

**RICHARDS BAY COMBINED CYCLE POWER PLANT (CCPP), KWAZULU-NATAL PROVINCE**  
**(DEA Ref No.: 14/12/16/3/3/2/1123)**

**COMMENTS AND RESPONSES REPORT**  
**Revised Environmental Impact Assessment Report**

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All registered I&APs were notified of the resubmission of the Application for Environmental Authorisation on Tuesday, 19 February 2019. The availability of the Environmental Impact Assessment (EIA) Report (revision 0) was announced on the Thursday, 18 April 2019 and was made available for review and comment for 45-days. The regulated 30-day review and comment period was from Sunday, 24 March 2019 to Friday, 26 April 2019. This review period was subsequently extended to end on Friday, 10 May 2019 and the notification of this extension was sent to all registered I&APs on Monday, 29 April 2019. All written comments received during the review period, as mentioned above have been recorded, included and responded to in this Comments and Responses Report.

All registered I&APs have been notified of the availability of the revised EIA Report (revision 1) on Monday, 22 July 2019. The revised EIA Report is available for a 30-day review and comment period from Wednesday, 24 July 2019 to Monday, 26 August 2019. All comments received during the 30-day review period will be recorded, included and responded to in the Comments and Responses Report and included as **Appendix C8** of the Final EIA Report.

**NOTE:**

In terms Regulation 44(1) of the EIA Regulations of December 2014 (as amended on 07 April 2017), comments raised at meetings held during the public participation process have been recorded in notes of the meeting, and appended as **Appendix C7**, and not captured in this C&RR.

**List of Abbreviations and Acronyms**

C&RR	Comments and Responses Report	DAFF	Department of Agriculture, Forestry and Fisheries
DEA	Department of Environmental Affairs	DRDLR	Department of Rural Development and Land Reform
DWS	Department of Water and Sanitation	EDTEA	Economic Development, Tourism and Environmental Affairs
EIAr	Environmental Impact Assessment Report	HIA	Heritage Impact Assessment
I&APs	Interested and Affected Parties	KZN	KwaZulu Natal
NWA	National Water Act	SACAA	South African Civil Aviation Authority

## EIA PHASE

### 1. COMMENTS RECEIVED: ENVIRONMENTAL IMPACT ASSESSMENT REPORT

#### 1.1 Organs of State

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
1.	This letter serves as a notice of receipt for the above document received on the 29th 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.	Thembalakhe Sibozana KZN DAFF  Letter: 01-04-2019	The timeframe provided by the department is noted. No additional information was requested by DAFF from the project team or the applicant.
2.	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:  <b>Project description:</b> 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	Thando Booie Case Officer DEA  Letter: 23-04-2019	The comments provided are noted, and responded to, below.  The issue raised by the DEA regarding the addition of the two components during the EIA phase, which was not considered during the Scoping Phase is noted, as well as the risk of the triggering of National Environmental Management: Waste Act listed activities through additions of these components.  In order to address this issue, Eskom arranged and held a meeting with the DEA: Waste Directorate on 24 May 2019. Savannah Environmental and the EIA case officer was also present at the meeting.

<p>for. On that note, the Department submits that the above mentioned is considered a flaw.</p>		<p>The purpose of the meeting was to obtain clarity from the DEA: Waste Directorate on why they consider the additional two project components as having triggered listed activities under the National Environmental Management: Waste Act due to the fact that these activities were not identified as applicable to the project during the EIA process.</p> <p>Following the meeting further consultation with the meeting attendees has taken place. This included the submission of a legal opinion on the matter. It was confirmed on 16 July 2019 via email by the DEA: Waste Directorate that the application does not trigger the waste listed activity and that the application may proceed. Refer to <b>Appendix C</b> for proof of this confirmation.</p> <p>The meeting notes of the meeting held are included as <b>Appendix P</b> of the revised EIA Report.</p>
<p>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:</p> <ul style="list-style-type: none"> <li>» Capacity of the dams;</li> <li>» The composition of the dirty water;</li> <li>» Type of liners to be used</li> <li>» The location of the storage facility;</li> <li>» The duration of storage of the waste;</li> <li>» The design of the storage facility; and</li> <li>» Types of waste to be stored.</li> </ul>		<p>The reasoning behind the addition of the two project components was to demonstrate how Eskom will deploy Duty of Care with respect to management of run-off water from its operational footprint. Additionally, presentation of these water containment systems does not trigger additional listed activities, particularly because all aspects related to them, e.g. footprint, visual, would not change the evaluation of the site. These facilities are smaller than other structures on site, and their footprint impact was already assessed as part of the impacts on site.</p> <p>The additional information requested in the comment has been included in Chapter 2, Table 2.2 of the revised EIA Report.</p>

<p><b>Project layout</b></p> <p>» Please furnish an amended project layout plan as discussed in the site inspection meeting of the 17 April 2019 and it must consider inputs from all the specialists.</p>		<p>During the authority site visit undertaken with the Department of Environmental Affairs (DEA) to confirm the findings of the Report, the applicant advised that it would undertake to amend and optimise the layout of the facility within the project site in order to reduce the offset deficit and implement Option 1 of the offset strategy. Part of the applicant's motivation was aligned to assurance of sustainability of the offset as the applicant would have full control over the offset area. Following the authority site visit, specialist input was sourced from all specialists considering a potential amended layout. Specialists' input (<b>Appendix Q5</b> of the revised EIA Report) indicated that there would be no change in the significance of the impacts (considering the impacts identified and assessed in the EIA Report (revision 0)) with the implementation of an amended layout and therefore Eskom reverted to offset Option 2.</p> <p>Following the end of the 30-day review period of the EIA Report (revision 0) and the consideration of all comments received from the specialists, the EIA team embarked on a consultation process with the wetland specialist, the City of uMhlatuze Local Municipality and KZN Ezemvelo in order to obtain a better understanding of the requirements and expectations associated with Option 2 proposed for the offset. Through this consultation process and obtaining a better understanding of the expectations and the further negotiations required Eskom was able to identify and confirm that the implementation of Option 2 as an offset is preferred. With the confirmation of Option 2 the need for an amended layout of the facility, as</p>
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			<p>required by the DEA, is deemed no longer relevant to the project for the consideration of the offset area.</p> <p>It must also be noted that Eskom investigated the possibility of an amended layout, however considering the associated infrastructure required for the facility, which will need to connect into the power station, and the constructability of an amended layout within the project site, this was identified as not being technically feasible.</p>
	<p>» Please ensure that the amended project lay out plan clearly illustrates all the components and associated infrastructure of the project.</p>		<p>The response provided in the row above is also relevant to this comment.</p> <p>The amended layout which was investigated by the applicant, but identified to be unfeasible from a technical and constructability perspective is included as <b>Figure 1</b> of the revised EIA Report.</p>
	<p><b>Alternatives</b></p> <p>» 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).</p>		<p>It is noted that the EIA Report (revision 0), is in-line with <b>Appendix 3 Section 3(1)</b>, as indicated by the DEA.</p> <p>It must be noted that no alternative site has been considered as part of the revised EIA Report and therefore the project site assessed as part of the EIA phase is still applicable. Therefore, there is no need for a change in the scope of the EIA Report. The project site, which was assessed and considered during the EIA process, was selected through a comprehensive site selection process.</p>
	<p><b>Other approvals</b></p> <p>Please indicate if the process of obtaining an air emission license has been undertaken for this proposed development.</p>		<p>An Air Emissions License is required to be obtained from the Local Municipality for the Richards Bay CCPP in terms of the NEM: Air Quality Act. This licensing process will only be undertaken following the completion of the EIA process and</p>

	<p><b>Specialist studies</b></p> <p>» 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.</p>		<p>after a decision on the Application for Environmental Authorisation has been issued, as the EA is required as supporting information to the application.</p> <p>Following the end of the 30-day review period of the EIA Report (revision 0) and the consideration of all comments received from the specialists, the EIA team embarked on a consultation process with the wetland specialist, the City of uMhlathuze Local Municipality and KZN Ezemvelo in order to obtain a better understanding of the requirements and expectations associated with Option 2 proposed for the offset (as Option 1 did not offer suitable habitat). Through this consultation process and obtaining a better understanding of the expectations and the further negotiations required, Eskom was able to identify and confirm that the implementation of Option 2 as an offset is preferred.</p>
	<p>» 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.</p>		<p>Input on the amended layout has been provided by the wetland specialist (<b>Appendix Q5</b> of the revised EIA Report).</p> <p>The amended layout investigated by the applicant and considered by the wetland specialist, was identified to be unfeasible from a technical and constructability perspective, and is therefore not considered as feasible for the development of the project.</p>
	<p><b>Heritage impact assessment</b></p> <p>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 "<i>that the total project footprint that is assessed for this project is 71 ha</i>".</p>		<p>Savannah Environmental has consulted the heritage specialist to advise on the extent provided for the development footprint in the Heritage Impact Assessment. The specialist advised that it was a typing error made on his side when the report was compiled and confirmed that the development footprint for the project assessed was 71ha. The Heritage Impact Assessment (<b>Appendix H</b> of the revised EIA Report) has been</p>

	<p><b>Public Participation Process</b></p> <p>» Please ensure that all issues raised and comments received during the circulation of the EIR from the registered I&amp;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.</p> <p>» 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.</p> <p>» The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</p>		<p>updated accordingly. Refer to Figure 4 of the Heritage Impact Assessment for an indication of the track logs during the site-survey.</p> <p>All written comments received are captured in this Comments and Responses Report and are adequately addressed. Where relevant comments have also been addressed in the revised EIA Report.</p> <p>Written comments received from Organs of State, key stakeholders and I&amp;APs are included in <b>Appendix C6</b> of the revised EIA Report.</p> <p>All comments received during the 30-day review period of the revised EIA Report will be included and responded to by the project team in this comments and responses report and the final EIA Report.</p> <p>Proof of distribution of the EIA report as hard copies and/or CDs are included in <b>Appendix C4</b> of the revised EIA Report, including follow-up e-mail notifications requesting comment sent to the registered I&amp;APs.</p> <p>Proof of notifications sent to registered I&amp;APs on the project database is included in <b>Appendix C5</b> of the revised EIA Report.</p> <p>It can be confirmed that the public participation process in terms of the EIA Regulations, 2014, as amended, has been complied with.</p> <p>Proof of compliance is included in the following <b>Appendices:</b></p> <ul style="list-style-type: none"> <li>• Regulation 39: Appendix C5</li> <li>• Regulation 40: Appendices C4 and C5</li> </ul>
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			<ul style="list-style-type: none"> <li>• Regulation 41: Appendices C2, C4 and C5</li> <li>• Regulation 42: Appendix C1</li> <li>• Regulation 43: Appendices C5, C6 and C7</li> <li>• Regulation 44: Appendices C6 and C7</li> </ul>
	<ul style="list-style-type: none"> <li>• 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 FEIR to the competent authority for a decision.</li> </ul>		<p>A revised EIA report has been made available for a 30-day review and comment period from 24 July 2019 to 26 August 2019. This revised EIA Report (revision 1), has been made available for review and comment in response to the comments received from the DEA on the need for an amended layout and to provide the relevant information on the amended layout which was found to be unfeasible for development. This revised EIA Report also aims to provide feedback from the applicant in terms of the offset identified as preferred for the development of the project. This revised report also provides the responses to the comments received during the 30-day review period of the EIA Report (revision 0) and provides an opportunity for I&amp;APs to confirm that their comments on the EIA Report (revision 0) have been included and addressed and to enable I&amp;APs to provide their final comment on the proposed project. Considering the nature and extent of the project, this approach is considered to be required and necessary in order to satisfy the requirements of the EIA Regulations, 2014 (as amended), and to respond to the comments received from the competent authority.</p> <p>Formal notifications of the availability of the revised EIA Report have been provided to all registered I&amp;APs on the project database and the availability of the revised EIA Report has been advertised in the same newspapers in which the EIA Report (revision 0) availability was advertised, as well as</p>

			<p>Savannah and Eskom websites. Refer to <b>Appendix C</b> of the revised EIA Report.</p> <p>The relevant commenting Organs of State have received the revised Report (hard copies and/or CDs). Proof of distribution of the revised EIA report will be included in <b>Appendix C4</b> of the final EIA Report, including follow-up e-mail notifications in order to obtain comments.</p>
	<p><b>General Comments</b></p> <p>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 EA Regulations, 2014.</p>		<p>The final EIA Report will be submitted to the DEA for decision-making following the 30-day review period of the revised EIA Report.</p> <p>The content of the final EIA Report will be in-line with the requirements of <b>Appendix 3</b> of the EIA Regulations, 2014, as amended. The submission of the final EIA Report will comply with the requirements as stipulated in Regulation 23(1) of the EIA Regulations, 2014, as amended.</p>
	<p>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 the these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p>		<p>It is noted that the Application for Environmental Authorisation will lapse should the prescribed timeframes not be met.</p> <p>It must be noted that the DEA was notified of the implementation of Regulation 23(1)(b) on 17 May 2019. The DEA acknowledged receipt of the notification on 22 May 2019. Refer to <b>Appendix P</b> of the revised EIA Report. The last day for the submission of the final EIA Report to DEA for decision-making is 02 September 2019.</p>
	<p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an</p>		<p>The implications of Section 24F of the National Environmental Management Act are noted, and the project will not be executed until the required permits are obtained.</p>

	environmental authorisation being granted by the Department.		
3.	<p>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 1st 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.</p> <p>Based on the information presented on the document received, site visit on the 17th 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 <i>Sclerocarya birrea</i> and <i>Ficus Trichopoda</i>. The above-mentioned trees are protected in terms of National Forest Act. The Richard's Bay CCPP infrastructure will cover 71 ha 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.</p>	<p>Mr. T. Sibozana Forestry Regulations and Support DAFF KZN</p> <p>Letter: 25-04-2019</p>	<p>DAFF's mandate in terms of regulating activities affecting natural forests and tree species protected in terms of the National Forest Act is noted.</p> <p>It must be noted that an EIA Report was submitted to DAFF for review and not a Basic Assessment Report. This is in-line with the EIA process required for the proposed project.</p> <p>The concern regarding the impacts to wetlands and protected trees (such as <i>Sclerocarya birrea</i> and <i>Ficus Trichopoda</i>) is noted. The Ecological Impact Assessment (<b>Appendix D</b> of the revised EIA Report)) identified <i>Sclerocarya birrea</i> and <i>Ficus Trichopoda</i> within the project site and has considered the presence of the species as part of the impact assessment undertaken.</p> <p>The concern regarding the impact on wetlands has been considered in the Water Resources Assessment (<b>Appendix E</b> of the revised EIA Report) undertaken for the project site. Due to the presence of wetlands within the project site and the limitations in terms of avoidance of the wetlands by the proposed development footprint a wetland offset is required to be implemented for the project. The specialist recommendations in terms of the wetland offset strategy is included in <b>Appendix E</b> of the revised EIA Report.</p> <p>Following the end of the 30-day review period of the EIA Report (revision 0) and the consideration of all comments received</p>

			<p>from the specialists, the EIA team embarked on a consultation process with the wetland specialist, the City of uMhlatuze Local Municipality and KZN Ezemvelo in order to obtain a better understanding of the requirements and expectations associated with Option 2 proposed for the offset. Through this consultation process and obtaining a better understanding of the expectations and the further negotiations required Eskom was able to identify and confirm that the implementation of Option 2 as an offset is preferred. With the confirmation of Option 2 the need for an amended layout of the facility, is deemed no longer relevant to the project for the consideration of the offset area.</p>
	<p>Should the project be approved the following conditions should be incorporated in the EMP and adhered to:</p> <ul style="list-style-type: none"> <li>a) The area should be rehabilitated using 100% indigenous tree species endemic to the area to retain the ecosystem.</li> <li>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.</li> <li>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.</li> </ul>		<p>The requirements provided by DAFF are covered in the EMP (<b>Appendix O</b> of the revised EIA Report) in the following sections:</p> <ul style="list-style-type: none"> <li>» Objective 1 of the rehabilitation management programme. This objective is to ensure appropriate rehabilitation of disturbed areas such that residual environmental impacts are remedied or curtailed.</li> <li>» Objective 2 of the planning and design management programme. This objective is to ensure that the relevant permits and plans are in place to manage the impacts to the environment.</li> </ul>
<p>4.</p>	<p>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 17th April 2019. The following</p>	<p>Stanley Tshitwamulomoni Acting Director: Biodiversity</p>	<p>The recommendations made by the DEA: Biodiversity Conservation Directorate to be included as conditions in the Environmental Authorisation are noted and have been included within the revised EIA Report as detailed below.</p>

	<p>recommendations can be regarded as final and must be included in the Environmental Authorisation as conditions:</p> <p>» 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;</p>	<p>Conservation Directorate                  DEA                  Letter: 26-04-2019</p>	<p>During the authority site visit undertaken with the Department of Environmental Affairs (DEA) to confirm the findings of the Report, the applicant advised that it would undertake to amend and optimise the layout of the facility within the project site in order to reduce the offset deficit and implement Option 1 of the offset strategy. Part of the applicant's motivation was aligned to assurance of sustainability of the offset as the applicant would have full control over the offset area. Following the authority site visit, specialist input was sourced from all specialists considering a potential amended layout. Specialists' input (Appendix Q5 of the revised EIA Report) indicated that there would be no change in the significance of the impacts (considering the impacts identified and assessed in the EIA Report (revision 0)) with the implementation of an amended layout and therefore Eskom reverted to offset Option 2.</p> <p>Following the end of the 30-day review period of the EIA Report (revision 0) and the consideration of all comments received from the specialists, the EIA team embarked on a consultation process with the wetland specialist, the City of uMhlatuze Local Municipality and KZN Ezemvelo in order to obtain a better understanding of the requirements and expectations associated with Option 2 proposed for the offset. Through this consultation process and obtaining a better understanding of the expectations and the further negotiations required Eskom was able to identify and confirm that the implementation of Option 2 as an offset is preferred. With the confirmation of</p>
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			<p>Option 2 the need for an amended layout of the facility, as required by the DEA, is deemed no longer relevant to the project for the consideration of the offset area.</p> <p>It must also be noted that Eskom investigated the possibility of an amended layout, however considering the associated infrastructure required for the facility, which will need to connect into the power station, and the constructability of an amended layout within the project site, this was identified as not being technically feasible.</p> <p>The requirement for the undertaking of Search and Rescue of species of concern is included under Objective 2 of the planning and design management programme and states that this task must be undertaken prior to the commencement of construction. <b>Appendix E</b> of the EMPr also includes a Plant Search and Rescue Plan for the project site</p>
	<p>» The biodiversity offset area to the north and conservation area to the south of the project site must be regarded as no-go areas;</p>		<p>The preferred layout for the development (Chapter 10 of the revised EIA Report) avoids biodiversity offset area to the north and conservation area to the south of the project site and therefore complies with this requirement.</p> <p>This requirement has been included in the EMPr (<b>Appendix O</b> of the revised EIA Report) under Objective 1 of the planning and design management programme. This objective is to ensure that the facility design responds to identified environmental constraints and opportunities.</p>
	<p>» A permit must be obtained from the relevant authorities for the removal or destruction of indigenous, protected or endangered plant or animal species;</p>		<p>The requirements for obtaining permits from the relevant authorities have been included in the EMPr (<b>Appendix O</b> of the revised EIA Report). Objective 2 of the planning and design</p>

			management programme covers this requirement. This objective is to ensure that the relevant permits and plans are in place to manage the impacts to the environment.
	» All areas with habitat rich and high concentration of flora and fauna must be avoided;		The project site contains areas of high aquatic sensitivity which relates to the presence of wetlands. The development footprint of the project will not be able to avoid these areas of high sensitivity and therefore an offset plan is required. The wetland specialist has developed a strategy in line with SANBI guidelines for the required offset. Refer to Chapter 10 of the revised EIA Report and <b>Appendix E</b> .
	» 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 requirement for the undertaking of Search and Rescue of species of concern is included under Objective 2 of the planning and design management programme and states that this task must be undertaken prior to the commencement of construction. <b>Appendix E</b> of the EMPr also includes a guideline for the Plant Search and Rescue Plan for the project site.
	» The Plant Rescue and Protection Plan must be compiled by ecological specialist and be implemented; and		The requirement for the compilation of the Plant Rescue and Protection Plan by an ecological specialist must be included as a condition in the Environmental Authorisation. <b>Appendix E</b> of the EMPr also includes a guideline for the Plant Search and Rescue Plan for the project site.
	» Recommendations in the Fauna and Flora Specialist Reports must be adhered to during construction and operational phases.		It is noted that the recommendations made by the Fauna and Flora specialist Reports must be adhered to during the construction and operation phases.  The recommendations of the specialist report have also been included in the EMPr ( <b>Appendix O</b> of the revised EIA Report).
5.	Kindly note that application have to be send to obstacles@caa.co.za and (Please see "Obstacle	Lizell Ströh Obstacle Inspector	It is noted that the application to SACAA must be submitted to Obstacle Applications, Management & Control. The applicant

