

**APPLICATIONS FOR SUSPENSION, ALTERNATIVE LIMITS
AND/OR POSTPONEMENT OF THE MINIMUM EMISSION
STANDARDS (MES) COMPLIANCE TIMEFRAMES FOR
ESKOM'S COAL AND LIQUID FUEL FIRED POWER
STATION IN THE MPUMALANGA HIGHVELD,
VAAL TRIANGLE AND CAPE REGION**

PUBLIC PARTICIPATION REPORT

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PREPARED FOR:

Eskom Holdings SOC Ltd

THIS PUBLIC PARTICIPATION REPORT HAS BEEN PREPARED FOR THE APPLICATIONS FOR SUSPENSION, ALTERNATIVE LIMITS AND/OR POSTPONEMENT FROM THE MINIMUM EMISSION STANDARDS (MES) COMPLIANCE TIMEFRAMES FOR ESKOM'S COAL AND LIQUID FUEL-FIRED POWER STATION IN THE MPUMALANGA HIGHVELD, VAAL TRIANGLE AND CAPE REGION

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NEC is an independent environmental consultancy with no vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed.

We do not echo the views of the applicant or client however provide an independent view formed by tasks conducted under the NEMA and the EIA Regulations of 2014 (as amended by GNR. 326).

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DISCLAIMER

This Public Participation Report has been prepared by Naledzi Environmental Consultants (Pty) Ltd for Eskom's Application for suspension, alternative limits and or/postponement of the Minimum Emission Standards (MES) Compliance Timeframes for its coal and liquid fuel-fired power station in the Mpumalanga Highveld and Vaal Triangle.

The report has been prepared for the sole use of Eskom Holdings SOC Limited, in accordance with generally accepted consulting practices and for the intended purposes, as stated in the agreement under which this work was prepared. Interested & Affected Parties (I&APs) are privy to the review of the report to provide input to the MES Postponement application.

PROJECT INFORMATION

Title: Application for suspension, alternative limits and/or postponement of the Minimum Emission Standards (MES) compliance timeframes for Eskom's coal and liquid fuel-fired power stations in the Mpumalanga Highveld and Vaal Triangle

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Contents

PROJECT INFORMATION	iii
1. INTRODUCTION	1
2. LEGISLATIVE REQUIREMENTS	2
3. APPROACH TO THE PUBLIC PARTICIPATION PROCESS.....	3
4. SUMMARY OF 1 ST AND 2 ND ROUND PUBLIC ENGAGEMENT TASKS	5
4.1 1 st Round: Provincial and AEL Authorities' engagements	5
4.2 1 st Round: Local Authority and Ward Councillor engagements;	6
4.3 1 st Round: Project announcement.....	7
4.4 2 nd Round: Local Authority and Ward Councillor engagement.....	8
4.5 2 nd Round of public engagements conducted to announce the availability of the draft Application Documentation for public review and comment	8
5. PROVINCIAL AND AEL AUTHORITIES ENGAGEMENTS.....	9
6. LOCAL AUTHORITIES AND WARD COUNCILLOR ENGAGEMENTS	10
7. NEWSPAPER ADVERTISEMENTS	11
8. SITE NOTICE PLACEMENT.....	13
9. INTERESTED AND AFFECTED PARTY DATABASE	14
10. DIRECT NOTIFICATION OF INTERESTED AND AFFECTED PARTIES.....	15
11. PUBLIC MEETINGS HELD AS PART OF FIRST ROUND OF PUBLIC ENGAGEMENT	17
12. PROJECT ANNOUNCEMENT TO DECLARED PRIORITY AREA TASK TEAMS	19
13. PUBLIC MEETINGS HELD AS PART OF SECOND ROUND OF PUBLIC ENGAGEMENT	19
14. COMMENTS FROM INTERESTED AND AFFECTED PARTIES.....	22
15. CONCLUSION.....	22
APPENDIX 1 –PROOF OF DEA’S CONSULTATION STANCE.....	26
APPENDIX 2A – MINUTES OF MPUMALANGA HIGHVELD AND VAAL TRIANGLE AUTHORITIES ENGAGEMENT MEETING AND ATTENDANC REGISTER AND MINUTES OF	

WESTERN CAPE AUTHORITIES ENGAGEMENT MEETING AND ATTENDANCE REGISTER	27
APPENDIX 2B -PROOF OF CANCELLED EASTERN CAPE AUTHORITIES MEETING	28
APPENDIX 3A –PROOF OF LOCAL AUTHORITY AND WARD COUNCILLOR CONSULTATION.....	29
APPENDIX 3B –MINUTES OF EMALAHLENI WARD COUNCILLORS BRIEFING,	30
APPENDIX 3C –MINUTES OF BALFOUR WARD COUNCILLORS BRIEFING,	31
APPENDIX 3D –PROOF OF LOCAL AUTHORITY AND WARD COUNCILLOR CONSULTATION_2 ND ROUND OF ENGAGEMENT	32
APPENDIX 4 -NEWSPAPER TEAR SHEETS AND SOCIAL MEDIA NOTICES	33
APPENDIX 5 - PHOTOGRAPHIC PROOF OF SITE NOTICE PLACEMENT	34
APPENDIX 6 - I&AP DATABASE.....	35
APPENDIX 7A - BACKGROUND INFORMATION DOCUMENT (BID).....	36
APPENDIX 7B - STAKEHOLDER NOTIFICATION LETTER OF AVAILABILITY OF DRAFT APPLICATION DOCUMENTATION FOR PUBLIC REVIEW AND COMMENT	37
APPENDIX 7C - SIGNED BID DISTRIBUTION LIST AND SIGNED DRAFT APPLICATION DOCUMENTS DISTRIBUTION LIST	38
APPENDIX 7D - PROOF OF DIRECT NOTIFICATION TO I&APS	39
APPENDIX 8A - PROOF OF PUBLIC MEETING CANCELLATIONS.....	40
APPENDIX 8B - PROOF OF BULK SMS REMINDERS TO i&APS FOR PUBLIC MEETINGS SCHEDULED FOR 28 – 29 AUGUST 2018.....	41
APPENDIX 9 - MINUTES OF THE 1 ST ROUND OF PUBLIC MEETINGS AND RELATED ATTENDANCE REGISTERS	42
APPENDIX 10 - BULK SMS REMINDERS FOR ZAMDELA AND KWAZAMOKUHLE PUBLIC MEEITNGS_2 ND ROUND OF PUBLIC ENGAGEMENT.....	43
APPENDIX 11 - MINUTES OF THE 2 nd round of PUBLIC MEETINGS AND RELATED ATTENDANCE REGISTERS	44
APPENDIX 12 - EMALAHLENI LOCAL MUNICIPALITY FOLLOW UP EMAIL AND THREE RIVERS COUNCILLOR FOLLOW UP EMAIL	45
APPENDIX 13 - ISSUES AND RESPONSE REPORT VERSION 2	46

