<sup>th</sup> March 2019. Kindly note that this document will be processed within 30 days from the date of receipt, provided that all requested information is submitted to the department timeously. Should any further information be required, please do not hesitate to contact this office.

Yours faithfully  
Mr. T. Sibozana

.....  
**Forestry Regulations & Support  
KwaZulu-Natal Forestry Management**



## **environmental affairs**

Department:  
Environmental Affairs  
**REPUBLIC OF SOUTH AFRICA**

Private Bag X 447· PRETORIA · 0001· Environment House · 473 Steve Biko, Arcadia· PRETORIA  
Tel (+ 27 12) 399 9372

**DEA Reference:** 14/12/16/3/3/2/1123

**Enquiries:** Mr Thando Booï

**Telephone:** (012) 399 9387 **E-mail:** TBooi@environment.gov.za

Jo-Anne Thomas  
Savannah Environmental (Pty) Ltd  
P.O. Box 148  
**SUNNINGHILL**  
2157

Telephone Number: (011) 656 3237  
Email Address: joanne@savannahsa.com

### **PER E-MAIL / MAIL**

Dear Ms Thomas

### **COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT AND ASSOCIATED INFRASTRUCTURE IN RICHARDS BAY IN KWAZULU NATAL PROVINCE**

The application form and draft Environmental Impact Report (EIR) dated March 2019 as received by this Department on 22 March 2019 refers.

This Department has the following comments on the abovementioned application:

#### **Project description:**

- The Department has noted that two components have been added to the project description on page 6 of the application form and page v under the executive summary that were not part of the project description as contained in the project application form that was submitted on 06 October 2017 and final scoping report that was accepted on 20 November 2017 i.e. dirty water retention dam and clean water retention dam as well as waste storage facilities (general and hazardous). The Department submits that the additional components might trigger the NEMWA listed activities which require waste license and were not applied for. On that note, the Department submits that the above mentioned is considered a flaw.
- Taking into consideration the additional information included in the draft EIR, please provide reasons for the inclusion of these two components at this stage of the EIA process. In addition the following with regard to the retention dams and storage facilities (general and hazardous): must be included in the report:
  - Capacity of the dams;
  - The composition of the dirty water;
  - Type of liners to be used
  - The location of the storage facility;
  - The duration of storage of the waste;
  - The design of the storage facility; and
  - Types of waste to be stored.

### **Project layout**

- Please furnish an amended project lay out plan as discussed in the site inspection meeting of the 17 April 2019 and it must consider inputs from all the specialists.
- Please ensure that the amended project lay out plan clearly illustrates all the components and associated infrastructure of the project.

### **Alternatives**

- The Department has noted that Appendix 3, (3) (1) of GN R.982 of 2014, as amended has been complied with however should there be an amendment of the alternative site, then the scope of the assessment and the content of environmental impact report must comply with NEMA EIA regulations of 2014 as amended (Appendix 3).

### **Other approvals**

Please indicate if the process of obtaining an air emission license has been undertaken for this proposed development.

### **Specialist studies**

- The Department has noted that the ecological specialist concluded that the current biodiversity offset area does not offer suitable habitat for wetland species, as a result it is not recommended as an offset option but other sites must be considered for offsetting.
- It has been noted that option 2 has been preferred by the aquatic specialist taking into consideration the development layout submitted with the draft EIR, therefore, the Department submits that inputs by the specialist be included in the final report which considered the amended layout plan.

### **Heritage impact assessment**

Please explain why only 36 ha of the project footprint was assessed for heritage impacts whereas it stated in section 8 on page 159 of the draft EIR "*that the total project footprint that is assessed for this project is 71 ha*".

### **Public Participation Process**

- Please ensure that all issues raised and comments received during the circulation of the EIR from the registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section, Air Quality and Climate Change Directorates) in respect of the proposed activity are adequately addressed in the final EIR.
- Proof of correspondence with the various stakeholders must be included in the final EIR, should you be unable to obtain comments, proof of the attempts that were made to obtain comments must be submitted to the Department.
- The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
- Please note any new information that was not available at the time of the availability of the draft EIR for comments must be made available to both the interested and affected parties and the competent authority for comment prior to the submission of the final EIR to the competent authority for a decision.

### **General Comments**

You are further reminded that the final EIR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Environment Impact Report in accordance with Appendix 3 and Regulation 23(1) of the amended EIA Regulations, 2014.

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).

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.

Yours faithfully



**Mr Sabelo Malaza**  
**Chief Director: Integrated Environmental Authorisations**  
**Department of Environmental Affairs**  
**Signed by: Ms Olivia Letlalo**  
**Designation: Control Environmental Officer: Strategic Infrastructure Developments**  
**Date: 23/04/2019**

cc:	Deidre Herbst	Eskom Holdings SOC Ltd
	Mr Siza Sibande	KZN DEDTEA
	Nontsundu Ndonga	City of UMhlatuze Local Municipality



# agriculture, forestry & fisheries

Department:  
Agriculture, Forestry and Fisheries  
REPUBLIC OF SOUTH AFRICA  
REPUBLIC OF SOUTH AFRICA

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F 033 342 8783

DAFF

Mr. T. Sibozana

T 033 392 7721

Forestry Regulations & Support

25 April 2019

P/Bag X9029

Pietermaritzburg, 3204091

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## **Savannah Environmental**

First Floor, Block 2

Woodlands Drive Office Park

Cnr Woodlands Drive & Western Service Park Road

Woodmead

2191

**Attention: Nicolene Venter**

## **RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU-NATAL PROVINCE.**

The Department of Agriculture, Forestry and Fisheries (DAFF) appreciates the opportunity given to review and comment on the Draft Basic Assessment Report (DBAR) received on the 1<sup>st</sup> of April 2019 for the above mentioned project. DAFF through the Sub-Directorate Forestry Regulations and Support is mandated to regulate activities affecting natural forests and tree species protected in terms of the National Forests Act, 1998 (Act No. 84 of 1998) in South Africa.

Based on the information presented on the document received, site visit on the 17<sup>th</sup> of April 2019 and desktop analysis performed for the above-mentioned project the proposed project will have detrimental impact on wetlands and protected trees such as *Sclerocarya birrea* and *Ficus Trichopoda*. The above mentioned trees are protected in terms of National Forest Act. The Richard's Bay CCPP infrastructure will cover 71ha of Maputaland wooded grassland vegetation, however the area does not constitute a natural forest. The department supports alternative one, only if the developmental footprint have been reduced, hence the alternative number 2 is still under discussion for Biodiversity offset for Umhlathuze and Ezemvelo KZN Wild life and a new layout plan be established by Eskom and included on the final report.

Should the project be approved the following conditions should be incorporated in the EMPr and adhered to:

- a) The area should be rehabilitated using 100% indigenous tree species endemic to the area to retain the ecosystem.
- b) Should protected trees be impacted by the proposed project, a licence application be submitted to DAFF offices in Pietermaritzburg for review and compensation of 1:3 ratio will apply for every protected tree removed.
- c) Trees of conservation importance should be rescued or transplanted to a suitable site or incorporated to a landscaping plan and this work should be done by an Ecologist or a vegetation Specialist.

This letter does not exempt you from considering other environmental legislations. Should any further information be required please do not hesitate to contact this office.

Yours faithfully

Mr. Thembalakhe Sibozana



.....  
**Forestry Regulations & Support - KZN**



## **environmental affairs**

Department:  
Environmental Affairs  
**REPUBLIC OF SOUTH AFRICA**

Private Bag X 447· PRETORIA · 0001· Environment House · 473 Steve Biko Road, Arcadia, PRETORIA  
Tel (+ 27 12) 399 9372

**Reference:** 14/12/16/3/3/2/1123

**Enquiries:** Seoka Lekota

**Telephone:** 012-399 9573 **E-mail:** [SLekota@environment.gov.za](mailto:SLekota@environment.gov.za)

Lisa Opperman  
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Email Address: [lisa.o@savannahsa.com](mailto:lisa.o@savannahsa.com)

### **PER E-MAIL**

Dear Sir/Madam

### **COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORTS OF THE PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU NATAL PROVINCE**

The Directorate: Biodiversity Conservation reviewed and evaluated the above-mentioned reports including its specialist's studies. Based on the information provided in the DEIR, specialist reports and the findings of the site visit that took place on the 17<sup>th</sup> April 2019. The following recommendations can be regarded as final and must be included in the Environmental Authorisation as conditions:

- The layout plan for the proposed development must be amended to cater for the revised work from Eskom Biodiversity section to reduce the impacts on wetlands found within the plant footprint,
- Search and Rescue of all protected species and species of biodiversity concern must be conducted before vegetation clearance,
- The biodiversity offset area to the north and conservation area to the south of the project site must be regarded as no-go areas,
- A permit must be obtained from the relevant authorities for the removal or destruction of indigenous, protected or endangered plant or animal species,
- All areas with habitat rich and high concentration of flora and fauna must be avoided,
- Rescue operation of all listed species suitable for translocation within the development footprint that cannot be avoided must be conducted. Affected individuals must be trans-located to a similar habitat outside the development footprint and marked for monitoring purposes,
- The Plant Rescue and Protection Plan must be compiled by ecological specialist and be implemented, and
- Recommendations in the Fauna and Flora Specialist Reports must be adhered to during construction and operational phases.

The overall biodiversity objective is to minimize loss to biodiversity as possible. In order to achieve this objective the above mentioned recommendations must be adhered to.

Yours faithfully



**Mr Stanley Tshitwamulomoni**  
**Acting Director: Biodiversity Conservation**  
**Department of Environmental Affairs**  
**Date: 26 April 2019**

## Savannah Public Process

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**From:** Lizell Stroh  
**Sent:** Tuesday, April 30, 2019 8:58 AM  
**To:** Savannah Public Process; nicolene@savannahsa.com; mabel@savannahsa.com  
**Subject:** RE: EXTENSION OF REVIEW PERIOD: PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLAN  
**Attachments:** Development around an Airport.pdf

Kindly note that application have to be send to [obstacles@caa.co.za](mailto:obstacles@caa.co.za) and (Please see "Obstacle Applications, Management & Control" on <http://www.caa.co.za/Pages/Contact%20Us/Contact-Us-Midrand.aspx> .

The Obstacle Application process & procedure is published on <http://www.caa.co.za/Pages/Obstacles/Urgent-notices.aspx>. Also see "Obstacle Application Process" under "Important Links" on the right hand side of the page which explains the process. Also see "Guidance documents" (1.Development Around Aerodromes) & "Forms" (CA139-27) published under "Important Links".

When submitting the Obstacle Application Form (CA139-27) please attach all the supporting documents you attached to this email. Please copy myself ([strohl@caa.co.za](mailto:strohl@caa.co.za)) when submitting the applications.

Please contact me should you have any questions regarding this matter as we will gladly try to assist.

Please correspond with the Airport Management as an effected party.

Kind regards



**Lizell Stroh**  
**Obstacle Inspector**  
**PANS-OPS Section**  
**Air Navigation Services Department**

Follow us on  

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**From:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Sent:** Monday, 29 April 2019 11:52  
**To:** nicolene@savannahsa.com; mabel@savannahsa.com  
**Subject:** EXTENSION OF REVIEW PERIOD: PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLAN

Dear Stakeholders and Interested and Affected Parties,

The public participation process for the above-mentioned project has reference.

Please note that the original review period on the draft EIAR, as communicated, is being extended by 2 weeks until **Friday, 10 May 2019** in order to accommodate requests from various parties.

You are kindly requested to please submit your written comments before, but no later than **Friday, 10 May 2019**.

Thank you to those stakeholders and Interested and Affected Parties who submitted their written comments on the draft EIAr.

Kind regards,

**Nicolene Venter**

Public Participation and Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Fax: +27 (0)86 684 0547

*SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015*



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**SOUTH AFRICAN**



**CIVIL AVIATION  
AUTHORITY**

## **Information Document**

### **Development around Aerodromes**

Developers planning developments and more specifically housing developments around aerodromes should take cognisance of the following: -

1. The most critical part of flight is the take off. Far less critical but never the less still potentially dangerous is the landing.
2. An incident relating to a take off and landing should be rated as probable, i.e. it will happen, sooner or later.
3. The noise of any aircraft taking off is in the vicinity of 100 decibel <sup>(1)</sup> (dB). At 60 m above the ground, a sound level of more than 100 dBA <sup>(2)</sup> can be realised. (See SANS standard below).

The extent of existing and future aircraft noise over a proposed development must be determined to ensure that the township layout and land uses are in line with **Chapter 6 of the Draft White Paper on National Civil Aviation Policy** and the applicable laws.

Failure to comply with the above will result in the creation of an environment that is not compatible with residential and associated land uses.

4. High levels of exhaust gasses emitted at low levels especially at take off where aircraft engines are at maximum power.
5. Risk of chemical pollutants like fuel, lubricants and pesticides (from crop spraying aircraft) etc.
6. Navigation equipment of different types, radiating electromagnetic energy in different frequency bands. From the **Medium Frequency** (MF) band (low hundreds of Kilohertz below the "Broadcast AM band"), to the **Very High Frequency** (VHF) band (above the "Broadcast FM" band starting at 108 Megahertz), to the **Ultra High Frequency** (UHF) band (above M-net and e-TV frequencies) and to frequencies in the **Microwave bands** are used on and around aerodromes. These

<sup>(1)</sup> *The decibel (dB) is used to measure sound level. The dB is a logarithmic unit used to describe a ratio where the log base is 10. 10 dB would represent a 10-fold increase, 20 dB a 100-fold increase, 60 dB a million fold increase etc., in the level.*

<sup>(2)</sup> *The decibel A-weighted (dBA) relates to the response of the human ear where 0dB is the threshold of hearing, i.e. the smallest sound a human can hear.*

facilities are most often placed on the extended centre line of runways. The effects of long term radiation from navigation equipment especially on children that could be playing in the vicinity of such equipment, has not been proven. **The only safeguard from electromagnetic radiation is distance.**

7. Structures built in the near vicinity of an aerodrome, especially in the approach path to a runway, has the potential to interfere with the proper operation of navigational equipment, both on the ground and on airborne equipment. In addition, expected spin-offs from such developments such as lights, sunlight reflections from roofs, trees that will grow high in time and smoke also have the potential to endanger aviation.

Furthermore, factories in the vicinity of aerodromes emitting large volumes of hot air/gasses can seriously affect the flying conditions of aircraft by producing high velocity ascending airflow being replaced by high velocity descending airflow. This could head to loss of control of aircraft by the rapid succession of down then up and down again forces exerted on aircraft, which in severe cases could also lead to structural damage to aircraft.

**It can hence reasonably be deduced that especially the approach areas to an aerodrome are neither safe nor healthy to live in.** It is against this background, that the areas in line with a runway was traditionally zoned for "Agriculture" in the immediate proximity of an aerodrome and for "Light industry" in the adjacent area.

#### SANS Standard 10117

1	2
Type of district	Equivalent continuous day/night rating levels ( $L_{Aeq,24}$ ) dBA
<b>RESIDENTIAL DISTRICTS</b>	
a) Low Density (<25 units/hectare) (Schools, churches, educational)	45
b) Medium Density (<25 to 100 units/hectare) (Schools, churches, educational)	50
c) High Density (>100 units/hectare) (Schools, churches, educational, conference)	55
<b>NON-RESIDENTIAL DISTRICTS</b>	
d) Commercial districts (Retail shopping, offices, consulting rooms)	60
e) Commercial/ industrial districts (Central business, district motor trade, warehousing, etc)	65
f) Agriculture (livestock and breeding) Cemeteries	65
g) Industrial (Manufacturing, assembly, repairing, packaging, bus depots, builders yards, etc)	70
h) Agriculture, land tenure, (not livestock), picnic facilities, open spaces (vacant land)	75
i) Forbidden areas – no development allowed	>80

Source: SABS 0117 (Ed.2)

### **The following should be noted: -**

It is clear that all legislation effecting such development is seldom properly investigated, especially as far as noise is concerned.

### **From a national level, noise is regulated by six acts, namely:**

- *The Constitution of the Republic of South Africa Act, 1996* (Act No. 108 of 1996).
- *The Environment Conservation Act, 1989* (Act No 73 of 1989).
- *The Standards Act, 1982* (Act No 30 of 1982).
- *The Road Traffic Act, 1996* (Act No 93 of 1996). (And attendant Regulations).
- *The Civil Aviation Act, 2009*, (Act No 13 of 2009).
- *The Occupational Health and Safety Act, 1993* (Act No 85 of 1993).

### **Other relevant legislation is:**

*EIA Regulations*  
*National/Provincial Noise Control Regulations.*  
*National Policy on Aircraft Noise and Engine Emissions.*

### **Issues**

- i) The legal proving of noise impact/noise disturbance/noise nuisance requires that an appropriate scientific and technical approach be applied in any investigation/evaluation of any noise-related problem.
- ii) Requirements placed on new developments/rezoning/consent uses regarding noise impact evaluation require a uniform and scientific approach.

### **Scope and Details**

- i) Noise measurement and calculations shall be undertaken in accordance with the appropriate standards. Reference to a standard is deemed to be a reference to the latest edition of that standard.
- ii) The procedure set out in **SANS 10328 (SABS 0328)**, *Methods for Environmental Noise Impact Assessments* shall be used as a guide for all noise impact investigations.
- iii) **SANS 10103:2003**, *The Measurement and Rating of Environmental Noise with Respect to Land Use, Health, Annoyance and to Speech Communications* is to be used as the specific reference for *the acceptable rating levels for noise in districts*.  
Also all noise measurement surveys are to be undertaken in accordance with this standard.
- iv) **SANS 10210 (SABS 0210)**, *Calculating and Predicting Road Traffic Noise* is to be used to calculate *supplementary* controlled areas related to road traffic as well as any road traffic problem noise levels.

- v) **SANS 10117:2003**, *Calculation and Prediction of Aircraft Noise around Airports for Land Use Purposes* is to be used to calculate the noisiness index related to the establishment of *supplementary controlled areas* around airports and military air bases.  
**SANS 10117** specifies that the Integrated Noise Model (INM) which has been developed and issued by the Federal Aviation Administration (FAA) is to be used to calculate the noise contours around airports.
- vi) **SANS 10357 (SABS 0357)**, *The Calculation of Sound Propagation by the Concave Method* is to be used for the calculation of *supplementary controlled areas* related to any major noise source(s).
- vii) The procedures set out in **SANS 10181 (SABS 0181)**, *The Measurement of Noise Emitted by Road Vehicles when Stationary* and **SANS 10205 (SABS 0205)**, *The Measurement of Noise Emitted by Motor Vehicles in Motion* will be used for the monitoring of individual motor vehicles.
- viii) Procedures are set out in the various SABS ISO Acoustics Codes of Practice.

It is most likely that most, if not all of the development will fall in an area where the noise level would exceed the 55 dBA limit set for residential development.