	<p>Applications, Management &amp; Control" on <a href="http://www.caa.co.za/Pages/Contact%20Us/Contact-Us-Midrand.aspx">http://www.caa.co.za/Pages/Contact%20Us/Contact-Us-Midrand.aspx</a></p> <p>The Obstacle Application process &amp; procedure is published on <a href="http://www.caa.co.za/Pages/Obstacles/Urgent-notices.aspx">http://www.caa.co.za/Pages/Obstacles/Urgent-notices.aspx</a>. 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) &amp; "Forms" (CA139-27) published under "Important Links".</p> <p>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) when submitting the applications.</p> <p>Please contact me should you have any questions regarding this matter as we will gladly try to assist.</p> <p>Please correspond with the Airport Management as an affected party.</p> <p><b>Information Document <i>Development around an Airport</i> is included in Appendix C6 of the revised EIA Report.</b></p>	<p>PANS-OPS Section Air Navigation Services Department SACAA  E-mail: 30-04-2019</p>	<p>has been informed of this requirement. This application will be submitted to SACAA before project execution.</p> <p>The important links provided by the SACAA are noted and will be consulted as and when required.</p> <p>The applicant has been advised of these requirements.</p> <p>The SACAA's offer for any further assistance, should it be required, is noted.</p> <p>It can be confirmed that the Richards Bay Airport is a registered Stakeholder on the project database.</p>
<p>6.</p>	<p>The Environmental Impact Assessment report (EIAR) for the aforementioned development received by this department for comments refers. 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.</p> <p>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</p>	<p>Muzi Mdamba KZN EDTEA  Letter: 10-05-2019</p>	<p>It is noted that the KZN EDTEA recognises the significance of the proposed project in terms of power generation and supply interventions. In terms of government policy provisions, this project also aligns with the Departmental policies.</p> <p>Independent specialist studies were undertaken for the project to address areas of sensitivity on site and provide appropriate mitigation measures for the identified impacts. The</p>

<p>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.</p>			<p>recommendations of the specialists will be implemented or responded to appropriately during project execution.</p>
	<p>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 at least 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.</p>		<p>The project is being developed in terms of Eskom's Project Life Cycle Model (PLCM) which observes governance processes that require confirmation of acquisition of all required permitting processes, and all supporting infrastructural processes, before the project is approved for execution. While the project development process is currently following Eskom processes, as the developer, Eskom is in engagement with other key service providers that would be required for project execution. It is understood that there can be no construction undertaken until all required services are provided for, and this includes gas.</p> <p>Eskom notes the concern with respect to prolonged period for diesel usage, but it must be noted that the plant will be operated mainly on gas, and diesel will be used under emergency conditions only, which should be limited. The impact of diesel was assessed in the Air Quality specialist report, and applicable mitigation was provided in the report. These mitigation provisions are part of the EMPr (<b>Appendix O</b>) and the revised EIA Report.</p> <p>Gas sourcing activities form part of the project feasibility studies, which will be implemented in line with Eskom's</p>

			procurement and governance processes. The feasibility studies are anticipated to be completed by August 2020.
	To this end, the department is satisfied that the EIAR in its current format meet the requirements of the NEMA EIA Regs 2014.		The comment is noted. No response is required.
7.	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:	Lwandle Sibango DWS Ref.No.: 16/2/7/W12F/D1	The comments submitted by the DWS have been responded to below.
	<b>SPECIFIC COMMENTS</b> 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;	Letter: 10-05-2019	The statement included in the EIA Report is acknowledged, and the recommended offset plan was developed by the wetland specialist ( <b>Appendix E</b> of the revised EIA Report).
	(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.		The statement included in the EIA Report is acknowledged, and it is confirmed that the listed infrastructure forms part of the project design layout.
	(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;		The statement included in the EIA Report is acknowledged, as it was provided by the wetland specialist ( <b>Appendix E</b> of the revised EIA Report).
	(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;		The statement included in the EIA Report is acknowledged, as it seeks to identify water uses that are triggered by the project implementation.

<p>(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)</p>		<p>The statement included in the EIA Report is acknowledged, as it aligns the project developmental processes with applicable policy and permitting provisions.</p>
<p>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).</p>		<p>The requirement for the project to be authorised by the DWS in terms of the water uses listed under Section 21 of the National Water Act (NWA) is included within the revised EIA Report. A water use license process will be undertaken for the project as required by the DWS. This process has commenced.</p>
<p>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.</p>		<p>Water uses applicable to the proposed project scope have been identified in terms of Section 21 of the NWA, and are listed within Chapter 6 of the revised EIA Report. These water uses were confirmed with DWS during a pre-application consultation meeting held on 26 June 2019. Any additional uses which may be identified will be included in the WUL application process.</p>
<p>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.</p>		<p>A Pre-Water Use Authorisation meeting was held with the DWS in Durban on 26 June 2019.</p> <p>The water uses applicable to the project were discussed and confirmed through the guidance of the DWS. Notes for the record of the meeting are included as <b>Appendix C7</b>.</p>
<p>2. Reference is made to:                  (a) Page 24 of this EIAR which states that water — potable water is to be sourced from the uMhlathuze Municipality Water Works;</p>		<p>The statement included in the EIA Report is acknowledged, and it provides that Eskom has had engagements for water provision with the Local Municipality.</p>
<p>(b) Page 25 of this EIAR which states that water of industrial quality will be provided by the municipality;</p>		<p>The statement included in the EIA Report is acknowledged, and it provides that Eskom has had engagements for water to be provided by the Municipality which will be of industrial quality.</p>

<p>(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;</p>		<p>The statement included in the EIA Report is acknowledged, and Eskom has engaged with the Local Municipality for use of their sewer pipeline system.</p>
<p>(d) Page 25 of this EIAR which states that wastewater from the plant will be discharged to the municipal system;</p>		<p>The statement included in the EIA Report is acknowledged, and Eskom has engaged with the Local Municipality for wastewater discharge into their system.</p>
<p>(e) Page 25 of this EIAR which states that wastewater produced from the CCPP will be generated from the demineralised water treatment system, Boiler Blowdown Recovery System and the Condensate Polisher System. The wastewater will be neutralised before discharge to the municipality;</p>		<p>The statement included in the EIA Report is acknowledged, and the wastewater will meet the Local Municipality quality requirements before being discharged into their system.</p>
<p>(f) Page 25 of this EIAR which states that wastewater 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.</p>		<p>The statement included in the EIA Report is acknowledged, and it is confirmed that this infrastructure is part of the project design layout.</p>
<p>1.1. 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:</p> <p>» Confirmation of sustainability of potable and industrial water services i.e. capacity of the source and supporting infrastructure.</p>		<p>The need for the provision of the Service Level Agreement by the applicant to DWS is noted. The requirements provided by the DWS to be included as part of the Service Level Agreements is noted.</p> <p>It must be noted that the applicant is still in the process of consulting and liaising with the service providers and therefore the Service Level Agreements are not available at this stage of the EIA process. The Service Level Agreements will be provided to the DWS by the applicant once finalised.</p>

	<p>» Confirmation of sustainability of waste water services: capacity of supporting infrastructure (pipelines, manholes, pump stations, etc) to withstand both anticipated qualities above and additional quantities.</p>		<p>Letters confirming the availability of the required services is included as <b>Appendix Q1</b> of the revised EIA Report.</p>
	<p>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.</p>		<p>The Water Use License for the project will be applied for to the DWS as was discussed in the Pre-Water Use Authorisation meeting (refer to <b>Appendix C7</b> of the revised EIA Report). The Water Use License will be obtained prior to the commencement of the construction of the proposed project.</p>
	<p>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.</p>		<p>The information provided by the DWS in terms of the regulated area is noted and has been provided to the Applicant.</p>
	<p>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.</p>		<p>The Applicant has been advised that they will be responsible to identify pollution sources and take the appropriate mitigation measures to prevent any pollution of the environment, as well as the consequences of not complying with this requirement.</p> <p>Measures for the mitigation of pollution have been included in the EMPr (<b>Appendix O</b> of the revised EIA Report).</p>
<p>8.</p>	<p>Following the mail below, we confirm that a claim has been lodged on the property.</p>	<p>Stephan Viljoen Chief Town and Regional Planner: Spatial Planning and</p>	<p>The lodging of a land claim for the project site is noted. It is acknowledged that the claim has not been finalised and that no timeframe for the finalisation can be provided.</p>

<p>It is a fairly large claim and has not been gazetted (Approved as final).                  The claim is still being processed and investigated by the Land Claims Commission.                  We can unfortunately not give timeframes for processing and finalisation of this claim</p>	<p>Land Use Management (KZN)                  DRDLR                  E-mail: 28-06-2019</p>	<p>The land claim will be the responsibility of the landowner and not the applicant of the project.</p>
<p>We were able to download the documentation.</p> <p>From our side we will only comment on issues related to Land Reform.</p> <p>It is important to note that a land claim was lodged against the property.</p> <p>We are looking into the status of this claim and will provide additional information shortly.</p> <p>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.</p>	<p>E-mail: 20-06-2019</p>	<p>The feedback provided has been acknowledged.</p> <p>The land claim will be the responsibility of the landowner and not the applicant of the project.</p>

	<p>From a socio-economic perspective the Department supports in principle the proposed RBCCPP based on the following aspects:</p> <ul style="list-style-type: none"> <li>» 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).</li> <li>» 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.</li> <li>» The potential increased production capability of the Richards Bay Special Economic Zone (RBSEZ), and the subsequent realisation of the Strategic Plans of the uMhlathuze Local Municipality.</li> <li>» 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.</li> </ul>	<p>Letter: 28-06-2019</p>	<p>It is noted that the Department supports the development of the proposed project based on the socio-economic impacts and aspects associated with the development.</p>
<p>9.</p>	<p>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:</p>	<p>Sharin Govender Manager: Environmental Management</p> <p>Letter: 27-06-2019</p>	<p>The comments submitted by the City of uMhlathuze on the project are responded to below.</p>
	<p><b>1. Background, Policy Framework and Strategic Imperatives</b></p> <p>1.1. At the outset the Municipality wishes to highlight the strategic nature of the project to meet the country's future energy needs.</p>		<p>It is noted that the Municipality acknowledges the strategic nature of the project in terms of meeting the country's energy needs.</p>

<p>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 Nationally Determined Contributions, which South Africa is required to comply with.</p> <p>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.</p> <p>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.</p> <p>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 MW 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.</p> <p>1.6. In support of the above and in advancing Government's Operation Phakisa, the uMhlathuze council reserved land for Gas to Power Development.</p>		<p>It is further noted that the project site (Phase 1D of the Richards Bay IDZ) has been selected for Gas to Power development by the City of uMhlathuze Local Municipality.</p>
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	<p>The preferred site, Phase 1 D, was carefully selected based on:</p> <ul style="list-style-type: none"> <li>» proximity to planning a gas import facility at the Port of Richards Bay;</li> <li>» Planning of gas servitudes and electricity transmission lines;</li> <li>» Transport linkages (road, rail and maritime);</li> <li>» Historic EIA approval for the particular site for a chemically-blended pulp paper mill;</li> <li>» The Environmental Management Framework for Richards Bay IDZ and Port Expansion;</li> <li>» Land use and zoning of the property; and</li> <li>» Disaster management considerations.</li> </ul>		
	<p><b>2. Design Considerations</b></p> <p>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.</p>		<p>The latest draft IRP determinations have made provision for 8100 MW of gas and no allocations have been made in this regard. The RB CCPP project has the flexibility to generate up to 3000MW. Once the IRP process has been finalised the plant will be constructed in line with the allocated determinations.</p>
	<p>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.</p>		<p>It must be noted that diesel is proposed to be used only as a back-up fuel and not as the primary fuel resource. The primary fuel resource of the facility is natural gas.</p> <p>Storage tanks will be developed for diesel to be used as the back-up fuel which will be enable the facility to operate for 8-hours during emergency situations where natural gas is not available, but these are expected to be infrequent as the contracting process for gas provision will ensure that there is adequate sources for gas.</p>
	<p>2.3. We wish to emphasize that the burning of diesel as a fuel source would be contrary to the policy and</p>		<p>The burning of diesel is proposed to be undertaken only during emergency situations and for a maximum period of 8 hours, to</p>

	<p>strategic objectives mentioned under the above section.</p>		<p>ensure sustainable power supply to the grid. The use of diesel as the primary source of fuel is not considered for the operation of the project.</p>
	<p>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.</p>		<p>The condition for inclusion to the decision on the Application for Environmental Authorisation is noted. This condition has been included in Chapter 10 of the revised EIA Report. It should be noted that the project execution would be dependent on all the required services having been confirmed, and required approval processes received.</p>
	<p><b>3. Climate Change Assessment</b>                  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 (e.g. the Carbon Disclosure Project).</p>		<p>The independent specialist who undertook the Climate Change Assessment (<b>Appendix J</b> of the revised EIA Report) has provided the following response to the comment:</p> <p>The methodology used to calculate the Richards Bay Combined Cycle Power Plant carbon footprint entailed the use of ISO/SANS 14064-1 and the Greenhouse Gas Protocol's Corporate Accounting and Reporting Standard (which is strongly aligned to ISO/SANS 14064-1).</p> <p>ISO/SANS 14064-1 is an internationally recognised and widely used standard that specifies principles and requirements at the organisation level for the quantification and reporting of historical figures of greenhouse gas emissions and removals.</p> <p>The consistent use of the standard across countries supports harmonization of greenhouse gas tracking and valuation, which supports consistency and comparability across different projects.</p>

			<p>ISO/SANS 14064-1 and the Greenhouse Gas Protocol's Corporate Accounting and Reporting Standard are recognised by the CDP (formerly known as the Carbon Disclosure Project) as methodologies/reporting protocols for calculating the carbon footprints that are reported on the platform.</p> <p>The CDP is a voluntary platform that organisations use to report their climate change risks and opportunities, as well as their carbon footprints on an ongoing basis. The CDP is not an appropriate platform for reporting or analyses relating to an Environmental Impact Assessment.</p>
	<p>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.</p>		<p>The independent specialist who undertook the Climate Change Assessment (<b>Appendix J</b> of the revised EIA Report) has provided the following response to the comment:</p> <p>The natural gas that will be consumed by the Richards Bay CCPP will be imported. It is common practice to account for greenhouse gas emissions only from emissions released within the country. This practice is used when reporting greenhouse inventories to the UNFCCC.</p> <p>The reason for focusing on the in-country combustion emissions is because the indirect emissions associated with imported fuel are comparatively small, considering that fossil fuel combustion accounts for about 85% of global CO<sub>2</sub> emissions.</p>
	<p>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.</p>		<p>It is noted that the impacts associated with the implementation of Carbon Capture and Storage as a mitigation measure for climate change has not been assessed. As the options</p>

			<p>available in this regard are not defined at this stage, it was not possible to include an assessment of these in the EIA process.</p> <p>Should this mitigation measure be considered for the operation of the project, the necessary processes in terms of the EIA Regulations 2014 (as amended) will need to be undertaken and approved by the competent authority.</p> <p>It must be noted that no carbon capture technologies will be included on the RB CCPP project as South Africa does not have any carbon storage facilities. Carbon capture can be added later to the facility once a carbon storage facility has been identified.</p>
	<p>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.</p>		<p>It is noted that the Local Municipality is in support of the use of Biogas as a fuel source and back-up, however the project will use natural gas mainly due to strict design parameters on the gas quality requirements. Eskom plans to use diesel as a back-up fuel for emergency situations and this was considered in the EIA process.</p> <p>Biogas is the mixture of gases produced by the breakdown of organic matter in the absence of oxygen. Biogas can be produced from raw materials such as agricultural waste, manure, municipal waste, plant material, sewage, green waste or food waste. Biogas is a renewable energy source (definition sourced from Wikipedia).</p> <p>Gas turbines have a very small tolerance and are very sensitive to the quality of gas. Biogas reactors cannot consistently</p>

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. (uMhlatuze Vulnerability Assessment 2010, Climate Change Action Plan 2018).

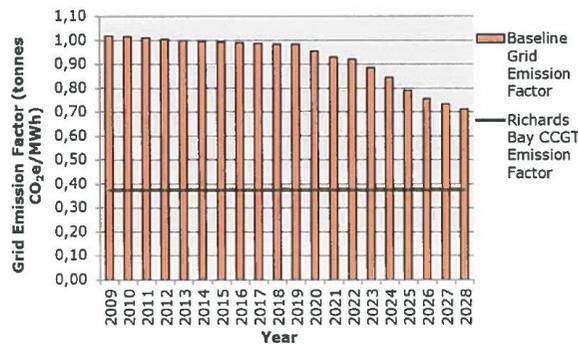


Figure 1: Comparison of annual emissions factors and project case in Page 18 of the Climate Change Assessment

provide the quality of gas required to operate the gas turbine associated with the project.

Biogas is ideal for small power generating facilities and not for a large power station.

The independent specialist who undertook the Climate Change Assessment (**Appendix J** of the revised EIA Report) has provided the following response to the comment:

The level of greenhouse gases (typically measured in tCO<sub>2</sub>e) emitted by local activities can be measured (for example, the figure of 0.37 tCO<sub>2</sub>e/MWh provided on page 18 of the report). The impacts of greenhouse gas emissions are however measured on a global scale, as opposed to other pollutants which may contaminate air, water or soil. This is because greenhouse gases that are released into the atmosphere trap some of the earth's outgoing energy, thus retaining heat in the atmosphere. The trapped heat causes changes in the radiative balance of the earth, which alters climate and weather patterns at global and regional scales.