TABLES

Table 1: Power Stations (and nearest large city) forming part of the postponement application	1
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Table 2: Public libraries at which the BID and Notification letters were made available for public review and comment	15
Table 3: Public Meeting schedule for the first round of public engagements.....	17
Table 4: Public Meeting schedule for the second round of public engagements	20

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1. INTRODUCTION

In terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (NEMAQA), all of Eskom's coal and liquid fuel-fired power stations are required to meet the Minimum Emission Standards (MES) under GNR 893 dated 22 November 2013, and as amended in GNR 1207 on 31 October 2018, which was promulgated in terms of Section 21 of the NEMAQA. GNR 1207 provides for postponement or suspension of compliance time frames. Any such applications need to be made to the National Air Quality Officer (NAQO).

Eskom is lodging applications to the NAQO for suspension and alternative emission limits and postponement for eleven (11) of its power stations emission limits contained within the MES compliance timeframes.

The power stations that will apply for suspension, alternative emission limits and postponement from the MES compliance timeframes include ten (10) coal fired power stations in the Mpumalanga Highveld Region and one (1) station in the Vaal Triangle. The power stations are listed below in Table 1. Eskom will submit the respective applications to the NAQO at the Department of Environmental Affairs (DEA) by 31 March 2019.

It was originally planned to include Grootvlei power station (Balfour) in the Mpumalanga Highveld and Acacia power station (Western Cape) and Port Rex power station (Eastern Cape) in the present application process. However given that Grootvlei has different compliance timeframes than the other power stations and based on the fact that there was no immediate need to change the Atmospheric Emission Licenses (AELs) for Port Rex and Acacia based on the applicable legislation at the time, Eskom decided to exclude these stations from this application process. Therefore Public Participation tasks and issues raised during the first round of public engagements, related to Grootvlei, Acacia and Port Rex power stations, have been recorded in the Public Participation Report but were excluded from the second round of engagements.

Table 1: Power Stations (and nearest large city) forming part of the postponement application

Mpumalanga Highveld Region	Vaal Triangle Region
<ul style="list-style-type: none">▪ Duvha (Emalahleni)▪ Kendal (Emalahleni)▪ Majuba (Amersfoort)▪ Camden (Ermelo)▪ Kriel and Matla (Kriel)▪ Hendrina (Middelburg)▪ Arnot (Middelburg)▪ Komati (Middelburg)	<ul style="list-style-type: none">▪ Lethabo (Sasolburg)

The reason for the applications by the power stations listed in Table 1, in most cases, is due to design-related limitations, since all of the existing power stations were constructed before promulgation of the MES. The existing power stations will not be able to comply with the MES for new plant in all cases for various reasons including with the original design of the plant, financial constraints, age of the power station, the coal quality used, water resources and maintaining a reserve margin. Further, installing abatement technology to achieve full compliance to the MES, on each station for PM, NO_x and SO₂, would cost an exorbitant amount of money, directly impacting on the electricity tariff and requiring an adjustment. Eskom is proposing alternative emission limits that are achievable until relevant abatement

technology has been installed at the respective power stations to reduce PM and NO_x. It is also requesting postponement of the SO₂ new plant limit until the stations are decommissioned.

The application process entails submitting an application for suspension, alternative limits and/or postponement from the MES compliance timeframes per specified power station yet undertaking one public participation process for all the applications. For this application process one consolidated Public Participation Report has been prepared which address all the power stations.

In accordance with the requirements for suspension, alternative limits and/or postponement applications, Eskom will submit to the NAQO the following documentations as part of the application process:

- A Summary Motivation Document for all the power stations as part of this application process;
- A Motivation Document supported by an Atmospheric Impact Report (AIR), Fugitive Emissions Plan and Variation request per individual power station;
- Summary Atmospheric Impact Report presenting the collective findings of the various AIR's;
- Health impact focused cost benefit analysis, Emission Reduction Plan and Decommissioning Plan for stations set to close by 2030;
- Consolidated Public Participation (PP) Report.

Naledzi Environmental Consultants (Pty) Ltd (NEC) was appointed by Eskom Holdings to facilitate the Public Participation Process (PPP) in support of the application in terms of the National Environmental Management Act, Act 107 of 1998 (NEMA) and it promulgated Environmental Impact Assessment (EIA) Regulations of 2014 (as amended by GNR 326, 2017). Since Eskom will also be required to submit AEL variation requests for the respective power stations parallel to the application process, the PPP also to meets the requirements of Section 57 of the NEMAQA.

2. LEGISLATIVE REQUIREMENTS

The PPP for the application process follows Regulation 40 to 44 under the NEMA EIA Regulations 2014 which requires that a PPP must provide access to all information that reasonably has or may have the potential to influence any decision with regard to an application. Regulation 40 (3) requires that it must provide interested and affected parties with favourable circumstances to comment, for a period of at least 30 days, on such reports before an application has been submitted to the decision making authority and must be afforded an opportunity to comment once an application has been submitted to the decision making authority. Regulation 41-44 requires the following:

- Giving notice to all I&AP's by means of:
 - fixing notice boards,
 - giving written notice
 - placing an advertisement in one local newspaper, at least one provincial or national newspaper or any other official Gazette;
- Open and maintain a register of I&APs and submit such register to the competent authority. The register must contain names of all persons who have submitted comments or attended public meetings or requested in writing to be registered;

- Registered I&AP's are entitled to comment, in writing, on all reports or plans submitted to such party during the PPP.
- All comments from I&AP's need to be recorded in reports and plans. Written submissions including responses to such comments and records of meetings are to be attached to the reports and plans submitted to the competent authority. Where a person desires but is unable to access written comments reasonable methods of recording comments must be provided for.

Section 57 of the NEMAQA requires that notice is given of an AEL variation request in a national or local newspaper and that members of the public are afforded 30 days to submit written presentations on or objections to the Minister or MEC from the date of notice.

