

## **Appendix 13: Motivation for No Feasible Alternatives**

Mr. Sabelo Malaza  
Chief Director: Integrated Environmental Authorisations  
Department of Environmental Affairs  
Private Bag X447  
PRETORIA  
0001

Date:  
21 May 2018

Enquiries:  
Tel +27 11 516 7585

Dear Mr. Malaza

**PROOF OF INVESTIGATION AND MOTIVATION FOR EXCLUSION OF FEASIBLE ALTERNATIVES FOR THE PROPOSED EMKHIWENI SUBSTATION AND 400KV LINE FROM EMKHIWENI SUBSTATION TO SILIMELA (DEA REF NUMBER: 14/12/16/3/3/2/1063)**

The Department of Environmental Affairs (DEA) submitted comments on the Draft Scoping Report for the proposed Emkhiweni Substation and 400KV Line from Emkhiweni Substation to Silimela (14/12/16/3/3/2/1063) on 09/05/2018. DEA requested that Eskom provide proof of an investigation and motivation if no reasonable and feasible alternatives exist as per the requirements of Appendix 2 (2)(1)(h)(i-xi) of Government Notice (GN) R.982 of the 2014 Environmental Impact Assessment (EIA) Regulations (as amended on 07 April 2017), in terms of the National Environmental Management Act (NEMA) (Act No. 107 of 1998).

The substation and powerline were previously authorised by DEA in May 2011 (Emkhiweni Substation) and July 2011 (Emkhiweni-Silimela 400kV line) (refer to Appendix 2 of the Scoping Report for a copy of the previous authorisations). As part of the previous EIA Process in 2011, alternative routes were considered for the powerline, and alternative substation sites were considered for the substation, refer to Section 6.1 and 6.2 of the Scoping Report for the details. Since the previous Record of Decisions (RoDs) were granted in 2011, Eskom proceeded with acquiring substation site and servitude for the powerline route. However, Eskom realised that they cannot proceed with construction as the previous RoDs had lapsed. Therefore Nema Consulting were appointed by Eskom to undertake a new application for Environmental Authorisation (EA) as part of the 2014 EIA Regulations, as amended (07 April 2017). Eskom was not able to proceed with construction within the previous ROD timeframes as a result of the lack of funding for the project.

Therefore, no feasible alternative sites for the substation or feasible alternative routes can be considered and assessed at this stage, but alternatives were considered in the previous EIA Process in 2011.

If you require further information, please do not hesitate to contact the undersigned.

Yours sincerely



Annah Kawadza

**PROGRAMME MANAGER (ACTING): LAND DEVELOPMENT**