While the municipality can measure climate change impacts within the boundaries of the municipality, such as increased instances of severe weather events, it is not possible to link the impacts with any particular source of greenhouse gas emissions. This is not the case for other, local pollutants. For example, it may be possible to link water pollutants to certain industrial activities based on the nature of the pollutant measured in the water

<p>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> 3/per unit energy from conventional coal fired power stations.</p>		<p>The independent specialist who undertook the Climate Change Assessment (<b>Appendix J</b> of the revised EIA Report) has provided the following response to the comment:</p> <p>The units of measurement relating to baseline grid emission factor and the Richards Bay CCPP emission factor are in tCO<sub>2</sub>e /MWh. This is consistent with the unit of measurement used in the updated version of South Africa's Integrated Resource Plan (published for public comment in August 2018), depicted in figure 4 of the Plan.</p> <p>The draft Integrated Resource Plan is based on different sources of electricity, which vary from conventional coal fired power stations to renewable energy facilities. The total emissions therefore include emissions from all power generation in the country, including coal and renewables, divided by the total electricity consumed (which includes coal and renewables).</p> <p>While the Integrated Resource Plan provides for increased electricity supplies from renewables on an ongoing basis, coal is expected to continue to supply the bulk of the country's electricity needs in the near-medium future (as plotted on the graph in figure 4, which shows the national grid emissions factor levels from 2009-2028).</p>
<p>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.</p>		<p>The independent specialist who undertook the Climate Change Assessment (<b>Appendix J</b> of the revised EIA Report) has provided the following response to the comment:</p>

	<p><b>4. Biodiversity</b></p> <p>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.</p>		<p>The assessment of climate change adaptation actions was not discussed or specified as a requirement.</p> <p>The Ecological Impact Assessment Report (<b>Appendix D</b> of the revised EIA Report) provides mitigation measures for the loss and disturbance of local fauna populations. The specialist recommended that prior to land clearance, the area should be investigated for the presence of fauna species (including threatened species) and relocated in appropriate habitat away from the site. There is no need for the recreation of habitat.</p> <p>The mitigation measures included in the Ecological Impact Assessment for the loss and disturbance of fauna will be relevant to all fauna located within the project site, including the wetlands present.</p>
	<p>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.</p>		<p>The offset proposal of adoption of Portion 1 of 11376 was based on discussion held with the stakeholders, but also based on the offset calculations made by the wetland specialist as part of the wetland offset strategy. Therefore, the conclusion that the adjacent land parcel is not sufficient for the offset is not solely based on the consultation with stakeholders, but also considered the offset guidelines and the results of the wetland offset calculations.</p>
	<p>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:</p> <ul style="list-style-type: none"> <li>» Property administration implications (landowner negotiations; alienation etc);</li> </ul>		<p>A formal biodiversity offset proposal will be developed by the Applicant through consultation and negotiation with all relevant stakeholders (including the Municipality and EKZN Wildlife). This will be undertaken prior to the development of the CCPP and will contain the required information as requested by the Local Municipality.</p>

	<ul style="list-style-type: none"> <li>» 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</li> <li>» Statutory processes, if any, that would need to be followed for formalizing the offset.</li> </ul>		
	<p><b>5. Air Quality</b></p> <p><b>5.1.</b> The air quality assessment confirms the detrimental impact of SO<sub>2</sub> from Diesel as a fuel source.</p>		<p>It is correct that the air quality impact assessment confirms the detrimental impact of SO<sub>2</sub> from the use of diesel as an alternative fuel source. It must be noted that the RB CCPP will not use diesel as the primary fuel source. Natural gas will be used as the primary fuel source. Diesel is only proposed as a back-up fuel during emergency situations and a maximum operation time of 8 hours is expected for Diesel during the emergency situations.</p>
	<p>5.2. The assessment is silent on compatibility with surrounding land uses, in particular with Mondi Pulp Mill.</p>		<p>The independent specialist who undertook the Air Quality Impact Assessment (<b>Appendix I</b> of the revised EIA Report has provided the following response to the comment:</p> <p>A cumulative assessment based on actual emissions from Mondi would require detailed information to be provided by Mondi, which is out of the scope of this study. A cumulative impact assessment has been provided based on measured TRS (total reduced sulfide) concentration measured at the Esikhawini and CBD RBCAA monitoring stations.</p> <p>Because the CCPP is not a particularly malodourous operation, the two land uses are considered to be compatible.</p>
	<p>5.3. A schedule trade permit would be required in terms of Municipal Environmental health bylaws.</p>		<p>The applicant has been informed of this requirement for the development of the project, and is aware of this undertaking, which will be executed as the project permitting requirements</p>

			<p>processes are continuing following the decision on this application.</p>
	<p><b>6. Transport Planning and Civil Services</b>  <b>6.1.</b> 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 signalling thereof, must be submitted to the Transportation and Road Planning unit of the Municipality</p>		<p>It is noted that the recommendations included for the development of the project in the Traffic Impact Assessment (<b>Appendix M</b> of the revised EIA Report) have been accepted by the Local Municipality. The design of the intersections will be undertaken by the applicant when the final design and layout of the project is available, and will be submitted to the Transportation and Road Planning Unit of the Local Municipality.</p>
	<p>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.</p>		<p>The civil engineering report for the project will be submitted to the Local Municipality by the applicant once the final facility layout is available. This report will include the details of the water demand, water conservation strategy and energy demand.</p>
	<p>6.3. A geotechnical investigation is required to establish founding soil conditions. This is imperative considering the high-water table evident in specialist reports</p>		<p>A geotechnical investigation will be undertaken for the project site to determine the final facility layout prior to construction. The geotechnical investigation will consider the high-water table identified in the specialist report.</p>
	<p><b>7. Spatial Planning and Land Use</b>  <b>7.1.</b> The uMhlathuze Spatial Development framework makes reference to gas to power development as a strategic infrastructure imperative to unlock economic growth.</p>		<p>It is noted that that the Local Municipality considers the development of gas to power facilities as strategic infrastructure required to unlock economic growth.</p>

			<p>This need identified within the local municipal area intensifies the need and desirability of the proposed CCPP project within the proposed project site.</p>
	<p>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.</p>		<p>It is noted that Portion 2 of Erf 11376 is considered as suitable for gas to power development and High Impact Industry in terms of the Land Use Scheme.</p> <p>The applicant will consult with the Land Use Management Unit of the Local Municipality in order to ensure compliance with the uMhlathuze Spatial Planning and Land use Bylaw and Land use Scheme. This consultation will take place once a decision on the Application for Environmental Authorisation has been provided by the competent authority, and will be part of project development processes.</p>
	<p>7.3. The zoning of Portion 3 of 11376 is confirmed as Conservation.</p>  <p>Figure 2: Land Use scheme for the application site/s</p>		<p>It is noted that Portion 3 of Erf 11376 is zoned for conservation. It must be noted that Portion 3 of Erf 11376 does not form part of the project site and is avoided in its entirety by the development of the proposed project.</p>
	<p>7.4. The site layout may be subject to change following building plan submission.</p>		<p>It is acknowledged that the submission of the building plan may result in a change of the layout. The final layout for construction will be developed after execution of detailed geotechnical investigations by the Contractor (still to be employed).</p>

<p><b>8. Disaster Management</b></p> <p><b>8.1.</b> 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 fulfils 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.</p>		<p>It is noted that a comprehensive capacity building program / training is required in order to develop an efficient emergency response in the event of a gas leak, explosion fire or any other disaster.</p> <p><b>Appendix H</b> of the EMPr (<b>Appendix O</b> of the revised EIA Report) includes a guideline for the development of an Emergency Preparedness, Response and Fire Management Plan. The emergency plan for the project, considering the possible emergency situations, will be covered and catered for emergency situations. This plan will only become available once the facility layout of the project has been finalised.</p> <p>In addition, the EIA and EMPr further include the requirement for an MHI Risk Assessment to be undertaken for the project. This will further inform the Emergency Preparedness, Response and Fire Management Plan for the CCPP project.</p> <p>Eskom develops Emergency Evacuation Plans at all its operations and the plans are developed inclusive of all affected stakeholders.</p>
<p>8.2. The recommendations of the quantitative risk assessment must be strictly adhered to.</p>		<p>The recommendations included in the Quantitative Risk Assessment (<b>Appendix N</b> of the revised EIA Report) are noted and will be adhered to.</p>
<p>8.3. The HAZOP study must amongst other considerations include:</p> <ul style="list-style-type: none"> <li>» Other Major Hazardous installations in the vicinity of the proposed gas to power plant;</li> <li>» Cumulative HAZOP assessment with the Gas import Facility and pipeline corridors;</li> </ul>		<p>The requirements for the undertaking of the HAZOP study identified by the Local Municipality is noted.</p> <p>The HAZOP studies will be completed prior to construction to ensure that design and operational hazards have been identified and that adequate mitigation is put in place. This is</p>

	<ul style="list-style-type: none"> <li>» Emergency response preparedness of Disaster management teams; and</li> <li>» Impact on major transport networks (Road, rail and maritime)</li> </ul>		<p>as per the recommendation included in the Quantitative Risk Assessment (<b>Appendix N</b> of the revised EIA Report).</p>
	<p>As uMhlathuze Municipality, and further to our EIA comment submission relating to the subject matter, we wish to provide the following inputs:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. Additional areas must be investigated. It would be preferred if such area is spatially and ecologically connected to Portion 1.</li> <li>3. We accept there are challenges in fulfilling the previous Pulp United MoA (i.e. in terms of proclaiming the 3 lakes in question).</li> <li>4. Without preempting resolutions from today's discussion, a biodiversity offset around Lake Nsezi would be a viable option.</li> <li>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.</li> <li>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.</li> </ol>	<p>E-mail: 08-07-2019</p>	<p>The additional inputs provided by the Municipality on the required offset is noted. These points will be considered by the applicant during the consultation and negotiation process with the relevant stakeholders for the finalisation of the offset. The required agreements between the relevant parties with regards to the offset will be put in place.</p>

<p>10.</p>	<p>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.</p> <p>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.</p>	<p>Dominic Wieners                  Co-Ordinator: IEM                  Ezemvelo KZN</p> <p>Letter: 09 -07-2019</p>	<p>It is noted that Ezemvelo is in agreement with the recommendations for the expected loss of wetlands and biodiversity. It is also noted that Ezemvelo supports the recommendation of the conservation of other wetland opportunities as part of the offset (Option 2).</p> <p>It must be noted that the Applicant has identified offset Option 2 as preferred for the project following further consultation and investigation into the requirements associated with this option.</p>
	<p>It must be noted however that the review of the specialist reports has highlighted some concerns with regards to 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,</p>		<p>The concerns raised regarding the information is acknowledged.</p> <p>It must be noted that the Applicant has identified offset Option 2 as preferred for the project following further consultation and investigation into the requirements associated with this option. This option involves the proclamation of areas for conservation in Richards Bay.</p>

<p>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.</p>		
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<p>In the context of the above, it is strongly advised that the project team draft an offset management plan, which clearly outlines:</p> <ul style="list-style-type: none"> <li>» The objectives of the offset,</li> <li>» 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.</li> <li>» The best recommended offset receiving alternative.</li> <li>» Recommended management interventions to achieve best practicable conservation outcomes on the ground, which satisfy the objectives of the offset</li> <li>» Recommended programme for offset implementation, with realistic timeframes and measurable stages for auditing purposes.</li> <li>» Recommended appropriate legal mechanism for securing offset receiving area in perpetuity, or for the length of the impact.</li> <li>» Recommended members of the Offset Oversight Committee.</li> </ul>		<p>An offset plan will be developed by the Applicant through a consultation and negotiation process with the relevant stakeholders (including the Local Municipality and Ezemvelo) for the finalisation of the offset. The required agreements between the relevant parties with regards to the offset will be put in place.</p> <p>The requirements for the plan, as indicated by Ezemvelo, will be covered in the plan and submitted to Ezemvelo for their consideration.</p>
<p>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</p>		<p>The comment regarding the clearing of alien invasive species in terms of the offset is noted. The inclusion of the clearing of alien invasive species as part of the plan will be investigated</p>

	<p>conservation outcome. It is however, recommended as part of a management approach for rehabilitation of the offset receiving area.</p>		<p>further and agreed upon, where relevant, with the associated stakeholders.</p>
	<p>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 and the specific objectives.</p>		<p>Comment noted. No response required.</p>
	<p>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.</p>		<p>Comment noted. No response required.</p>

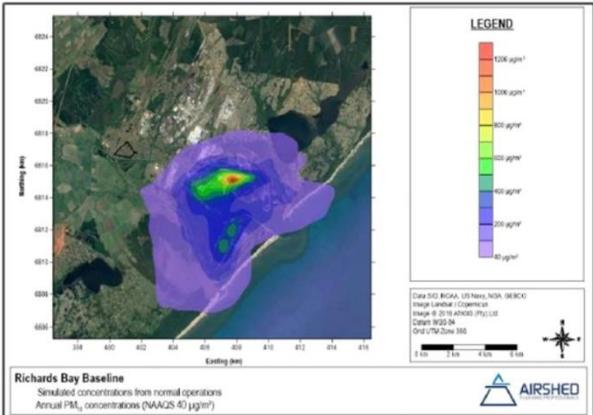
**2.1 Stakeholder and Interested and Affected Parties**

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
1.	<p>The comments provided below are based on the Richards Bay Clean Air Association's (RBCAA) review of the Draft Environmental Impact Assessment Report (DEIAR), prepared by Savannah Environmental, dated March 2019, and associated Appendices.</p>	<p>Sandy Camminga Chairman: EIA Committee  RBCAA</p>	<p>The comments provided by the RBCAA on the EIA Report are responded to below.</p>
	<p><b>1. COMMENT</b></p> <p><b>1.1. Specialist Studies:</b> The proposed CCPP is to operate as a mid-merit plant, however the plant can operate as a baseload plant, which would magnify the impacts. This is quantified in the Climate Change Assessment, which states that should the proposed CCPP be run as a baseload plant, greenhouse gas emissions would increase by 70%.</p>	<p>Letter: 10-05-2019</p>	<p>The Richards Bay CCPP is operation specific and can be designed and constructed to operate via all operating modes e.g. peaking, mid-merit or baseload. Mid-merit was the chosen as the operating mode due to the high fuel cost and will provide the best returns. Therefore, consideration of the facility as baseload has not been undertaken as this is not considered as a feasible option. Should this be considered by the applicant, the impacts associated with the baseload operation will need to be assessed and the relevant approvals obtained.</p> <p>This application is based on the plant operations at mid-merit.</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>It is the view of the RBCAA that it would have been prudent to include the assessment of the proposed CCPP as a baseload plant.</p>		<p>The independent specialist who undertook the Air Quality Impact Assessment (<b>Appendix I</b> of the revised EIA Report has provided the following response to the comment:</p> <p>As a conservative estimate, the dispersion simulations considered continuous emissions.</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p><b>1.2. Atmospheric Impact Report:</b> While the report makes reference to hourly and daily average simulations, there are no dose maps for the majority of pollutants to support the findings. The report appears to focus primarily on the representation of the annual average simulations.</p> <p><b>The report falls short in providing the following information;</b></p> <p><b><u>Simulations:</u></b></p> <ol style="list-style-type: none"> <li>1. Simulated daily average PM10 for the Richards Bay Baseline.</li> <li>2. Simulated daily and hourly average SO<sub>2</sub> for the Richards Bay Baseline.</li> <li>3. Simulated hourly average NO<sub>2</sub> for the Richards Bay Baseline.</li> <li>4. Dose maps for simulated daily PM10 and PM<sub>2.5</sub> from normal operations of the CCPP.</li> <li>5. Dose maps for simulated daily and hourly SO<sub>2</sub> from normal operations of the CCPP.</li> <li>6. Dose map for simulated hourly NO<sub>2</sub> from normal operations of the CCPP.</li> <li>7. Dose maps for simulated NO<sub>2</sub> for Emergency 1, and Emergency 2 type events.</li> <li>8. Dose map for simulated H<sub>2</sub>S from the CCPP.</li> </ol>		<p>The independent specialist who undertook the Air Quality Impact Assessment (<b>Appendix I</b> of the revised EIA Report) has provided the following response to the comment:</p> <p>Data provided by WSP for the simulated Richards Bay Baseline was only provided as annual average. Measured short-term ambient concentrations of SO<sub>2</sub> and PM10 (section 5.1.3.3 of <b>Appendix I</b> of the revised EIA Report) shows compliance with the NAAQS and improvement in air quality over the period of assessment (2014 to 2017). NO<sub>2</sub> is only monitored at the three newly deployed stations owned by the City of uMhlathuze Local Municipality. Data was requested from the City of uMhlathuze for these stations during the assessment however the data was not provided. Therefore, short-term baseline concentrations of NO<sub>2</sub> could not be assessed.</p> <p>Isopleth plots for short-term averaging periods have been included in Appendix F of the Air Quality Impact Assessment (<b>Appendix I</b> of the revised EIA Report).</p>
	<p><b><u>Odour Impacts:</u></b> Odour impacts from the operation of the proposed CCPP have <u>not</u> been adequately addressed, with only 2 lines in the report referencing H<sub>2</sub>S emissions;</p>		<p>The independent specialist who undertook the Air Quality Impact Assessment (<b>Appendix I</b> of the revised EIA Report) has provided the following response to the comment:</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>Mondi is an emitter of H<sub>2</sub>S which is a source of ongoing and a significant number of community complaints, with reported associated health impacts.</p> <p>The issue of odour was raised by Mondi at a meeting held with Eskom on 30 August 2017 (Comments &amp; Response Report Oct 2017). Mondi requested that Eskom take note of the fact that odour is inherent in Mondi's process, and that although stringent odour abatement processes are adhered to, the CCPP site will be impacted by nuisance air quality impacts. In response it is stated in the Comments &amp; Responses Report that <i>"This will be investigated by the air quality specialist study."</i></p> <p>The Air Quality Impact Report is however silent on this issue.</p> <p><u>The RBCAA requests that a cumulative assessment of H<sub>2</sub>S from the CCPP and Mondi operations be undertaken.</u></p>		<p>The fugitive emissions inventory (section 4.7 of the Air Quality Impact Assessment - <b>Appendix I</b> of the revised EIA Report) has been updated to include H<sub>2</sub>S emissions from the dirty water retention dam.</p> <p>A cumulative assessment based on actual emissions from Mondi would require detailed information to be provided by Mondi, which is out of the scope of this study. A cumulative assessment has been provided based on measured TRS (total reduced sulfide) concentrations measured at the Esikhawini and CBD RBCAA monitoring stations (refer to section 5.1.6.4 of the Air Quality Impact Assessment – <b>Appendix I</b> of the revised EIA Report).</p>
	<p><b><u>Air Quality Monitoring:</u></b> The Atmospheric Impact Report is silent on this issue.</p>		<p>The independent specialist who undertook the Air Quality Impact Assessment (<b>Appendix I</b> of the revised EIA Report) has provided the following response to the comment:</p> <p>Monitoring requirements have been recommended in section 5.3.1 of the Air Quality Impact Assessment Report – Impact Assessment Rating Tables. Monitoring recommendations include:</p> <ul style="list-style-type: none"> <li>» Dustfall monitoring during construction and decommissioning phases; and</li> </ul>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p><b>Richards Bay Baseline:</b>                      Simulations of baseline operations result in PM10 exceedances across much of the Port area and adjacent areas as a result of operations within the Port. These findings are cause for concern, and the RBCAA would urge the Regulatory Authorities to take the necessary action to ensure the implementation of appropriate mitigation measures.</p>  <p>Figure 5-13: Simulated annual average PM<sub>10</sub> concentrations for the Richards Bay baseline</p>		<p>» Assistance with the RBCAA to expand the pollutants and meteorology measured at two of the existing monitoring stations (Bayside and/or Scorpio)</p> <p>The comment is noted and must be considered by the Regulatory Authorities as described in the comment.</p>
	<p><b>1.3. Climate Change Assessment:</b>                      The finding is that the proposed plant will produce <b>significant</b> quantities of <u>greenhouse gas emissions</u> annually (4.6 million tons). The <u>impacts</u> of which are considered to be <b>high</b>. It is noted that this equates to <b>0.85%</b> of South Africa's greenhouse gas inventory when operated as a mid-merit plant. However,</p>		<p>The applicant has been made aware of the alternatives proposed by the specialist for the mitigation of the impacts expected to occur.</p> <p>Biogas is the mixture of gases produced by the breakdown of organic matter in the absence of oxygen. Biogas can be produced from raw materials such as agricultural waste,</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>should the plant be operated as a baseload plant it will contribute <b>1.69%</b> to the national emissions each year.</p> <p>The report details various alternatives that would mitigate the carbon emissions, and the authors advise that the design of the project should take these options into account. <u>In view of the above, the RBCAA recommends that the alternatives as detailed in the Climate Change Assessment be investigated and incorporated into the design of the plant.</u></p>		<p>manure, municipal waste, plant material, sewage, green waste or food waste. Biogas is a renewable energy source (sourced from Wikipedia).</p> <p>Gas turbines have a very small tolerance and very sensitive on the quality of gas. Biogas reactors cannot consistently provide the quality of gas required to operate the gas turbine. Biogas is ideal for small power generating facilities and not for a large power station.</p> <p>No carbon capture technologies will be included on the RB CCPP project as South Africa does not have any carbon storage facilities. Carbon capture can be added later to the facility once a carbon storage facility has been identified.</p>
	<p><b>2. RECOMMENDATIONS:</b></p> <p>Should the proposed CCPP receive authorisation the RBCAA recommends that the Authorisation should be subject to;</p> <ol style="list-style-type: none"> <li>1. Approval and construction of LNG facility, Pipeline and Transmission Infrastructure.</li> <li>2. Submission of a Carbon Emissions Management Plan.</li> <li>3. Submission of an Air Quality Monitoring Plan.</li> <li>4. The CCPP may only operate as a mid-merit plant, and not a baseload plant.</li> <li>5. Membership of the RBCAA.</li> </ol>		<p>The conditions provided by the RBCAA for the project are noted. The conditions must be considered by the competent authority for inclusion as part of the Environmental authorisation, should the project be authorised.</p>
	<p><b>3. CONCLUSION:</b></p> <p>Given the gaps in information relating to the air quality assessment, the RBCAA is unable to comment on the acceptability of the proposed CCPP project from an air quality perspective.</p>		<p>It is noted that the RBCAA was not able to comment on the acceptability of the project from an air quality perspective.</p> <p>It must be noted that the specialist has provided responses to the comments raised on the air quality impact assessment, as</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	The RBCAA reserves the right to amend and \or provide further comment once the additional information has been provided.		per the comments included above. These responses are available for review by the RBCAA as part of the revised EIA Report. All additional comments received from the RBCAA will be included and responded to in the Comments and Responses report to be submitted as part of the final EIA Report.