- **Section 24 of the Constitution** provides that "*everyone has the right ... to an environment that is not harmful to their health or well-being; and ... to have the environment protected for the benefit of present and future generations through reasonable legislative and other measures that*
  - (i) *prevent pollution and ecological degradation;*
  - (ii) *promote conservation; and*
  - (iii) *secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.*"

The Constitution thus, compels government to give effect to people's environmental rights and places government under a legal duty to act as a responsible custodian of the nation's environment. This would apply to developments around airports.

#### **CIVIL AVIATION REGULATIONS, 2011 to the CIVIL AVIATION ACT, 2009 (ACT NO 13 OF 2009)**

##### **Regulations from The Civil Aviation Act relating to Obstacles** (Extract)

##### **Obstacle limitations and markings outside aerodrome or heliport** **139.01.30**

(1) All objects, whether temporary or permanent, which project above the horizontal surface within a specified radius of 8 kilometers as measured from the aerodrome reference point should be marked as specified in Document SA-CATS 139.

(2) Any other object which projects the horizontal surface beyond these radii or above the conical surface and which constitutes a potential hazard to aircraft must be marked as specified in Document SA-CATS 139.

(3) Buildings or other objects which will constitute an obstruction or potential hazard to aircraft moving in the navigable air space in the vicinity of an aerodrome, or navigation aid, or which will adversely affect the performance of the radio navigation or instrument landing systems, must not be erected or allowed to come into existence without the prior approval of the Director.

(4) No buildings or objects higher than 45 meters above the mean level of the landing area, or, in the case of a water aerodrome or heliport, the normal level of the water, must without the approval of the Director be erected within a distance of 8 kilometer measured from the nearest point on the boundary of an aerodrome or heliport.

(5) No building, structure or object which projects above a slope of 1 in 20 and which is within 3000 meters measured from the nearest point on the boundary of an aerodrome or heliport must, without the prior approval of the Director be erected or be allowed to come into existence.

(6) No building, structure or other object which will project above the approach, transitional or horizontal surfaces of an aerodrome or heliport must, without the prior approval of the Director, be erected or allowed to come into existence.

(7) The obstacle limitation surface as prescribed in Document SA-CATS 139 must be clear of any penetration of obstacles temporary or otherwise.

(8) In the event of a conflict of interest between land use authorities and air space users, air safety must be regarded as predominant and not to be compromised by land development projects or other obstacles.

#### **Protection of radio sites** **171.03.3**

No structure or object, whether natural or artificial, which have the potential of interfering or degrading radio signals for the purpose of aviation safety, shall be allowed to come in existence or to move or be moved within the surfaces and slopes as prescribed in the Document SA-CATS 171.

#### **Endangering safety** **91.01.10**

(1) No person shall, through any act or omission –

- (a) endanger the safety of an aircraft or person therein; or
- (b) cause or permit an aircraft to endanger the safety of any person or property.

(2) No person shall cause, by any means, a beam of light or other energy source, either visible or not, to be emitted towards any aircraft or air traffic control tower or any person therein such that there would be the potential for causing blindness or otherwise adversely affecting the ability of such person to safely carry out his or her duties.

**Part 188.00.1** Makes non compliance of the above an offence

1. In accordance with the **Civil Aviation Regulations (CAR)** to the **Civil Aviation Act (Act 13 of 2009)**, the standards of the International Civil Aviation Organisation (ICAO) are applicable.
2. ICAO annex 14 stipulates that all new developments in the approach area shall be below 1,6% (slope of 1: 62,5), if a slope of not exceeding 2% (slope of 1:50) does not already exist. In which case this slope (2% or lower) shall be maintained. The approach area starts at a point 60 m **beyond** the end of the runway and 150 m either side of the extended centre line, diverging by 15% (10 degrees) outwards from this point outwards.

## **Conclusion**

The aerodrome license holder should register safeguarding maps with the Local Planning Authorities and should receive, from the Local Planning Authority, copies of applications for developments in and within the vicinity of the aerodrome.

If against the above background, developers still persist on continuing with development, the existence of mentioned dangers should be reflected in the establishment conditions.



**edtea**

**Department :**  
Economic Development, Tourism and  
Environmental Affairs  
**PROVINCE OF KWAZULU-NATAL**

Enquiries : Mr. Muzi Mdamba  
Imibuzo :  
Navrae :

Telephone: 035 780 0313  
Ucingo :  
Telefoon :

Private Bag : X20018  
Isikhwama Seposi : Empangeni  
Privaat Sak : 3800

DEA Reference:  
Inkomba : N/A  
Verwysing:

Fax : 035 780 0315  
iFeksi :  
Faks :

Date : 10 May 2019  
Usuku :  
Datum :

## Fax Transmission

Savannah Environmental (Pty) Ltd  
PO Box 148  
Sunninghill  
2157  
Johannesburg

**ATT: Nicolene Venter**  
email: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)

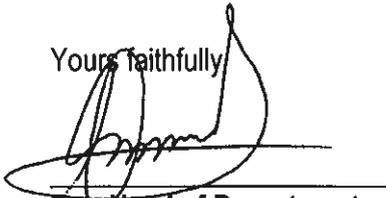
Dear Sir

### COMMENTS ON THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT (CCP) AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU-NATAL PROVINCE

1. The Environmental Impact Assessment report (EIAR) for the aforementioned development received by this department for comments refers.
2. This Department recognizes the need for power generation and supply interventions for this area in order to ensure the reliable and desirable supply of electricity at all times. Hence the significance of this project.
3. However, while this fact is acknowledged, environmental limits and constraints are also a reality for the development of this nature as the development of the Combined Cycle Power Plant (CCPP) is proposed in an environmentally constrained area. Nevertheless, it is pleasing that the EIAR in the form of specialist studies undertaken has identified and also attempted to address some of the key negating environmental issues that could possibly impede the success of the project if not fully considered.

4. Notwithstanding the abovementioned milestones in the process, the only concerning aspect of the project is the failure of the applicant in ensuring alignment of the gas supply project and its associated infrastructure with the CCPP. KZNEDTEA would like to encourage that the commissioning of the approval processes for the gas supply project be aligned with the CCPP project or atleast commitments be made on the projected timeframes of commencing and eventually finalizing this project. An idea of running the plant with diesel for a prolonged period will not be supported instead of gas. It is therefore recommended that the applicant provide details on the progress of the approval of the gas supply infrastructure before the issuing of environmental authorization of the CCPP, should it be authorized.
5. To this end, the department is satisfied that the EIAR in its current format meet the requirements of the NEMA EIA Regs 2014.

Yours faithfully



**For: Head of Department**

**Department of Economic Development, Tourism and Environmental Affairs**



## water & sanitation

Department:  
Water and Sanitation  
REPUBLIC OF SOUTH AFRICA

P.O. Box 1018, Durban, 4000. 88 Joe Slovo Street, Southern Life Building, Durban, 4001  
Tel: (031) 336 2700, Fax: (031) 305 9915, [www.dws.gov.za](http://www.dws.gov.za)

Savannah Environmental  
P. O. Box 148  
Sunninghill  
2157  
10 May 2019

Enq : Ms Lwandle Sibango  
Ref No: 16/2/7/W12F/D1  
DEA Ref : 14/12/16/3/3/2/1027

**ATTENTION: Ms Nicolene Venter**

Dear Madam

**RE: ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR): RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) PROJECT WITHIN UMHLATHUZE LOCAL MUNICIPALITY**

Reference is made to the Environmental Impact Assessment Report (EIAR) with reference: 14/12/16/3/3/2/1027, received by the Department of Water and Sanitation (Department). This Department has the following comments:

### **(A) SPECIFIC COMMENTS**

1. Reference is made to:

- (a) Page 1 of this EIAR which states that the during the impact phase by independent wetland and biodiversity specialist investigations on site, it was concluded that a wetland offset plan would be required to address significant residual impacts ...;
- (b) Page 3 of this EIAR which states that the main infrastructure associated with the facility includes, amongst others,
  - Dirty Water Retention dam and Clean Water Dams;
  - Storm water channels ;
  - A water treatment plant...;
- (c) Page 10 of this EIAR which states that some wetland features are located within the project site. The wetlands located within the project site are considered to be in a largely natural state and are ecologically important;
- (d) Page 68 - 69 of this EIAR (Table 6.3) which lists water uses associated with the proposed project, identified in terms of the National Water Act (NWA) which require authorisation;

(e) Page 87 - 103 of this EIAR (Table 6.8): a review of legislative requirements applicable to the proposed development, which identified activities triggered in terms of the National Water Act (NWA).

1.1. The Applicant is reminded (as stated in our letter dated 18 Sept 2017) that the above statements clearly confirm that this project must be authorised by this office in terms of Section 21 of the National Water Act (NWA).

1.2. It is the responsibility of the Applicant to identify all water uses applicable to the activity in terms of Section 21 of the NWA.

1.3. The Applicant is reminded to contact the Department's Licensing Administrator, Ms Zama Hadebe, (031 336 2767/2700) for a Pre- Water Use Authorisation meeting. Such a meeting will assist to determine all water uses requiring authorisation and provide guidance on the requirements in this regard.

2. Reference is made to:

(a) Page 24 of this EIAR which states that water – potable water is to be sourced from the uMhlatuze Municipality Water Works;

(b) Page 25 of this EIAR which states that water of industrial quality will be provided by the municipality ...;

(c) Page 24 of this EIAR which states that sanitation – during construction and operation of the Richards Bay CCPP a connection to the municipal sewer pipeline will be established for sanitation purposes at the plant;

(d) Page 25 of this EIAR which states that waste water from the plant will be discharged to the municipal system;

(e) Page 25 of this EIAR which states that waste water produced from the CCPP will be generated from the demineralised water treatment system, Boiler Blowdown Recovery System and the Condensate Polisher System. The waste water will be neutralised before discharge to the municipality;

(f) Page 25 of this EIAR which states that waste water containing oil will include waste water from ground-run-offs, and therefore the effluent is expected to contain grit and silt. An oil separator will be installed and a secondary oil water separator will be required to refine the waste water prior to discharging it to the local municipality sewage treatment plant.

2.1. This Department reiterates the request indicated in our letter dated 18 Sept 2017 that the Applicant is required to provide this office with a Service Level Agreement (SLA) between the project proponent and the Water Services Authority that will provide the services. Such a SLA should include, amongst others,

2.1.1. Confirmation of sustainability of potable and industrial water services i.e. capacity of

the source and supporting infrastructure.

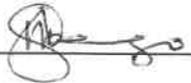
- 2.1.2. Confirmation of sustainability of waste water services: capacity of supporting infrastructure (pipelines, manholes, pump stations, etc) to withstand both anticipated quantities above and additional quantities.

N.B.

The applicant is reminded that since this development, parts of it, and its infrastructure are located within the regulated area then this project must be authorised by this department prior to commencement of the activity. Therefore the applicant is required to apply for a Water Use Licence as the activity will not be a permissible water use as stipulated in Section 22 of the National Water Act, Act 36 of 1998.

A regulated area is an area within 1:100 year floodline or within a horizontal distance of 100m (whichever is greatest) of a watercourse in terms of the National Water Act, Act 36 of 1998 and an area within 500m radius from a boundary of a wetland in terms of the General Authorisation No 509 of 27 July 2016.

Notwithstanding the above, the responsibility rests with the Applicant to identify any source or potential source of pollution from his undertaking and to take appropriate measures to prevent any pollution of the environment. Failure to comply with the requirements of the National Water Act (Act 36 of 1998) could lead to legal action being instituted against the Applicant.

 10 MAY 2019

For REGIONAL HEAD: KWAZULU NATAL

LLLS/llls 16725

## Savannah Public Process

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**From:** Savannah Public Process  
**Sent:** Friday, June 21, 2019 7:58 AM  
**To:** Stephanus Petrus Viljoen  
**Cc:** Ross Hoole  
**Subject:** RE: Comment on EIA Report: Richards Bay Combined Cycle Power Plant

Dear Stephanus.

Thank you for the feedback below.

Kind regards,

**Nicolene Venter**

Public Participation & Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Cell: +27 (0)60 978 8396 | Fax: +27 (0)86 684 0547  
[SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015](#)

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**From:** Stephanus Petrus Viljoen  
**Sent:** Thursday, June 20, 2019 12:33 PM  
**To:** Savannah Public Process <publicprocess@savannahsa.com>  
**Cc:** Ross Hoole <ross.hoole@drdlr.gov.za>  
**Subject:** RE: Comment on EIA Report: Richards Bay Combined Cycle Power Plant

Hi Nicolene,

We were able to download the documentation.

From our side we will only comment on issues related to Land Reform.  
It is important to note that a land claim was lodged against the property.  
We are looking into the status of this claim and will provide additional information shortly.

We trust the above to be in order but should you require any further information please do not hesitate to contact our offices on (033) 264 1401 or (033) 264 1419.

Kind Regards

**Stephan Viljoen Pr. Pln A/077/2008 (BTRP)**  
Chief Town and Regional Planner  
Spatial Planning and Land Use Management (KZN)  
Dept. of Rural Development & Land Reform

---

**From:** Savannah Public Process [<mailto:publicprocess@savannahsa.com>]  
**Sent:** 20 June 2019 12:25  
**To:** Stephanus Petrus Viljoen  
**Cc:** Ross Hoole  
**Subject:** RE: Comment on EIA Report: Richards Bay Combined Cycle Power Plant

Dear Stephan,

With reference to our e-mail trail below, I am just following up whether your Department was successful with downloading the Report and relevant Appendices.

Would you also please be so kind and inform us whether your Department will be submitting written comments.

Please do not hesitate to contact us should your Department require any additional information.

Kind regards,

**Nicolene Venter**

Public Participation & Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Cell: +27 (0)60 978 8396 | Fax: +27 (0)86 684 0547  
[SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015](#)

---

**From:** Savannah Public Process  
**Sent:** Wednesday, June 12, 2019 4:35 AM  
**To:** Stephanus Petrus Viljoen  
**Cc:** Ross Hoole  
**Subject:** RE: Comment on EIA Report: Richards Bay Combined Cycle Power Plant

Dear Stephan,

Please find herewith the Release Code to access the Report and Appendices on our website: **TYFyYd^C8t**

I am also sending the documents to you via WeTransfer.

Please do not hesitate to contact us should you experience any problems with downloading the documents.

Kind regards,

**Nicolene Venter**

Public Participation & Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Cell: +27 (0)60 978 8396 | Fax: +27 (0)86 684 0547  
[SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015](#)

---

**From:** Stephanus Petrus Viljoen  
**Sent:** Tuesday, June 11, 2019 12:56 PM  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Cc:** Ross Hoole  
**Subject:** Comment on EIA Report: Richards Bay Combined Cycle Power Plant

Good Day Nicolene,

We have been tasked to comment on the "Proposed Richards Bay Combined Cycle Power Plant (CCPP) And Associated Infrastructure near Richards Bay, Kwazulu Natal Province".

We received the letter requesting comment from our national office but not the CD.

Could you please make the documentation available via Dropbox (or similar method)?

We trust the above to be in order but should you require any further information please do not hesitate to contact our offices on (033) 264 1401 or (033) 264 1419.

Kind Regards

**Stephan Viljoen Pr. PIn A/077/2008 (BTRP)**  
Chief Town and Regional Planner  
Spatial Planning and Land Use Management (KZN)  
Dept. of Rural Development & Land Reform



**agriculture, land reform  
& rural development**

Department:  
Agriculture, Land Reform and Rural Development  
REPUBLIC OF SOUTH AFRICA

Directorate: Spatial Planning and Land Use Management, KwaZulu-Natal, Branch SPLUM,  
83 Peter Kerchhoff (Chapel) Street, Pietermaritzburg, Private Bag X9000, Pietermaritzburg, 3200.  
Tel (033) 264 1400, Fax (033) 264 1413.

Enquires: SP Viljoen  
File Ref: RBCCPP

Savanah Environmental (Pty) Ltd.  
First Floor, Block 2  
5 Woodlands Drive Office Park  
**WOODMEAD**  
2191

**Attention: Nicolene Venter**

Dear Madam/Sir

**COMMENT ON THE PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT**

With reference to the above-mentioned matter, the Department of Agriculture, Land Reform and Rural Development (The Department) thank you for the opportunity to comment on the Proposed Development of the Richards Bay Combined Cycle Power Plant (RBCCPP).

From a socio-economic perspective the Department supports in principle the proposed RBCCPP based on the following aspects:

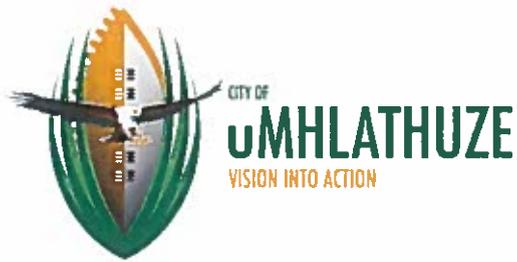
- Number of direct and indirect employment opportunities created during the construction phase (temporary employment) as well as the opportunities created during the operational Phase (Permanent employment),
- The skills development programme during the construction phase which leads to empowerment of the neighbouring community, and the long term positive impact this will have on general household income.
- The potential increased production capability of the Richards Bay Special Economic Zone (RBSEZ), and the subsequent realisation of the Strategic Plans of the uMhlatuze Local Municipality.
- The limited negative impact the proposed development will have on the surrounding environment, since the site is situated within the area earmarked for the RBSEZ.

It needs to be noted that a Restitution Land Claim was lodged against the property, it is still under investigation and it has not yet been gazetted. The claim covers a large portion of land, and due to the complexity thereof, we can unfortunately not give timeframes for processing and finalisation of this claim.

We trust the above to be in order. Should you require any additional information, please contact us at your earliest convenience.

Yours faithfully

Mr SP Viljoen  
Chief Town and Regional Planner  
Spatial Planning and Land Use Management (KZN)  
Department of Agriculture, Land Reform & Rural Development  
Date: 2019 / 06 / 28



5 Mark Strasse Civic Centre  
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Richards Bay 3900  
E: reg@umhlathuze.gov.za  
T: 035 907 5000  
F: 035 907 5144/5167  
Toll Free No: 0800 222 827

[www.umhlathuze.gov.za](http://www.umhlathuze.gov.za)

**Your ref:**

**Contact:** Sharin Govender

**Our file ref:**

**In response to DMS** 1335580;13420774;1342075;  
**No:** 1342080-90  
**Date:** 27 June 2019

Savannah Environmental (Pty) Ltd  
PO Box 148  
SUNNINGHILL  
2157

**ATTENTION: Ms Nicolene Venter**

Email: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)/ [nicolene@savannahsa.com](mailto:nicolene@savannahsa.com)

Dear Madam

**COMMENTS ON ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR ESKOM'S  
COMBINED CYCLE POWER PLANT ON PORTION 2 11376, PHASE 1D, RICHARDS  
BAY**

Thank you for affording the City of uMhlathuze an extended opportunity to comment on the Environmental Impact Assessment (EIA) for the above project. We have afforded due diligence in reviewing the lengthy documentation provided. In the course of reviewing such, we have had to further engage key affected parties. Our comments are accordingly set out as follows:

**1. Background, Policy Framework and Strategic Imperatives**

- 1.1. At the outset the Municipality wishes to highlight the strategic nature of the project to meet the country's future energy needs.
- 1.2. The above is particularly significant in the context of being signatory to the Conference of the Parties Paris (Climate Change) Agreement and subsequent



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Nationally Determined Contributions, which South Africa is required to comply with.