3. APPROACH TO THE PUBLIC PARTICIPATION PROCESS

The PPP followed for the application process was planned and executed to meet the requirements of the NEMA EIA Regulations of 2014 as per Regulation 40-44 and Section 57 of the NEMAQA. An addition to the requirements the PPP was further supplemented with authority engagement meetings with provincial- and district atmospheric licensing authorities, project briefings with Speaker's and ward councillors and several public engagement meetings in areas surrounding the Eskom power stations which form part of the application process.

The approach to the PPP includes two rounds of public engagement. The first round provides an opportunity to review a Background Information Document (BID) and comment on the approach in preparing the application, AIR's, health related cost benefit analysis including attendance of public meetings. During the second round the applications themselves, the AIRs, Variation requests, health related cost benefit analysis and PP Report & Issues and Responses Report (IRR) is made available for public review and another round of public meetings is arranged, generally at the same public venues as used for the first round, to facilitate comments on the draft application documentation. See Figure 1 overleaf for a diagrammatic presentation of the process.

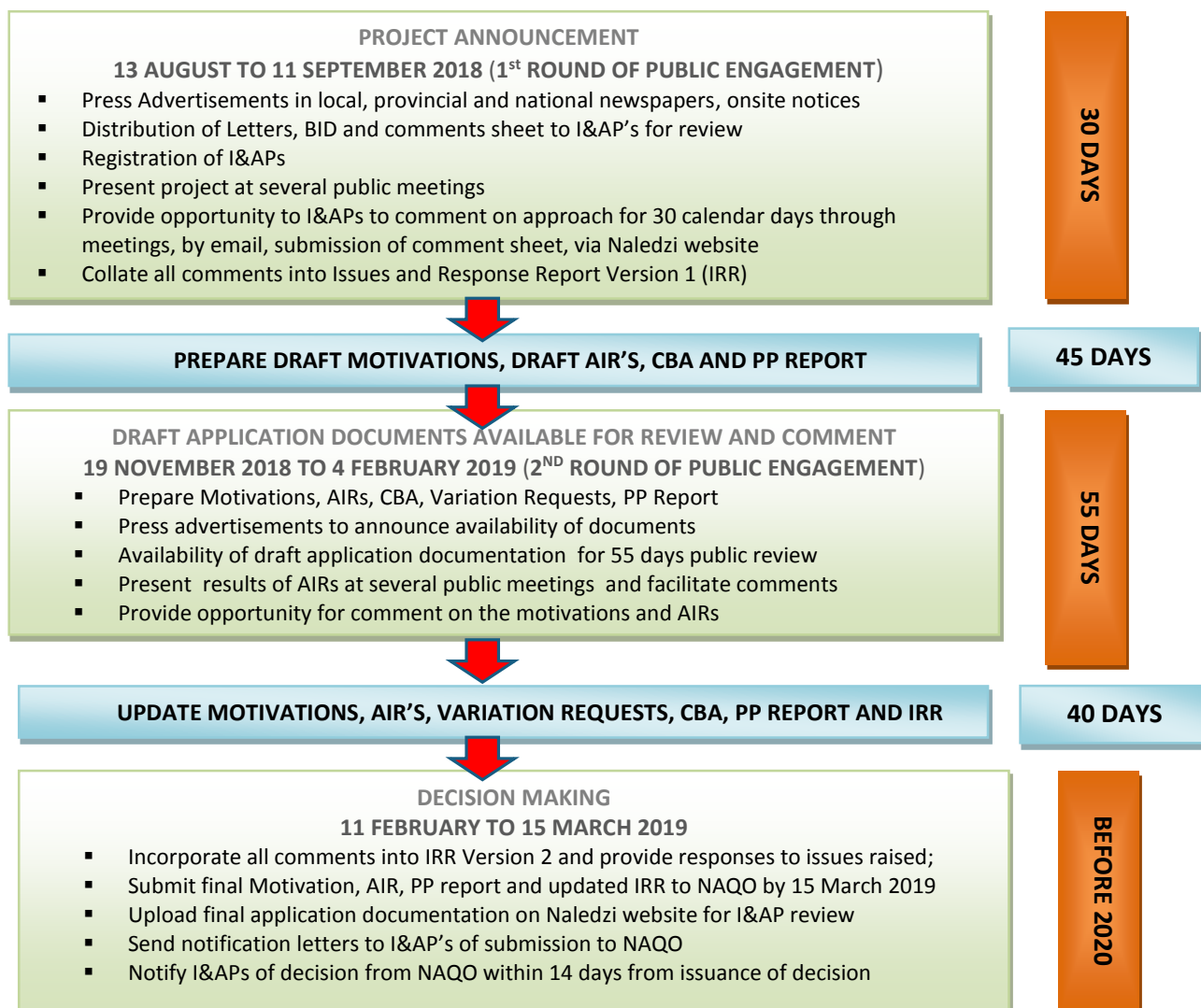


Figure 1: Public Participation Process

For this application process, the 1st round of engagement was undertaken from 13 August to 11 September 2018 and the 2nd round was undertaken from 19 November 2018 to 4 February 2019. During the 2nd round the draft application documents, including the motivations for the respective applications, the AIRs, Variation requests, CBA and the Public Participation Report were each made available for 55 days' public review and comment. The 2nd round lapsed on 4 February 2019 and the PP Report has been finalised on 18 February 2019 to record and consolidate all PPP tasks, comments, issues raised at the public meetings and received during the entire public participation process. Essentially all issues raised during the PPP for the application process has been recorded in the attached IRR which is a standalone document to the PP Report.

It is important to note that the 1st round of engagement in respect of the application process was completed prior to the publication of the 2017 National Framework for Air Quality Management (NAQF) on 26 October 2018 and the updated MES regulations GNR 1207 on 31 October 2018. The 2nd round was completed after the publication of the updated regulations and 'Framework'.

The updated Public Participation Report includes the outcome of the entire PPP and has been prepared for submission together with the application documentation to the NAQO for approval.

I&APs have been notified of the submission and have access to the final documents placed on the Naledzi website. I&APs will also be notified of the decision made by the NAQO.

The Public Participation Report includes comments received from interested and affected parties (I&APs), including any comments by the decision making authority received during:

- the project announcement period and public meetings held as part of the 1st round of public engagement;
- the public review and comment period and public meetings held as part of the 2nd round of public engagement.