## 2. COMMENTS RECEIVED: RESUBMISSION OF APPLICATION

### 2.1 Organs of state

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
1.	Thank you for the opportunity to comment on this development proposal as outlined above. The Archaeological Scoping Report by Jaco van der Walt and the field-based Paleontological Report by Elize Butler have been considered. While the Palaeontologist 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.	Bernadet Pawandiwa Senior Heritage Officer Amafa/Heritage KZN  Letter: 14-03-2019	A field-based Heritage Impact Assessment was undertaken during the EIA Phase of the project. The site investigation was undertaken by the independent heritage specialist on 20 December 2017. The specialist advised that the vegetation cover was low (less than 400 mm high) with good archaeological visibility. The project site was sufficiently covered (to adequately record the presence of heritage resources. The Heritage Impact Assessment in included as <b>Appendix H</b> of the revised EIA Report.  The Heritage Impact Assessment identified the need for the implementation of a Chance Find Procedure due to the possible occurrence of subsurface finds, which cannot be excluded. The Chance Find Procedure is included as Section 10.0 of the Heritage Impact Assessment ( <b>Appendix H</b> of the revised EIA Report) and has also been included under Objective 9 of the construction management programme which aims to ensure the protection of heritage resources.

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
			<p>The Heritage impact Assessment (based on a site investigation) indicated that no archaeological sites were identified. In terms of the built environment of the area no standing structures older than 60 years occur within the project site. No burial sites were recorded. No public monuments are located within, or close to, the project site and the project site is located in an industrial area away from main tourist routes and the proposed development will not impact negatively on significant views.</p>
	<p>The HIA Study should cover:</p> <ul style="list-style-type: none"> <li>» Identification of all heritage resources in the development area and its surroundings -50m</li> </ul>		<p>No heritage resources were identified in the Heritage Impact Assessment Report (<b>Appendix H</b> of the revised EIA Report).</p>
	<ul style="list-style-type: none"> <li>» Assessment of the impact of the development on such heritage</li> </ul>		<p>An impact assessment of the impact on heritage resources within the project site was undertaken in the Heritage Impact Assessment Report (<b>Appendix H</b> of the revised EIA Report). The specialist report concluded that the impact of the project on heritage resources will be low.</p>
	<ul style="list-style-type: none"> <li>» Evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development</li> </ul>		<p>An impact assessment of the impact on heritage resources within the project site was undertaken in the Heritage Impact Assessment Report (<b>Appendix H</b> of the revised EIA Report). The specialist report concluded that the impact of the project on heritage resources will be low.</p>
	<ul style="list-style-type: none"> <li>» 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.</li> </ul>		<p>No heritage concerns were raised during the public participation process undertaken for the project.</p>
	<ul style="list-style-type: none"> <li>» Consideration of alternatives if heritage resources are affected by the development</li> </ul>		<p>No heritage resources were observed and identified to be affected by the project. Therefore, no alternatives have been considered.</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>» Mitigation plans for any adverse effects during and after completion of the project.</p>		Mitigation measures have been recommended by the specialist, including the implementation of a Chance Find Procedure.
	<p>» Table of all heritage resources identified. This should show Heritage resource type, description, location, significance and reasons for this rating.</p>		As no heritage resources were identified during the site investigation undertaken for the Heritage Impact Assessment, this requirement is not applicable to the project.
	<p>Amafa will therefore provide further comment on the field-based full Heritage Impact Assessment Report once its submitted.</p>		<p>The full Heritage Impact Assessment was made available for review to Amafa as part of the EIA Report.</p> <p>Amafa has been notified of the availability of the revised EIA Report for a 30-day review period.</p>
2.	<p>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.</p>	<p>Sharin Govender Project Manager: Environmental Planning City of uMhlathuze</p> <p>E-mail: 04-03-2019</p>	<p>The requested report was not yet available for distribution at the time of this request, and therefore not uploaded on Savannah Environmental's website.</p> <p>All registered I&amp;APs were notified of the report availability for review and comment once this was available. The release code to access the report on the Savannah Environmental website was provided after the notification was distributed.</p> <p><b>Note:</b> All registered I&amp;APs were notified of the availability of the EIA Report on 18 March 2019.</p>

## 2.2 General Comments and Requests

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
1.	<p>I am inquiring for K Peters as we seen you notice on the wall at the RBIDZ.</p>	<p>Wayne Fisher Transnet Port Terminals RCB</p>	<p>Mr Fisher was thanked for the e-mail sent on behalf of Mr/Ms K Peter.</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>She would like to find out if there would be any vacancies for admin staff in your Richards Bay branch.</p> <p>She had lived and worked in Richards Bay all her life and feel she will be a great asset to your company.</p> <p>This is K Peter CV.</p>	<p>E-mail: 13-03-2019</p>	<p>Savannah Environmental has been appointed by Eskom Holdings SOC Ltd as the independent Environmental Assessment Practitioner responsible only for assessing all environmental impacts (positive and negative) regarding the proposed Combined Cycle Power Plant and Associated Infrastructure in Richards Bay. Savannah Environmental, is therefore not responsible for facilitating employment opportunities for the proposed development.</p> <p>Eskom is currently conducting feasibility studies only. The decision to implement the project and the process for the employment of staff will be finalised once the business case has been approved.</p> <p>Mr/Ms K Peter CV will however be forwarded to the applicant and it would be up to the client to make contact should they wish to do so.</p>
2.	<p>Please note that Candice Webb is no longer with Mondi.</p> <p>The contact person is Brendan Crawford (in copy).</p>	<p>Sandy Camminga Director: Richards Bay Clean Air Association</p> <p>E-mail: 18-03-2019</p>	<p>Updated information acknowledged and project database updated accordingly. Proof included in <b>Appendix C5</b>.</p>
3.	<p>Kindly remove me from the distribution list.</p>	<p>Roelof Camminga Senior Supercargo Island View Shipping</p> <p>E-mail: 24-04-2019</p>	<p>Request acknowledged and removed from project database as a registered I&amp;AP. Proof included in <b>Appendix C5</b>.</p>
4.	<p>Pls send me the release code for the Richards Bay CCPP link if possible.</p>	<p>Louwaine Swarts E.O.H: Richards Bay</p>	<p>Release Code e-mailed as requested on 07 May 2019. Proof included in <b>Appendix C5</b></p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	We are based locally in Richards Bay and are very interested in the latest developments that might provide additional opportunities in the work force	E-mail: 07-05-2019	

## SCOPING PHASE

### 1. COMMENTS RECEIVED ON THE SCOPING REPORT

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
<b>2.1. Organs of State Acknowledgments And Requests For Information</b>			
1.	Do you have a locality plan depicting the proposed activities versus Transnet Freight Rail properties so that we are able to comment comprehensively?	Futhi Mathebula National Capacity Planning & Strategy  Transnet Real Estate Transnet Ltd  Email: 21-08-2017	A locality map was sent to Futhi Mathebula of Transnet via email on 24 August 2017.
2.	Please send me the Background Information Document (BID) or a locality map.	John Geeringh Senior Environmental Consultant  Eskom SOC Ltd  Email: 22-08-2017	The BID and locality map was sent to John Geeringh of Eskom via email on 22 August 2017. No further comments have been received to date.
3.	Your EIA process notice forms part of our approval from the South African Civil Aviation Authority (SACAA) with regard to CCPP project refers. There is a SACAA process whereby permission is applied for with regards to obstacles which could pose an aviation hazard. More information can be obtained at <a href="http://www.caa.co.za">http://www.caa.co.za</a> . 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	Lizell Stroh Obstacle Inspector Procedures for Air Navigation Services- Aircraft Operations Air Navigation Services	SACAA's requirements have been submitted to the applicant. The applicant will apply for the SACAA approvals once the CCPP designs are finalised. SACAA will be consulted in November 2017 to determine the process to follow.

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	<p>the proposed overhead electric power line route that will evacuate the generated power to the national grid.</p> <ul style="list-style-type: none"> <li>» Also indicate the highest structure of the project &amp; the Overhead electric power transmission line.</li> <li>» Note that there may be other wind farms and PV farms in the area. Unique names are preferable.</li> <li>» Please always use the proposed PV farm name in the Subject box when corresponding via email with this office and indicate the name &amp; address which should appear on the CAA approval/decline letter.</li> <li>» There is an assessment fee of R820 per application.</li> <li>» For billing purposes: company name VAT nr. and postal details.</li> <li>» Kindly ensure that all the above data is forwarded. Incomplete data causes unnecessary delays.</li> </ul>	<p>South African Civil Aviation Authority (SACAA)</p> <p>Email: 22-08-2017</p>	
4.	<p>Thank you for notifying Amafa. Comment will be published on the SAHRIS facility on <a href="http://www.sahra.org.za">www.sahra.org.za</a> once we have received proof of payment (currently R700) and site photos/case images. The payment details are on the cover sheet of the Need and Desirability Form (NID-Notice of Intention to Develop Form) available on the Amafa website <a href="http://www.heritagekzn.co.za">www.heritagekzn.co.za</a>.</p>	<p>Bernadet Pawandiwa Senior Heritage Officer Archaeology Compliance/Permits</p> <p>Amafa Heritage KwaZulu-Natali</p> <p>Email: 22-08-2017</p>	<p>The Scoping Report was uploaded on the SAHRIS website (Case Reference: 11535) on 21 August 2017. A completed Need and Desirability Form and proof of payment was submitted to SAHRIS and Amafa Heritage on 04 September 2017. No further comments have been received to date.</p>
5.	<p>The South African National Roads Agency SOC Ltd (SANRAL) hereby notifies you that all Scoping Environmental Impact Assessment Reports submitted to this office for comments shall conform to the following requirements:</p>	<p>Jabu Zondo Statutory Control – Eastern Region</p> <p>SANRAL</p>	<p>SANRAL's requirements with regards to the submission of Scoping and Environmental Impact Assessment Reports are noted. A Scoping Report was submitted to SANRAL on 21 August 2017. It must be noted that a Traffic Impact Assessment will be undertaken during the EIA Phase of the project.</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>1) All reports must be submitted as a hard copy via courier or normal mail.</p> <p>2) Submissions must be A4 – DIN size (210x297mm) and be bound on the left side.</p> <p>3) Cover letter fully describing the purpose of the submission.</p> <p>4) Executive Summary including a description of the proposed development or activity.</p> <p>5) Clearly annotated Locality Map – A3-Din size (297x420mm) folded to A4 size.</p> <p>6) Clearly annotated Development/Site Layout plan – A3 Din size (297x420mm) folded to A4 size.</p> <p>7) Associated Town Planning Proposal</p> <p>8) Listed Activities.</p> <p>9) Road infrastructure provision and the associated Traffic Impact Assessment</p> <p>10) Comments from other relevant Transport Authorities e.g. Provincial Departments of Transport, Municipality etc.</p> <p>11) Storm water management</p> <p>All ancillary information must be included on a Compact Disc (CD) for further reference.</p> <p>12) All submissions to be addressed to:                      The Regional Manager – Eastern Region                      58 Van Eck Place                      Mkondeni                      Pietermaritzburg                      3201                      Attention: Statutory Control Department</p>	<p>Email: 25-08-2017</p>	

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>13) Every effort must be taken by the applicant to ensure that only relevant and concise information is included to prevent unnecessarily large or voluminous submissions.</p> <p>Your cooperation in this regard will be appreciated and you are to note that any submission in an electronic (soft copy) format or a submission that does not conform to the above standard requirements will not be processed from hereon. Furthermore, SANRAL reserves the right to request any additional information it deems relevant in its consideration of any submission in this regard.</p>		
<b>2.1. Traffic Impacts</b>			
6.	<p>From the drawing supplied it is not clear if you will be near a National Route our comments are set out below in the event that it does traverse or run parallel to a National Route.</p> <p>Any powerline and associated infrastructure that crosses or runs parallel to the National Road or placed within SANRAL's (The South African National Roads Agency SOC Ltd) building restriction area which is 60 metres from the Road Reserve Boundary needs SANRAL's approval.</p> <p>Once a route has been approved and finalised and falls within 60 metres parallel or crosses the National Road a wayleave will have to be submitted to SANRAL's Eastern Region for approval.</p>	<p>Judy Marx                      Statutory Control –                      Eastern Region</p> <p>South African National                      Roads Agency SOC                      Ltd (SANRAL)</p> <p>Letter:                      15-08-2017</p>	<ul style="list-style-type: none"> <li>» The routes which are located within close proximity to the project site include the Regional road (R34) located approximately 900m south of the project site and the National road (N2) located approximately 4.5km to the west of the project site.</li> <li>» The project site and the associated infrastructure does not traverse the National road, therefore approval from SANRAL will not be required in this regard. It should be noted that the grid infrastructure to connect the CCPP to the national grid, or any other linear infrastructure associated with the project, will be assessed under a separate application for environmental authorisation.</li> <li>» The roads associated with the development of the Richards Bay CCPP will not be located within 60m of a National</li> </ul>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	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.		road, therefore no wayleave application will be required to be approved by SANRAL's Eastern Region. » A formal application for encroachment is not required due to the location of the project site in relation to the N2, which is located approximately 4.5km to the west.
7.	How will the impacts on traffic be managed if diesel or gas is required to be trucked in.	Franz Schmidt SHREQC Manager  Richards Bay Alloys  Public Meeting: 31-08-2017	A Traffic Impact Assessment will be undertaken in the EIA phase of this project, and will also address issues related to transportation of the fuel. Traffic impacts will be assessed and appropriate management measures proposed and presented in the Traffic Impact Assessment and in the EIA Report. Gas will not be trucked in but will be supplied by a gas supplier via its pipeline to the Eskom connection point at the boundary fence of the plant. Only diesel (used as back-up) will be trucked in.
8.	What modes of transport will be moving in and out of the proposed power plant?	Vuyo Keswa Environmental Manager  Transnet Freight Rail	A gas pipeline will be used to supply gas to the power plant as the primary fuel. Fuel tankers will be used occasionally should diesel be required to operate the facility as a back-up (this is all during operation of the power plant). During construction there will be construction vehicles moving in and out of the site on a regular basis
9.	Has a Traffic Impact Assessment been undertaken?	Meeting: 31-08-2017	A Traffic Study was undertaken as part of the Environmental Screening and Site Selection Study and a Traffic Impact Assessment will be conducted during the EIA phase.
<b>2.1. Public Participation Process and I&amp;AP Registrations</b>			
10.	I noted with surprise in the Zululand Observer (dd: 25/08/2017) that Public Meetings are to be held for what I can only assume to be the same project as this one, but this time round for a facility 10 times the size, i.e. 3000MW vs. the original 300MW. We have not heard from you whatsoever	Frans van der Walt  QS2000 Plus (Quantity Surveyors & Project Managers)	The proposed 3000MW Richards Bay Combined Cycle Power Project (CCPP) is a different project to the Gas Power Plant proposed by Richards Bay Gas Power 2 (Pty) Ltd, an independent power producer (IPP) and to which the previous correspondence, referred to by Frans Schmidt, related to. The EIA process for the Gas Power Plant (proposed by Richards Bay

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	<p>since the communication hereunder, and also find that curious?</p> <p>I shall be attending the Public Meeting on Thursday, 31/08 at 09h00 at the Richards Bay Public Library. I look forward to receiving substantially more information on this project, as well as the planned routing of the LNG Gas from the source and/or the Port of Richards Bay. I can only assume that this EIA process actually include the route?!</p> <p>I do have various issues with the deemed locality for the facility and would share that at the Meeting. Please do ensure that we are added to the database on this project to ensure we do receive future correspondence, notices, etc.</p>	<p>Email: 28-08-2017</p>	<p>Gas Power 2) project was completed in 2016. The project received environmental authorisation in October 2016.</p> <p>The EAP confirms that Frans Schmidt has been registered as an Interested and Affected Party (I&amp;AP) on the Richards Bay CCPP project's database. Correspondence distributed from the CRM system did not reach Frans Schmidt due to technical issues which have subsequently been resolved.</p> <p>Please note that the LNG gas pipeline will be subjected to an EIA process under a separate application which will be undertaken by a separate entity.</p>
11.	<p>Kindly add Motla Consulting Engineers (specifically George Lotter) via email rbadm@motla.co.za to your database. We are electrical consulting engineers.</p>	<p>George Lotter Electrical Engineer</p> <p>Motla Consulting Engineers (Pty) Ltd.</p> <p>Email: 29-08-2017</p>	<p>George Lotter of Motla Consulting Engineers has been registered as an I&amp;AP on the project's database.</p>
12.	<p>The DEA will request comments from DWS on the Scoping and EIA reports. We will submit our comments to the environmental consultant and to DEA directly.</p>	<p>Masala Nemubura Environmental Officer</p> <p>Department of Water and Sanitation</p> <p>Meeting: 30-08-2017</p>	<p>Comments on the draft SR dated 17-09-2017 were received from the DWS.</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
13.	It is recommended that you consult Mondi. Mondi has previously blocked activity on the proposed project site. I have noted that air quality has been identified as least preferable in terms of the selected site. Air pollution works both ways and one would need to take cognisance of the air pollution impacts that Mondi would have on the project site and determine what mitigation measures could be implemented to reduce these impacts.	Franz Schmidt SHREQC Manager  Richards Bay Alloys  Public Meeting: 31-08-2017	A one-on-one meeting was held with Candice Webb the Environmental Manager at Mondi on 30 August 2017. Potential air quality impacts caused by Mondi have been raised and Eskom has taken note of these.
14.	The site is in close proximity to Mondi. Have any incompatibilities with those land users been assessed (i.e. the pulp mill).	Sandy Camminga Chairperson – EIA Committee RBCAA  Meeting: 31-08-2017	A meeting has been held with Mondi and further discussions will be held in this regard and comments on the DSR are expected to be submitted.
15.	The presentation should have included more detailed information on the power plant processes.	Sharin Govender PM: Environmental Management  City of uMhlatuze Municipality  Meeting: 31-08-2017	The presentation provided a summary of the infrastructure required for the power plant and the technology being investigated. Detailed information is presented within the Scoping Report.
<b>2.1. Visual Impacts &amp; Site Location</b>			
16.	Is the proposed site the same even that Pulp United undertook an EIA on?	Candice Webb Environmental Manager'  Mondi	The project is proposed on Portion 2 and Portion 4 of Erf 11376, the same site that was considered for the Pulp United plant.
17.	Mondi's primary concern is the potential impact the power plant or power plant processes would have on the quality of our product. Only potable water is utilised within our		Mondi's concern regarding the potential impacts to their product considering the location of the warehouse in relation to the proposed power plant site is noted. Eskom and the air

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	process to ensure the brightness and whiteness of our product. The proposed power plant will face Mondi's warehouse and this is a concern for us.	Meeting: 30-08-2017	quality specialist will consider this concern in their layout design, and the most optimal layout will be provided in the Draft EIA.
18.	What will the power plant's visual impact be? The power plant's proximity to the John Ross Highway must be considered.	Frans van der Walt  QS2000 Plus (Quantity Surveyors & Project Managers)	Afzelia Environmental Consultants have been appointed to undertake a Detailed Visual Impact Assessment. The Scoping report provides detail on the visual receptors in the area that would be impacted by the development. At this stage, the visual impact is considered to be medium-low subject to a detailed assessment being undertaken in the EIA phase.
19.	This power plant will be a Major Hazardous Installation (MHI). The location of the power plant in close proximity to the John Ross Highway, a critical arterial to the Richards Bay Port, must be considered.	Public Meeting: 31-08-2017	A MHI assessment is being conducted and will form part of the EIA report. The potential impact of the facility on the John Ross Highway will be considered in the MHI assessment.
20.	I am not supportive that Phase 1D is being considered as the site for the development of the proposed power plant due to the potential visual impacts and that it will be a MHI. This project will have a negative impact on the proposed Richards Bay Port expansion. More appropriate sites should be considered, for example, sites within Phase 2 of the IDZ might be better suited for the development of a power station.		Afzelia Environmental Consultants have been appointed to undertake a Detailed Visual Impact Assessment. The Scoping report provides detail on the visual receptors in the area that could be impacted by the development. At this stage, the visual impact is considered to be medium-low subject to a detailed assessment being undertaken in the EIA phase. Eskom identified six potential sites within the greater Richards Bay area for the development of the proposed power plant. Four sites were taken forward into an environmental screening study. The process followed in determining which sites were most preferred is outlined in Chapter 3 of the Scoping report. Phase 1D is considered to be the most preferred alternative for consideration in the environmental screening and site selection study. The area surrounding the project site is inclusive of open fields, industrial activities, and pockets of commercial activities. The proposed development is,

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			therefore, compatible with the surrounding land uses. No fatal flaws from an environmental perspective were identified. Mitigation in terms of air quality through appropriate design of the facility will however be required.
21.	That specific location concerns me. A much better site would be next to the Athene Transmission Station in Empangeni because of its proximity to the Sasol pipeline. The power station can also connect to the Athene Transmission Station. This site would make more sense as there would be limited visual and air quality impacts.		As Savannah Environmental indicated in the presentation, Eskom commissioned a Site Screening and Selection Study to identify the most preferred site for the power plant. The Site Screening and Selection Study details the methodology used and the factors considered in selecting this site as the most preferred alternative. The Scoping report provides further details in this regard.
<b>2.1. Project Need and Desirability</b>			
22.	What is the reason for developing this project? It seems as though 3000MW is more than Richards Bay requires in the future with the development of other energy related projects.	Franz Schmidt SHREQC Manager  Richards Bay Alloys  Public Meeting: 31-08-2017	The purpose of the project is to reduce transmission losses from generation facilities supplying KwaZulu-Natal, by having a generation centre in KwaZulu-Natal. Also, the project is planned to aid in reducing Eskom's carbon footprint per Unit of electricity produced, as power plants using natural gas emit approximately half the carbon of coal-fired power plants while using considerably less water, thus supporting Government's commitment to reduce carbon emissions. It should be noted however, that Eskom are still undertaking feasibility studies to determine whether the development of such a power plant will be viable. Eskom will decide whether to proceed with the implementation of this power plant once the permitting requirements and regulatory compliance requirements have been met.
23.	Is the intention of this power plant to be part of the primary generation of Eskom or will it be a standby plant that will	GA Lotter Engineer	The plant is a mid-merit plant that will operate for 16 hours per day for 5 days per week.