- 1.3. Further, Chapter 5 of the National Development plan (NDP) charts a clear path for transitioning into a low carbon economy to avert dangerous levels of climate change. The NDP is explicit on reducing emissions below a baseline of 34 % by 2020 and 42 % by 2025 to align with projections of below 1.5 degrees global temperature increase.
- 1.4. South Africa is currently the 13<sup>th</sup> highest Greenhouse Gas emitter per capita GDP in the world as a result of coal fired power stations. (uMhlathuze Climate Action Plan 2018). In meeting the above targets, the country would have to diversify its energy mix. Gas to power is in this regard, considered a secure energy source to augment this supply.
- 1.5. Hence, in line with the above and provisions set out in the draft National Resource plan, the Department of Energy has allocated 2000 MG of Gas to Energy development for Richards Bay. The geographic placement is strategic considering supply of natural gas and further transmission to the South Africa's hinterland.
- 1.6. In support of the above and in advancing Government's Operation Phakisa, the uMhlathuze council reserved land for Gas to Power Development. The preferred site, Phase 1 D, was carefully selected based on:
  - o proximity to planning a gas import facility at the Port of Richards Bay;
  - o Planning of gas servitudes and electricity transmission lines;
  - o Transport linkages (road, rail and maritime);
  - o historic EIA approval for the particular site for a chemically-blended pulp paper mill;
  - o the Environmental Management Framework for Richards Bay IDZ and Port Expansion;
  - o Land use and zoning of the property; and
  - o Disaster management considerations.

## **2. Design Considerations**

- 2.1 The Municipality notes the design capacity of the combined cycle gas plant as 1000 MW above the Department of Energy gas allocation for the region.

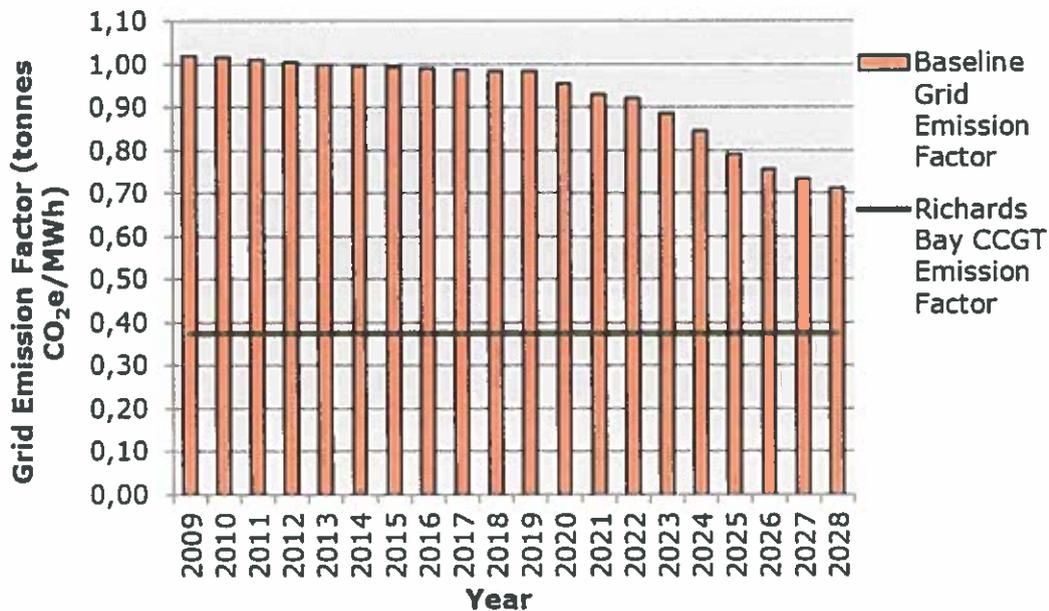


- 2.2 Of particular concern to the Municipality however is the use of Diesel as a back-up fuel source. The switch from Gas to Diesel is also not explained in terms of probability, frequency nor duration.
- 2.3 We wish to emphasize that the burning of diesel as a fuel source would be contrary to the policy and strategic objectives mentioned under the above section.
- 2.4 The unbundling of applications relating to the (a) Gas plant, (b) the respective Gas import facility at the Port, and (c) associated transmission lines, is understood and accepted. The granting of this application however must be subject to the availability of natural gas to supply the Gas plant.

### **3. Climate Change Assessment**

- 3.1 The Climate change assessment, based on SANS/an ISO standards, is noted. The expectation however was to further report emission aspects in terms of current reporting protocols by utilizing accepted platforms (eg. the Carbon Disclosure Project).
- 3.2 A further expectation of the specialist scope was to have a baseline assessment of Greenhouse gases based on projected emissions factors. Such would need to expand to transport and even waste emission sources.
- 3.3 Carbon Capture and storage mentioned on Page 12 of the above assessment cannot be considered as greenhouse gas mitigation as its impacts have not been assessed as part of this application.
- 3.4 Use of Biogas as a fuel source as back up is supported and which the Municipality can play a support role on in facilitating discussions around sourcing of biomass.
- 3.5 The position regarding the project not contributing to localized climate impacts on Page 21 contradicts findings in the same report on Page 18 that 0.37 tonnes CO<sub>2</sub> equivalent would be produced. The view offered by the municipality is that CO<sub>2</sub> is a greenhouse gas contributor and therefore linked to climate change regardless of locality. The municipality can moreover vouch that localized climate change impacts have been experienced. (uMhlathuze Vulnerability Assessment 2010, Climate Change Action Plan 2018).





**Figure 1: Comparison of annual emissions factors and project case in Page 18 of the Climate Change Assessment**

3.6 The comparison between Baseline grid emission and the proposed gas to power plant on page 18 is useful. Clarity is however sought as to whether the Baseline Grid Emission Factor refers to CO<sub>2</sub> e/ per unit energy from conventional coal fired power stations.

3.7 A further expectation of the climate change assessment for this project was to report on climate adaptation actions. This would include amongst others, water; stormwater; biodiversity and landscaping etc.

#### 4. Biodiversity

4.1 The ecological and water resource assessment documents potential loss and impact of threatened fauna species as of High Sensitivity. It was not clear in terms of mitigation however, whether there would be a need for translocation and recreation of habitat to offset unavoidable impacts.

4.2 The proposed offset proposal of adoption of Portion 1 of 11376, which is Municipal owned and zoned conservation, misrepresents discussions held amongst stakeholders. This is raised following conclusions made by the biodiversity specialist that the adjacent land parcel did not sufficiently meet the offset required to develop Portion 2 of 11376.



4.3 The municipality requests that a formal biodiversity offset proposal be drafted, in agreement with the Municipality, EKZN Wildlife and any other relevant party. The agreement must amongst other information contain:

- Property administration implications (land owner negotiations; alienation etc);
- Clearly defined roles and responsibilities for the offset, noting that the Municipal mandate is limited in terms of fulfilling the role of a biodiversity management agent for the offset; and
- Statutory processes, if any, that would need to be followed for formalizing the offset.

## **5. Air Quality**

5.1 The air quality assessment confirms the detrimental impact of SO<sub>2</sub> from Diesel as a fuel source.

5.2 The assessment is silent on compatibility with surrounding land uses, in particular with Mondi Pulp Mill.

5.3 A schedule trade permit would be required in terms of Municipal Environmental health bylaws.

## **6. Transport Planning and Civil Services**

6.1 The recommendations of the Traffic Impact Assessment are accepted subject to review thereof as further details emerge and project specifics change. Design of intersections, including signaling thereof, must be submitted to the Transportation and Road Planning unit of the Municipality.

6.2 A civil engineering report is required for municipal approval, amongst which must include:

- Water demand, inclusive of a water conservation strategy
- Energy demand (where applicable). A detailed energy efficiency strategy must also be devised. Such must assess plant operations and design considerations
- Stormwater management plan, inclusive of details of dewatering and hydrological engineering needed to develop the site.

7.3 A geotechnical investigation is required to establish founding soil conditions. This is imperative considering the high water table evident in specialist reports



## 7. Spatial Planning and Land Use

7.1 The uMhlathuze Spatial Development framework makes reference to gas to power development as a strategic infrastructure imperative to unlock economic growth.

7.2 The zoning of portion 2 of 11376 is confirmed as High Impact Industry and suitable for Gas to Power development. The applicant would however be required to consult with the Land use management unit of the Municipality to ensure compliance with the uMhlathuze Spatial Planning and Land use Bylaw and Land use Scheme.

7.3 The zoning of Portion 3 of 11376 is confirmed as Conservation.

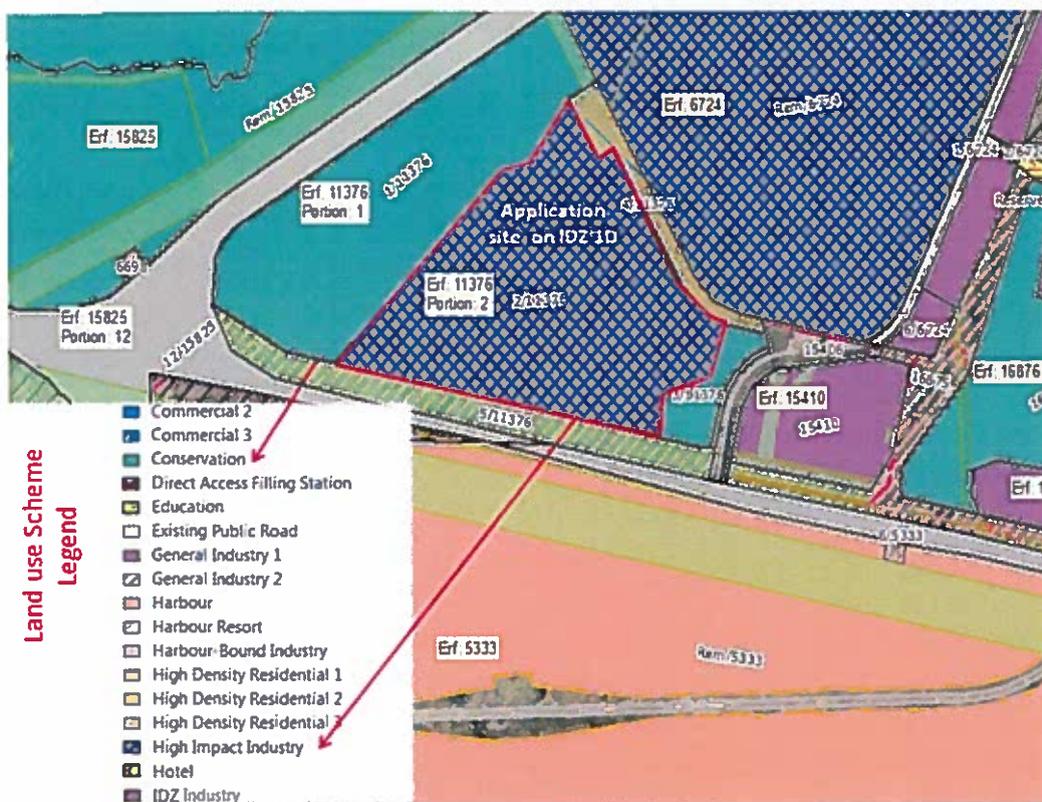


Figure 2: Land Use scheme for the application site/s

7.4 The site layout may be subject to change following building plan submission.

## 8. Disaster Management

8.1 The handling of LNG is widely accepted to be a significant disaster management risk. Yet, the operational parameters and functioning of the facility is still vague to ascertain exact disaster management implications. It is hence requested that the developer fulfills the obligation of a comprehensive capacity building program/



training to render an efficient emergency response in the event of a gas leak, explosion, fire or any other disaster.

8.2 The recommendations of the quantitative risk assessment must be strictly adhered to.

8.3 The HAZOP study must amongst other considerations include:

- Other Major Hazardous installations in the vicinity of the proposed gas to power plant;
- Cumulative HAZOP assessment with the Gas import Facility and pipeline corridors;
- Emergency response preparedness of Disaster management teams; and
- Impact on major transport networks (Road, rail and maritime)

You are welcome to direct further queries regarding the above to Ms. Sharin Govender of the office of the Deputy Municipal Manager: City Development

Yours faithfully



**NONTSUNDU NDONGA Pr Pln A/080/2008**

**DEPUTY MUNICIPAL MANAGER: CITY DEVELOPMENT**

DMS 1341521



ALL CORRESPONDENCE MUST BE ADDRESSED TO THE MUNICIPAL MANAGER

## Lisa Opperman

---

**From:** Sharin Govender  
**Sent:** Monday, July 8, 2019 9:40 AM  
**To:** Tobile Bokwe; Warren Funston; 'Koogendran Govender'; Tinyiko Masondo; Mpho Muswubi; 'Anita Rautenbach'; Percy Langa; Jo-Anne Thomas; Lisa Opperman; Andrew Husted  
**Cc:** Thobeka Dlamini; Neeran Maharaj; Siboniso Zungu; Brenda Strachan  
**Subject:** 000000Re: Richards Bay CCPP Project - Telecon to discuss the Wetland Offset Strategy

Dear Lisa

Unfortunately I am committed on other work engagements and would not be able to participate in the telecon.

As uMhlathuze Municipality, and further to our EIA comment submission relating to the subject matter, we wish to provide the following inputs

1. Based on the specialists findings, as well as historic agreements with Ezemvelo re Phase ID, Portion 1 of Erf 11376 does not adequately address the biodiversity offset requirements for the CCPP.
2. Additional areas must be investigated. It would be preferred if such area is spatially and ecologically connected to Portion 1.
3. We accept there are challenges in fulfilling the previous Pulp United MoA (ie in terms of proclaiming the 3 lakes in question)
4. Without preempting resolutions from today's discussion, a biodiversity offset around Lake Nsezi would be a viable option.
5. the uMhlathuze water stewardship partnership (uWASP) COULD be a vehicle to implement management actions relating to the above. Details regarding the uWASP can be forwarded on to this committee for further consideration of its appropriateness.
6. If agreed, a needs assessment would need to be undertaken to clearly determine net biodiversity gains of the offset, nature of activities to achieve such, roles and responsibilities and even associated capital costs involved

I hope these inputs would assist resolve this matter

Kind regards  
Sharin



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## Planning Division: IEM Section

---

Enquiries: Dominic Wieners

Your Ref: None Provided

Savannah Environmental  
PO Box 148  
Sunninghill  
2157

09 July 2019

**ATTENTION: NICOLENE VENTER**

Dear Ms Venter

**PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED INFRASTRUCTURE**  
**District Municipality: King Cetshwayo**

The Draft Environmental Impact Assessment Report (EIR), and the associated specialist reports for the abovementioned application has been reviewed by the Ezemvelo KZN Wildlife (Ezemvelo) IEM Planning Committee.

It is submitted that the significance of the cumulative loss of wetlands and associated biodiversity has been adequately assessed, and the recommendation for a plan to consider the cumulative loss for the larger catchment is supported. In addition, the conclusion drawn that the applicant should involve themselves in the conservation of other wetland opportunities is also supported, and Ezemvelo supports the realization of this through an Offset Plan for the project.

It must be noted however that the review of the specialist reports has highlighted some concerns with regards the proposed offset areas. The report refers to an "MOU Offset Area", and additionally to Option 2 receiving areas. It is brought to your attention that through the historical IDZ EIA process (the receiving site falls on an IDZ land parcel), offset areas were agreed to and it was resolved through an MOU between Ezemvelo and the Umhlatuze Municipality which receiving areas would be proclaimed – MOU Attached. It should be noted that progress has been halted since the signing of the MOU. During the initial engagements with stakeholders, the proposal was mooted that, as part of the offset discussions required for developing the proposed Combined Cycle Power Plant (CCPP), that Eskom would be able to assist the Municipality with support for the proclamation of these areas. These discussions were held in absence of the baseline information presented in the EIR, that the wetlands on Portion 1 would not suffice to address the residual impact resulting in the loss of wetlands on Portion 2. In addition, the risk of the CCPP to Portion 1, has been identified to render this as a sub-optimal choice as a wetland offset receiving area.

In the context of the above, it is strongly advised that the project team draft an offset management plan, which clearly outlines:

- The objectives of the offset,
- The possible alternatives for offset receiving areas with an assessment of respective positive and negative attributes for each potential alternative. The list should also indicate land ownership and possible constraints, how the area is to be secured, what the outcomes of each alternative would be in terms of contribution to the required offset, what finance mechanisms and controls would be required for the long term provisions and possible liabilities, and what involvement would be required from other stakeholders.
- The best recommended offset receiving alternative.
- Recommended management interventions to achieve best practicable conservation outcomes on the ground, which satisfy the objectives of the offset.
- Recommended programme for offset implementation, with realistic timeframes and measurable stages for auditing purposes.
- Recommended appropriate legal mechanism for securing offset receiving area in perpetuity, or for the length of the impact.
- Recommended members of the Offset Oversight Committee.

It should be noted that programmes such as clearing of alien invasive weeds for a period of 2 years on their own, for example, would not suffice as an acceptable on the ground conservation outcome. It is however, recommended as part of a management approach for rehabilitation of the offset receiving area.

Ezemvelo looks forward to working together with the applicant in securing suitable offset receiving areas which would address the requirements above, and which would satisfy offset principles<sup>i</sup> and the specific objectives.

Should you wish to discuss any of the points raised above or should any further biodiversity issues arise please do not hesitate to contact our offices.

Yours sincerely

pp



Coordinator IEM

For CEO : EZEMVELO KZN WILDLIFE

DATE : 09 July 2019

C:\Dom\Alternative Energy\11636\_RichardsBayCCPP\11636\_RichardsBayCCPP\_OfficialComment\_090719  
cc: Sharin Govender (City of Umhlatuze), Warren Funston (Eskom)

<sup>i</sup> You are referred to Section 2.3 of Ezemvelo KZN Wildlife (2013) Comprehensive Guideline for Biodiversity Offsets: KwaZulu-Natal Province, South Africa for a list of principles guiding biodiversity offsets, adapted and drawn from internationally used principles.



## In line with Smart City principles to improve productivity & **City of uMhlathuze is Going Live with SAP ERP in July 2019**

>>> Lisa Opperman 7/5/2019 9:20 AM >>>

Good Day,

Please note that the wetland specialist is not available for the call today (05 July) due to a family emergency. Please can we move the call to Monday 08 July @ 11:00?

Kindly accept the calendar invitation for the telecon to be held on Monday 08 July 2019 at 11:00.