4. SUMMARY OF 1ST AND 2ND ROUND PUBLIC ENGAGEMENT TASKS

In summary the following tasks were undertaken as part of the first round of public engagements (project announcement phase):

4.1 1st Round: Provincial and AEL Authorities' engagements

- The project was communicated to the relevant Mpumalanga Highveld Region and Vaal Triangle Region provincial air quality management officers and district AEL authorities telephonically on 6 July 2018 and via email on 10 July 2018 before any public announcements tasks were undertaken. The communication requested authorities to be informed of the project and opportunity to engage through a stakeholder meeting. The following authorities were consulted:
 - Mpumalanga- and Free State Provincial Air Quality Management Officers;
 - Nkangala District-, Gert Sibande District- and Fezile Dabi District Atmospheric Licensing Authorities;

The engagement covered the Mpumalanga Highveld Region power stations including Lethabo power station in the Vaal Triangle Region.

- Equally, the project was communicated to the Western – and Eastern Cape Region provincial air quality management officers and district AEL authorities telephonically on 6 July 2018 and via email on 10 July 2018. The communication requested authorities to be informed of the project and opportunity to engage through a video conference call meeting. The following authorities were consulted:
 - Western Cape Provincial Air Quality Management Officer;
 - City of Cape Town Atmospheric Licensing Authority
 - Eastern Cape Atmospheric Licensing Authority
 - Buffalo City Metropolitan Municipality Air Quality Division;

The engagement covered the two peaking stations, Acacia and Port Rex in the Cape Region.

- The project was further communicated to the DEA Directorate: Air Quality Authorisations and NAQO telephonically on 9 July 2018 and via email on 9 August 2018. The communication requested the NAQO to be informed of the project and

requested an engagement meeting. DEA confirmed telephonically and via email that no engagements were necessary before the official applications for postponements were lodged to the NAQO;

- A combined Mpumalanga Highveld Region and Vaal Triangle Region authority's engagement meeting was held on 30 July 2018 in Middelburg at the Nkangala District Municipality Offices. All relevant provincial air quality officers and district AEL authorities were invited.
- A 'video conference call' (VCC) Western Cape authorities' engagement meeting was held on 1 August 2018 in Edgemead, Cape Town at Acacia power station. The meeting was facilitated through a VCC from Eskom Megawatt Park via Acacia. Invitees included Western Cape Provincial Air Quality Manager and atmospheric AEL authority, City of Cape Town. The meeting was relevant to the Acacia peaking station in Western Cape Region;
- An Eastern Cape authorities' engagement meeting was scheduled for 2 August 2018. Eskom requested that the meeting be rescheduled as a VCC at Port Rex power station in East London. Eastern Cape Province AEL authority and Buffalo City Metropolitan Air Quality Unit were not satisfied with method. Alternatively the authorities were requested to attend the public meeting to be scheduled in East London as part of the first round of public engagements;

4.2 1st Round: Local Authority and Ward Councillor engagements;

- Before any public announcement tasks were undertaken, the project was communicated to the relevant local authority Speaker's offices and councillors within whose jurisdiction the respective power stations fall. The announcement was made from 18 to 23 July 2018 telephonically and via email. The communication requested authorities to be informed of the project and requested their inputs to determine suitable dates, times and venues to host the 1st round of public engagement meetings to inform the public. The following authorities were consulted:
 - Emfuleni Local Municipality (Lethabo power station)
 - Metsimoholo Local Municipality (Lethabo power station)
 - Dipaleseng Local Municipality (Grootvlei power station)
 - Pixley Ka Seme Local Municipality (Majuba power station)
 - Msukaliga Local Municipality (Camden power station)
 - Steve Tshwete Local Municipality (Arnot-, Hendrina- and Komati power stations)
 - Emalahleni Local Municipality (Kendal-, Duvha-, Kriel- and Matla power stations)
 - City of Cape Town Metropolitan Municipality – Subward Manager for Edgemead (Acacia power station)
 - Buffalo City Metropolitan Municipality (Port Rex power station)
- A ward councillors briefing meeting was held with Emalahleni Local Municipality on 17 August 2018 at the Emalahleni municipal offices with the relevant ward councillors for the areas surrounding Kendal, Duvha, Kriel and Matla power stations, Emalahleni PP Officer and the office of the municipal manager to discuss the PPP approach before initiated;

- Suitable public meeting venues, dates and times were confirmed by all relevant local authorities and councillors by 31 July 2018.

4.3 1st Round: Project announcement

- Press advertisements announcing the MES Postponement Applications were published in 18 different national, regional and local newspapers in the Mpumalanga Highveld-, Vaal Triangle and Cape Region from 7 to 15 August 2018;
- Site notices were placed in strategic places in Vereeniging, Vanderbijlpark, Sharpsville, Sasolburg, Zamdela, Refenkgotso, Ermelo, Hendrina, Grootvlei, Greylingstad, Balfour, Volksrust, Amersfoort, Middelburg, Emalahleni, Kriel, East London, Bothasig and Edgemead in Cape Town from 10 to 14 August 2018;
- All I&APs registered on the previous MES Postponement application process database, recent EIA Processes undertaken for activities at the respective power stations, priority area task team forums including standing stakeholder forums were notified with a Background Information Document (BID) and Comment and Registration Form, requesting I&APs to register on the MES Postponement application process database;
- BID's, Notification letters including Comments and Registration Forms were made available for public review and comment at twenty six (26) public libraries within the Mpumalanga Highveld-, Vaal Triangle- and Cape Region including on the Naledzi website www.naledzi.co.za/publicdocuments;
- A series of public meetings took place from 20 to 31 August 2018 at various venues close to power stations;
- **Loud hailing** was scheduled from 19 -29 August 2018 to prompt the communities of the scheduled public meetings;
- Due to circumstances beyond Naledzi's control public meetings in Ermelo, Thubelihle, Kriel, Phola and Emalahleni were cancelled on 23 August 2018 and notifications to this effect were sent out the registered I&APs via email on 23 August 2018. The meetings were cancelled due to protest action in the areas.
- An **updated BID** for the project was sent to all the registered I&APs on the project database on 24 August 2018;
- Bulk messaging system (sms) reminders were sent to I&APs on 27 August 2018 as a reminder of the public meetings scheduled to take place during the week of 27-31 August 2018 in their areas;
- Eskom in their capacity as stakeholders in the Highveld– and Vaal Triangle Priority Area ITT Task teams, also announced the project and the commencement of the 1st round of public engagements for the project at the Sasolburg Air Quality Meeting on 15 August 2018, at the Sedibeng ITT meeting on 16 August 2018 and at the Highveld Priority Area ITT Meeting held at Nkangala District Municipality on 20 September 2018.