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	only be used if necessary. Is the plant going to run fulltime or on a standby basis?	Motla  Public Meeting: 31-08-2017	
<b>2.1. Project Technical Details</b>			
24.	Why is the gas pipeline being assessed under a separate EIA process?	Candice Webb Environmental Manager  Mondi  Meeting: 30-08-2017	Eskom will need to enter into a gas sales agreement (GSA) with potential gas suppliers. The entity supplying the gas will be responsible for undertaking the EIA for the gas pipeline. However, the pipeline inside the power plant or at the boundary fence (connection point) of the gas power plant will be assessed in this EIA. Eskom is in discussions with Transnet and other stakeholders to determine possible routing options for the gas pipeline.
25.	Where will the fuel for this power plant be sourced from? Will the fuel be supplied via the Mozambique gas pipeline, via LNG containers being delivered, via an FSRU or a land-based storage facility? How can an EIA for the gas power plant be undertaken without having completed an EIA for the fuel pipeline?  Details pertaining to the supply of fuel must be included in this EIA assessment as this aspect of the project will have a monumental impact on transportation routes, safety, etc. One has to take fuel supply into consideration in this EIA.	Dion Wilmans Director  Richards Bay Gas Power 2  Public Meeting: 30-08-2018	The application for environmental authorisation only applies to the power plant itself. In terms of Eskom's mandate, it is not authorised to develop or construct gas pipelines. Eskom is a power generation, transmission and distribution company. A partnership with the relevant service provider would need to be established to determine the routing of the pipeline and the supply of gas. This partnership will be responsible for the permitting of the pipeline and gas supply and storage. It should be noted, however, that Eskom considered aspects relating to fuel supply when the site was selected. The project is being developed in phases and the project's operational requirements will be met when all the phases and aspects of the project have been considered.  Eskom has experience from two plants requiring the supply of fuel in the Western Cape and therefore, understand the

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			requirements and what the impacts are. Furthermore, Eskom has in-house knowledge, expertise and capability to mitigate and manage those impacts.
26.	I assume that this power plant will start up on diesel instead of gas. Will the plant be fully operational on diesel fuel alone?	Franz Schmidt SHREQC Manager  Richards Bay Alloys  Public Meeting: 31-08-2017	The primary fuel stock for this power plant is gas. The plant will have dual fuel capabilities; however, the intention is to have the power station supplied by gas full time. The plant will only operate on diesel as a backup for emergency situations.
27.	The same site was subjected to an EIA for Pulp United. A number of environmental challenges were identified during that process. I am glad that you are aware of these challenges. Too often we find that outside consultants are unaware of other environmental assessments undertaken in the area.  What is the full extent of that site? My concern is that there will not be sufficient space to develop the project due to the environmental sensitivities identified on the site.	Frans van der Walt  QS2000 Plus (Quantity Surveyors & Project Managers)  Public Meeting: 31-08-2017	Savannah Environmental are fully aware of the challenges faced with regards to the Pulp United EIA that was previously conducted. Phase 1D is approximately 107ha in extent. The project study site is 71ha, as the off-set area has to be avoided. The footprint of the power plant is likely to be less than 71ha depending on the environmental sensitivities on the site. The entire power plant may require approximately 60ha.
28.	The gas pipeline will require an EIA. The pipeline route is critical as it may impact the Richards Bay Port expansion project.		A partnership needs to be established with other state-owned companies or with private companies to establish the gas pipeline. This entity will be responsible for the permitting required for the pipeline. More work needs to be undertaken in this regard from a technical and commercial point of view.
29.	Where will the product be stored and where is your strategic reserve going to be stored. This needs to be considered within the EIA. Is the storage going to be included within the		The current planning is that only diesel will be stored on the site.

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	footprint that you are referring to or will it be at another location?		
30.	My sentiment is that this EIA cannot be approved until you have clarified the routing of the transmission lines and the pipelines.		Comment noted.
31.	Why are the EIAs for the various project components being undertaken separately?	Retha van Niekerk Director  Urban Plan  Public Meeting: 31-08-2017	<p>Eskom is unable to undertake the EIA for the fuel supply pipeline as the gas supplier will conduct this. A partnership needs to be established with other state-owned companies or with private companies to establish the gas pipeline. This entity will be responsible for the permitting required for the pipeline. More work needs to be undertaken in this regard from a technical and commercial point of view. Eskom's transmission department will be initiating the EIA for the transmission lines which will commence once a consultant has been appointed (envisaged to be in the fourth quarter of 2017). Once this is completed the EIA for the powerlines will commence. It should be noted that Eskom is not developing the power plant in isolation from its other critical components. Consultation with various stakeholders and state-owned companies are ongoing.</p> <p>In terms of the project lifecycle for generation project, the Transmission EIA lags the facility EIA (generation). Eskom's transmission department will be initiating the EIA for the transmission lines which will commence once a consultant has been appointed (envisaged to be in the fourth quarter of 2017). Desktop and conceptual studies were undertaken from Eskom's transmission, generation and technical engineering departments. This information was used to inform the Site</p>

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			<p>Screening and Selection Study. Eskom's transmission department will be initiating the EIA for the transmission lines which will commence once a consultant has been appointed (envisaged to be in the fourth quarter of 2017). Eskom has to select three corridors and a few substations close to the site are being considered. Also, Eskom is taking due consideration of future developments planned within the IDZ. Eskom is working very closely with the IDZ as well as Transnet and other key state-owned companies. It is expected that the Scoping Report for the transmission lines will be available in due course.</p>
32.	<p>This project must take cognisance of other developments such as the relocation of the airport and the expansion of the port. With all due respect to Eskom, we have been involved in EIAs in Richards Bay where the same mistake was made. Applicants separated the transmission lines from the substation EIAs and then it failed. It is tax payers' money that Eskom is wasting by using this approach. Rather undertake a Scoping Study on the preferred sites and investigate more sites and present realistic solutions. Undertaking an EIA on this site is premature if you do not know what your source of supply is and where your source of supply is going to be stored. The UVS site would have been optimal for this development but was dropped to environmental concerns.</p>	<p>Frans van der Walt QS2000 Plus (Quantity Surveyors &amp; Project Managers) Public Meeting: 31-08-2017</p>	<p>Eskom is not working in isolation. Key stakeholders and government departments are being consulted and we are aware of other developments taking place in Richards Bay.</p> <p>It should be noted that some of the sites considered within the Site Screening and Selection Study were considered no-go areas for development due to water related issues. The UVS site (Site 4a) is not preferred from an environmental perspective as the impacts on the aquatic ecology and wetlands may present an impact of high significance in these areas which cannot be avoided.</p>
33.	<p>The City of uMhlatuze Municipality is concerned that this project is not being planned holistically as the gas pipeline, the LNG import terminal and the liquefaction plant are excluded from this EIA. It is the Municipality's sentiment that</p>	<p>Sharin Govender PM: Environmental Planning</p>	<p>This project is being developed in a development phased approach where the project is considered holistically. The pipeline and transmission power lines are being considered by Eskom even though separate EIA processes are being undertaken for these project components. Eskom is in the</p>

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	<p>this project needs to be dealt with from a cumulative perspective.</p>	<p>City of uMhlatuze Municipality</p> <p>Meeting; 31-08-2017</p>	<p>process of appointing an EIA consultant to undertake the environmental assessment required for the transmission line infrastructure. This process will not lag far behind the EIA for the power plant.</p> <p>With regards to the gas pipeline, Eskom's commodities department is responsible for sourcing potential gas supply through various stakeholders. The gas supplier will be responsible for the permitting requirements of this project component, therefore a separate EIA will be undertaken by the entity responsible for the gas. It must be noted that Eskom will not present a business case for this power plant if all the project components are not in place.</p>
<p>34.</p>	<p>The Richards Bay Clean Air Association is concerned that there is no gas available to supply a gas power plant in Richards Bay. We will not support a gas power plant which will be operated using diesel because there is no gas available.</p>	<p>Sandy Camminga Director</p> <p>Richards Bay Clean Air Association</p> <p>Meeting: 31-08-2017</p>	<p>The Richards Bay CCPP will be operated on gas with diesel as a back-up in case there is an emergency situation. It would not be feasible to operate the power plant solely on diesel as this is too expensive and harmful to the environment. Eskom is currently engaging with various stakeholders to source gas. There is a possibility that gas could be imported from Mozambique via a pipeline.</p>
<p>35.</p>	<p>There is no EIA process underway for the gas supply. My sentiments are that the EIA for the power plant is being undertaken prematurely. The critical component of this project is the supply of gas and this need to be put in place prior to the power plant being approved. We do not want a gas power plant operating on diesel in Richards Bay. Will the Air Quality Impact Assessment investigate the worst-case scenario which is a power plant that runs entirely on diesel? This is an assumption that the Richards Bay Clean Air</p>	<p>31-08-2017</p>	<p>Eskom's governance will not approve the business case for this power plant if the fuel source is not available. Eskom is mandated to source the gas from potential gas suppliers and Eskom would be unable to proceed with the project if the gas is not sourced. Eskom will not run this plant on diesel as its primary source of fuel. The power plant will operate on a mid-merit basis of 16 hours a day for 5 days a week on gas. It will not operate at baseload, although the EIA will assess the impacts for both mid-merit and baseload cases.</p>

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	Association is going to make until there is an LNG facility in Richards Bay.		
36.	It is understood that the gas pipeline, the LNG import terminal and the liquefaction process plant will be operated by different entities. It is important to understand that the National DEA is in the process of undertaking a Strategic Environmental Assessment on the gas network and it is assumed that this assessment will include LNG aspects. However, it is imperative that I&APs are provided with a holistic understanding of this project.	Sharin Govender PM: Environmental Management  City of uMhlatuze Municipality  Meeting; 31-08-2017	Eskom is engaging with the Department of Energy on an ongoing basis. Eskom forms part of the committee that is working on the SEA.
37.	Is this plant considered a Major Hazardous Installation (MHI)?	Sandy Camminga Director  Richards Bay Clean Air Association  Meeting: 31-08-2017	The power plant is considered to be a MHI and an MHI assessment will be undertaken in the EIA phase.
38.	What kind of waste would be generated by the power plant?	Issue raised at the meeting held with the Richards Bay IDZ ERC Committee on 31-08-2017	The waste which would be generated would include sewage, waste from the reverse osmosis plant.
39.	Phase 1D consists of 3 portions and the portion being investigated are Portion 2 and Portion 4 of Erf 11376. Portion 3 of Erf 11376 will likely be traversed by infrastructure such as access roads. It must be noted that any infrastructure linking to the site would need to bypass the off-set area. We	Sandy Camminga Director  Richards Bay Clean Air Association	The detailed layout will be presented in the EIA report. Eskom will ensure that the offset areas are avoided.

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	would need an understanding of what infrastructure will need to traverse Portion 3 of Erf 11376.	Meeting: 31-08-2017	
<b>2.1. Site Selection Process</b>			
40.	How were the sites selected? I am not entirely convinced that the other three sites options which were assessed were even viable to begin with.	Sandy Camminga Director  Richards Bay Clean Air Association  Meeting: 31-08-2017	<p>KG: The sites along the coast were chosen based on the technology that Eskom wanted to use for the power plant, which was wet cooling technology and planned to use sea water for cooling. The two inland sites were chosen based on their availability for power generation following discussions with the landowners.</p> <p>Eskom's project selection criteria does not consider technology only. Transmission studies and the cost of the project are considered as well. Eskom undertook a pre-site selection screening exercise prior to these four sites being selected. Richards Bay is identified as the best locality for this project as the Department of Energy (DoE) plans to implement a gas-to-power programme in Richards Bay which would include the supply of gas to the port. Three of the sites were not selected based on cost factors. Eskom commissioned an Environmental Screening and Site Selection Study which was undertaken by Savannah Environmental prior to the commencement of the Scoping Study. The site selection report was concluded and approved in March 2017.</p>
41.	Was there any consultation with the City of uMhlathuze Municipality during the Environmental Screening and Site Selection Study.		The City of uMhlathuze Municipality was consulted during the Environmental Screening and Site Selection Study. It is Eskom's intention to continue to liaise and engage with the Municipality during the EIA process and during the entire life cycle of the project.

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
42.	It is true that site 4a, 5 and 6 are deemed unfeasible for various reasons. These sites should not be presented as alternative sites in the EIA as they are deemed unfeasible.	Sharin Govender PM: Environmental Planning  City of uMhlatuze Municipality  Meeting; 31-08-2017	<p>These sites were assessed in the Environmental Screening and Site Selection Study that was undertaken prior to the EIA process being initiated. Site 4a, 5 and 6 are not presented as alternative sites in the Scoping report.</p> <p>It is important to demonstrate how the site was selected prior to the Scoping study being initiated, therefore, the process undertaken for the Environmental Screening and Site Selection Study is detailed in the Scoping Report. A motivation as to why these sites were not preferred has been included in the Scoping report.</p>
43.	With all due respect you cannot present unfeasible sites as alternative sites. It is disingenuous if you present four sites as alternatives which are deemed unfeasible from the commencement of this process.		<p>There are two processes which were undertaken prior to the Scoping study being undertaken. First, Eskom undertook an assessment of six potential sites from an engineering and cost perspective. Technical and landowner issues reduced the potential sites to four. Second, Savannah Environmental was commissioned to undertake an Environmental Screening and Site Selection Study. Four sites were assessed within this study. The result of this study was that Site 7 is considered to be the most preferred alternative considered within this Environmental Screening and Site Selection Study. No fatal flaws from an environmental perspective were identified at this stage in the process. A Scoping and EIA study are now being undertaken on Site 7. The other sites are not being considered as alternative sites within the EIA.</p>
44.	It is important to note within the Scoping and EIA report that an initial Environmental Screening and Site Selection Study was undertaken and that the sites assessed are not being assessed within the EIA.		<p>The Environmental Screening and Site Selection process is detailed in Chapter 3 of the Scoping report.</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
<b>2.1. Grid Connection Infrastructure</b>			
45.	Where will the proposed power station connect to the Eskom grid? The transmission lines will be subject to an EIA. Why is this aspect of the project not included within this EIA?	Frans van der Walt  QS2000 Plus (Quantity Surveyors & Project Managers)  Public Meeting: 31-08-2017	Eskom has undertaken desktop level studies in relation to the transmission lines. Three corridor alternatives have to be selected and assessed within an EIA. This project is being developed in a phased approach and the permitting of the transmission lines will be undertaken once Eskom has completed the required options analysis and technical studies with respect to the transmission lines. Since the current site is the only site deemed most feasible, all Transmission corridors being investigated are leading to this site.
46.	Do you have your plans in place already in terms of where the application area will be?	Retha van Niekerk Director  Urban Plan  Pubic Meeting: 31-08-2017	Transmission studies have been undertaken on a desktop level, and some corridors were identified.
<b>2.1. Land Claims</b>			
47.	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	Mr N Mdluli Manager: Information and Records Management  Commission of Restitution of Land Rights  Letter: 22-08-2017	It is noted that the Commission of Restitution of Land Rights' records indicate that no claims for restitution in terms of the provisions of the Restitution of Land Rights Act, 22 of 1994 (as amended) have been lodged in respect of Portion 2 and 4 of Erf 11376 located within Richards Bay, at this stage.