The purpose of the call is to discuss the wetland offset strategy of the Richards Bay CCPP project.

Please use the dial-in details below:

- 1). Participants to call: **0862 000 000** | +27 862 000 000 (international callers)
- 2). Select **option 1**
- 3). Dial **19735#**

Please let me know should you require any further information.

Kind regards

Lisa

savannah  
environmental

t: +27 (0) 11 656 3237  
f: +27 (0) 86 684 0547

**Lisa Opperman**  
Environmental Consultant

e: lisa.o@savannahsa.com  
c: +27 (0) 84 920 3111

[SAWEA Award for Leading Environmental Consultant on Wind Projects in 2013 & 2015](#)

COMMENTS RECEIVED DURING THE REVISED  
ENVIRONMENTAL IMPACT ASSESSMENT REPORT  
REVIEW AND COMMENT PERIOD  
(24 July 2019 to 26 August 2019)

DEPARTMENT OF AGRICULTURE, FORESTRY AND  
FISHERIES



# agriculture, forestry & fisheries es

Department:  
Agriculture, Forestry and Fisheries  
**REPUBLIC OF SOUTH AFRICA**  
**REPUBLIC OF SOUTH AFRICA**

---

F 033 342 8783

DAFF

Mr. T. Sibozana

Forestry Regulations & Support

15 August 2019

P/Bag X9029

Pietermaritzburg, 3204091

---

## **Savannah Environmental**

First Floor, Block 2

Woodlands Drive Office Park

Cnr Woodlands Drive & Western Service Park Road

Woodmead

2191

**Attention: Nicolene Venter**

### **REVISED ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU-NATAL PROVINCE.**

The Department of Agriculture, Forestry and Fisheries (DAFF) appreciates the opportunity given to review and comment on the revised Environmental Impact Assessment Report (rEIAR) received on the 24<sup>th</sup> of July 2019 for the above mentioned project. DAFF through the Sub-Directorate Forestry Regulations and Support is mandated to regulate activities affecting natural forests and tree species protected in terms of the National Forests Act, 1998 (Act No. 84 of 1998) in South Africa.

The development footprint of 71ha has been reduced to 52ha which will minimize vegetation clearance for the proposed development therefore, the department support the new layout and reiterates the previous comments dated 25<sup>th</sup> April 2019.

This letter does not exempt you from considering other environmental legislations. Should any further information be required please do not hesitate to contact this office.

Yours faithfully

Mr. Thembalakhe Sibozana

.....

**Forestry Regulations & Support - KZN**

Department of Water and Sanitation



## water & sanitation

Department:  
Water and Sanitation  
REPUBLIC OF SOUTH AFRICA

P.O. Box 1018, Durban, 4000. 88 Joe Slovo Street, Southern Life Building, Durban, 4001  
Tel: (031) 336 2700, Fax: (031) 305 9915, [www.dws.gov.za](http://www.dws.gov.za)

Savanna Environmental

P. O. Box 148

Sunninghill

2157

15 Aug 2019

**Enq : Ms Lwandle Sibango**  
**Ref No: 16/2/7/W12F/D1**  
**DEA Ref : 14/12/16/3/3/2/1027**

### **ATTENTION: Ms Nicolene Venter**

Dear Madam

**RE: REVISED ENVIRONMENTAL IMPACT ASSESSMENT REPORT (REIAR):  
RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) PROJECT WITHIN  
UMHLATHUZE LOCAL MUNICIPALITY.**

Reference is made to the Scoping Report received by the Department of Water and Sanitation (Department) in August 2017, our comment letter dated 18 Sept 2017, Environmental Impact Assessment Report (EIAR) received by this Department in April 2019, our comment letter dated 10 May 2019 and the Revised Environmental Impact Assessment Report (REIAR) with reference: 14/12/16/3/3/2/1027, received by this Department in July 2019. This Department has the following comments:

### **(A) SPECIFIC COMMENTS**

1. This Department supports that this development proceeds on grounds of the documentation at its disposal and on the basis that:-
  - 1.1. The Applicant has and is continuously engaging with this Department with regards to water uses which need to be authorised in terms of Section 21 of the National Water Act (NWA).
  - 1.2. The City of Umhlathuze Local Municipality (CoULM) commits, in the letter dated 11 February 2019, to avail potable and waste water services as a Water Services Authority (WSA).
  - 1.3. Considering that this letter from CoULM does not explicitly address the issues raised in our previous letters i.e. capacity of the source and supporting infrastructure for potable water as well as the capacity of supporting infrastructure (pipelines, manholes, pump stations, etc.) to withstand anticipated **qualities**, **this Department**

**sets a condition that the Applicant commits, through a water use licence application, provisions to manage, treat and dispose of the waste streams that the CoULM has not committed to handling.**

N.B.

The applicant is reminded that since this development, parts of it, and its infrastructure are located within the regulated area then this project must be authorised by this department prior to commencement of the activity. Therefore the applicant is required to apply for a Water Use Licence as the activity will not be a permissible water use as stipulated in Section 22 of the National Water Act, Act 36 of 1998.

A regulated area is an area within 1:100 year floodline or within a horizontal distance of 100m (whichever is greatest) of a watercourse in terms of the National Water Act, Act 36 of 1998 and an area within 500m radius from a boundary of a wetland in terms of the General Authorisation No 509 of 27 July 2016.

Notwithstanding the above, the responsibility rests with the Applicant to identify any source or potential source of pollution from his undertaking and to take appropriate measures to prevent any pollution of the environment. Failure to comply with the requirements of the National Water Act (Act 36 of 1998) could lead to legal action being instituted against the Applicant.

 15 AUG 2019

For **REGIONAL HEAD: KWAZULU NATAL**

LLLS/lls

16548

Department of Environmental Affairs



## **environmental affairs**

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko, Arcadia · PRETORIA  
Tel (+ 27 12) 399 9372

**DEA Reference:** 14/12/16/3/3/2/1123

**Enquiries:** Mr Thando Booï

**Telephone:** (012) 399 9387 **E-mail:** TBooi@environment.gov.za

Jo-Anne Thomas  
Savannah Environmental (Pty) Ltd  
P.O. Box 148  
**SUNNINGHILL**  
2157

Telephone Number: (011) 656 3237  
Email Address: joanne@savannahsa.com

### **PER E-MAIL / MAIL**

Dear Ms Thomas

### **COMMENTS ON THE AMENDED DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT AND ASSOCIATED INFRASTRUCTURE IN RICHARDS BAY IN KWAZULU NATAL PROVINCE**

The amended draft Environmental Impact Report (EIR) dated July 2019 and received by this Department on 23 July 2019 and acknowledged on 29 July 2019 refers.

#### **This Department has the following comments on the abovementioned application:**

- It has been noted that the geohydrologist confirmed in a letter dated 27 May 2019 that *'the geohydrological assessment undertaken did not include the pollution area, the top-soil laydown area and the diesel fuel pump plant as these facilities were not part of the layout and its description received initially'*, however, on page 20 to 22 of the Geohydrological Assessment report dated 22 March 2018, the impacts and its mitigation measures were addressed. Therefore, the Department requires clarity on whether the recommended desktop study will generate different outcomes as indicated on the aforesaid pages.
- The Department has noted that you have revised the draft EIAr and re-submitted for further comments. However; no proof of circulation of the revised report to registered Interested and Affected Parties (I&APs) has been attached. You are therefore, being advised that the amended report should be circulated for further 30 day public participation process (PPP) and proof of such correspondence must be appended to final EIAr.
- Ensure that all issues raised and comments received during the circulation of the amended as well as the initial draft EIAr from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAr. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.

## General Comments

The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

You are further reminded that the final EIR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Environmental Impact Assessment Report in accordance with Appendix 3 and Regulation 23(1) of the amended EIA Regulations, 2014.

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).

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.

Yours faithfully



**Mr Sabelo Malaza**

**Chief Director: Integrated Environmental Authorisations**

**Department of Environmental Affairs**

**Signed by: Ms Olivia Letlalo**

**Designation: Control Environmental Officer: Strategic Infrastructure Developments**

**Date: 06/08/2019**

cc:	D Herbst	Eskom Holdings SOC Ltd
	Mr S Sibande	KZN DEDTEA
	N Ndonga	Umhlathuze Local Municipality

Department of Economic Development, Tourism and  
Environmental Affairs



**edtea**

**Department :**  
Economic Development, Tourism and  
Environmental Affairs

**PROVINCE OF KWAZULU-NATAL**

Enquiries : Mr. Muzi Mdamba  
Imibuzo :  
Navrae :

Telephone: 035 780 0313  
Ucingo :  
Telefoon :

Private Bag : X20018  
Isikhwama Seposi : Empangeni  
Privaat Sak : 3800

DEA Reference:  
Inkomba : N/A  
Verwysing:

Fax : 035 780 0315  
iFeksi :  
Faks :

Date : 26 August 2019  
Usuku :  
Datum :

## Fax Transmission

Savannah Environmental (Pty) Ltd  
PO Box 148  
Sunninghill  
2157  
Johannesburg

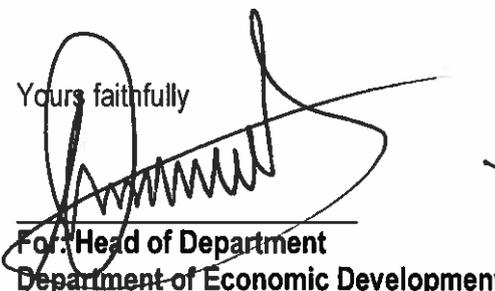
**ATT: Nicolene Venter**  
**email: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)**

Dear Nicolene

### **COMMENTS ON THE REVISED ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT (CCP) AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU-NATAL PROVINCE**

1. The Revised Environmental Impact Assessment report (REIAR) for the aforementioned development received by this department for comments refers.
2. This Department has reviewed the aforementioned report and scrutinized the options presented in relation to the offset discussions.
3. Firstly, thank you for responding and giving clarity to our previous comments on the original EIAR. With regards to this REIAR, please note that we have no substantive issues pertaining to the report, on the question of offsets. We are confident that the Ezemvelo KZN wildlife which is one of this department's entities has provided appropriate guidelines on the establishment and the implementation of the offset options.
4. Should you have any queries on this correspondence, please feel free to contact this department. .

Yours faithfully



For: Head of Department

Department of Economic Development, Tourism and Environmental Affairs

King Cetshwayo District Municipality

## Nicolene Venter

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**From:** Londeka Ngcobo  
**Sent:** Monday, August 26, 2019 3:47 PM  
**To:** Nicolene Venter; Savannah Public Process  
**Cc:** Wisdom Mpofu  
**Subject:** COMMENTS ON ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR ESKOM'S COMBINED CYCLE POWER PLANT ON PORTION 2 11376, PHASE 1D, RICHARDS BAY

Good Day Nicolene

Kindly note the official EIA comments below from King Cetshwayo District Municipality.

### **COMMENTS ON ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR ESKOM'S COMBINED CYCLE POWER PLANT ON PORTION 2 11376, PHASE 1D, RICHARDS BAY**

King Cetshwayo District Municipality (KCDM) wishes to thank you for the extension to comment on the proposed above mentioned development. The report is acknowledged and supported based on the proposed development being in line with Conference of Parties (COP) climate change signing of the Paris Agreement to committing to reducing Global Climate Change impacts which South Africa is part of with below mentioned recommendations:

- i. The granting of this application however must be subject to the availability of natural gas to supply the Gas plant.
- ii. Clarity is required as to whether the Baseline Grid Emission Factor refers to CO<sub>2</sub> e/ per unit energy from conventional coal fired power stations as per climate change assessment
- iii. Clear mitigation outline on whether there would be a need for translocation and recreation of habitat to offset unavoidable impacts as per Biodiversity assessment.

Should you have further enquiries, please contact the Control Environmental Officer, Ms Londeka Ngcobo at Tel: 035-799 2684, or email: [ngcobolo@kingcetshwayo.gov.za](mailto:ngcobolo@kingcetshwayo.gov.za)

*Londeka Ngcobo*

*The Department of Environmental Affairs*

*CD: Environmental Sector Performance*

*D: Local Government Support*

*seconded to King Cetshwayo District family of municipalities, Richards Bay( kzn)*

# Key Stakeholders and Interested and Affected Parties

## Savannah Public Process

---

**From:** Savannah Public Process  
**Sent:** Wednesday, July 24, 2019 12:42 PM  
**To:** Nicola Botha  
**Subject:** Richards Bay CCPP Project: Acknowledgement of Comment and Questions for Clarification

Dear Nicola,

Please receive herewith our acknowledgement of your comments in your e-mail below.

To ensure that we respond correctly to your comments submitted, would you please be so kind to confirm our understanding of:

- We built more biogas power stations in South Africa  
Can it please be confirmed whether this is a statement that biogas power stations have been built in South Africa; or  
That South Africa must rather build power stations using biogas?
- Do a EIA on Transnet natural gas  
The undertaking of an EIA for Transnet for natural gas does not form part of Savannah Environmental's Scope of Work and therefore we cannot respond to the request formally.

Hope you find above-mentioned in order.

Kind regards,

**Nicolene Venter**

Public Participation & Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Cell: +27 (0)60 978 8396 | Fax: +27 (0)86 684 0547  
[SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015](#)

**From:** Nicola Botha  
**Sent:** Wednesday, July 24, 2019 9:17 AM  
**To:** Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
**Subject:** Natural Gas

Dear Savannahsa

No to gas power station in South Africa and do a EIA on Transnet natural gas . We built more biogas power station in South Africa.

Thanks

Nicola Botha



P O Box 10299, Meerensee, 3901 Tel: +27 (35) 7892471 or +27 (83) 515 2384  
Office A6-A7, Smart Plan Building, 95 Dollar Drive, Richards Bay  
E-mail: [info@rbcaa.co.za](mailto:info@rbcaa.co.za) Web Site: [www.rbcaa.org.za](http://www.rbcaa.org.za)

---

26 August 2019

Savannah Environmental  
P.O.Box 148  
Sunninghill  
2157

**Attention:** Nicolene Venter [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)

**RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED INFRASTRUCTURE**  
**Applicant: Eskom Holdings SoC Ltd**

**COMMENT: REVISED ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR):**

The comments provided below are based on the Richards Bay Clean Air Association's (RBCAA) review of the Revised Environmental Impact Assessment Report (EIAR), prepared by Savannah Environmental, dated July 2019, and associated Appendices.

The issues raised in the RBCAA's submission, dated 10 May 2019, have been correctly captured in the Revised EIAR, and the Comments and Responses Report.

The RBCAA is satisfied that the impacts of emissions from the proposed Combined Cycle Power Plant (CCPP) have been adequately assessed in the Revised Atmospheric Impact Report.

It is noted that emergency events are likely to result in off-site exceedances of SO<sub>2</sub> and NO<sub>x</sub>.

The RBCAA remains concerned that H<sub>2</sub>S emissions will contribute to off-site TRS exceedances, and odour complaints.

Registration Number 96/13031/08

Directors: Ms. C. Webb (Managing Director), Ms. S. Camminga, Mr. A. Roberts, Ms. Y. Chetty  
Mr. K. Buthelezi, Ms. N. Sibanyoni, Mr. B. Crawford, Mr F Schmidt

Although predicted concentrations for other pollutants demonstrate compliance, it has to be noted that the proposed CCPP will nonetheless contribute to existing concentrations.

**RECOMMENDATIONS:**

Should the proposed CCPP receive authorisation the RBCAA recommends that the Authorisation should be subject to;

1. Approval and construction of LNG facility, Pipeline and Transmission Infrastructure.
2. Submission of a Carbon Emissions Management Plan.
3. Submission of an Air Quality Monitoring Plan.
4. The CCPP may only operate as a mid-merit plant, and not a baseload plant.
5. Stringent conditions regarding the operation of the CCPP using diesel as a source of fuel, in order to mitigate off-site exceedances.
6. Membership of the RBCAA

Thank you for affording the Richards Bay Clean Air Association (RBCAA) the opportunity to comment on the above proposed project.

The RBCAA reserves the right to amend and \or provide further comment.

Yours faithfully,



**MS S CAMMINGA**  
**CHAIRMAN EIA COMMITTEE**



groundWork

**Environmental justice action**

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Tel: +27-33-342 5662 ● Fax: +27-33-342 5665 ● team@groundwork.org.za ● www.groundwork.org.za

**Nicolene Venter**

Date: 26 August 2019

**Savannah Environmental (Pty) Ltd**

**1st Floor, Block 2,**

**5 Woodlands Drive Office park,**

**Cnr of Woodlands Drive & Western Service Road,**

**Woodmead, 2191**

**Email: [nicolene@savannahsa.com](mailto:nicolene@savannahsa.com)**

**Project Name:** Richards Bay Combined Cycle

Power Plant (CCPP) and

Associated Infrastructure near

Richards Bay

DEA Ref. No: 14/12/16/3/3/2/1123

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Dear Sirs and Mesdames

**Comments on the Revised EIAR for the proposed Richards Bay  
Combined Cycle Power Plant project, KwaZulu-Natal Province, by  
Eskom (Pty) Ltd:**

**Revised Environmental Impact Assessment Report; Environmental  
Management Programme; Waste Management Licence Application  
Report; and Atmospheric Emission Licence Application**

### **Introduction**

We make these submissions on behalf of groundWork. groundWork is a non-profit environmental justice service and developmental organization working primarily in Southern Africa in the areas of Climate & Energy Justice, Coal, Environmental Health, Global Green and Healthy Hospitals, and Waste.

---

Trustees: Thuli Makama, Joy Kistnasamy, Farid Esack, Patrick Kulati, Sandile Ndawonde, Richard Lyster, Jon White.



groundWork is the South African member of Health Care Without Harm and Friends of the Earth International.

Below, we elaborate on a few of the deficiencies in the Revised Environmental Impact Assessment report (Revised EIAr).

### 1. Failure to adequately assess cumulative impacts

“The preceding impact assessment chapter has reported on the assessment of the impacts associated with the RB CCPP **only**, not taking into account similar surrounding developments from a cumulative perspective. This chapter therefore considers the potential cumulative impacts associated with the development of the project.”