- The public meeting minutes for the meetings held from 20 – 31 August 2018 were distributed for comments to attendees on 20, 21 and 25 September 2018 respectively. The minutes were finalised and distributed to attendees on 10 October 2018.
- All comments solicited at the 1st round of public meetings including written submissions were captured in the IRR Version 1.

4.4 2nd Round: Local Authority and Ward Councillor engagement

Same as in the 1st round of engagement the commencement of the 2nd round of public engagement was communicated to the relevant local authority Speaker's offices and councillors within whose jurisdiction the respective power stations fall excluding the Cape Region authorities. The announcement was made from 18 to 23 July 2018 telephonically and via email. The communication requested authorities to be notified of the commencement of the 2nd round of public engagement and requested their inputs to determine suitable dates, times and venues to host the 2nd round of public engagement meetings to inform the public.

4.5 2nd Round of public engagements conducted to announce the availability of the draft Application Documentation for public review and comment

For the second round of public engagements the following has been done to announce the availability of the draft application documents:

- Press advertisements were published on 9 November 2018 in the same 13 national, regional and local newspapers in the Mpumalanga Highveld- and Vaal Triangle as published in the first round of public engagement;
- All I&APs registered on the application process database were notified through a Stakeholder Notification Letter and Comment Sheet of the availability the draft documentation for public review and comment on 12 November 2018.
- An electronic version of the draft application documentation was made available for public review and comment from 12 November 2018 to 16 January 2019 on the Naledzi website www.naledzi.co.za/publicdocuments. Hard copies of the draft Application Documentation were delivered to public venues from 26 to 29 November 2018 at the same public libraries as displayed at in the first round of public engagement.
- A series of public meetings took place from 19 to 29 November 2018 generally at the same public venues as used in the first round of public engagements.
- During the public review period several bulk sms reminders and email reminders were distributed to I&APs regarding the public meetings.
- Loud Hailing was conducted in several areas including Thubelihle, greater Sharpeville and Zamdela.

- The public meeting minutes for the meetings held from 20 – 29 November 2018 were distributed for comments to attendees on 23 and 24 January 2019 respectively. The minutes were finalised and distributed to attendees on 7 February 2019. The finalised minutes were also uploaded onto the Naledzi website for access and download by all registered I&APs.
- On 16 November 2018, the Centre of Environmental Rights requested an extension of the draft application documentation commenting period until 6 February 2019. An alternative extension was granted until 31 January 2019 and a notification to this effect was distributed to all registered I&APs.
- During the 2nd round of public meetings Eskom received a request to avail the Annual Emission Reports for the power stations forming part of the application process. On 10 December 2018, The Annual Emission Reports were uploaded onto the Naledzi website for public review and comment as part of the application process documentation. A notification to this effect was sent to registered I&APs on the same day.
- On 28 January 2019, the Centre of Environmental Rights requested another short extension of the draft application documentation commenting period until Monday 4 February 2019. The extension request was granted and a notification to this effect was distributed to all registered I&APs on 29 and 31 January 2019 respectively.
- The public comment and review period on the Draft Application Documentation therefore lapsed on 4 February 2019 which afforded I&APs and organs of state 55 days to make written submissions or objections on the project.
- All the comments solicited at the 2nd round of public meetings including written submissions have been incorporated in the updated IRR Version 2 for submission to the NAQO.
- The final Draft Application Documentation will submit to the NAQO on 15 March 2019. The finalised documentation will be available on the Naledzi website.

5. PROVINCIAL AND AEL AUTHORITIES ENGAGEMENTS

On 9 July 2018 and 9 August 2018 the DEA Directorate: Air Quality Authorisations including the NAQO was informed of the project and opportunity to engage with the authority was requested. The DEA confirmed via email that no engagements were necessary before the official applications for postponement were lodged with the NAQO.

Refer to **Appendix 1** for Proof of DEA stance to engagement.

Next, two authority engagement meetings took place as part of the first round of public engagement on 30 July 2018 and 1 August 2018 respectively in the Mpumalanga Highveld Region and Cape Region.

Firstly, an Mpumalanga Highveld and Vaal Triangle authority engagement meeting took place on 30 July 2018 at Nkangala District Municipality Offices from 11:00am to 13:00pm to

consult the Mpumalanga-and Free State Provincial Air Quality Managers including Nkangala-, Gert Sibande- and Fezile Dabi District AEL Authorities regarding project. The respective power stations under conversation included Lethabo-, Duvha, Kendal-, Kriel-, Matla-, Camden-, Majuba-, Komati-, Arnot and Hendrina power stations.

Secondly, a Western Cape authority engagement meeting took place on 1 August 2018 at Acacia power station in Edgemoor Cape Town to consult the Western Cape Provincial Air Quality Manager and AEL authority, City of Cape Town. The meeting was facilitated through a VCC from Eskom Megawatt Park via Acacia power station. The meeting was relevant to the Acacia peaking station in Edgemoor, Cape Town in the Western Cape Region. The meeting presentation and agenda for the meeting was made available to invitees on 31 August 2018.

Thirdly, an Eastern Cape authority engagement meeting was scheduled for 2 August 2018 at Buffalo City Metropolitan Municipality Office in East London. The meeting was subsequently rescheduled as a VCC from Port Rex power station in East London via Eskom Megawatt Park. Both the authorities were not satisfied with the method. The meeting was cancelled and the meeting presentation circulated to invitees with the alternative to attend the scheduled public meeting at the East London Museum as part of the first round of public engagements.

The authorities' engagement meetings served to inform the licensing authorities regarding the applications, obtain clarity on project information and provide authorities opportunity to raise comments, issues and concerns regarding the planned project approach and project. It allowed the project team to record comments and issues regarding the application.

Refer to **Appendix 2A** for Minutes of the Authorities Engagement Meetings and related Attendance Registers.

Refer to **Appendix 2B** for Proof of Cancelled Eastern Cape Authority Meeting.