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	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.		
<b>2.1. Air Navigation Impacts</b>			
48.	<p>Interest in the project: Aviation safety with regards to traffic operating with the Richards Bay airspace.</p> <p>Questions, views or concerns: 1) Position of the proposed CCPP 2) Height of the tallest structure 3) Footprint of the CCPP</p>	<p>Oscar Nzima Richards Bay Airport Manager</p> <p>Indiza Airport Management</p> <p>Reply Form: 28-08-2017</p>	<p>The proposed CCPP is to be developed on Portion 2 and 4 of Erf 11376 which is located in the Richards Bay Industrial Development Zone.</p> <p>The tallest structures will be between 40 and 60 meters and includes the bypass stack and the exhaust stack for the CCPP.</p> <p>The development footprint of the CCPP is approximately 60ha in extent.</p>
49.	My interest in this project is the potential impact of the project on aviation. The IDZ is positioned in line with the runway of the Richards Bay Airport. It is approximately 4.5 miles from the runway threshold. Any development in line with the runway might affect aircraft operation and the decent gradient onto the runway. From an advisory point of view, Eskom needs to take this into consideration and consult the Civil Aviation Authority (CAA) so that an obstacle evaluation assessment can be undertaken.	<p>Oscar Nzima Richards Bay Airport Manager</p> <p>Indiza Airport Management</p> <p>Public Meeting: 31-08-2017</p>	Eskom has received correspondence from the CAA. Eskom is liaising with Lizell Stroh, Obstacle Specialist – Aviation Obstacle and GIS, and she has advised that the application for obstacle evaluation assessment should be submitted once the project is in an advanced stage, once the heights have been determined.
<b>2.1. Impacts to Agricultural Potential</b>			
50.	<p>1. GENERAL</p> <p>1.1. The Provincial Department of Agriculture and Rural Development: Agriculture Resource Management Land Use Regulatory Unit acknowledges receipt of the above mentioned application.</p>	<p>P. Mans Deputy Director: Land Use Regulation</p> <p>KwaZulu-Natal Department of</p>	<p>COMMENTS ON PROPOSAL:</p> <p>1. It is noted that the development of the proposed CCPP will have limited impact on the agricultural land of the Province. The agricultural potential of the project site has also been identified by the Soils and Agricultural Potential Scoping Study (<b>Appendix H</b>) as Class III land, which is</p>

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	<p>1.2. The submitted application requests that the Provincial Department of Agriculture and Rural Development to provide inputs on the Environmental Impact Assessment Process (EIA).</p> <p>1.3. The EIA is conducted as Eskom proposes to develop a Combined Cycle Power Plant (CCPP) and associated infrastructure.</p> <p>2. BACKGROUND</p> <p>2.1. The proposed CCPP will be located on Portion 2 and Portion 4 of Erf 11376 in the Richards Bay Industrial Development Zone (IDZ) Phase 1D.</p> <p>2.2. Portion 2 and 4 are located 6km south west of Richards Bay and 4km south west of Alton.</p> <p>2.3. Portion 2 and 4 are within uMhlatuze Town Planning Scheme and as part of uMhlatuze Local Municipality.</p> <p>2.4. Portion 2 and 4 are 71 hectares in total combined.</p> <p>2.5. The proposed project is aimed at reducing transmission losses from generation facilities supplying KwaZulu-Natal.</p> <p>2.6. The project is also aimed in reducing Eskom's carbon footprint per unit of electricity produced as power plants using natural gas emit approximately half the carbon of coal-fired power plants while using considerably less water.</p> <p>2.7. CCPP will use a gas turbine generator to generate electricity and the waste heat will be used to make</p>	<p>Agriculture and Rural Development</p> <p>Letter: 01-09-2017</p>	<p>considered to pose moderate limitations to agriculture with some erosion hazard, and would require special conservation practice and tillage methods for agricultural production.</p> <p>2. The proposed development has an impact on surface and ground water and soil and land capability, however the significance of the impacts on surface and ground water and soils and land capability will be considered, assessed and quantified during the EIA Phase. It is noted that the proposed project is within the well-developed site that has been permanently transformed. The project site will be subjected to further detailed assessments during the EIA phase in order to confirm that agricultural potential of the site will not be impacted upon.</p> <p>3. The footprint of the project site is approximately 71 ha, which is considered to be sufficient to accommodate the CCPP with a development footprint of ~60ha. Layout design and planning will be undertaken by the developer will consider the environmental sensitivities and constraints in order to avoid or minimise impacts on sensitive environmental features. It must however be noted that a biodiversity offset area is located directly adjacent to the project site for the conservation of the vegetation and coastal wetland system present within the project site and the surrounding area.</p> <p>4. Maintenance and operational requirements to ensure that the development will not have a detrimental impact on the environment will be included as part of the Environmental Management Programme within the EIA phase. This will</p>

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3.	<p>steam to generate additional electricity via a steam turbine.</p> <p>2.8. Associated infrastructure will include the following:</p> <ul style="list-style-type: none"> <li>» Gas turbines</li> <li>» Heat recovery steam generators</li> <li>» Steam turbines for the generation of additional electricity</li> <li>» Condensers for conversion of steam back to water</li> <li>» Bypass and exhaust stacks</li> <li>» Water treatment plant for treatment of potable water and production of demineralized water</li> <li>» Water pipeline and tanker</li> <li>» Dry cooled systems or once-through cooling system technology</li> <li>» Closed fin fan coolers to cool lubrication oil for the gas and steam turbines</li> <li>» A gas pipeline and gas pipeline supply conditions process facility</li> <li>» Diesel offloading facility and storage tanks</li> <li>» Ancillary infrastructure including access roads, warehousing and buildings, storage facilities, generators and 132kV and 400kV switchyards.</li> <li>» A power line to connect the Richards Bay CCPP to the national grid for the evacuation of generated electricity.</li> </ul> <p>3. COMMENTS ON PROPOSAL</p>		<p>ensure the proper operation and maintenance of the water treatment plant.</p> <p>5. As part of the EIA Phase an Environmental Management Programme will be compiled to include all the appropriate and required mitigation measures to ensure that the construction, operation and decommissioning of the Richards Bay CCPP is undertaken such that it will not lead to detrimental impacts on the environment.</p> <p>6. It is noted that information regarding the pipelines to be constructed as part of the project needs and the location thereof needs to be made available. However, the gas pipeline associated with this development will be undertaken as part of a separate application for environmental authorisation.</p> <p>7. Impacts on wetlands within the project site will be investigated in detail by a qualified specialist during the EIA phase. The outcome of the assessment of impacts on wetlands will be included in a Wetland and Aquatic Ecology Impact Assessment Report as well as in the environmental impact assessment report (EIAR).</p> <p>RECOMMENDATIONS</p> <ul style="list-style-type: none"> <li>» A detailed EIA Report will be submitted to the KwaZulu-Natal Department of Agriculture and Rural Development in due course. The requirements stated by the Department will be considered during the compilation of the EIA Report and EMPr.</li> </ul> <p>CONCLUSION</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>3.1. The proposed development has limited impact on reducing available agricultural lands within the Province as it is within an area that is already been under local municipality control.</p> <p>3.2. Even though the proposed development is foreseen as the project that will highly have impact on surface and ground water and impact on soil and land capability.</p> <p>3.3. The proposed project is within the well-developed site, which is an area that is permanently transformed so there are no foreseen agricultural activities that will be impacted upon by the proposed development.</p> <p>3.4. Generally, it is important that the available land is enough for all proposed operations to avoid possible negligence of important parts that might lead to greater degradation of natural resources within the area.</p> <p>3.5. Proper maintenance is essential as to meet discharge standards of water treatment plant</p> <p>3.6. Environmental management plan for such projects is important. The office notes that this is still the beginning of the whole process.</p> <p>3.7. There should be a correct allocation of pipes in terms of distances from the rivers.</p> <p>3.8. Wetlands also need to be observed and delineated as to avoid possible pollution.</p> <p>4. RECOMMENDATIONS</p>		<p>» It is noted that the KwaZulu-Natal Department of Agriculture and Rural Development supports the development of the Richards Bay CCPP within the proposed project site. A detailed EIA Report will be submitted to the Department for their consideration and comment.</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>4.1. A detailed report that is still to be submitted to this office, it is important that the following areas be addressed as to have a sound project view:</p> <p>4.1.1.Type of dam and method that will be used for construction of a dam for the proposed water treatment plant.</p> <p>4.1.2.Types and construction methods of underground tanks for fuel tanks.</p> <p>4.1.3.Clarity where the gas will be sourced and its disposal plan.</p> <p>4.1.4.Water Use License Application is lodged and addressed as per National Water Act, 1998 (Act No 36 of 1988) for the proposed development.</p> <p>4.1.5.Proper mitigation measures are implemented and adhered to.</p> <p>4.1.6.Proposed development and associated infrastructure is not affecting our Natural Resources which is ground water, surface water and soils.</p> <p>4.1.7.Conservation of Agricultural Resources Act 43 of 1983 should be taken into consideration with application to Paragraph 6 and 18 Subsection 1.</p> <p>4.1.8.Re-vegetating and rehabilitating plan of the areas that will be affected by the construction phase.</p> <p>4.1.9.Proper storm water management plan is also adhered to as to prevent possible soil erosion.</p>		

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	<p>4.1.10. The office request that detailed information and a report is sent to us with information that will clearly indicate:</p> <ul style="list-style-type: none"> <li>» Depth of ground water on site</li> <li>» Distance from project site to the coast</li> </ul> <p>5. CONCLUSION</p> <p>5.1. Please be advised that the Provincial Department of Agriculture and Rural Development: Land Use Regulatory Component's is in support of the project but the approval is on basis of submission of a detailed report with a detailed environmental management programme.</p>		
<b>2.1. Comments from the National Department of Environmental Affairs</b>			
51.	<p>The draft Scoping Report (SR) dated August 2017 and received by this Department on 22 August 2017 refers.</p> <p>This Department has the following comments on the abovementioned application:</p> <ul style="list-style-type: none"> <li>» <u>Public Participation Process (PPP)</u> <ul style="list-style-type: none"> <li>o Please ensure that all issues raised and comments received during the circulation of the SR from registered I&amp;APs and organs of state which have jurisdiction (including this Department's Biodiversity Section and Air Quality Section: Contact person Ms Olga Chauke at 0123999161 ochauke@environment.gov.za or Kent</li> </ul> </li> </ul>	<p>Olivia Letlalo Control Environment Officer: Strategic Infrastructure Developments</p> <p>Thando Boo: Environmental Officer Specialised Production: Strategic Infrastructure Developments</p> <p>Department of Environmental Affairs</p>	<p><u>Public Participation Process</u></p> <ul style="list-style-type: none"> <li>» All issues raised and comments received by I&amp;APs have been collated and responded to in the Comments and Responses Report (<b>Appendix C8</b>). Copies of the Scoping Report were submitted to Wilma Lutch of the DEA's Biodiversity Section and Thulie Khumalo of the DEA's Air Quality Management Directorate on 21 August 2017 (refer to <b>Appendix C4</b> for evidence of this submission). Follow-up emails requesting comments from Olga Chauke and Kent Buchanan were sent on 20 September 2017, following receipt of the DEA's letter dated 15 September 2017.</li> <li>» Proof of correspondence with I&amp;APs and proof of attempts made to obtain comments are contained in <b>Appendix C4 and C5</b> of the final Scoping Report.</li> </ul>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>Buchanan at 0123998868 or kbuchanan@environment.gov.za) in respect of the proposed activity are adequately addressed in the final SR.</p> <ul style="list-style-type: none"> <li>o Proof of correspondence with the various stakeholders must be included in the final SR, should you be unable to obtain comments, and proof should be submitted to the Department of attempts that were made to obtain comments.</li> <li>o The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</li> </ul> <p>» <u>Description of the identified Alternatives</u></p> <ul style="list-style-type: none"> <li>o Please provide a description of the identified alternatives for the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives will have on the environment and on the community that may be affected by the activity as per Appendix 2 of GN R.982 of 2014 as amended.</li> <li>o Alternatively, you should submit written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 2.</li> </ul>	<p>Letter: 15-09-2017</p>	<p>» The Public Participation Process undertaken for the Richards Bay CCPP, is included in Chapter 4: Approach to undertaking the Scoping Phase, is in line with Regulations 39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended in April 2017.</p> <p><u>Description of the identified Alternatives</u></p> <ul style="list-style-type: none"> <li>» All alternatives which were assessed as part of the Scoping phase are included in Chapter 3, Section 3.4 of the final Scoping Report. Alternatives considered as part of the project included technology alternatives and the 'do-nothing' alternative. The advantages and disadvantages expected to be associated with the development of the Richards Bay CCPP is included in Chapter 3, Section 3.2 and chapter 6 of the final Scoping Report.</li> <li>» A motivation for not assessing site alternatives is provided in Chapter 3, Section 3.4.1.</li> <li>» Appendix 2 of GN R326 has been fully considered and complied with within the Scoping Report, which was submitted for review and the final Scoping Report submitted to DEA for their consideration. At the start of each Chapter, requirements as per Appendix 2 of the 2014 EIA Regulations are included to illustrate in each Chapter which requirements have been met. Please refer to the following sections in the report which indicate the requirements that have been met in each chapter and where in the chapter the requirement is addressed; Sections 1.1, 2.1, 3.1, 4.1, 5.1, 6.1, 7.1 and 8.1.</li> </ul>

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

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	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.		24 F of the National Environmental Management Act, Act No 107 of 1998, as amended.
<b>2.1. Water Uses and Water Use License Application Procedure</b>			
52.	Were wetland delineation studies undertaken?	Masala Nemubura Environmental Officer  Department of Water and Sanitation	Desktop Wetland and Aquatic Ecology and Geo-hydrology studies have been undertaken and are appended to the Scoping Report. A wetland delineation study will be undertaken during the EIA phase.
53.	What are the plans to compensate for the expected loss of water features on the site?	Meeting: 30-08-2017	A preliminary layout would be looked at in terms of where the infrastructure would be placed. It is our intention from an environmental perspective to try and avoid and minimize impact if we can on the water features. The layout will be configured to avoid water features. In areas where this is not possible we will recommend mitigation measures.  Eskom has met with KZN Ezemvelo Wildlife to understand their concerns and some of the work regarding the biodiversity offset agreement between them and the Municipality.
54.	This meeting will be considered a pre-application meeting required as part of the Water Use License (WULA) submission process. A Water Use License will be required to be submitted. The conceptual designs can be submitted with the WULA. The detailed designs can be submitted at a later stage once they are finalized.		The WULA is planned to be submitted during the EIA phase. The WULA is planned to be submitted once Eskom has completed the conceptual design in October or November 2017.
55.	The Integrated Water and Waste Management Plan (IWWMP) document provides details of what information is		The EAP is aware of the requirements that need to be met in order to submit the WULA.

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	required to be submitted to DWS as part of the WULA. I will send this to you.		
56.	You will be required to submit a letter from the DEA acknowledging that an application for environmental authorisation has been lodged as part of the WULA.		The DEA's acknowledgment letter will be included in the WULA.
57.	The maximum timeframe for the issuing of a WULA is 300 days.		It is noted that the WULA will take a maximum of 300 days to process.
58.	<p>Reference is made to the above-mentioned document received by the Department of Water and Sanitation (Department) on 23 August 2017.</p> <p>This Department has the following comments with regards to the proposed development which must be addressed and form part of subsequent environmental assessment process: The final document must include responses to issues raised which must be submitted to this Department for further review and comments.</p> <p><b><u>A) SPECIFIC COMMENTS</u></b></p> <p>1. Water Uses and Water use Authorisations</p> <p>1.1. It is indicated on page 3 of the SR that the proposed facility will include the following infrastructure:</p> <p>a) Water Treatment Plant for the treatment of potable water and the production of demineralised water;</p>	<p>Ms Nokwanda Mkhize Institutional Establishment</p> <p>Department of Water and Sanitation</p> <p>Letter: 18-09-2017</p>	<p><u>Specific Comments</u></p> <ul style="list-style-type: none"> <li>» It is noted that the Applicant is required to apply for a Water Use Authorisation (WUA) in terms of Section 21 of the National Water Act, No. 36 of 1998 (NWA) prior to commencement due to the development of infrastructure planned to take place within a watercourse.</li> <li>» It is noted that the Department requires proof of a Service Level Agreement with the Water Service Authority for the development. The Service Level Agreement or an equivalent will be included in the EIAR. It is also noted that taking water from a water resource constitutes a Section 21 water use and must be authorised accordingly.</li> <li>» A layout map and environmental sensitivity map of the facility will be provided in colour in the EIAR for the Department's consideration.</li> <li>» It is noted that any activity within a 500m radius from the boundary of a wetland requires a water use licence in terms of Section 21 of the NWA.</li> <li>» During the EIA phase a Wetland and Aquatic Impact Assessment will be undertaken to delineate all wetlands</li> </ul>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>b) Storage facilities for fuel, gas, diesel and chemicals;</p> <p>c) Water storage facilities for process water and firefighting purposes;</p> <p>d) A gas pipeline and a gas pipeline supply conditioning process facility;</p> <p>e) Internal roads.</p> <p>1.2. Reference is made to Table 4.1 of the Listed Activities on page 42 of the SR:</p> <p>a) GN 327, Activity 12: The development of infrastructure or structures with a physical footprint of where such development occurs within a watercourse and;</p> <p>b) GN 327, Activity 19: The infilling or depositing of material of more than 5 cubic meters into a watercourse.</p> <p>The above statements indicate that the proposed development activities constitute water uses. The Applicant is therefore required to apply for a Water Use Authorisation (WUA) in terms of Section 21 of the National Water Act, No. 36 of 1998 (NWA) prior to commencement.</p> <p>1.3. According to page 31 of the Scoping report it is indicated that the source of water for the proposed development will be from the uMhlathuze Municipal Water Works. It is further indicated that "no agreement or confirmation for the above</p>		<p>located within the project site. The Department of Water and Sanitation's guideline and other applicable regulatory tools will be applied.</p> <ul style="list-style-type: none"> <li>» The Wetland and Aquatic Ecology Impact Assessment will determine the impacts that will be posed by the proposed development on the wetlands located within the project site. The study will be undertaken during the EIA phase.</li> <li>» An Environmental Management Programme, including appropriate mitigation measures for the management of impacts on wetlands will be compiled during the EIA Phase.</li> <li>» It is noted that the Applicant must identify all water uses applicable to the activity in terms of Section 21 of the NWA and ensure that all applicable water uses are authorised. A meeting was held with the Department of Water and Sanitation on 30 August 2017 as part of the process to obtain the required water use license.</li> </ul> <p><u>Other issues to be addressed</u></p> <ul style="list-style-type: none"> <li>» It is noted that the Department requires proof of the Services Level Agreement (SLA) with the Municipality for the disposal of waste and that proof of such disposal must be recorded and made available when required. The Service Level Agreement will be included in the EIAR .</li> <li>» It is noted that temporal or permanent toilet facilities must not be situated within 100m of a watercourse or within the 1:100 year floodline (whichever is the greatest). Mitigation measures will be included on the EMP to ensure that no form of secondary pollution arises from the disposal of refuse or sewage from temporal or permanent toilets.</li> </ul>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>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.</p> <p>1.4. It is indicated on page 43 that the proposed development will occur within 500m of a wetland feature. In light of this, the Applicant is required to provide this office with a legible colour Layout Map for this development (preferable an A2 size or bigger). Such a map should, amongst others:</p> <ul style="list-style-type: none"> <li>i) Show all water courses within and around the site of interest;</li> <li>ii) Show the 1:100 year floodline of all watercourses (in and around the site) or 100m distance (whichever is greatest);</li> <li>iii) Show all wetlands (in and around the site), their delineated boundaries as well as buffer zone(s) to be applied for this development;</li> <li>iv) Superimpose all the activity area/project as well as infrastructure (temporary &amp; permanent) which forms part of this development.</li> </ul> <p>Furthermore:</p> <p>1.1.1. The Applicant must note that any activity within a 500m radius from the boundary of a</p>		<p><u>General Comments</u></p> <ul style="list-style-type: none"> <li>» All comments and requirements regarding solid waste are noted and will be considered in the EIAR and EMPr.</li> <li>» All comments and requirements regarding sewage and wastewater management are noted and will be considered in the EIAR and the EMPr.</li> <li>» All requirements regarding stormwater management for the Richards Bay CCPP are noted and will be considered in the EIAR and EMPr during the EIA phase of the project.</li> <li>» The concerns regarding erosion control are noted. Appropriate mitigation measures to ensure the management of erosion will be considered by the specialists and included in the EMPr.</li> <li>» It is noted that no unacceptable impacts should occur with the development of the Richards Bay CCPP due to spillages on site. The concerns raised by the Department regarding the matter is noted and appropriate mitigation measures for the management and avoidance of spillages will be included in the EMPr to ensure that spillages do not impact on the water resources within the area.</li> <li>» The EMPr to be compiled as part of the EIAR will include mitigation measures to ensure that all water resources within the area will be protected from pollution and degradation. Appropriate buffer areas for the protection of the resources will be recommended by the relevant specialists in the EIA phase that will need to be adhered to.</li> <li>» Areas identified and considered to be sensitive from an ecological perspective, as well as the recommended</li> </ul>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>wetland requires a water use licence in terms of Section 21 of the NWA;</p> <p>1.1.2.A Wetland Delineation study must be conducted for all wetlands occurring on site. The delineations of the watercourse, riparian habitat and wetlands must be done according to this Department's guideline and other applicable regulatory tools;</p> <p>1.1.3.The Applicant must conduct an impact assessment to determine the impacts that will be posed by the proposed development on the wetland of importance;</p> <p>1.1.4.Mitigation measures must also be included, outlining how the impacts will be mitigated and managed so as to not pose detrimental impact on the wetland.</p> <p>1.5. It is the responsibility of the Applicant to identify all water uses applicable to the activity in terms of Section 21 of the NWA and to ensure that all applicable water uses are authorised as such. Should the Applicant engage in any water use activity without the necessary Water Use Authorisation, it will be regarded as an unlawful water use. The Applicant will thus be guilty of an offence and 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.</p>		<p>associated buffers will be considered by the developer during the design of the layout for the facility in order to ensure that the features will not be degraded due to activities associated with the development of the Richards Bay CCPP.</p> <ul style="list-style-type: none"> <li>» Permitted and appropriate contractors will be appointed for the disposal of sewage and refuse to ensure that secondary pollution is avoided.</li> <li>» It is noted that DWS has the right to inspect the project site without prior notification to ensure that all requirements of the Department are met.</li> <li>» It is noted that the Department reserves the right to revise/withdraw comments and request further information regarding the project should any other information that contradicts the above come to light.</li> <li>» It is noted that all sources or potential sources of pollution from the undertaking of the proposed development must be identified and appropriate measures must be recommended to prevent any pollution of the environment. The need to comply with the National Water Act requirements are also noted.</li> </ul>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>Zamashenge Hadebe of the Water Use Authorisation Unit on (031) 336 2700/2767.</p> <p><b>2. OTHER ISSUES TO BE ADDRESSED</b></p> <p>2.1. It is indicted on page 31 of the SR that “all waste material generated from the development will be collected by a contractor and that the waste will be disposed of at a licensed waste disposal site off site. This service will be arranged with the municipality when required”. This Department would like to request a Services Level Agreement (SLA) with the said Water Service Authority and proof of such disposal must be recorded and safe disposal certificates must be kept on record and made available to this Department when required.</p> <p>2.2. It is further indicated on Page 31 of the SR that “during construction, all sewage waste will be collected by a contractor to be disposed of at a licensed waste disposal site. This service will be arranged with the municipality when required. During operation, the facility will be 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</p>		