<sup>1</sup>The lack of adequate assessment of cumulative impacts in consideration of other existing activities in the area. Richards Bay is the home of other polluting processing plants such as Foskor Phosphoric acid and Phosphate processing plant, Mondi wood processing plant, and Aluminium smelter, “*Hillside Aluminium uses the Hall-Hérault process and Pechiney Technology (AP-30 electrolytic pots) to produce aluminium from alumina by electrolysis. The major emissions which are contained, treated and monitored are:-*

**Solid Particulates:** *These include carbon, alumina (aluminium oxide), fluorides and condensed hydrocarbons.*

**Carbon Dioxide and Carbon Monoxide:** *These gases are generated during the electrolysis process as the carbon in the anode reacts with oxygen in the molten electrolytic liquid.*

**Gaseous Fluorides:** *These have evaporated from the molten electrolytic liquid.*

**Sulphur Dioxide:** *Sulphur dioxide is generated during the anode oxidation (as above) and during the baking of the anodes before they are used in the pots.”<sup>2</sup>*

2. The construction of the RB CCPP project in the area already occupied by polluting industries will exacerbate the pollution problem. According to the report, ‘*The cumulative water resource impacts, considering the*

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<sup>1</sup> Assessment of Potential Cumulative Impacts p248

<sup>2</sup> <https://www.environment.co.za/environmental-issues/richards-bay-faqs.html>



*development of RB CCPP within the surrounding area will be of High significance. However, a wetland offset plan (**Appendix E**) has been compiled in consultation with the local conservation authority (Ezemvelo KZN Wildlife). The wetland offset plan offers a long-term conservation solution to conserve other wetlands in the region through offsetting the significant residual impacts to wetlands on the project site.<sup>3</sup>*

3. The lands targeted to be used to offset the lost wetlands were already existing wetlands. It is questionable how a lost wetland could be offset with another one that is already existing. This clearly shows that a wetland cannot be offset. The targeted land for construction of the project would be a lost wetland with no replacement.

## **Market**

4. Offsets are internationally defined as market-based instruments. The DEA discussion paper implies that offsets may also be non-market (we will call them 'direct offsets') but does not distinguish between them.
5. Market-based offsets subordinate nature – and ultimately the biosphere as a whole - to the law of value determined by the market since “it is only through this that nature can be ‘valued’ and thus efficiently managed and allocated”. Effectively, this is handing power to the market. This power will be increasingly remote and indifferent to ecological values as tradable offsets and offset derivatives may be traded on global securities markets.
6. Direct offsets – where a specified offset is required as a condition of project approval and is not to be traded or sold – do not necessarily escape market power. Rather, that power may be expressed by the unequal market value of what is damaged and what is preserved, and by the impermanence of the latter when market values change.

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<sup>3</sup> P 255



7. Further, offsets are supposed to be based on equivalent ecological values which can then be exchanged 'like for like' as if the place has no consequence. The calculation of such equivalences is not only reductive and generally specious, but also a necessary precursor to trading. Direct offsets may therefore facilitate the development of markets even if they are excluded. Assuming that ecological functions do acquire market value, it may be anticipated that business lobbies will emerge to convert non-tradable to tradable assets.

### **A unique context?**

8. It is argued that South African context makes the prospects for offsetting different to other locations. We agree. We think that the risks exposed elsewhere are magnified and multiplied in the local context. This is because regulatory capacity is weak and economic power is highly concentrated within the minerals-energy complex (MEC). Hence, handing power to the market hands more power to the MEC which is noted for its disdain for anything perceived as an impediment to profits – including environmental or social ethics and legal prohibitions.
9. We think the challenge is to strengthen existing regulatory capacity and planning processes rather than taking on new and more complex regulatory tasks in a context where the regulator is already disempowered by being made to play by market rules.

### **The poor record of offsets**

10. The argument that South Africa is different also side-steps the problem that there is no real evidence that offsets work. To the contrary, they have a dismal record. Carbon offsets are associated with dispossession in southern countries and the pervasive 'gaming of the system' or outright corruption. It has served as a subsidy to big polluters without reducing emissions.



11. Australia is often cited as demonstrating biodiversity offset benefits. However, Dr Philip Gibbons and Professor Jochen Zeil of the Australian National University comment on the irony that “conserving our biodiversity is becoming dependent on its destruction”. They conclude that government is using offsets to save money “at the expense of threatened species”.
12. And while there is no evidence that they do work, there is evidence that they don’t. Friends of the Earth and FERN<sup>4</sup> cite several case studies from the UK, Europe and Australia.
13. The record in South Africa appears even worse. Projects such as the Vele mine offset agreement with CoAL confirm our comments about regulatory capacity above. This is made worse by the inclination for secrecy and the exclusion of civil society from the relevant committees.

### **Polluter pays**

14. It is also argued that offsets are a way of making the polluter pay. We think that the end result of giving power to the market, is that the polluter will conjure up an additional profit paid for by the public – as is the case with carbon offsetting.

### **Options**

15. At the DEA’s offset workshop, civil society organisations called for a moratorium on offsetting.
16. The facilitator repeatedly suggested that this would imply that all development must stop. In so far as much of what is called development profits the rich at the cost of poor people and the environment, this is not a bad idea. The suggestion, however, is a

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<sup>4</sup> FoE and FERN, *Case studies of biodiversity offsetting: voices from the ground*, 2 June 2014.



decoy since most environmental authorisations, thus far, have been issued without offsets. We are concerned that offsets will become routine and will be routinely abused as the numbers increase exponentially but monitoring and enforcement capacity does not.

17. At present, there is no register and no knowing how many authorisations do include offsets. Moreover, the workshop was told that some – also an unknown number - are negotiated in secret. We strongly support the proposal that existing offsets should be registered and made public.
18. As groundWork, we wish to go beyond the civil society call for an end to all offsets. We believe that the resources of the state should rather go into strengthening the regulatory and spatial planning processes.
19. At the workshop, there was a call to distinguish different kinds of offset according to the ecological and regulatory context:
20. It was generally agreed that the air offsets will not work. Those proposed by Eskom and Sasol are viewed as a way of shifting blame onto communities. There is no comparison in the scale of emissions from industrial and domestic sources and it was argued that interventions to reduce domestic emissions are a responsibility of government and should not depend on offsets. It is particularly galling that government has failed to address domestic emissions in any meaningful way but, over the last decade, has tried to do it on the cheap with the risible Basa programme.
21. Water and wetland offsets were also seen as problematic. The Sasol water offset, for example, was seen as a resource grab justified by fixing leaks in Emfuleni while wetland offsets seem to have a short shelf life with no effective monitoring.
22. Several participants had a more favourable view of bio-diversity offsets arguing that there is potential for good offset projects. We are concerned that there may be a very wide gap between potential and realisation. Beyond that, we believe these good projects should be



done anyway – just as the Emfuleni leaks should be fixed anyway – and not left to the lottery of offsets.

23. The remaining justification for offsets is that none of these things happen anyway because government doesn't or can't do its job. But if it can't do its job, it won't manage offsets either. In that case, future offsets will be much like past offsets – like the wetland destroyed by the mine that used it to offset an earlier development.
24. We believe that government needs to strengthen its primary regulatory and planning capacity rather than trying to offset them. Spatial planning is particularly important for biodiversity and healthy wetlands and rivers which can provide clean water. We think that the rigorous application of the environment right in the Bill of Rights to all planning and processes will provide a more coherent approach for good projects and give better results all round than offsets.

### **Summary of concerns:**

25. The use of offsets inverts the mitigation hierarchy. Offsets will always be preferred to mitigation measures if they are cheaper (e.g. Eskom and Sasol's air quality offset proposals). Hence, there will be pressure to cut costs of the offset.
26. Offsets are used to justify the unjustifiable: projects that should be rejected are permitted on the basis of offset proposals; illegal practices (e.g. exceedance of minimum emission standards) are permitted on the basis of offsets.
27. Regulatory capacity is inadequate to the task and provides no oversight. The assumption that offsetting compensates for weak regulatory and planning capacity is false. To the contrary, it exacerbates it.



28. Offsets will tempt government to abandon responsibilities rather than build capacity to meet them – thus playing into the arms of the business lobby (next item).
29. Offsets will call forth a business lobby for weak regulation of a new market in offset buying and selling on the argument that the market will be more 'efficient' than regulation – that is efficient in money terms, not biodiversity terms but proponents will elide the difference. In the UK, business proponents are lobbying against government establishing a central registry of offsets – which will prevent any national overview and inhibit evaluation.<sup>5</sup>
30. Destruction from the original project is certain, benefits of the offset are not – indeed, some offsets may themselves be destructive. Offsets usher in the commodification and financialization of nature.
31. If there is real money involved (as proponents hope) big capital will move in. Offset providers will not be restricted to small and ethical biodiversity practitioners. It will be profit driven.
32. Offsets will not be maintained if profits or securities (bought and sold globally) decline, offset providers are bankrupted or property values favour different land-use. In the UK, business proponents are already arguing for time limited offsets to avoid 'sterilising' land – meaning removing it from the market. In this context, it is striking that what is economically sterile is ecologically fecund and vice versa.
33. The use of offsets will depend on a series of false equivalences – between what is destroyed and what is preserved and between ecological and money values. (How many chameleons are worth a hawk and what's the price?)

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<sup>5</sup> Sian Sullivan and Mike Hannis, *Nets and frames, losses and gains: Value struggles in engagements with biodiversity offsetting in England*, Leverhulme Centre for the Study of Value, University of Manchester, June 2014.



34. Offsetting will mask the fact that habitat and species loss is irreplaceable. 'No net loss' is merely an advertising slogan.
35. Calculation of offsets and equivalences will depend on reductive simplifications of complex ecological systems.
36. This will start with delimiting the supposed area of impact: e.g. focusing on a wetland and its immediate surrounds and excluding cumulative impacts on the catchment. (Note: this is already common practice in EIAs so it is very likely to be transferred to offsets.)
37. People may be removed for the original project (e.g. to make way for mines) and then again for the offset itself. This may be because people lose jobs with the change of land-use (already observed on the change from farms to game farms and the eviction of farmworkers) or because people who used land and natural resources in the offset area are excluded from doing so (as is likely in former Bantustan areas).
38. People will lose access to natural areas and resources turned over to development and offset at distant locations.
39. Within specific catchments or airsheds, the offsets may be overwhelmed by the accumulation of destructive activities – e.g. acid mine drainage ruins wetlands preserved as offsets to the mining projects; air quality offsets fall far short of the scale and geographic spread of industrial pollution (e.g. the Eskom and Sasol proposed offsets).

### **Excessive Water Consumption**

40. According to this EIA report, the proposed RB CCPP project will require an excessive amount of water to operate. 'For the Operations of the



Power Plants, the volumes of water required is between 2000 - 5000m<sup>3</sup>/day to be provided by the municipality'<sup>6</sup>

41. The country is susceptible to drought owing to climate change. KwaZulu-Natal suffered a crippling drought throughout 2015 and 2016, leaving farms, town and rural areas with JoJo tanks as the only source of water. The project will require a whopping 2millions to 5millions litres of water per day for operation. This is so unacceptable because community people would surely be deprived of water to some extent when it is hit by drought as they will be competing with the power plant. The report does not disclose where the water would be fetched from. The disclosure of the water source is significant in order to establish who else is depending on that particular water source and whether or not the source would be able to supply all those who depend on it and even during the drought seasons.

Since the country often experience drought, the report does not provide any guarantee that during that time it would not use water which is supposed to be provided to communities in desperate need.<sup>7</sup>

### **Failure to guarantee cheap and affordable electricity to community**

42. The report states that the facility would supply cheap and affordable electricity. '*There are on-going collaborations with the Department of Energy to ensure that the province of KwaZulu-Natal contribute significantly to the diversification of the energy mix and supply of clean and affordable electricity.*'<sup>8</sup>

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<sup>6</sup> p31

<sup>7</sup> <https://www.ecr.co.za/news/news/protectors-block-jozini-roads-water-woes-continue>  
[http://www.umhlathuze.gov.za/index.php?option=com\\_content&view=article&id=89:water-users-urged-to-serve-as-drought-continues&catid=30&Itemid=385](http://www.umhlathuze.gov.za/index.php?option=com_content&view=article&id=89:water-users-urged-to-serve-as-drought-continues&catid=30&Itemid=385)  
[www.umhlathuze.gov.za > index.php > media-manager > news-updates](http://www.umhlathuze.gov.za/index.php/media-manager/news-updates)

<sup>8</sup> P5



43. The report does not afford any guarantee that the communities at least located adjacent to facility would benefit from this cheap and affordable electricity. The report should quantify how the electricity would be cheap and affordable to the community, not industries. Furthermore, the report should develop a commitment document (to the effect of cheap and affordable electricity) which is signed by both the community and the facility for future reference, or else this promise would be nothing but one of those talk shops to elicit support to the project.

### **Wetland Delineation**

44. In your report it is stated that, *'The proposed project will result in the loss of wetland area, and the subsequent loss of ecological services. This loss is the key consideration for the impact assessment, with the loss of wetland area unavoidable. No mitigation is possible for the loss of wetlands, and a wetlands offset plan is therefore required. A wetland offset plan (**Appendix E**) has been compiled in consultation with the local conservation authority (Ezemvelo KZN Wildlife). The wetland offset plan offers a long term conservation solution to conserve other wetlands in the region through offsetting the high residual impacts to wetlands on the project site.'*<sup>9</sup>

45. Wetlands are biologically diverse ecosystems that provide a habitat for many **important** species, act as buffers against coastal storms, and naturally filter water by breaking down harmful pollutants. One of the most significant role of wetlands in the ecosystem is that they are natural water purification system and can never be replaced.

46. There is nothing in the Draft EIA Report of this project illustrating how the offset of the wetlands are going to be carried out and offset the wetlands that are going to be destroyed for the project. So the report has to explain and be convincing that the offset plans for this valuable

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<sup>9</sup> Potential Impacts on Wetlands p175



resource can be legally accepted and are in line with the objectives pursued by the regulatory laws.

47. It is important that the offset plans be substantially equivalent or greater to the loss of the wetlands on the site. The offset plans of wetlands should be justifiable in law as to why this significant water resource should be degraded and why the law should allow the loss to happen.

#### **Public health impacts study on surrounding communities.**

48. The Report makes a general comment that the public health impacts would be minimal goes on to claim that that on balance the social benefits outweigh the potential public health impacts. We submit that this is over-simplistic and in the context of our greatest existential threat from climate change the EIA report fails in that it does not undertake a full health risk assessment to determine the public health risks posed by climate change which are elaborated in the section below. We submit that this is an even greater threat to development and will in fact result in maldevelopment of the communities that this EIA report purports will benefit from such a facility.
49. In fact the EIA report does not adequately determine the public health impacts from an additional industrial installation in Richards Bay in general - where the ambient air quality is generally in exceedance of our National Ambient Air Quality regulations.
50. For this reason we submit that a dedicated Health Impact Assessment by a qualified public health professional taking into account the cumulative health risk from the existing industrial facilities in the Greater Richards Bay area is required at a minimum to determine the potential cumulative health impacts on the surrounding communities from the existing and potential pollution emissions from the proposed facility.
51. There has to be a health study done on the type of pollution impacts onto the communities, i.e. the types of diseases they are going to suffer



and who is going to carry the costs of taking care of them. The findings of such health study should be communicated to those who would be potentially affected.

### **Climate Change impacts (local and regional)**

52. All fossil fuel-fired electric power plants, including CCPPs, emit greenhouse gases (GHGs) at different levels, making them the main contributor to climate change. As the CCPPs burn natural gas, their emission rates are lower compared to other fossil fuels. While natural gas produces less carbon dioxide and other dangerous air pollutants per energy unit than coal, these plants carry their own environmental and health risks, especially when they operate in areas that are already suffering under disproportionate and unfair pollution burdens.
53. The carbon intensity of this plant will be 4.6 million tonnes CO<sub>2</sub>e and will make a significant contribution to the SA GHG inventory. There is simply no more carbon budget left for an additional fossil fuel emitting electricity plant considering the availability and price of renewable energy.
54. We also emphasise, in light of the growing body of research, and increasing evidence of the dire impacts of climate change – particularly on South Africa – that taking urgent and effective steps to substantially reduce the country's GHG emissions without delay is a legal obligation on the state – including National Treasury - and a Constitutional imperative.
55. A landmark report released on 8 October 2018 by the United Nations Intergovernmental Panel on Climate Change<sup>10</sup> (IPCC) on Global Warming of 1.5 °C (“the IPCC Report”), confirms, inter alia, that:

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<sup>10</sup> Intergovernmental Panel on **Climate Change(IPCC)** on 8 October **2018**



56. human activities have already caused approximately 1.0°C of global warming above pre-industrial levels, resulting in increased natural disasters, droughts, and rising sea levels;
57. the risks of allowing temperature increases to reach even 1.5 degrees Celsius are dire (the Paris Agreement currently sets the target at 2 °C);
58. limiting global warming to 1.5°C would require “rapid and far-reaching” transitions in land, energy, industry, buildings, transport, and cities; and
59. global net human-caused emissions of carbon dioxide (CO<sub>2</sub>) must fall by about 45 percent from 2010 levels by 2030, reaching ‘net zero’ around 2050.
60. The IPCC report essentially confirms that drastic GHG emission reductions are needed, and these are needed urgently. The IPCC envisages a 60-80% reduction in the use of coal and fossil fuels in the energy sector by 2030 and negligible use of coal and fossil fuels by 2050.
61. The IPCC report emphasises the following climate change impacts to southern Africa:
62. “At 1.5°C, a robust signal of precipitation reduction is found over the Limpopo basin and smaller areas of the Zambezi basin, in Zambia, as well as in parts of Western Cape, in South Africa, while an increase is projected over central and western South Africa as well as in southern Namibia (Section 3.3.4)”.
63. The IPCC report also includes Southern Africa as one of the “hot spots of change” when comparing a global warming of 1.5°C and 2° C. It states:
64. “The southern African region is projected to be a climate change hot spot in terms of both hot extremes (Figures 3.5 and 3.6) and drying (Figure 3.12). Indeed, temperatures have been rising in the subtropical regions of southern Africa at approximately twice the global rate over



the last five decades (Engelbrecht et al., 2015). Associated elevated warming of the regional land-based hot extremes has occurred (Section 3.3; Seneviratne et al., 2016). Increases in the number of hot nights as well as longer and more frequent heat waves are projected even if the global temperature increase is constrained to 1.5°C (high confidence), with further increase at 2°C of global warming and beyond (high confidence) (Weber et al., 2018)

65. Moreover, the region is likely to become generally drier with reduced water availability under low mitigation (Niang et al., 2014; Engelbrecht et al., 2015; Karl et al., 2015; James et al., 2017), with this particular risk also prominent under 2°C of global warming and even 1.5°C of warming (Gerten et al., 2013). Risks are significantly reduced, however, under 1.5°C of global warming (Schleussner et al., 2016b). There are consistent and statistically significant projected increases in risks of increased meteorological drought in southern Africa at 2°C vs 1.5°C of warming (medium confidence). Despite the general rainfall reductions projected for southern Africa, daily rainfall intensities are expected to increase over much of the region (medium confidence), and increasingly so with further amounts of global warming. There is medium confidence that livestock in southern Africa will experience increased water stress under both 1.5°C and 2°C of global warming, with negative economic consequences (e.g., Boone et al., 2017). The region is also projected to experience reduced maize, sorghum and cocoa cropping area suitability as well as yield losses under 1.5°C of warming, with further decreases towards 2°C of warming (World Bank, 2013). Generally, there is high confidence that vulnerability to decreases in water and food availability is reduced at 1.5°C versus 2°C for southern Africa (Betts et al., 2018), whilst at 2°C these are expected to be higher (Lehner et al., 2017; Betts et al., 2018; Byers et al., 2018; Rosenzweig et al., 2018) (high confidence)” (emphasis added).
66. What the IPCC report makes clear is that aiming for a 2° C temperature increase, as per the Paris Agreement, is not sufficient to protect people and the planet from irreversible harm. South Africa’s own Nationally Determined Contribution (NDC) notes that a global average temperature increase of 2°C translates to up to 4°C for South Africa by



the end of the century. South Africa is not even on track to meeting the (now confirmed inadequate) 2°C target, with its current NDC ambitions being rated as highly insufficient by Climate Action Tracker.