6. LOCAL AUTHORITIES AND WARD COUNCILLOR ENGAGEMENTS

As a matter of consideration, the relevant local authorities and respective Speaker's offices were contacted telephonically and notified via email from 18 to 23 July 2018 of the planned PPP tasks to be undertaken in support of the MES Postponement applications. Communications with the local authorities requested their inputs to confirm suitable dates, times and venues to host the first round of public engagement meetings. This was done to ensure that planned project meetings did not coincide with municipal PPP planned within the same period. The following municipalities were consulted:

- Emfuleni Local Municipality (Lethabo power station)
- Metsimoholo Local Municipality (Lethabo power station)
- Dipaleseng Local Municipality (Grootvlei power station)
- Pixley Ka Seme Local Municipality (Majuba power station)
- Msukaliga Local Municipality (Camden power station)
- Steve Tshwete Local Municipality (Arnot-, Hendrina- and Komati power stations)
- Emalahleni Local Municipality (Kendal-, Duvha-, Kriel- and Matla power stations)

- City of Cape Town Metropolitan Municipality – Subward Manager for Edgemoor (Acacia power station)
- Buffalo City Metropolitan Municipality (Port Rex power station)

Suitable public meeting venues, dates and times were confirmed by local authorities and councillors by 31 July 2018.

A project briefing took place on 17 August 2018 with Emalahleni ward councillors at Emalahleni Local Municipality, Speaker's Office. During the briefing, the office manager for the Municipality Manager, municipal PP Officer and relevant ward councillors for Phola, Ogies, Kendal, Kriel, Thubelihle, Blesboklaagte, Reedstream Park, Witbank Dam, Duvha Park were provided an opportunity to better understand the project's PPP intent and provide inputs to the PPP approach.

Another project briefing meeting took place on 21 August 2018 with ward councillors for Dipaleseng Local Municipality at the Balfour Council Chambers. The Speaker, Ward Council Ward Coordinator and Councillors formed part of the meeting. The meeting served the same purposes as the Emalahleni briefing.

Refer to **Appendix 3A** for Proof of local authority and ward councillor consultation.

Refer to **Appendix 3B** for Minutes of the Emalahleni Ward Councillor's Briefing and related Attendance Register.

Refer to **Appendix 3C** for the Minutes of the Balfour Ward Councillor's Briefing Meeting and related Attendance Register.

For the second round of public engagement, the commencement of the engagement was communicated to the relevant local authority Speaker's offices and councillors within whose jurisdiction the respective power stations fall excluding the Cape Region authorities. The communications were sent during the week of 22 to 26 October 2018 telephonically and via email. The communication requested authorities to be notified of the commencement of the 2nd round of public engagement and requested their inputs to determine suitable dates, times and venues to host the 2nd round of public engagement meetings to inform the public.

Refer to **Appendix 3D** for Proof of local authority and ward councillor consultation for the 2nd round of engagements.

7. NEWSPAPER ADVERTISEMENTS

Regulation 41, 2(c) of the NEMA EIA Regulations of 2014 requires that an advertisement is placed in (i) one local newspaper or provincial Government Gazette and (ii) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the metropolitan or district municipality.

Accordingly press advertisements announcing the project and respective power stations, applying for postponement from the MES compliance timeframes, were published in the following local and national newspapers:

- Page 16 of the Beeld (national issues) on 10 August 2018 in Afrikaans
- Page 30 of the Daily Sun (national issue) on 10 August 2018 in English
- Page 10 of the Sedibeng Ster on 15 August 2018 in English
- Page 14 of the Vanderbijlpark Ster on 14 August 2018 in English
- Page 14 of the Vereeniging Ster on 14 August 2018 in English
- Page 14 of the Sasolburg Ster on 14 August 2018 in English
- Online Vaalweekblad of 15 August 2018 in English
- Page 13 of the Heidelberg Heraut on 8 August 2018 in English
- Page 6 of the Highveld Tribune on 7 August 2018 in English
- Page 11 of the Ermelo Hoëvelder/Highvelder on 10 August 2018 in English
- Page 9 of the Volksrust Recorder on 10 August 2018 in English
- Page 19 of the Middelburg Observer on 10 August 2018 in English
- Page 24 of the Witbank News on 10 August 2018 in English
- Page 3 of the Cape Times on 10 August 2018 in English
- Page 8 of the Tygerburger-Grendel on 8 August 2018 in English
- Page 9 of the Tygerburger – Goodwood on 8 August 2018 in English
- Page 7 of the Tygerburger – Milnerton on 8 August 2018 in English
- Page 14 of the Daily Dispatch on 10 August 2018 in English

Please note that a generic press advertisement was published in each of the above specified newspapers and it contained the details of every power station applying for postponement from the MES compliance timeframes.

The Beeld and Daily Sun are national newspapers and addressed all the power stations applying for postponement from the MES compliance timeframes. In the Vaal Triangle the Sedibeng Ster, Vanderbijlpark-, Vereeniging- and Sasolburg Ster including the Vaalweekblad addressed Lethabo power station.

In the Mpumalanga Highveld the Heidelberg Heraut addressed Grootvlei power station. The Highveld Tribune, Ermelo Hoëvelder and Volksrust Recorder addressed Camden- and Majuba power stations. The Middelburg Observer and Witbank News addressed Arnot-, Hendrina-, Komati-, Kendal- and Duvha power stations.

In the Cape Region the Cape Times and Tygerburger addressed Acacia power station in the Western Cape. The Daily Dispatch is distributed in East London and address Port Rex power station in the Eastern Cape.

For the second round of public engagement, newspaper advertisements were published in the same newspapers, excluding Heidelberg Heraut and the Cape Region newspapers. The press advertisements were published as follows:

- Page 6 of the Beeld (national issues) on 9 November 2018 in Afrikaans
- Page 20 of the Daily Sun (national issue) on 9 November 2018 in English
- Page 9 of the Sedibeng Ster on 14 November 2018 in English
- Page 15 of the Vanderbijlpark Ster on 13 November 2018 in English
- Page 15 of the Vereeniging Ster on 13 November 2018 in English
- Page 15 of the Sasolburg Ster on 13 November 2018 in English
- Page 15 of the Midvaal Ster on 13 November 2018 in English
- Online Vaalweekblad of 13 November 2018 in English
- Page 6 of the Highveld Tribune on 13 November 2018 in English

- Page 9 of the Ermelo Hoëvelder/Highvelder on 9 November 2018 in English
- Page 8 of the Volksrust Recorder on 9 November 2018 in English
- Page 30 of the Middelburg Observer on 9 November 2018 in English
- Page 21 of the Witbank News on 16 November 2018 in English

Refer to **Appendix 4** for Newspaper Tear Sheets for the respective newspapers.