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	<p>arise from the disposal of refuse or sewage from temporal or permanent toilets. Any pollution problems arising from the above are to be addressed immediately by the Applicant.</p> <p><b>3. <u>GENERAL COMMENTS</u></b></p> <p>3.1. Solid Waste</p> <p>3.1.1.The requirements of this Department with respect to solid waste must be strictly enforced and complied with</p> <p>3.1.2.The applicant should note that contaminated soil or other hazardous material must be disposed of at a permitted hazardous landfill site that is authorized to accept the said material and proof of his must be made available to this Department when required.</p> <p>3.1.3.Should private contractors be used, all solid waste must be disposed of at a permitted landfill site and proof of this must be made available to this Department when required.</p> <p>3.1.4.This Department would like to put an emphasis that 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</p>		

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>and groundwater pollution, or pose any health hazards.</p> <p>3.1.5.The recycling of suitable material is encouraged by this Department, provided it is properly managed.</p> <p>3.2. Sewage and Wastewater Management</p> <p>3.2.1.Washing, refuelling, maintaining of vehicles or the transfer of hazardous substances must be conducted within a bunded area. All drainage arising from the bunded area must be treated as a water containing waste and disposed of safely.</p> <p>3.2.2.The following is applicable should wastewater be generated during the construction phase:</p> <ul style="list-style-type: none"> <li>» Water containing waste must not be discharged into the natural environment and;</li> <li>» Measures to contain the water containing waste and safe disposal thereof must be implemented.</li> </ul> <p>3.3. Stormwater Management</p> <p>3.3.1.It is imperative that there is proper management of storm water at the project site.</p> <p>3.3.2.The Engineer or Contractor must ensure that only clean stormwater runoff enters the environment.</p>		

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	<p>3.3.3.Drainage must be controlled to ensure that runoff from the project area does not culminate in off-site pollution, flooding or result in any damage to properties downstream of any stormwater discharge point(s).</p> <p>3.4. Erosion Control</p> <p>3.4.1.This Department therefore recommends that erosion control measures must be put in place to minimise erosion along the proposed construction areas. Extra precautions must be taken in areas where the soils are deemed highly erodible.</p> <p>3.4.2.Soil erosion onsite must be prevented at all times, i.e. pre, during and post construction activities. Erosion control measures must be implemented in areas prone to erosion such as near water supply points, edges of slopes, etc. These measures could include the use of sand bags, hessian sheets, bidim, retention or replacement of vegetation.</p> <p>3.4.3.Where the land has been disturbed during construction it must be re-habilitated and re-vegetated back to an acceptable state after construction.</p> <p>3.4.4.Stockpiling of soil or any other materials used during the construction phase must not be allowed on or near steep slopes, near a watercourse or water body. This is to prevent</p>		

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
	<p>pollution or the impediment of surface run-off. The applicant must control and establish suitable mitigation measures to prevent the erosion of residue stockpiles.</p> <p>3.5. Spillages Management</p> <p>3.5.1. There must be no unacceptable impact on the quality of both surface and groundwater in the area. If pollution of any surface or groundwater occurs, it must be immediately reported to this Department and the appropriate mitigation measures must be employed. In addition, should the proposed development impact on any groundwater and/or surface water users, then water of equal quality and quantity must be provided to the affected users.</p> <p>3.5.2. Storage of material, chemicals, fuels etc. must not pose a risk to the surrounding environment, and this includes surface and groundwater. Temporary bunds must also be constructed around chemical or fuel storage areas to contain possible spillages. Such storage areas must be located outside the 1:100 year flood-line of the water source and must be fenced to prevent unauthorized access into the area.</p> <p>3.5.3. It is important that any significant spillage of chemicals, fuels, etc. during the construction phase and/or operation phase is reported to</p>		

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	<p>this Office and other relevant authorities. In the event of a spill, the following steps can be taken:</p> <ul style="list-style-type: none"> <li>» Stop the source of the spill;</li> <li>» Contain the spill;</li> <li>» All significant spills must be reported to this Department and other relevant authorities;</li> <li>» Remove the spilled product for treatment and authorised disposal;</li> <li>» Determine if there is any soil, groundwater or other environmental impact;</li> <li>» If necessary, remedial action must be taken in consultation with this Department and;</li> <li>» Incident must be documented.</li> </ul> <p>3.6. This Department notes the content and recommendations made on the following studies:</p> <p>3.6.1.The Wetland and Aquatic Ecology, dated 28 April 2017, prepared by The Biodiversity Company;</p> <p>3.6.2.Hydrology and flood Line Study, dated 15 February 2017, prepared by Raws Consulting Engineers</p> <p>3.6.3.Geo-Hydrology Study, dated 02 May 2017, prepared by Geo Hydraulic and Environmental Technology (Pty) Ltd</p>		

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	<p>3.7. Adequate measures must be put in place to protect all water resources that flow adjacent to, as well as through the proposed project area, from being polluted and/or degraded. Visible markings showing/demarcating the buffers must be provided on site during the construction phase. If pollution of any surface or groundwater occurs, it must be immediately reported to this Department and the appropriate mitigation measures must be employed.</p> <p>3.8. Ecological sensitive areas and their appropriate buffers must be protected and should not be degraded by the activities arising from the proposed development.</p> <p>3.9. No form of secondary pollution should arise from the disposal of sewage and refuse. The contractor must be clearly briefed on the method of disposal of such waste and compliance must be ensured/or monitored. Any pollution problems arising from the above project is to be addressed immediately by the Applicant.</p> <p>3.10. This Office reserves the right to inspect the site without prior notice in order to ensure that its requirements, as mentioned above, are adhered to. Should any problems be noted, measures must be undertaken immediately to rectify the situation.</p>		

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	<p>3.11. This Department reserves the right to revise/withdraw these comments and request further information from the applicant should any other information that contradicts the above comes to light.</p> <p>3.12. Notwithstanding the above, the responsibility rests with the Applicant to identify all sources or potential sources of pollution from the undertaking of the proposed development and to take appropriate measures to prevent any pollution of the environment. Failure to comply with the requirements of the NWA could lead to legal action being instituted against the Applicant.</p>		
<b>2.1. Water Consumption Requirements and Water Availability</b>			
59.	What are the water consumption volumes requirements for the proposed power plant?	Candice Webb Environmental Manager	The project will require approximately 37 290 m <sup>3</sup> for the construction period of 36 months. Approximately 1 825 000m <sup>3</sup> will be required annually during the operational phase.
60.	From a cumulative impact the industry in Richards Bay has made noteworthy efforts to reduce the need and demand on the water that is left. New industry must be on board in making efforts to reduce water demand.	Mondi  Meeting: 30-08-2017	Eskom is certainly aware of the scarce water resource South Africa is facing and is always investigating innovative ways to save water. Currently there is a public participation project with the Richards Bay Municipality with regards to water supply and Eskom is well represented in this regard.
61.	This area is a severely water-stressed area. Recent rains have caused the dam levels to rise slightly. In August 2016 dam levels were at 17% and many of the industries in Richards Bay were facing closure due to no water being	Dion Wilmans Director  Richards Bay Gas Power 2	Water is planned to be sourced from the uMhlatuze Local Municipality. The Municipality has informed Eskom that they are investigating the option of using effluent from other industries in the Empangeni area. Such effluent will be treated and then used to supply the power station.

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62.	<p>available. How much water will this power plant require and where will the water be sourced from?</p> <p>We are aware that the Municipality is undertaking a technical advisory on the potential recycling of effluent. However, this process has not been concluded. Do the water volumes provided by the Municipality meet the water consumption requirements of the power station?</p> <p>The report must include a comparison of what the minimum and maximum water requirements are when using ACC technology when compared to water-cooled technology. A balance of the water consumption needs must be provided in terms of what the municipality can provide and where the shortfall will be sourced from.</p>	<p>Public Meeting: 20-08-2017</p>	<p>Eskom is currently preparing the power station's basic design and that will tie in with the Municipality's plan. Eskom will provide the Municipality with the first opportunity to supply water and then look to other water providers if the power station's water requirement needs cannot be met.</p> <p>Eskom sits on a working group which is investigating the possibility of recycling water from industries in Richards Bay and Empangeni. Eskom is considering the best practice figures internationally and we cannot provide accurate water consumption figures at this stage. Accurate figures will be provided during the EIA Phase. Eskom has identified and acknowledged that water scarcity is a major risk to this project.</p>
63.	<p>Are there any plans to construct a desalination plant? Will water recycling plants be considered to provide the water for the power plant?</p>		<p>The working group is investigating the development of a desalination plant which could provide water in the future. Eskom aims to conclude the basic design of the CCPP project by the end of 2017. The water use consumption figures will be detailed in the EIA report. A Water Use License Application will be submitted by Savannah Environmental during the EIA phase.</p>
64.	<p>Was access to sea water cooling one of the criteria for this development?</p>	<p>Darryl Hunt Consultant</p> <p>Cheniere</p> <p>Public Meeting: 31-08-2017</p>	<p>Access to sea water cooling would have been a criterion if the project site was located along the coast.</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
65.	What are the water consumption requirements for the power plant? There is no water available for this project at this stage.	Sandy Camminga Director  Richards Bay Clean Air Association  Meeting: 31-08-2017	The project will require approximately 37 290 m <sup>3</sup> for the construction period of 36 months. Approximately 1 825 000m <sup>3</sup> will be required annually during the operation phase. Two cooling technology alternatives are being considered for the project namely dry cooling and once-through cooling.  KC: Eskom is aware of the water constraints in the region and Eskom has representation in working group that has been established to investigate various water supply options for the region. Options being considered include the utilisation of treated effluent from other industries in the area, a desalination plant and a water treatment plant on the site.
66.	Will rain water be harvested at the proposed power plant?		Onsite rainwater harvesting will be implemented. Eskom's policy is to have a zero discharge so all rain water is harvested. This water could be used for domestic use and in the cooling process.
<b>2.1. Treatment and Disposal of Effluent</b>			
67.	What type of process will be used for effluent treatment?	Candice Webb Environmental Manager  Mondi	Eskom is considering installing a reverse osmosis treatment plant. Eskom's transmission department will be initiating the EIA for the transmission lines which will commence once a consultant has been appointed (envisaged to be in the fourth quarter of 2017) and confirmation of this will be finalised as the engineering designs progress from concept to basic designs.
68.	Would the effluent be treated so that you could feed the treated water back into the plant or are you planning on disposing effluent via the marine outlet?	Meeting: 30-08-2017	It is likely that effluent would be discharged via the sea outlet.
69.	Is effluent discharge going to go into uMlathuze Effluent Pipeline and out to sea?	Sandy Camminga Chairperson – EIA Committee	Effluent will be discharged to sea via the uMlathuze Effluent Pipeline.

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
		Richards Bay Clean Air Association  Meeting: 31-08-2017	
<b>2.1. Air Quality Impacts</b>			
70.	Eskom must note that Mondi has an impact on air quality from a nuisance point of view. Odour is inherent in our process and although stringent odour abatement processes are adhered to, the power plant site will be impacted by nuisance air quality impacts. Mondi do not wish to find themselves in a situation where complaints are lodged against them regarding this nuisance impact. Eskom will need to decide whether it is acceptable to deal with this air quality impact.	Candice Webb Environmental Manager  Mondi  Meeting: 30-08-2017	This will be investigated by the air quality specialist study, which is part of the current EIA process. Following the installation of the plant, appropriate monitoring will be undertaken by Eskom, as Mondi is also expected to continue its monitoring processes.
71.	Eskom will need to consider the air quality impacts from any other processes that could have an impact on air quality in the region to avoid impacts to our process and quality of the end product.		The impact assessment for air quality will include the following: <ul style="list-style-type: none"> <li>» The compilation of a baseline emissions inventory for existing facilities within Richards Bay based on measured emissions in the RBCAA inventory;</li> <li>» The establishment of an emissions inventory by referring to NMES and emission factors for combustion processes, fuel storage and fugitive dust (construction);</li> <li>» Atmospheric dispersion simulations using the US EPA CALPro suite (CALMET and CALPUFF); and</li> <li>» A human health risk and nuisance impact screening assessment based on dispersion simulation results.</li> </ul>
72.	Richards Bay is reported to have the second worst air quality in South Africa, second only to Secunda, due to the high	Dion Wilmans Director	The appointed air quality specialist, AirShed Planning Professionals, is in contact with the Richards Bay Clean Air

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	<p>concentration of heavy industry. There are numerous industries contributing to air emissions in Richards Bay including Mondi (who have taken steps to reduce their own emissions), a cement factory, a smelter, a fertilizer manufacturing plant, a chrome smelter and two titanium smelters all contributing to the second worst air quality in the Country. Surely a regional air emissions study has to be completed rather than a site specific one due to the excessive impact of these industries in Richards Bay. What is your proposed methodology for assessing air emissions on a cumulative scale.</p> <p>The wind does blow in both directions and if the wind does blow in a certain direction it will blow the emissions over sugar cane and forestry lands as well as a few rural communities. However, if the wind blows in the opposite direction it will take the emissions over highly concentrated residential areas.</p>	<p>Richards Bay Gas Power 2</p> <p>Public Meeting: 20-08-2017</p>	<p>Association and their data is being considered in the air quality assessment. The EIA will assess cumulative impacts as well as localised impacts. The air quality impacts of all industries within a 30 – 50km radius of the proposed site will be assessed. The assessment of cumulative impacts is a requirement of the EIA Regulations, 2014 (as amended), and the EIA Report will include a chapter on cumulative impacts.</p>
73.	<p>The Scoping report does not make reference to sulphur dioxide. Sulphur dioxide emissions are a key concern in Richards Bay as many industries contribute to sulphur dioxide emissions.</p>	<p>Franz Schmidt SHREQC Manager</p> <p>Richards Bay Alloys</p> <p>Public Meeting: 31-08-2017</p>	<p>The Scoping report identifies sulphur dioxide as a source of air pollution within the region. A detailed Air Quality Impact Assessment will be provided in the EIA Report.</p>
74.	<p>In terms of the air quality would it be possible for you to present the impact on residential areas in Richards Bay?</p>	<p>Retha van Niekerk Director</p> <p>Urban Plan</p>	<p>Air quality impacts to residential areas in Richards Bay will be detailed in the Air Quality Impact Assessment which will be undertaken in the EIA phase.</p>

NO.	COMMENT/ISSUE	ISSUE RAISED BY	RESPONSE
		Public Meeting: 31-08-2017	
75.	Does the Air Quality Impact Assessment investigate air quality impacts on the facility operating on gas or the facility operating on diesel?	Sandy Camminga Director	The Air Quality Impact Assessment considers air quality impacts with the facility operating on gas as the primary fuel and diesel as a backup.
76.	The term "back-up" needs to be clearly defined in the Scoping and EIA reports.	Richards Bay Clean Air Association  Meeting: 31-08-2017	The term "back-up" will be quantified and clarified in the report. Diesel will not be used to operate the plant for 16 hours a day for 5 days a week (only natural gas will be used for this purpose). Diesel will only be utilised in extreme worst-case scenarios. The quantities of diesel will be small.
77.	The Scoping report does not make reference to abatement technologies that will be used in case the plant is required to operate on diesel.	Siyabonga Zigubu Air Quality Inspection  City of uMhlatuze Municipality  Meeting: 31-08-2017	The requirement for emissions for diesel is that they should be within the air emission limits. No <sub>x</sub> and So <sub>x</sub> emissions would need to fall within these limits.
<b>2.1. Consultation with the Richards Bay Clean Air Association</b>			
78.	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:	Sandy Camminga Chairperson – EIA Committee  Richards Bay Clean Air Association  Letter: 27-09-2017	<u>COMMENTS</u>  3.1 In order to ensure that the development of the Richards Bay CCPP is undertaken within a site that is both feasible from a technical and environmental perspective, Eskom in consultation Savannah Environmental and independent specialists, undertook an Environmental Screening and Site Selection process. As included in Section 3.4.1, Eskom identified 6 potential sites in the greater Richards Bay area for

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	<p>Eskom Holdings SoC Ltd proposes to develop a Combined Cycle Power Plant (CCPP) and associated infrastructures, with a generating capacity of up to 3000MW. The Project site is located in Richards Bay Industrial Development Zone (IDZ) Phase 1D. The purported purpose of the project is to;</p> <p>a) Reduce transmission losses from generation facilities supplying KwaZulu-Natal, by having a generation center in Kwazulu-Natal.</p> <p>b) Aid in reducing Eskom's carbon footprint per unit of electricity produced, as power plants using natural gas emit approximately half the carbon of coal-fired power plants while using considerable less water.</p> <p>The DSR lists the main infrastructure associated with the facility to include the following;</p> <ul style="list-style-type: none"> <li>» Gas Turbines for generation of electricity through the use of natural gas or diesel.</li> <li>» Heat recovery steam generators (HRSG) to produce steam.</li> <li>» Steam turbines for the generation of additional electricity through the use of steam generated by the HRSG.</li> <li>» Condensers for the conversion of steam back to water.</li> <li>» Bypass stacks associated with each gas turbine.</li> <li>» Exhaust stacks.</li> <li>» A water treatment plant for the treatment of potable water and the production of demineralized water.</li> <li>» A water pipeline and water tank.</li> </ul>		<p>the development of the proposed CCPP which were considered to be feasible from a technical perspective. Following consideration of various technical and landowner issues associated with the sites, four sites were taken forward into the environmental screening study namely Site 4A; Site 5, Site 6 and Site 7. The four sites selected by Eskom which formed part of the Environmental Screening and Site Selection process were considered to be feasible from a technical perspective. Technical requirements considered were the location of a site in relation to the sea level (performance related), the proximity of a cooling source (performance related) and the proximity to the fuel supply. This could have been located anywhere along the Richards Bay coast however sites 5 and 6 were identified as the most feasible sites along the coast from a technical and locality perspective. However, sites 5 and 6 were not favourable from a transmission and power evacuation perspective. Sites 4A and 7 were identified on the same criteria however Air Cooled Condensers were considered as the cooling technology.</p> <p>It should be noted that the findings of the Screening and Site Selection Process identified that none of the sites were fatally flawed, however some of the sites presented some social and environmental factors which made the sites less favourable from an environmental perspective for the development. On this basis, these sites were considered as not being preferred for the development due to the envisaged significance of the potential issues that would occur. The screening process is considered to be a full-rounded process which provided Eskom</p>