67. South Africa’s own Climate Change Response White Paper states that:

“even under emission scenarios that are more conservative than current international emission trends, it has been predicted that by mid-century the South African coast will warm by around 1 to 2°C and the interior by around 2 to 3°C. By 2100, warming is projected to reach around 3 to 4°C along the coast, and 6 to 7°C in the interior. With such temperature increases, life as we know it will change completely: parts of the country will be much drier and increased evaporation will ensure an overall decrease in water availability. This will significantly affect human health, agriculture, other water-intensive economic sectors such as the mining and electricity-generation sectors as well as the environment in general. Increased occurrence and severity of veld and forest fires; extreme weather events; and floods and droughts will also have significant impacts” (emphasis added).

68. Evidently much more needs to be done by the state to firstly, ensure that the people of South Africa are protected from the impacts of climate change and the country’s GHG emissions reduced and, secondly, to ensure that the country’s international climate commitments are adequate and honoured.

69. The recent Dutch case of the State of the Netherlands v the Urgenda Foundation<sup>11</sup>, demonstrates the obligations of the state to protect its people from the impacts of climate change. In the judgment handed down on 9 October 2018 the court confirmed that the state was acting unlawfully, and in contravention of the duty of care by failing to pursue a more ambitious GHG emission reduction plan. The court held, inter alia, that: “the State has a positive obligation to protect the lives of citizens within its jurisdiction .... This obligation applies to all activities, public and non-public, which could endanger the rights protected ...,

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<sup>11</sup> [2015] HAZA C/09/00456689 (June 24, 2015); aff’d (Oct. 9, 2018) (District Court of the Hague, and The Hague Court of Appeal (on appeal))



and certainly in the face of industrial activities which by their very nature are dangerous” (emphasis added);

70. “the Court believes that it is appropriate to speak of a real threat of dangerous climate change, resulting in the serious risk that the current generation of citizens will be confronted with loss of life and/or a disruption of family life. ....[T]he State has a duty to protect against this real threat” (emphasis added); and “up till now the State has done too little to prevent a dangerous climate change and is doing too little to catch up, or at least in the short term (up to end-2020). Targets for 2030 and beyond do not take away from the fact that a dangerous situation is imminent, which requires interventions being taken now. In addition to the risks in that context, the social costs also come into play. The later actions are taken to reduce, the quicker the available carbon budget will diminish, which in turn would require taking considerably more ambitious measures at a later stage...., to eventually achieve the desired level of 95% reduction by 2050”(emphasis added).

71. *Negative impacts on air quality can be expected during the construction of the RB CCPP due to release of particulate and gaseous pollutants. This impact was rated to have a potentially low impact (after mitigation). During the operation phase, negative impacts as a result of sulphur dioxide emissions, and other atmospheric pollutants due to the RB CCPP can be expected; and were assessed to be of medium to Low significance (after mitigation), respectively.*<sup>12</sup>

72. Eskom, just like any other polluting industry, has a responsibility to reduce ambient air pollution. RB CCPP need not to contribute to any pollutions levels in the Richards Bay area, not even anywhere else.

73. Section 24 of the Constitution<sup>13</sup> and section 28 of the National Environmental Management Act, 1998 (NEMA)<sup>14</sup> impose the same

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<sup>12</sup> Assessment of Impact on Air Quality p165

<sup>13</sup> Act No. 108 of 1996

<sup>14</sup> No. 107 of 1998



duty of care and obligation on the state to take reasonable measures to protect the people of South Africa from harmful impacts to their health and/or wellbeing and to protect the people and future generations from the irreversible impacts of climate change. In line with the above, we confirm that adopting effective and adequate climate change mitigation measures is in fact a legal – and Constitutional - obligation on the state. Simply adhering to inadequate targets, making provision for carbon offsets and otherwise imposing loose and ineffectual regulations, which are unlikely to give rise to a meaningful reduction of GHG emissions, does not, in any way, discharge the state's Constitutional duties to implement proper GHG emission reduction measures to protect the people of South Africa from the impacts of climate change, or its international commitments.

### **Costs of the Project**

74. There is lack of information about the costs of the project. Eskom is currently having an estimated R 248 billion in debts. The question is, who is carry the costs of the project? Is Eskom expecting the taxpayers' money to bail them out again? This is a very important information to be included in this report for the public to know whether or not the costs would be incurred by the public and what does this mean regarding the inflation rate.

### **Source of the natural gas**

75. The document does not indicate where the natural gas intended to be used in the project comes from. This failure of disclosure for the source of the gas does not give us confidence that the gas provider does not cause environmental destruction. The document should disclose this information so that the public can make an informed decision that they are benefitting or approving the project which is indirectly causing environmental harm elsewhere and to some community.



76. Kindly keep us updated.

Yours sincerely

groundWork

per

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## Nicolene Venter

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**From:** Percy Langa  
**Sent:** Monday, August 26, 2019 12:03 PM  
**To:** Savannah Public Process; Nicolene Venter  
**Cc:** Zakithi Ngcobo; Ntando Mtshali  
**Subject:** RE: REMINDER: Richards Bay CCPP Project: Revised EIAR Review and Comment period ending soon

Hi Nicolene,

Thank you for the reminder to submit comments.

I have four comments -

1. EIAR, Table 2.2: Add a third bullet to the component below and mention that the powerlines to connect the power station to the grid are subject to a separate EIA (DEA Ref: xx)

**Grid connection**

- » The CCPP will be connected to the national grid line<sup>9</sup>.
- » The CCPP will have a maximum of 12 generators

2. EIAR, Table 2.2: Stormwater
  - a. Page 27: The sea outfall pipeline is owned and operated by Mhlathuze Water, not the municipality.
  - b. Page 28: "The location of the storage facility – storage will be in bunded tanks and sumps" – The yellow bit does not talk to the green bit.
3. EIAR, Section 10.7, page 284: 2<sup>nd</sup> last bullet should state a maximum of 8 hours per day
4. The use of diesel as backup during emergencies
  - a. There is general concern from members of the public about the use of diesel as a backup for the gas-fired power plant. The concern is mainly air quality. However, it is noted that it will be used as backup for a limited period, under emergency conditions.
    - i. It would be helpful to include examples of emergency conditions for information and awareness
  - b. The use of low sulphur content diesel (50 ppm) is noted. Question: was 10 ppm diesel, which has been available in SA for a while, considered? Although not available in SA yet, ultra-low sulphur diesel (5 ppm and lower) is available in Europe / EU members and North America [1]. It is only a matter of time until it is available in SA.

Notes:

[1] [https://en.wikipedia.org/wiki/Ultra-low\\_sulfur\\_diesel](https://en.wikipedia.org/wiki/Ultra-low_sulfur_diesel)

Regards,  
Percy

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**From:** Savannah Public Process [mailto:publicprocess@savannahsa.com]  
**Sent:** 22 August 2019 12:09 PM  
**To:** nicolene@savannahsa.com  
**Subject:** FW: REMINDER: Richards Bay CCPP Project: Revised EIAR Review and Comment period ending soon

**PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU NATAL PROVINCE**

**(DEA REF: 14/12/16/3/3/2/1123)**

Dear Stakeholder and Interested and Affected Party,

With reference to our e-mail below, this e-mail serves as a reminder that the review and comment period on the Revised EIAR is ending on **Monday, 26 August 2019**.

The Revised EIAR can be downloaded from the following websites:

- Eskom Holdings SOC  
Ltd: <http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/RichardsBayCCPP/Pages/default.aspx>
- Savannah Environmental (Pty) Ltd: <https://www.savannahsa.com/public-documents/energy-generation/richards-bay-combined-cycle-power-plant-ccpp/>

The Revised EIAR is also at the following public places:

- Richards Bay Public Library, No. 5 Kruger Rand Road, Richards Bay; and
- Empangeni Public Library, Cnr Union & Maxwell Streets, Empangeni

Thank you to those Stakeholders and Interested and Affected Parties who already submitted their written comments and we urge those who have not yet submitted their written comments to do so before or on **Monday, 26 August 2019**, by close of business day.

Kind regards,

**Nicolene Venter**

Public Participation and Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Fax: +27 (0)86 684 0547

*SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015*

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> From: Savannah Public Process <[publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)>  
> Date Sent: 15/08/2019 13:13  
> To: [nicolene@savannahsa.com](mailto:nicolene@savannahsa.com)  
> Cc:  
> Subject: REMINDER: Richards Bay CCPP Project: Revised EIAR Review and Comment period ending soon  
>

**PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU NATAL PROVINCE**

Dear Stakeholder and Interested and Affected Party,

With reference to the attached notification letter sent on Monday, 22 July 2019, this e-mail serves as a reminder that the review and comment period on the Revised EIAR will be ending soon. The Revised EIAR can be downloaded from the following websites:

- Eskom Holdings SOC  
Ltd: <http://www.eskom.co.za/OurCompany/SustainableDevelopment/EnvironmentalImpactAssessments/RichardsBayCCPP/Pages/default.aspx>
- Savannah Environmental (Pty) Ltd: <https://www.savannahsa.com/public-documents/energy-generation/richards-bay-combined-cycle-power-plant-ccpp/>

The Revised EIAR is also at the following public places:

- Richards Bay Public Library, No. 5 Kruger Rand Road, Richards Bay; and
- Empangeni Public Library, Cnr Union & Maxwell Streets, Empangeni

The review and comment period for the Revised EIAR was from **Wednesday, 24 July** and will be ending on **Monday, 26 August 2019**.

Thank you to those Stakeholders and Interested and Affected Parties who already submitted their written comment.

For those who had not yet submitted written comments, we kindly request that you do so before or on **Monday, 26 august 2019**, by close of business day.

Kind regards,

**Nicolene Venter**

Public Participation and Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Fax: +27 (0)86 684 0547

*SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015*

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> From: Savannah Public Process  
> Date Sent: 22/07/2019 17:15  
> To: [nicolene@savannahsa.com](mailto:nicolene@savannahsa.com)  
> Cc:  
> Subject: Richards Bay CCPP Project: Notification of Availability of Revised EIAR for Review and Comment  
>

**PROPOSED RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU NATAL PROVINCE**

**(DEA REF: 14/12/16/3/3/2/1123)**

Dear Stakeholder and Interested and Affected Party,

Eskom Holdings SoC Ltd (Eskom) proposes to develop a Combined Cycle Power Plant (CCPP) and associated infrastructure with a generating capacity of up to 3000MW. The proposed project is to be known as the Richards Bay Combined Cycle Power Plant (RB CCPP). The Project site is to be located on Portion 2 and Portion 4 of Erf 11376 in the Richards Bay Industrial Development Zone (IDZ) Phase 1D, approximately 6km south west of Richards Bay and 4km south west of Alton which falls within the jurisdiction of the City of uMhlathuze Local Municipality and the King Cetshwayo District Municipality, KwaZulu-Natal Province.

An EIA Report (revision 0) was made available for the RB CCPP project for a 30-day review period from Sunday, 24 March to Friday, 26 April 2019. The review period of the EIA Report was extended to Friday, 10 May 2019 in order to accommodate various requests from I&APs in terms of extending the review period. All registered I&APs were notified of the extension on Monday, 29 April 2019.

Following the end of the 30-day review period of the EIA Report (revision 0) and through the consideration of all comments received on the EIA Report, the need for the release of a revised EIA Report was identified.

This e-mail serves to inform you that the revised EIAR will be available for your review and comment from **Wednesday, 24 July to Monday, 26 August 2019**.

More information is available in the letter attached to this e-mail notificaiton.

Please do not hesitate to contact us should you require any additional information at this stage.

Kind regards,

**Nicolene Venter**

Public Participation and Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Fax: +27 (0)86 684 0547

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Scoping Phase



**Eastern Region**

58 Van Eck Place, Mkoneni, Pietermaritzburg, 3200  
PO Box 100410, Scottsville, South Africa, 3209  
Tel +27 (0) 33 3928100 Fax +27 (0) 33 3863365

**Offices in** Val de Grace – Pretoria (Head Office), Cape Town, Port Elizabeth

**Reference:** 11/5/3 – 2/29 - Gen

**Date:** 15 August 2017

**Your Ref:**

**Direct Line:** 033 3928100

**Website:** [www.nra.co.za](http://www.nra.co.za)

Savannah Environmental  
P O Box 148  
**SUNNINGHILL**  
2145

**Attention: Gabriele Stein**

Dear Madam

NATIONAL ROUTE N2/29

**ENVIRONMENTAL IMPACT ASSESSMENT PROPOSED DEVELOPMENT OF  
THE RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND  
ASSOCIATED INFRASTRUCTURE ON A SITE NEAR RICHARDS BAY, KWA  
ZULU NATAL**

Your abovementioned EIA refers.

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 runs parallel to a National Route.

Any powerline and associated infrastructure that 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.

Once a route has been approved and finalised and falls within 60 metres parallel or crosses the National Road will have to be submitted to SANRAL's Eastern Region for approval.

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.

Yours faithfully

  
**For Regional Manager  
Eastern Region  
SA National Roads Agency SOC Ltd**

## Gabriele Stein

---

**From:** Futhi Mathebula Transnet Freight Rail JHB  
**Sent:** 21 August 2017 13:23  
**To:** Gonnie Nadasen Transnet Freight Rail DBN  
**Cc:** gabriele@savannahsa.com; Vuyo Keswa Transnet Freight Rail JHB; Benny Molaba Transnet Freight Rail JHB; Basil Louw Transnet Freight Rail JHB  
**Subject:** FW: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING  
**Attachments:** Reply Form.pdf; Eskom CCPP Scoping Review & PM\_21.08.17.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Gabriele

Do you have a locality plan depicting the proposed activities versus Transnet Freight Rail properties so that we are able to comment comprehensively? Gonnie, who at Central Region is the area manager of this area. So that they can assist attend public participation if need be?

Futhi

---

**From:** Gabriele Stein [mailto:gabriele@savannahsa.com]  
**Sent:** 21 August 2017 12:46 PM  
**Subject:** EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

Dear Stakeholder

Eskom Holdings SoC Ltd (Eskom) proposes to develop a Combined Cycle Power Plant (CCPP) and associated infrastructure with a generating capacity of up to 3000MW. The proposed project is to be known as the Richards Bay Combined Cycle Power Plant (CCPP). The Project site is to be located on Portion 2 and Portion 4 of Erf 11376 in the Richards Bay Industrial Development Zone (IDZ) Phase 1D, approximately 6km south west of Richards Bay and 4km south west of Alton which falls within the jurisdiction of the City of uMhlathuze Local Municipality and the King Cetshwayo District Municipality, KwaZulu-Natal Province. The Richards Bay CCPP is approximately 71ha in extent.

The development of the Richards Bay CCPP requires that Environmental Authorisation (EA) be obtained from the National Department of Environmental Affairs (DEA), the Competent Authority (CA), in consultation with the KZN Department of Economic Development, Tourism and Environmental Affairs (EDTEA), the Local Commenting Authority, in accordance with the National Environmental Management Act (No. 107 of 1998) (NEMA) and the provisions of the 2014 Environmental Impact Assessment (EIA) Regulations, as amended on 07 April 2017, published in GNR 324 to GNR 327.

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A Scoping Report is available for review and comment. The report can be viewed at the Richards Bay Public Library, Civic Centre, 05 Mark Strasse, from **21 August 2017 – 20 September 2017**. Please refer to the attached letter for details regarding the availability of the Scoping Report for review and comment and the public meetings details.

Please do not hesitate to contact me if you have any queries in this regard.

Kind regards,

**Gabriele Stein**

**Public Participation and Social Consultant**

**Savannah Environmental (Pty) Ltd**

**Tel: 27 11 656 3237**

**Fax: 086 684 0547**

**Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)**

**[www.savannahsa.com](http://www.savannahsa.com)**

## Gabriele Stein

---

**From:** Gabriele Stein <gabriele@savannahsa.com>  
**Sent:** 24 August 2017 08:58  
**To:** 'Futhi Mathebula Transnet Freight Rail JHB'; 'Gonnie Nadasen Transnet Freight Rail DBN'  
**Cc:** 'Vuyo Keswa Transnet Freight Rail JHB'; 'Benny Molaba Transnet Freight Rail JHB'; 'Basil Louw Transnet Freight Rail JHB'  
**Subject:** RE: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING  
**Attachments:** Richards Bay CCGT Project - Landowners Map - 22.08.17.jpg

Hi Futhi,

Please find the landowners map attached as requested. We will be meeting with Vuyo Keswa on 30 August 2017 to discuss the project further.

Kind regards,

**Gabriele Stein**

Public Participation and Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Fax: +27 (0)86 684 0547

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**From:** Futhi Mathebula Transnet Freight Rail JHB  
**Sent:** 21 August 2017 13:23  
**To:** Gonnie Nadasen Transnet Freight Rail DBN <Gonnie.Nadasen@transnet.net>  
**Cc:** gabriele@savannahsa.com; Vuyo Keswa Transnet Freight Rail JHB; Benny Molaba Transnet Freight Rail JHB; Basil Louw Transnet Freight Rail JHB  
**Subject:** FW: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

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Futhi

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**From:** Gabriele Stein [<mailto:gabriele@savannahsa.com>]  
**Sent:** 21 August 2017 12:46 PM  
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Kind regards,

**Gabriele Stein**

**Public Participation and Social Consultant**

**Savannah Environmental (Pty) Ltd**

**Tel: 27 11 656 3237**

**Fax: 086 684 0547**

**Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)**

**[www.savannahsa.com](http://www.savannahsa.com)**



**OFFICE OF THE REGIONAL LAND CLAIMS COMMISSIONER: KWAZULU-NATAL**  
139 Langalibalele Street, PIETERMARITZBURG, 3200, Private Bag X 9120, PIETERMARITZBURG, 3200  
Tel: (033) 341 2600 | Fax: (033) 342 2881

Your Ref:

Enquiries: Lynn Boucher

Savannah Environmental (Pty) Ltd  
First Floor, Block 2, Woodlands Drive Office Park  
cnr Woodlands Drive & Western Service Road  
**WOODMEAD**  
2191

Dear Sir/Madam

**REQUEST INFORMATION ON PROPERTY: LAND CLAIM**

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.**

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.