Moreover, since social media has become a more popular news source than traditional sources, social media notifications regarding the project, second round of public engagement and scheduled public meetings were placed on several social media pages namely:

- Hendrina/Pullenshope/Blinkpan/Komati on 13 November 2018;
- Ermelo/Lothair/Dundonald/Volksrust Business Classified Ads on 25 and 26 November 2018;
- Ermelo Advertisers and the Surrounding Areas on 26 November 2018;
- Vanderbijlpark Sasolburg Vereeniging Adverteer on 25 November 2018;
- Sasolburg Advertensies on 27 November 2018 (5AM);
- Hartland Koffie Winkel (Amersfoort) on 27 November 2018;
- Metsimaholo Local Municipality on 25 November 2018.

Proof of social media notifications are also appended under Appendix 4.

8. SITE NOTICE PLACEMENT

Regulation 41 (2) of the NEMA EIA Regulations of 2014 requires a person conducting PPP to take into account any relevant guidelines applicable to PP as contemplated in section 24J of the Act and must give notice to all potential I&APs of an application or proposed application which is subject to PP by - (a) fixing a notice board at places conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of (i) the site where the activity to which the application or proposed application relates; and (ii) any alternative site.

For the MES Postponement applications, approximately 27 Site Notices have been placed at places conspicuous to and accessible by the public. These 27 Site Notices have been placed at the following public places:

Mpumalanga Highveld and Vaal Triangle:

- Vereeniging-Vanderbijlpark- and Sasolburg Public Library in English, Afrikaans, Sesotho
- Sharpeville - , Zamdela- and Refengkgotso Public Library in English and Sesotho
- Grootvlei-, Greylingstad- and Balfour Public Library in English, Afrikaans, Zulu and Sesotho;
- Amersfoort- and Volksrust Public Library in English, Afrikaans and Zulu;

- Ermelo – and Thusiville Public Library in English, Afrikaans, Zulu and Siswati;
- Hendrina Public Library in English, Afrikaans, Zulu and Siswati
- Middelburg Public Library in English, Afrikaans and Zulu
- Emalahleni Main Public Library in English, Afrikaans and Zulu
- Kriel Public Library in English, Afrikaans and Zulu

In the Eastern Cape Region, Site Notices were placed the following places in East London in Afrikaans, English and Xhosa:

- Port Rex power station
- Pick and Pay Greenfields in Westbank
- Spar, Greenfields in Westbank
- Fleet Street Spar, Quigney
- East London City Hall
- Met Suprette, Braelyn

In the Western Cape Region, Site Notices were placed the following places in Cape Town in the Edgemoor, Bothasig area in Afrikaans and English:

- Bothasig Public Library
- Along Edgemoor Drive at Edgemoor Public Library
- Engen Bothasig Motors
- Intersection of Vryburger and Grendel

Please refer to **Appendix 5** for Photographic Proof of Site Notice Placement.

For the second round of public engagement, advertisements were published in 13 newspapers and direct notifications were sent to all registered I&APs of the availability of the Draft Application Documentation and scheduled public meetings.

9. INTERESTED AND AFFECTED PARTY DATABASE

Regulation 42 of the NEMA EIA Regulations of 2014 requires that a register of interested and affected parties is opened and maintained and such is to be submitted to the decision making authority, it must (a) contain all persons, who as a consequence of the PPP conducted in respect of the application, have submitted written comments or attended meetings (b) all persons who have requested, in writing for their names to be placed on the register; and (c) all organs of state which have jurisdiction in respect of the project.

An I&AP database has been opened for the project and all I&APs registered on the previous MES Postponement application process database, recent EIA Processes undertaken for activities at the respective power stations, organs of state, standing stakeholder forum members for the respective power stations including the Highveld Priority Area Information Task Team (ITT) members have been added to the database. Public meetings also took place during the month of August 2018 and November 2018 and attendees at the meetings have also been added to the project database.

Refer to **Appendix 6** for the I&AP Database.

The database was reviewed and updated during the PPP.

10. DIRECT NOTIFICATION OF INTERESTED AND AFFECTED PARTIES

Regulation 41 (2)(b) of the EIA Regulations of 2014 requires that the PPP involves giving written notice, in any manner provided for in Section 47D of NEMA to-

- The occupiers of the site and, if proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken or to any alternative site where the activity is to be undertaken;
- Owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;
- The municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;
- Municipality which has jurisdiction in the area
- Any organs of state having jurisdiction in respect of any aspect of the activity; and
- Any other party as required by the decision making authority.

All I&APs registered on the previous MES Postponement application process database, on recent EIA Processes undertaken for activities at the respective power stations, organs of state, standing stakeholder forums for the respective power stations including the Highveld Priority Area ITT forum were notified with a BID and Comment and Registration Form, requesting I&APs to register on the current MES Postponement application process database. The BID was made available in Afrikaans, English, Sesotho, Xhosa, Zulu and Siswati.

The BID with attached Comment and Registration Forms were emailed to the list of pre-identified I&APs, sent to registered I&APs and were hand delivered to twenty five (25) public libraries in the Mpumalanga Highveld - , Vaal Triangle – and Cape Region from 10 to 16 August 2018, see Table 2.

Table 2: Public libraries at which the BID and Notification letters were made available for public review and comment

Public Libraries	Address
Vaal Triangle Region- Lethabo Power Station	
Sharpeville Library	C/o Seeiso and Zwane Street, Sharpeville
Sasolburg Public Library	John Vorster Road, Sasolburg
Zamdela Public Library	Stand 3246, Zamdela Community Centre
Refengkgotso Library	2195 Phomolong Road, Refengkgotso
Vereeniging Public Library	c/o Lesley and Mark Ave, Vereeniging
Vanderbijlpark Public Library	c/o Frikkie Meyer & Klasie Havenga Street, Vanderbijlpark
Mpumalanga Highveld	
Grootvlei Power Station	
Grootvlei Library	c/o Jacaranda and Ring Road, Grootvlei Mine Town
Greylingstad Public Library	Sechaba Drive, Nthoroane
Balfour Ward 3 Public Library	Johnny Mokoena Street, Balfour
Camden Power station	
Ermelo Public Library	c/o Church and Smuts Street, Ermelo
Thusville Public Library	Wesselon Extension 2 (Close to Reggie Masuku High school, next to crèche)
Majuba Power Station	
Amersfoort	Bree & Plain Street, Amersfoort
Volksrust Public Library	c/o Nelson Mandela and Adelaide Street, Volksrust