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	<ul style="list-style-type: none"> <li>» Dry-cooled system or Once-Through-Cooling system technology.</li> <li>» Closed Fin-fan coolers to cool lubrication oil for the gas and steam turbines.</li> <li>» A gas pipeline and a gas pipeline supply conditioning process facility.</li> <li>» Diesel off-loading facility and storage tanks.</li> <li>» Ancillary infrastructure including access roads, warehousing and buildings, storage facilities, generators and 132kV and 400 kV switchyards.</li> <li>» 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")</li> </ul> <p>The DSR goes on to state that;</p> <ul style="list-style-type: none"> <li>» The Richards Bay CCPP will be a baseload or mid-merit plant.</li> <li>» 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;</li> <li>» The LNG Terminal at the Port does not form part of this assessment.</li> </ul> <p>3. COMMENT</p> <p>3.1 Site Alternatives:</p>		<p>with the necessary information regarding the proposed sites and which has led to the preferred site being identified. It must be noted that all four sites were considered feasible from a technical perspective, however due to environmental constraints identified in the screening process the least environmentally sensitive site was identified and assessed as part of the EIA process (i.e. Site 7).</p> <p>3.2 The Air Quality Assessment indicated that the potential impact is likely to be high due other industries located near the site (industries such as Mondi Richards Bay (next door) and other industries in Richards Bay such as Lafarge, TATA Steel and Pulp United). The location of the site in relation to other sources of pollution – likelihood for cumulative SO<sub>2</sub> and PM<sub>10</sub> ambient concentrations - were also taken into consideration. As indicated above, the site was not fatally flawed. The Air Quality impact assessment will undertake a detailed assessment for the worst case scenario during the EIA Phase.</p> <p>During the scoping phase it was identified that the construction of the Richards Bay CCPP has the potential to impact on the ambient air quality of the area through elevated daily PM<sub>10</sub> concentrations due to background PM<sub>10</sub> and the proximity of the project site to other particulate emission sources. During the operation phase, the Richards Bay CCPP is likely to contribute NO<sub>x</sub>, CO, and VOCs to the existing baseline concentrations (including greenhouse gasses). Based on the findings of the scoping Phase the impact is expected to be of a medium-low significance. It should be noted that the project</p>

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	<p>It is the opinion of the RBCAA that, from an environmental perspective, 3 of the 4 sites considered were unfeasible from the outset. The site selection process is therefore automatically skewed in favour of the preferred site. This issue was raised and discussed at the presentation made to the Industrial Development Zone Environmental Review Committee (IDZ ERC), of which the RBCAA is a member. The response given to the Forum was that "The sites had been assessed from a technical perspective and not an EIA perspective". This assertion appears to be contradicted on page 32, Section 3.4.1 which states that "..., 4 sites were taken forward into an environmental screening study."</p> <p>3.2 Preferred Site 7:</p> <p>It is noted with extreme concern that the selected preferred site, located in IDZ 1D, has been deemed to be not acceptable from an air quality perspective.</p> <p>3.3 Gas Pipeline:</p> <p>The gas pipeline is listed in the report as forming part of the main infrastructure associated with the facility; however the construction of the pipeline does not form part of this application.</p> <p>The RBCAA does not support this approach. The location and construction of the pipeline will contribute directly to</p>		<p>is subjected to further detailed specialist assessment which will provide the significance of the air quality impacts, as well as provide feasible mitigation measures which will aid in the management and/or reduction in the impacts. The Air Quality specialist will address the worst case operating model (baseload and mid-merit plant)</p> <p>3.3 Eskom will need to enter into a gas sales agreement (GSA) with potential gas suppliers. The entity supplying the gas will be responsible for undertaking the EIA for the gas pipeline. However, the pipeline inside the power plant site, from the boundary fence (connection point) of the gas power plant will be assessed in this EIA. Eskom is in discussions with Transnet and other stakeholders to determine possible routing options for the gas pipeline. It should be noted that a corridor for locating the gas pipeline infrastructure within the project site will be assessed within this EIA Process.</p> <p>3.4 The Supply Conditioning Process Facility is a facility within the power station to condition the natural gas supplied by a third party to meet the gas turbine inlet process conditions required. This is not a LNG regasification facility. The source of the natural gas is still not known however Eskom is in discussions with potential gas suppliers and it currently seems likely that LNG at the Richards Bay port is the most favourable solution. Eskom would not be able to obtain an approved business case if the natural gas supply GSA is not signed.</p>

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	<p>the impacts of the proposed facility, and can therefore not be excluded from the current process.</p> <p>3.4 Gas Pipeline Supply Conditioning Process Facility (LNG Facility)</p> <p>While references are made to a possible LNG facility within the Port of Richards Bay, there is no commitment to the construction of such a facility. Section 2.2.10 (page 15) of the report states that; "It is envisaged that by the time construction of the proposed development is complete, more gas infrastructure will be available, such as the LNG import terminal at the Richards Bay Port." And goes on to say "... the gas-fired power station in Richards Bay could acquire local gas cheaply if the infrastructure to obtain it is developed. However, as identified, the lack of said infrastructure is currently a constraint."</p> <p>Section 3.3 (page 29) of the DSR states that; "The natural gas is to be supplied via a gas pipeline to the CCPP from a supply take-off point at Richards Bay Harbour. The LNG terminal infrastructure at the port does not form part of the scope of this assessment."</p> <p>Clarity is requested regarding the above statement, as the IDZ ERC was informed that the source of the natural gas is still unknown.</p>		<p>3.5 The volumes and impacts of effluent discharge as part of the development will be included and considered in the EIA Phase and Report.</p> <p>3.6 The Traffic Impact Assessment will be undertaken during the EIA phase and the terms of reference has been included in the Plan of Study for EIA (refer to Chapter 8 of the Final Scoping Report).</p> <p>3.7 Clarification regarding the storage tanks and the holding capacity and amount of tanks required will be clarified in the EIA report.</p> <p>3.8 The Chapter within which Table 4.3 is included refers specifically to the approach undertaken during the Scoping Phase. Please note that the Climate Change Impact Assessment will only be undertaken during the EIA Phase, the terms of reference has been included in the Plan of Study for the EIA Phase (refer to Chapter 8). The specialist details have been included in chapter 8.</p> <p>3.9 The terms of reference for the EIA phase for Air Quality has been updated in the Plan of Study for the EIA (Chapter 8 of the Final Scoping report), and reflects this recommendation.</p> <p><u>RECOMMENDATIONS</u></p> <p>1. The project is under development, of which the EIA is part, and the finalisation of the gas supplier is a function of a</p>

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	<p>The RBCAA does not support the approach of proceeding with the application for a CCPP, without an established and confirmed source of natural gas.</p> <p>3.5 Effluent Discharge: The impact of discharging effluent into the marine outfall pipeline must be quantified.</p> <p>3.6 Traffic Impact Assessment: The report is silent on traffic impacts. A Traffic Impact Assessment must be included in the scope of Specialist Studies.</p> <p>3.7 Diesel Storage Tanks: The report speaks of "storage tanks" which will hold a capacity for eight (8) hours operation. It is unclear as to how many tanks will be constructed, and whether the 8 hour capacity is per tank or the cumulative holding capacity. Please may we request clarification in this regard.</p> <p>3.8 Climate Change: The RBCAA notes and supports the statement on page 105 that "A Climate Change Impact Assessment will be undertaken as during the EIA phase."</p>		<p>commercial process and a negotiation, since there are various possible suppliers. The contracted gas supplier will be responsible for permitting processes associated with their infrastructure. Eskom is responsible for the said pipeline within the power station up to the boundary of the site (this is part of the associated infrastructure assessed within this EIA process). The corridor to be assessed for gas transportation allows for ease of approach and connection by any of the potential gas suppliers.</p> <ol style="list-style-type: none"> <li>2. Availability of gas is guaranteed, but a commercial process and a negotiation process must be finalised. Therefore, there is no risk of gas unavailability for the project.</li> <li>3. The primary fuel stock for this power plant is gas. The plant will have dual fuel capabilities; however, the intention is to have the power station supplied by gas full time. The plant will only operate on diesel as a backup for emergency situations. Therefore the Air quality assessment will assess the impacts associated with the facility mainly operating on gas and operation on diesel as a backup.</li> <li>4. The terms of reference for the EIA phase for Air Quality has been updated in the Plan of Study for the EIA (Chapter 8 of the Final Scoping report), and reflects this recommendation.</li> <li>5. The terms of reference and the details of the independent specialist that will be undertaking the Climate Change impact Assessment has been included in the Plan of Study for the EIA (refer to Chapter 8 of the Final Scoping Report).</li> <li>6. A Traffic Impact Assessment will be undertaken as part of the EIA Phase and the terms of reference has been</li> </ol>

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	<p>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.</p> <p>3.9 Air Quality Impact Assessment – Scoping Report (Airshed Planning Professionals):                      Terms of Reference for the EIA Phase should include the assessment of;</p> <ul style="list-style-type: none"> <li>a) Worst Case Scenario. Dispersion simulations for worst case scenario, which would be the plant operating solely on diesel.</li> <li>b) Fugitive Emissions.</li> <li>c) Odour.</li> </ul> <p>4. RECOMMENDATIONS:</p> <p>The RBCAA strongly recommends that;</p> <ul style="list-style-type: none"> <li>1. The Gas Pipeline form part of this application.</li> <li>2. CCPP application not proceed until a guaranteed source and supply of natural gas is confirmed.</li> <li>3. The Air Quality Impact Assessment (AQIA) include worst case scenario, which is the plant operating solely on diesel.</li> <li>4. The AQIA include the assessment of fugitive emissions and odour during operation.</li> <li>5. A Climate Change Specialist be included in the list of Specialist Consultants.</li> <li>6. A Specialist Traffic Impact Assessment be undertaken.</li> </ul>		<p>included in the Plan of Study for EIA (refer to Chapter 8 of the Final Scoping Report).</p>

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	<p>Thank you for affording the Richards Bay Clean Air Association (RBCAA) the opportunity to comment on the above proposed project.</p> <p>The RBCAA reserves the right to amend and/or provide further comment.</p>		
<b>2.1. Ecological Impacts</b>			
79.	<p>Extensive studies were undertaken within Phase 1D of the IDZ in 2003/204. Kwambo Grassland (<i>Kwambonambi Hygrophilous Grassland</i>) was identified as an endangered plant species. Does the Scoping report identify Kwambo Grassland as endangered?</p>	<p>Franz Schmidt SHREQC Manager</p> <p>Richards Bay Alloys</p> <p>Public Meeting: 31-08-2017</p>	<p>The <i>Kwambonambi Hygrophilous Grassland</i> has been identified as an endangered species in the Scoping report. Further detail on how impacts to this plant species will be mitigated or managed will be provided in the EIA report.</p>
80.	<p>It must be noted that as much as Phase 1D is being made available for purposes of gas development there are issues that need to be tested through an environmental process. These issues relate to terrestrial, ecological and hydrological impacts identified in the Environmental Screening and Site Selection Study.</p>	<p>Sharin Govender PM: Environmental Management</p> <p>City of uMhlatuze Municipality</p> <p>Meeting: 31-08-2017</p>	<p>The terrestrial, ecological and hydrological impacts will be further assessed in the EIA phase and detailed impact assessments will be provided in the specialist studies and EIA report.</p>
81.	<p>The agreements regarding the biodiversity offset between KZN Ezemvelo wildlife and the City of uMhlatuze Municipality will remain in place.</p>	<p>Dominic Weiners Principal Planner</p> <p>Ezemvelo KZN Wildlife</p> <p>Meeting:</p>	<p>The agreements regarding the biodiversity offset between KZN Ezemvelo wildlife and the City of uMhlatuze Municipality will remain in place.</p>

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<b>2.1. Impacts to Transnet Activities and Infrastructure</b>			
82.	Is Eskom aware of the Port Expansion Programme. This programme is being developed in phases and implementation is likely to commence in 2050.	Vuyo Keswa Environmental Manager  Transnet Freight Rail  Meeting: 31-08-2017	Eskom is aware of the Port Expansion Programme and are engaging with the Transnet Port Authority and the Richards Bay IDZ in this regard. It should be noted that the Richards Bay CCPP lifespan is approximately 20 years and the plant is likely to come online by 2023. Therefore the power plant is likely to be decommissioned before 2050.
83.	Transnet infrastructure and servitudes are not affected by the proposed development. Transnet will require a better understanding of how the gas pipeline and the transmission lines would impact on Transnet infrastructure.	Thulani Fakude Depot Engineer – Infrastructure  Transnet Freight Rail  Meeting: 31-08-2017	It is noted that the power plant project does not impact on Transnet's servitudes or infrastructure. A separate EIA applications will be undertaken for the transmission lines. The potential gas supplier whom Eskom will enter into consider a Gas Sales Agreement (GSA) will conduct an EIA for its gas pipeline corridor from the power plant to Eskom's connection point at the boundary fence of, and the power plant. The gas pipeline from this connection point to Eskom's power plant is part of service provider will be responsible for authorisation processes from the associated infrastructure included in this EIA.
<b>2.1. Socioeconomic Impacts</b>			
84.	How many people will be based on the site during the construction and operation phases?	Vuyo Keswa Environmental Manager  Transnet Freight Rail  Meeting:	Approximately 800 – 1000 people will be on site during the construction phase and 80 – 100 people during the operation phase.

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<b>2.1. Consultation With The Richards Bay Idz</b>			
85.	<p>I am aware the commenting period for the Scoping Report closed on the 20th of September, nonetheless I would like to submit the following input –</p> <ol style="list-style-type: none"> <li>1. The RBIDZ welcomes the proposed gas-to-power plant in the Richards Bay area. We are equally excited about future arrival of LNG and its benefits for industry, businesses and households in the Zululand area, and to the rest of the Province.</li> <li>2. I would urge Eskom to work closely with the local municipality and Transnet as hosts of the natural gas project for Richards Bay.</li> <li>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.</li> <li>4. Having attended the 2nd public meeting held at the public library and later hosting your team at our ERC meeting on the same day, the Impact Assessment phase will need to address the following matters:               <ol style="list-style-type: none"> <li>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)                   <ol style="list-style-type: none"> <li>i. Related matter: Traffic impact of diesel supply to the CCGT</li> </ol> </li> </ol> </li> </ol>	<p>Percy Langa SHEQ Manager</p> <p>Richards Bay Industrial Development Zone</p>	<ol style="list-style-type: none"> <li>1. The support from the RBIDZ for the development of the Richards Bay CCPP is noted.</li> <li>2. Eskom and Savannah Environmental have been in consultation with the local municipality and Transnet and will also continue to do so during the EIA Phase. The local municipality and Transnet were invited to provide comment and raise any potential issues regarding the development of the Richards Bay CCPP (refer to <b>Appendix C</b> of the Final Scoping Report), all comments raised will form part of the EIA reporting.</li> <li>3. During the Scoping Phase Ezemvelo KZN Wildlife and the Department of Water and Sanitation have been consulted and invited to provide comment and raise any potential issues regarding the development of the Richards Bay CCPP (refer to <b>Appendix C</b> of the Final Scoping Report). Consultation will be continuous throughout the remainder of the EIA process and all comments raised will form part of the EIA reporting.</li> <li>4. It is noted that Percy Langa attended the 2<sup>nd</sup> public meeting and the RBIDZ ERC meeting for the Richards Bay CCPP.               <ol style="list-style-type: none"> <li>a. The need and desirability for the use of diesel as a back-up fuel will be included and considered in the EIA Report during the EIA Phase.                   <ol style="list-style-type: none"> <li>i. A Traffic Impact Assessment will assess all traffic impacts related to the construction and operation of the Richards Bay CCPP</li> </ol> </li> </ol> </li> </ol>

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	<p>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?</p> <p>i. It makes sense that Eskom needs to manage the risk associated with the reality that, for whatever reason, LNG or natural gas supply to the CCGT could be unavailable or affected – and therefore resulting in the CCGT standing idle until the gas supply is restored. Would additional storage tanks for natural gas (either at the CCGT or the LNG Import Terminal at the Port) not provide mitigation against this?</p> <p>c. Incorporate a summary of the Site Selection study for the CCGT into the Impact Assessment Report.</p> <p>d. Key missing pieces in the current EIA: transmission powerlines for power evacuation and incoming natural gas pipeline.</p> <p>e. Other pieces in the current EIA:</p> <p>i. Incoming bulk infrastructure/services (water, whether it be portable, raw or industrial)</p> <p>ii. Outgoing bulk infrastructure/services (wastewater, effluent?, hazardous waste?, etc.)</p>		<p>during the EIA Phase (refer to the Plan of study for EIA, Chapter 8 of the Final Scoping Report)</p> <p>b. Diesel will be utilised to operate the Richards (in case of emergencies) Bay CCPP in situations where gas is not available for use. This will be investigated further in the EIA Report.</p> <p>i. This project is being developed in a phased approach where the project is considered holistically. The transmission power lines are being considered by Eskom even though separate EIA processes are being undertaken for these project components. Eskom is in the process of appointing an EIA consultant to undertake the environmental assessment required for the transmission line infrastructure. This process will not lag far behind the EIA for the power plant.</p> <p>c. A summary of the Site Selection and Screen Process has been included in Chapter 3 of the Scoping Report.</p> <p>d. This project is being developed in a phased approach where the project is considered holistically. The pipeline and transmission power lines are being considered by Eskom even though separate EIA processes are being undertaken for these project components. Eskom is in the process of appointing an EIA consultant to undertake the environmental assessment required for the transmission line</p>

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	<p>f. The transfer of CCGT-related and LNG-related knowledge and skills (technical and other) to the local communities, in particular youth and women.</p> <p>g. The current EIA process must also undertake to educate the general public on safety, health and environmental benefits of natural gas.</p> <p>h. Lastly, we would be happy to engage with your environmental specialists to either provide information or discuss any other relevant matter.</p>		<p>infrastructure. This process will not lag far behind the EIA for the power plant.</p> <p>e. Other comments on the scoping report:</p> <ul style="list-style-type: none"> <li>i. Specific details regarding the bulk infrastructure or services will be made available for consideration in the EIA Report. In this regard, an infrastructure/service corridor will be assessed as part of this EIA process. This will be undertaken within the project site.</li> <li>ii. Specific details regarding the outgoing bulk infrastructure or services will be made available for consideration in the EIA Report. In this regard, an infrastructure/service corridor will be assessed as part of this EIA process. This will be undertaken within the project site.</li> </ul> <p>f. Details regarding skills transfer processes as part of the development of the Richards Bay CCPP will be included in the EIA Report for consideration.</p> <p>g. Comment noted. This will be addressed during the EIA phase and appropriate stakeholder management and consultation with local communities will be undertaken.</p> <p>h. Comment noted. Should the need arise for consultation between the RBIDZ and the independent specialists engagement between the parties will be arranged.</p>

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<b>2.1. General</b>			
86.	Cheniere supports any gas to power initiative in South Africa irrespective of whether those projects are being developed by Eskom or by the private sector. Gas power is a strategic market since coal and nuclear power generation options have numerous challenges. Gas is viewed as a key part of South Africa's secure power supply. We welcome any initiative that can sustainably move the Country forward in an environmentally friendly way.	Darryl Hunt Consultant  Cheniere  Public Meeting: 30-08-2017	The support for the project is noted.
87.	The Scoping Report states that the gas power plant's load factor is assumed to operate for 16 hours per day for 5 days per week (mid merit basis). The impacts should be assessed for both mid-merit and baseload options so that the EA is not constrained in the event that the plant is required to operate at baseload.		Comment noted. During the EIA phase both mid-merit and baseload options will be considered in order to ensure that the environmental Authorisation is applicable to both options.
88.	It is advised that Eskom join the Richards Bay Clean Air Association which will provide access to a network of updated and relevant information.	Franz Schmidt SHREQC Manager  Richards Bay Alloys  Public Meeting: 31-08-2017	This recommendation is noted by the applicant.
89.	The Vortum Energy Project and the Accelor Mittal Thermal Plant located in Saldanha in the Western Cape recently received environmental authorisation from the Department of Environmental Affairs (DEA) which also excluded the grid connection and pipeline infrastructure. DEA has approved the impact of the power plant in isolation, with the condition	Darryl Hunt Consultant  Cheniere  Public Meeting: 31-08-2017	Comment noted.

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	that the remaining project components must receive environmental authorisation within two years.		
90.	I hope that the EIAs being undertaken by the private sector will continue. NERSA is the deciding factor and will make the decision based on rate. Eskom cannot develop a plant like this in competition and price wise then it should go to the private sector. The sad thing is that in this instance the tax payers are funding this EIA. IPPs should be assisted by our government to do these studies because at the end of the day this is all to the benefit of the Country.	Frans van der Walt  QS2000 Plus (Quantity Surveyors & Project Managers)  Public Meeting: 31-08-2017	Comment noted.
91.	Are there any other combined cycle power plants in South Africa?	Sandy Camminga Chairperson – EIA Committee  Richards Bay Clean Air Association  Meeting: 31-08-2017	There are no combined cycle power plants in South Africa currently.