Regards

M

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**MR N. MDULI**  
**MANAGER: INFORMATION AND RECORDS MANAGEMENT**  
**DATE: 22 August 2017**

## Gabriele Stein

---

**From:** John Geeringh  
**Sent:** 22 August 2017 11:34  
**To:** Gabriele Stein  
**Subject:** RE: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please send me the BID or a locality map. I seem to have misplaced previous information I had on this project.

Regards  
John

---

**From:** Gabriele Stein [mailto:gabriele@savannahsa.com]  
**Sent:** 21 August 2017 12:46 PM  
**Subject:** EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

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Please do not hesitate to contact me if you have any queries in this regard.

Kind regards,

**Gabriele Stein**

**Public Participation and Social Consultant**

**Savannah Environmental (Pty) Ltd**

**Tel: 27 11 656 3237**

**Fax: 086 684 0547**

**Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)**

**[www.savannahsa.com](http://www.savannahsa.com)**

NB: This Email and its contents are subject to the Eskom Holdings SOC Ltd EMAIL LEGAL NOTICE which can be viewed at [http://www.eskom.co.za/Pages/Email\\_Legal\\_Spam\\_Disclaimer.aspx](http://www.eskom.co.za/Pages/Email_Legal_Spam_Disclaimer.aspx)

## Gabriele Stein

---

**From:** Gabriele Stein <gabriele@savannahsa.com>  
**Sent:** 22 August 2017 11:50  
**To:** 'John Geeringh'  
**Subject:** RE: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING  
**Attachments:** Richards Bay CCPP BID.PDF

Hi John

Please find the BID attached.

Kind regards

**Gabriele Stein**

Public Participation and Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Fax: +27 (0)86 684 0547

[SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015](#)

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**From:** John Geeringh  
**Sent:** 22 August 2017 11:34  
**To:** Gabriele Stein <gabriele@savannahsa.com>  
**Subject:** RE: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

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John

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**Sent:** 21 August 2017 12:46 PM  
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**Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)**

**[www.savannahsa.com](http://www.savannahsa.com)**

NB: This Email and its contents are subject to the Eskom Holdings SOC Ltd EMAIL LEGAL NOTICE which can be viewed at [http://www.eskom.co.za/Pages/Email\\_Legal\\_Spam\\_Disclaimer.aspx](http://www.eskom.co.za/Pages/Email_Legal_Spam_Disclaimer.aspx)

## Gabriele Stein

---

**From:** Lizelle Stroh  
**Sent:** 22 August 2017 12:41  
**To:** Gabriele Stein  
**Subject:** RE: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING  
**Attachments:** Pylon Geographic co ordinates.xls; Solar Park footprint corners.xls

Your EIA process notice forms part of our approval from the SACAA with regard to PV farms refers.

There is a SACAA process whereby permission is applied for wrt 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.

- Kindly provide a **.kml (Google Earth) file reflecting the footprint of the proposed development site including the proposed overhead electric power line route that will evacuate the generated power to the national grid.**
- 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.*

Kind regards

**Lizell Stroh**  
**Obstacle Inspector**  
**PANS-OPS (Procedures for Air Navigation Services-Aircraft Operations)**  
**Air Navigation Services**

Follow us on    

Based on the ICAO USOAP CMA 2017 audit preliminary outcome

# *The leading CAA in Africa!*

*We are committed to keeping you safe in the sky!*



---

**From:** Gabriele Stein [mailto:gabriele@savannahsa.com]

**Sent:** 21 August 2017 12:46 PM

**Subject:** EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

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**[www.savannahsa.com](http://www.savannahsa.com)**

## Gabriele Stein

---

**From:** Bernadet  
**Sent:** 22 August 2017 15:45  
**To:** 'Gabriele Stein'  
**Subject:** RE: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

Good day

Thank you for notifying Amafa. Comment will be published on the SAHRIS facility on [www.sahra.org.za](http://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 J(NID-Notice of Intention to Develop Form) available on the Amafa website [www.heritagekzn.co.za](http://www.heritagekzn.co.za).

Kind regards  
Bernadet Pawandiwa  
Senior Heritage Officer  
Archaeology Compliance/Permits  
Amafa /Heritage KwaZulu -Natali  
P.O. Box 2685  
Pietermaritzburg  
3201  
Tel: 033 394 6543  
Fax: 033 394 6552

**“Stand up for what is right even if you stand alone.”**  
– **Suzy Kassem**

---

**From:** Gabriele Stein [mailto:[gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)]  
**Sent:** 21 August 2017 12:46 PM  
**To:** undisclosed-recipients:  
**Subject:** EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

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**[www.savannahsa.com](http://www.savannahsa.com)**

**From:** Jabulisile Zondo (ER Temp)  
**Sent:** 25 August 2017 16:30  
**To:** 'gabriele@savannahsa.com'  
**Subject:** RE: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

Good day Gabriele

Kindly find below circular from SANRAL regarding Draft Basic Assessment Reports.

**ENVIRONMENTAL SCOPING AND IMPACT ASSESSMENT REPORT SUBMISSIONS**

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:

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.

All ancillary information must be included on a Compact Disc (CD) for further reference.

12. All submissions to be addressed to:

- The Regional Manager – Eastern Region  
58 Van Eck Place  
Mkondeni  
Pietermaritzburg  
3201  
Attention: Statutory Control Department

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.

Your co-operation 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.

Kind regards

Jabu Zondo  
ER stat control

---

**From:** Gabriele Stein [<mailto:gabriele@savannahsa.com>]

**Sent:** 21 August 2017 12:46 PM

**Subject:** EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

Dear Stakeholder

Eskom Holdings SoC Ltd (Eskom) proposes to develop a Combined Cycle Power Plant (CCPP) and associated infrastructure with a generating capacity of up to 3000MW. The proposed project is to be known as the Richards Bay Combined Cycle Power Plant (CCPP). The Project site is to be located on Portion 2 and Portion 4 of Erf 11376 in the Richards Bay Industrial Development Zone (IDZ) Phase 1D, approximately 6km south west of Richards Bay and 4km south west of Alton which falls within the jurisdiction of the City of uMhlatuze Local Municipality and the King Cetshwayo District Municipality, KwaZulu-Natal Province. The Richards Bay CCPP is approximately 71ha in extent.

The development of the Richards Bay CCPP requires that Environmental Authorisation (EA) be obtained from the National Department of Environmental Affairs (DEA), the Competent Authority (CA), in consultation with the KZN Department of Economic Development, Tourism and Environmental Affairs (EDTEA), the Local Commenting Authority, in accordance with the National Environmental Management Act (No. 107 of 1998) (NEMA) and the provisions of the 2014 Environmental Impact Assessment (EIA) Regulations, as amended on 07 April 2017, published in GNR 324 to GNR 327.

Savannah Environmental (Pty) Ltd has been appointed as the independent Environmental Assessment Practitioner (EAP), responsible for undertaking an Impact Assessment process (Scoping and EIA) to identify and assess all potential environmental impacts associated with the project for the area as identified, and propose appropriate mitigation and management measures in an Environmental Management Programme (EMPr). As part of these environmental studies, Interested and/or Affected Parties (I&APs) will be actively involved through the public participation process.

A Scoping Report is available for review and comment. The report can be viewed at the Richards Bay Public Library, Civic Centre, 05 Mark Strasse, from **21 August 2017 – 20 September 2017**. Please refer to the attached letter for details regarding the availability of the Scoping Report for review and comment and the public meetings details.

Please do not hesitate to contact me if you have any queries in this regard.

Kind regards,

**Gabriele Stein**

**Public Participation and Social Consultant**

**Savannah Environmental (Pty) Ltd**

**Tel: 27 11 656 3237**

**Fax: 086 684 0547**

**Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)**

**[www.savannahsa.com](http://www.savannahsa.com)**

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Tel +27-(0)12 844 8000, [www.nra.co.za](http://www.nra.co.za)

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ENVIRONMENTAL IMPACT ASSESSMENT PROCESS  
PUBLIC PARTICIPATION PROCESS  
DEVELOPMENT OF THE RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND  
ASSOCIATED INFRASTRUCTURE ON A SITE NEAR RICHARDS BAY, KWAZULU-NATAL  
PROVINCE  
STAKEHOLDER REPLY FORM

Return completed reply form to: Gabriele Stein of Savannah Environmental

Fax: 086 684 0547

Phone: 011 656 3237

E-mail: gabriele@savannahsa.com

Postal Address: PO Box 148, Sunninghill, 2157

Please provide your complete contact details:

Name & Surname:

OSCAR NZIMA

Organisation & Designation:

INDIZA AIRPORT MANAGEMENT, RBAY AIRPORT MANAGER

Postal Address:

POSTNET SUITE 75

Would you like to register as an interested and affected party (I&AP)? YES  NO

(please tick the relevant box)

Note: You are required to register as an I&AP to receive further correspondence regarding the EIA process for the project.

Please state your interest in the project (add additional pages if necessary):

Aviation Safety w/out traffic operating with the Richards Bay Airspace.

Please list your questions, views or concerns regarding the project (add additional pages if necessary):

1. Position of the proposed CCPP.
2. Height of the tallest structure.
3. Footprint of the CCPP

Please provide contact details of other persons who you regard as a potential interested or affected party:

Name & Surname:

JOHNITHIN BREYER BACH

Organisation & Designation:

INDIZA AIRPORT MANAGEMENT. AIR TRAFFIC CONTROL

Postal Address:

Telephone:

Fax:

## Gabriele Stein

---

**From:** Frans Van Der Walt  
**Sent:** 28 August 2017 15:13  
**To:** Gabriele Wood  
**Cc:** Sandy Camminga; Mike Patterson; Christo Botha; Alen Viljoen; Kevin Seamark (UVS); Retha van Niekerk  
**Subject:** RE: EIA for Proposed DEVELOPMENT of 300MW GAS POWER PLANT, RICHARDS BAY  
**Importance:** High

Dear Gabrielle,

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, ie 3000MW vs. the original 300MW. We have not heard from you whatsoever since the communication hereunder, and also find that curious ?

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 ?!

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.

Regards,

**Frans van der Walt** (B.Sc (QS), Pr.QS (2167), PMAQS, MRICS)  
**QS2000 Plus** (Quantity Surveyors & Project Managers)

QS2000 is a Certified **BBBEE level 4 Contributor**.



---

**From:** Gabriele Wood [mailto:gabriele@savannahsa.com]  
**Sent:** 4 December 2015 09:52 AM  
**To:** Frans Van Der Walt  
**Subject:** RE: EIA for Proposed DEVELOPMENT of 300MW GAS POWER PLANT, RICHARDS BAY

Dear Frans

Public Meetings will be held in the first quarter of 2016. The dates are still to be confirmed. In the meanwhile, please do not hesitate to send me your written comments/concerns regarding the locality of the proposed Power Plant. I will request responses from the developer and/or specialists as required. Your submission will also be included in the Scoping Report which will be submitted to the National Department of Environmental Affairs.

Thanks.

Kind regards

**Gabriele Wood**

Public Participation and Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 11 656 3237 | Fax: +27 86 684 0547 | Cell: +27 83 458 5570

---

**From:** Frans Van Der Walt  
**Sent:** 04 December 2015 09:40  
**To:** Gabriele Wood  
**Subject:** RE: EIA for Proposed DEVELOPMENT of 300MW GAS POWER PLANT, RICHARDS BAY

Thank you Gabriel,

Are there going to be any Public Meetings held ? We need to debate the appropriateness of the locality and desirability of establishing a Power Plant within an IDZ.

Regards,

**Frans van der Walt** (B.Sc (QS), Pr.QS (2167), PMAQS, MRICS)  
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---

**From:** Gabriele Wood [<mailto:gabriele@savannahsa.com>]  
**Sent:** 4 December 2015 09:24 AM  
**To:** Frans Van Der Walt  
**Subject:** RE: EIA for Proposed DEVELOPMENT of 300MW GAS POWER PLANT, RICHARDS BAY

Dear Frans Van Der Walt

Apologies for the late response – I was out of the office with limited access to email. Please find the background information document attached as requested. More information on the project can be obtained from the Scoping Report which is available on our website at the following link: <http://www.savannahsa.com/projects/project.php?project=411>

This also serves to confirm that you have been registered as an I&AP on the project's EIA database.

Please do not hesitate to contact me if you have any queries in this regard.

Kind regards

**Gabriele Wood**

Public Participation and Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 11 656 3237 | Fax: +27 86 684 0547 | Cell: +27 83 458 5570

---

**From:** Frans Van Der Walt  
**Sent:** 02 December 2015 15:35

To: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)

Subject: EIA for Proposed DEVELOPMENT of 300MW GAS POWER PLANT, RICHARDS BAY

Hallo Gabrielle Wood,

Further to the recent Notice in the media about the above project, I would appreciate if you could add me as Interested and Affected Party and if I could request all background information.

I look forward to hearing more and being involved in the EIA process going forward.

Regards,

**Frans van der Walt** (B.Sc (QS), Pr.QS (2167), PMAQS, MRICS)  
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**Gabriele Wood**

Public Participation and Social Consultant

Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)

[www.savannahSA.com](http://www.savannahSA.com)



Tel: +27 11 656 3237 | Fax: +27 86 684 0547 | P.O. Box 148, Sunninghill, 2157  
1st Floor, Block 2, 5 Woodlands Drive Office Park, Woodlands Drive, Woodmead, 2191

*Awarded Leading Environmental Consultant on Wind Projects in 2013 & 2015 (SAWEA)*

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## Gabriele Stein

---

**From:** Gabriele Stein <gabriele@savannahsa.com>  
**Sent:** 28 August 2017 16:02  
**To:** 'Frans Van Der Walt'  
**Cc:** 'Sandy Camminga'; 'Mike Patterson'; 'Christo Botha'; 'Alen Viljoen'; 'Kevin Seamark (UVS)'; 'Retha van Niekerk'  
**Subject:** RE: EIA for Proposed DEVELOPMENT of 300MW GAS POWER PLANT, RICHARDS BAY  
**Attachments:** Richards Bay Power Facility - EA Notification Letter 18.10.2016.pdf; 867 cover letter.pdf; 867 ea.pdf; Frans vd Walt\_Proof of Correspondence.pdf; Eskom CCPP Scoping Review & PM\_21.08.17.pdf; Richards Bay CCPP BID.PDF

Dear Frans

Thank you for the email.

The proposed 3000MW Richards Bay Combined Cycle Power Project (CCPP) is a different project to the Gas Power Plant as proposed by Richards Bay Gas Power 2 (Pty) Ltd, an independent power producer (IPP) and to which my previous correspondence 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 on 04 October 2016. I have attached the Environmental Authorisation and notification letter that was distributed for your reference. I confirm that you were registered as an Interested and Affected Party (I&AP) on the project's database. According to our records the following correspondence was sent to you via email (please refer to the attached proof of correspondence for a record of all emails sent to you).

- EIA Process – Proposed Gas to Power Plant on a site within the Richards Bay IDZ – Notification of Availability of EIA Report and Public Meeting dated 09 May 2016
- 400MW Richards Bay Power Facility within the Richards Bay IDZ – Notification of Granting of Environmental Authorisation by DEA dated 18 October 2016

The Richards Bay Combined Cycle Power Plant (CCPP), is a 3000MW power plant which is being proposed by Eskom. I have attached the background information document (BID) and notification letter announcing the availability of the Scoping Report for your reference. I confirm that I have registered your details on the project's database for this particular project and that you should have received a letter announcing the EIA process (dated 11 August 2017) and a letter announcing the availability of the Scoping Report and public meeting dates (dated 21 August 2017) via email. If you did not receive this correspondence, please check your spam filter as it is possible my email address could be blocked.

Thank you for confirming your attendance to the public meeting on 31 August 2017. We look forward to providing you with more details throughout the process.

Kind regards,

**Gabriele Stein**

Public Participation and Social Consultant | Savannah Environmental (Pty) Ltd  
Tel: +27 (0)11 656 3237 | Fax: +27 (0)86 684 0547

[SAWEA Award for Leading Environmental Consultant for Wind Projects in 2013 & 2015](#)

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**QS2000 Plus** (Quantity Surveyors & Project Managers)



**Gabriele Wood**

Public Participation and Social Consultant

Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)

[www.savannahSA.com](http://www.savannahSA.com)



Tel: +27 11 656 3237 | Fax: +27 86 684 0547 | P.O. Box 148, Sunninghill, 2157  
1st Floor, Block 2, 5 Woodlands Drive Office Park, Woodlands Drive, Woodmead, 2191

*Awarded Leading Environmental Consultant on Wind Projects in 2013 & 2015 (SAWEA)*

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## Gabriele Stein

---

**From:** George Lotter  
**Sent:** 29 August 2017 16:39  
**To:** gabriele@savannahsa.com  
**Cc:** RBadmin  
**Subject:** Register on database: Development of the RB combined cycle power plant (CCPP)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good day

Kindly add Motla Consulting Engineers (specifically George Lotter) via email to your database.

We are Electrical Consulting Engineers.

Thank you

Regards

**George Lotter** (B. Eng) Pr. Eng  
*Electrical Engineer*  
*Motla Consulting Engineers (Pty) Ltd*

MOTLA

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**ENVIRONMENTAL IMPACT ASSESSMENT PROCESS  
PUBLIC PARTICIPATION PROCESS  
DEVELOPMENT OF THE RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND  
ASSOCIATED INFRASTRUCTURE ON A SITE NEAR RICHARDS BAY, KWAZULU-NATAL  
PROVINCE  
STAKEHOLDER REPLY FORM**

Return completed reply form to: *Gabriele Stein of Savannah Environmental*

Fax: **086 684 0547**

Phone: **011 656 3237**

E-mail: **gabriele@savannahsa.com**

Postal Address: **PO Box 148, Sunninghill, 2157**

**Please provide your complete contact details:**

Name & Surname:

Organisation & Designation:

Postal Address:

	FRANZ SCHMIDT
	RICHARDS BAY ACCOYS,
	SHRECC MANAGER.

Telephone:

Fax:

**Would you like to register as an interested and affected party (I&AP)?** YES  NO

(please tick the relevant box)

*Note:* You are required to register as an I&AP to receive further correspondence regarding the EIA process for the project.

**Please state your interest in the project** (add additional pages if necessary):

**Please list your questions, views or concerns regarding the project** (add additional pages if necessary):

**Please provide contact details of other persons who you regard as a potential interested or affected party:**

Name & Surname:

Organisation & Designation:

Postal Address:

Telephone:

Fax:

	Cellphone:	
	E-mail:	



**agriculture  
& rural development**

Department:  
agriculture  
& rural development  
PROVINCE OF KWAZULU-NATAL

KZN Department of Agriculture & Rural Development  
Private Bag X9059, Pietermaritzburg, 3200  
Enquiries: Thabede Sthandiwe (Prof. Natural Scientist)

Ref no: 2017/08/4 500  
Date: 25 AUGUST 2017

**SAVANNAH ENVIRONMENTAL**  
**First Floor, Block 2**  
**5 Woodlands Drive Office Park**  
**Corner Woodlands Drive and Western Service Road**  
**Woodmead, 2191**

**ATTENTION: GABRIELE STEIN**

**Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)**

**RE: DEVELOPMENT OF THE RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP)  
AND ASSOCIATED INFRASTRUCTURE ON ERF 11376 (PORTION 2 AND 4), IN RICHARDS BAY,  
UMHLATHUZE LOCAL MUNICIPALITY, KWAZULU-NATAL PROVINCE, EIA PROCESS.**

**1. GENERAL**

- 1.1. The Provincial Department of Agriculture and Rural Development: Agriculture Resource Management: Land Use Regulatory Unity acknowledges the receipt of the above mentioned application.
- 1.2. The submitted application request that the Provincial Department of Agriculture and Rural Department to provide comments and inputs on the Environmental Impact Assessment Process (EIA).
- 1.3. The EIA is conducted as ESKOM proposes to develop a Combined Cycle Power Plant (CCPP) and associated infrastructure.

**2. BACKGROUND**

- 2.1. The proposed CCPP will be located on Portion 2 and Portion 4 of Erf 11376 in the Richards Bay Industrial Development Zone (IDZ) Phase 1D.
- 2.2. Portion 2 and 4 are located 6km south west of Richards Bay and 4km south west of Alton.
- 2.3. Portion 2 and 4 are within Umhlathuze Town Planning Scheme and as part of Umhlathuze Local Municipality.
- 2.4. Portion 2 and 4 are 71 hectares in total combined.
- 2.5. The proposed project is aimed at reducing transmission losses from generation facilities supplying KwaZulu Natal.

**CONFIDENTIAL - NOT FOR PUBLICATION**

2.6. The project is also aimed at aiding 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.

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.

2.8. Associated infrastructure will include the following:

- Gas turbines
- Heat recovery steam generators
- Steam turbines for the generation of additional electricity
- Condensers for conversion of steam back to water
- Bypass and exhaust stacks
- Water treatment plant for treatment of portable 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 a gas pipeline supply conditions process facility
- Diesel offloading facility and storage tanks.
- Ancillary infrastructure including access roads, ware housing 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

### **3. COMMENTS ON PROPOSAL**

3.1. The proposed development has limited impact on reducing available agricultural lands within the Province as it is within area that is already been under local municipality control.

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.

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.

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.

3.5. Proper maintenance is essential as to meet discharge standards of Water treatment plant

3.6. Environmental management plan for such projects is important. The office notes that this is still the beginning of the whole process.

3.7. There should be a correct allocation of pipes in terms of distances from the rivers.

3.8. Wetlands need also to be observed and delineated as to avoid possible pollutions.

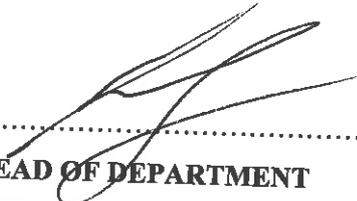


#### 4. RECOMMENDATIONS

- 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.
- 4.1.1. Type of dam and method that will be used for construction of a dam for the processed water treatment plant.
  - 4.1.2. Types and construction methods of underground tanks for fuels tanks.
  - 4.1.3. Clarity where the gas will be sourced and its disposal plan.
  - 4.1.4. Water Use License Application is logged and addressed as per National Water Act, 1998 (Act No 36 of 1988) for the proposed development.
  - 4.1.5. Proper mitigation measures are implemented and adhered to.
  - 4.1.6. Proposed development and associated infrastructure is not affecting our Natural Resources which is ground water, surface water and soils.
  - 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.
  - 4.1.8. Re-vegetating and rehabilitating plan of the areas that will be affected by the construction phase.
  - 4.1.9. Proper storm water management plan is also adhered to as to prevent possible soil erosions.
  - 4.1.10. The office request that detailed information and a report is sent to us with information that will clearly indicates
    - Depth of ground water on site
    - Distance from project site to the coast

#### 5. CONCLUSION.

- 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.

  
.....  
**FOR HEAD OF DEPARTMENT**  
**AGRICULTURE AND RURAL DEVELOPMENT**

**LETTER SIGNED BY: Mr. P. H. Mans**

**DESIGNATION: Deputy Director**

**DATE: .....** 1/9/17 **.....**

**Cc Mashudu Marubini, DAFF, Fax no: 012 329 5938**

**RECEIVED BY RURAL DEVELOPMENT AND AGRICULTURE DEPARTMENT**



## environmental affairs

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA · 0001· Environment House · 473 Steve Biko, Arcadia· PRETORIA  
Tel (+ 27 12) 399 9372

DEA Reference: 14/12/16/3/3/2/1027

Enquiries: Mr Thando Booï

Telephone: (012) 399 9387 E-mail: TBooi@environment.gov.za

Jo-Anne Thomas  
Savannah Environmental (Pty) Ltd  
First Floor, Block 2  
5 Woodlands Drive Office Park  
C/o Woodland Drive & Western Service Road  
Woodmead  
JOHANNESBURG  
2191

Telephone Number: (011) 656 3237  
Email Address: joanne@savannahsa.com

### PER E-MAIL / MAIL

Dear Madam

### COMMENTS ON THE DRAFT SCOPING REPORT FOR THE CONSTRUCTION OF RICHARDS BAY COMBINED CYCLE POWER PLANT AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY, KWAZULU NATAL

The draft Scoping Report (SR) dated August 2017 and received by this Department on 22 August 2017 refers

This Department has the following comments on the abovementioned application:

- **Public Participation Process (PPP)**
  - Please ensure that all issues raised and 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](mailto:ochauke@environment.gov.za) or Kent Buchanan at 0123998868 or [kbuchanan@environment.gov.za](mailto:kbuchanan@environment.gov.za)***) in respect of the proposed activity are adequately addressed in the final SR.
  - 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 the attempts that were made to obtain comments.
  - The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
- **Description of the identified Alternatives**
  - Please provide a description of any 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 and on the community that may be affected by the activity as per Appendix 2 of GN R.982 of 2014 as amended.

- Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2.
- 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.

In addition to the above, please ensure that the climate change impact assessment study is undertaken and be incorporated in the final SR.

- **General Comments**

- Please provide three (3) cd copies and one (1) hard copies of the final scoping report.
- 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 Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the amended EIA Regulations, 2014 (as amended).
- 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).

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.

Yours faithfully



**Mr Sabelo Malaza**

**Chief Director: Integrated Environmental Authorisations**

**Department of Environmental Affairs**

**Signed by: Ms Olivia Letlalo**

**Designation: Control Environment Officer: Strategic Infrastructure Developments**

**Date: 15/09/2017**

---

cc:	Deidre Hebst	ESKOM Holding SOC Ltd
	Musi Mdamba	KwaZulu Natal DEDTEA
	Sharin Govender	City of uMhlathuze Local Municipality



P.O. Box 1018, Durban, 4000. 88 Joe Slovo Street, Southern Life Building, Durban, 4001. Tel: (031) 336 2700. Fax (031) 304 9546. [www.dws.gov.za](http://www.dws.gov.za)

Gabriele Stein  
PO Box 148  
Sunninghill  
2157

Dear Madam

**RE: ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS: SCOPING REPORT (SR) FOR THE RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED INFRASTRUCTURE NEAR RICHARDS BAY WITHIN UMHLATHUZE LOCAL MUNICIPALITY**

Reference is made to the above-mentioned document received by the Department of Water and Sanitation (Department) on 23 August 2017.

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 inclusive of responses to issues raised must be submitted to this Department for further review and comments.

**A) SPECIFIC COMMENTS**

**(1) Water Uses and Water Use Authorisations**

- (1.1) It is indicated on page 3 of the SR that the proposed facility will include the following infrastructure;
- 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 fire fighting purposes;
  - d) A gas pipeline and a gas pipeline supply conditioning process facility;
  - e) Internal roads.

- (1.2) Reference is made to Table 4.1 of the Listed Activities on page 42 of the SR:
- a) GN 327, Activity 12: The development of infrastructure or structures with a physical footprint of...where such development occurs...within a watercourse..and;
  - b) GN 327, Activity 19: The infilling or depositing of material of more than 5 cubic meters into...a watercourse...

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.

- (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 from a water resource constitutes a Section 21 water use and must be authorised accordingly.

- (1.4) It is indicated on page 43 that 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 color Layout Map for this development (preferable an A2 size or bigger). Such a map should, amongst others;

- 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.

Futhermore...;

- a) The Applicant must note 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;
- b) 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;

- c) The Applicant must conduct an impact assessment to determine the impacts that will be posed by the proposed development on the wetland of importance;
- d) 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.

(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 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.

## **(2) Other issues to be addressed**

(2.1) It is indicated 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.

(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 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.

### **(3) GENERAL COMMENTS**

#### **(3.1) Solid Waste**

- (3.1.1) The requirements of this Department with respect to solid waste must be strictly enforced and complied with.
- (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 this must be made available to this Department when required.
- (3.1.3) Should private contractors be used, all solid waste must be disposed of at a permitted landfill site and proof of this must be made available to this Department when required.
- (3.1.4) This Department would like to put an emphasis that bins 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.
- (3.1.5) The recycling of suitable material is encouraged by this Department, provided it is properly managed.

#### **(3.2) Sewage and Wastewater Management**

- (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.
- (3.2.2) The following is applicable should wastewater be generated during the construction phase:
- Water containing waste must not be discharged into the natural environment and;
  - Measures to contain the water containing waste and safe dispose of thereof must be implemented.

#### **(3.3) Stormwater Management**

- (3.3.1) It is imperative that there is proper management of storm water at the project site.
- (3.3.2) The Engineer or Contractor must ensure that only clean stormwater runoff enters the environment.

(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).

#### **(3.4) Erosion Control**

- (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 precautions must be taken in areas where the soils are deemed highly erodible.
- (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.
- (3.4.3) Where the land has been disturbed during construction it must be re-habilitated and re-vegetated back to an acceptable state after construction.
- (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 stockpiles.

#### **(3.5) Spillages Management**

- (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.
- (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.

(3.5.3) It is important that any significant spillage of chemicals, fuels, etc. during the construction phase and/or operational phase is reported to this Office and other relevant authorities. In the event of a spill, the following steps can be taken:

- 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.

(3.6) This Department notes the content and recommendations made on the following studies:

- The Wetland and Aquatic Ecology, dated 28 April 2017, prepared by The Biodiversity Company;
- Hydrology and Flood Line Study, dated 15 February 2017, prepared by Raws Consulting Engineers;
- Geo-Hydrology Study, dated 02 May 2017, prepared by Geo Hydraulic and Environmental Technology (Pty) Ltd

(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.

(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.

(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. Any pollution problems arising from the above project is to be addressed immediately by the Applicant.

- (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.
- (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.
- (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.

Please do not hesitate to call this Office should you have any concerns, comments or queries.

Yours faithfully

 18 SEPT 2017

For Director: Institutional Establishment

NM/nm/14574



P O Box 10299, Meerensee, 3901 Tel: +27 (35) 7892471 or +27 (83) 515 2384  
Office A6-A7, Smart Plan Building, 95 Dollar Drive, Richards Bay  
E-mail: [info@rbcaa.co.za](mailto:info@rbcaa.co.za) Web Site: [www.rbcaa.org.za](http://www.rbcaa.org.za)

---

27 September 2017

Savannah Environmental  
P.O.Box 148  
Sunninghill  
2157

**Attention: Gabriele Stein**

**RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP) AND ASSOCIATED  
INFRASTRUCTURE  
Applicant: Eskom Holdings SoC Ltd**

**COMMENT ON DRAFT SCOPING REPORT (DSR)**

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.

**PROJECT INFORMATION:**

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;

- a) Reduce transmission losses from generation facilities supplying KwaZulu-Natal, by having a generation center in Kwazulu-Natal.
- b) 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 considerable less water.

Registration Number 96/13031/08

Directors: Ms M. Boshoff (**Managing Director**), Ms S. Camminga,  
Mr A. Roberts, Ms Y. Chetty, Mr F. Schmidt, Mr. E. Mlambo, Mr. R. Gafoor.

The DSR lists the main infrastructure associated with the facility to include the following;

- ✓ 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, generators and 132kV and 400 kV switchyards.
- ✓ 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*”)

The DSR goes on to state that;

- ✓ 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.

### **3. COMMENT**

#### **3.1 Site Alternatives:**

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 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.*”

### **3.2 Preferred Site 7:**

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.

### **3.3 Gas Pipeline:**

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.

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.

### **3.4 Gas Pipeline Supply Conditioning Process Facility (LNG Facility)**

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.”*

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.”*

Clarity is requested regarding the above statement, as the IDZ ERC was informed that the source of the natural gas is still unknown.

The RBCAA does not support the approach of proceeding with the application for a CCPP, without an established and confirmed source of natural gas.

### **3.5 Effluent Discharge:**

The impact of discharging effluent into the marine outfall pipeline must be quantified.

### **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.

### 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.

### 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 not include a Specialist Consultant on Climate Change.

### 3.7 Air Quality Impact Assessment – Scoping Report (Airshed Planning Professionals):

**Terms of Reference for the EIA Phase** should include the assessment of;

- a) Worst Case Scenario. Dispersion simulations for worst case scenario, which would be the plant operating solely on diesel.
- b) Fugitive Emissions.
- c) Odour.

## 4. RECOMMENDATIONS:

**The RBCAA strongly recommends that;**

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.

Thank you for affording the Richards Bay Clean Air Association (RBCAA) the opportunity to comment on the above proposed project.

The RBCAA reserves the right to amend and\or provide further comment.

Yours faithfully,



**MS S CAMMINGA  
CHAIRMAN EIA COMMITTEE**

## Gabriele Stein

---

**From:** Percy Langa  
**Sent:** 27 September 2017 13:03  
**To:** Gabriele Stein  
**Cc:** Simphiwe Mbonambi  
**Subject:** RE: UPDATE: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

Dear Gabriele,

I am aware the commenting period for the Scoping Report closed on the 20<sup>th</sup> of Sep, nonetheless I would like to submit the following input –

1. The RBIDZ welcomes the proposed gas-to-power plant in the Richards Bay area. We are equally excited about future arrival LNG and its benefits for industry, businesses and households in the Zululand area, and to the rest of Province.
2. I would urge Eskom to work closely with the local municipality and Transnet as hosts of the natural gas project for R 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 2<sup>nd</sup> 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:
  - 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)
    - 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?
    - i. It makes sense that Eskom needs to manage the risk of 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:
    - i. Incoming bulk infrastructure/services (water, whether it be portable, raw or industrial)
    - ii. Outgoing bulk infrastructure/services (wastewater, effluent?, hazardous waste?, etc.)
  - f. The transfer of CCGT-related and LNG-related knowledge and skills (technical and other) to the local communities, in particular youth and women.
  - g. The current EIA process must also undertake to educate the general public on safety, health and environmental benefits of natural gas.
  - h. Lastly, we would be happy to engage with your environmental specialists to either provide information or discuss any other relevant matter.

I think that is it for now.

Feel free to contact me should you require additional information.

Regards,



The Richards Bay Industrial Development Zone offices in Tuzi Gazi, Waterfront have relocated to the new offices with effect from 28 August 2017.  
New Address: RBIDZ OFFICE COMPLEX (Old Bayside),  
4 Harbour Arterial, ALTON, Richards Bay 3900

New Telephone Number is: **035 797 2600**  
Email: [info@rbidz.co.za](mailto:info@rbidz.co.za)

**MOVERS**

**R B I D Z**  
**INDUSTRIAL**



Percy Langa  
SHEQ Manager

Richards Bay Industrial Development Zone Company SOC Ltd  
4 Harbour Arterial Rd, Alton, Richards Bay, 3900

**ISO 9001 certified organisation**

This e-mail and its contents are subject to the RBIDZ SOC Ltd.

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**From:** Gabriele Stein [mailto:[gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)]

**Sent:** 29 August 2017 01:44 PM

**Subject:** UPDATE: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

Dear Stakeholder

Further to the correspondence below, please be advised that the venue for the **Public Meeting** to be held on **31 August 2017 at 09:00** is:

**Richards Bay Library  
03 Krugerrand Grove,  
Richards Bay  
3900**

The library is not located in Mark Strasse as was initially communicated to us by the Municipality. Apologies for the confusion caused in this regard.

Kind regards,  
Gabriele Stein

---

> From: Gabriele Stein <[gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)>

> Date Sent: 21/08/2017 12.46

> To:

> Cc:

> Subject: FW: EIA PROCESS - RICHARDS BAY COMBINED CYCLE POWER PLANT, KZN - NOTIFICATION OF AVAILABILITY OF SCOPING REPORT FOR REVIEW AND INVITATION TO PUBLIC MEETING

>

Dear Stakeholder

Eskom Holdings SoC Ltd (Eskom) proposes to develop a Combined Cycle Power Plant (CCPP) and associated infrastructure with a generating capacity of up to 3000MW. The proposed project is to be known as the Richards Bay Combined Cycle Power Plant (CCPP). The Project site is to be located on Portion 2 and Portion 4 of Erf 11376 in the Richards Bay Industrial Development Zone (IDZ) Phase 1D, approximately 6km south west of Richards Bay and 4km south west of Alton which falls within the jurisdiction of the City of uMhlatuze Local Municipality and the King Cetshwayo District Municipality, KwaZulu-Natal Province. The Richards Bay CCPP is approximately 71ha in extent.

The development of the Richards Bay CCPP requires that Environmental Authorisation (EA) be obtained from the National Department of Environmental Affairs (DEA), the Competent Authority (CA), in consultation with the KZN Department of Economic Development, Tourism and Environmental Affairs (EDTEA), the Local Commenting Authority, in accordance with the National Environmental Management Act (No. 107 of 1998) (NEMA) and the provisions of the 2014 Environmental Impact Assessment (EIA) Regulations, as amended on 07 April 2017, published in GNR 324 to GNR 327.

Savannah Environmental (Pty) Ltd has been appointed as the independent Environmental Assessment Practitioner (EAP), responsible for undertaking an Impact Assessment process (Scoping and EIA) to identify and assess all potential environmental impacts associated with the project for the area as identified, and propose appropriate mitigation and management measures in an Environmental Management Programme (EMPr). As part of these environmental studies, Interested and/or Affected Parties (I&APs) will be actively involved through the public participation process.

A Scoping Report is available for review and comment. The report can be viewed at the Richards Bay Public Library, Civic Centre, 05 Mark Strasse, from **21 August 2017 – 20 September 2017**. Please refer to the attached letter for details regarding the availability of the Scoping Report for review and comment and the public meetings details.

Please do not hesitate to contact me if you have any queries in this regard.

Kind regards,

**Gabriele Stein**

**Public Participation and Social Consultant**

**Savannah Environmental (Pty) Ltd**

**Tel: 27 11 656 3237**

**Fax: 086 684 0547**

**Email: [gabriele@savannahsa.com](mailto:gabriele@savannahsa.com)**

**[www.savannahsa.com](http://www.savannahsa.com)**

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