Kriel – and Matla Power Stations	
Kriel Public Library	Quetin and Heinrich Street, Kriel
Thubelihle Community Hall	Thubelihle
Duvha - and Kendal Power Stations	
Emalahleni Main Library	c/o Hofmeyer Street & Elizabeth Avenue, Emalahleni
Middelburg Public Library	Wanderers Avenue, Middleburg
Phola Public Library	2426 Qwaabe Street, Phola (CANCELLED-BURNT DOWN DURING PPP)
Ogies Public Library	Hoofweg, Ogies
Hendrina-, Arnot- and Komati Power Stations	
Hendrina Public Library	44 Kerk Street, Hendrina
Pullen's Hope Library	Kiaat Street, Pullen's Hope
Rietkuil Public Library	Marula Street, Rietkuil, Arnot
CAPE REGION	
Acacia Power Station (Western Cape)	
Edgemead Library	Edgemead Drive, Edgemead , Cape Town
Bothasig Public Library	Vryburger Avenue, Bothasig, Cape Town
Port Rex Power Station (Eastern Cape)	
East London Central Library	Gladstone Street, East London City Centre
West Bank Public Library	Hood Street, West Bank Village, East London
Greenfields Public Library	8 Reitz Street, Greenfields, East London

The project BID was updated on 23 August 2018 and was sent to all the registered I&APs on the project database on 24 August 2018. See **Appendix 7A** for a copy of the BID.

Similarly the electronic copies of the draft application documents for the respective power stations (the motivations for the applications, the draft Atmospheric Impact Reports (AIR), Cost Benefit Analysis, PP Report and Issues and Response Report) were made available to all pre-identified and registered I&APs on 19 November 2018, and printed copies were made available for public review and comment on 26 November 2018 at the same public libraries as displayed at in the first round of public engagement, excluding the Grootvlei, Balfour and Cape Region libraries-see Table 2. A Stakeholder Notification Letter and Comment's Form to this effect was emailed to the list of I&APs on 12 November 2018. The Stakeholder Notification Letter was also made available in Afrikaans, English, Sesotho, Zulu and Siswati at the public libraries in the Mpumalanga Highveld and Vaal Region. See **Appendix 7B** for a copy of the Stakeholder Notification Letter of availability of the draft application documentation.

The BID, Comment and Registration Form, Stakeholder Notification Letter and the draft Application documents for the respective power stations were made available on the Naledzi website www.naledzi.co.za/publicdocuments.

Essentially, on 9, 13 and 14 November 2018 the press advertisements as stated in Section 7 announced the availability of the draft application documentation for public review and comment from 19 November 2018 until 16 January 2018.

Subsequent to the notification, the CeR requested, that the public review and comment period on the draft application documentation be extended until 6 February 2019, after which Naledzi granted an extension until 31 January 2019. Closer to the lapse of the commenting period CeR requested another extension for submission of comments until 4 February 2019. The request was granted. I&APs registered on the application process database were notified

accordingly through emailed notifications of the further extension of the public review period for the draft documentation until 31 January and later to 4 February 2019.

Later during the Hendrina Public Meeting, it was requested that the Annual Emission Reports for the power stations forming part of the application process be made available to the public. On 10 December 2018, the Annual Emission Reports were uploaded onto the Naledzi website for public review and comment as part of the application process documentation. A notification to this effect was sent to registered I&APs.

Refer to **Appendix 7C** for the Signed BID Distribution List and signed draft application documentation Distribution List.

Refer to **Appendix 7D** for Proof of Direct notifications to I&APs.

11. PUBLIC MEETINGS HELD AS PART OF FIRST ROUND OF PUBLIC ENGAGEMENT

As stated under Section 3 ‘Approach to the PPP’, there is no specified requirement within the NEMA EIA Regulation of 2014 to conduct public meetings as part of a consultation process. The regulations do require that a person conducting PPP must take into account any relevant guideline applicable to PPP. Referring to DEA (2017) PPP Guideline in terms of NEMA EIA Regulations hosting a public meeting as a method to transfer project information and to solicit comments is a pertinent task. Therefore the PPP for the application process was supplemented with several public engagement meetings in areas surrounding the Eskom power stations.

Sixteen (16) public meetings were scheduled from 20 to 31 August 2018 at various venues close to power stations -see Table 3. The schedule of public meetings was made available on the Naledzi website www.naledzi.co.za/publicdocuments.

Table 3: Public Meeting schedule for the first round of public engagements

DATE	VENUE	TIME	Power Station
20 August (Mon)	Vereeniging (City Hall)	11:00 – 13:00	Lethabo Power Station
20 August (Mon)	Sharpville (Community Hall)	16:00 – 18:30	Lethabo Power Station
21 August (Tues)	Balfour (Siyathemba Community Hall)	11:00 – 13:00	Grootvlei Power Station
21 August (Tues)	Grootvlei (Thabakgoadi Community Hall)	15:00 – 17:00	Grootvlei Power Station
21 August (Tues)	Sasolburg, Zamdela (Harry Gwala Multipurpose Centre)	16:00 – 18:00	Lethabo Power Station
22 August (Wed)	Amersfoort (Mayor’s Hall)	11:00-13:00	Majuba Power Station
22 August (Wed)	Ermelo (Ella De Bruyn Hall)	17:00 – 19:00	Camden Power Station Majuba Power Station
23 August (Thursday)	Thubelihle (Community Hall)	11:00 – 13:00	Kriel Power Station Matla Power Station
23 August (Thursday)	Kriel (Volle Evangelie Church)	17:00 – 19:00	Kriel Power Station Matla Power Station
24 August	Phola (Community Hall)	11:00 – 13:00	Kendal

(Friday)			
24 August (Friday)	Emalahleni City Hall	16:00 – 18:00	Duvha, Kendal
28 August (Tues)	Hendrina (Kosmos Hall)	11:00 – 13:00	Hendrina, Komati, Arnot
28 August (Tues)	Kwazamokuhle (AME Church)	15:00 – 17:00	Hendrina, Komati, Arnot
28 August (Tues)	East London Museum	11:00 – 13:00	Port Rex Power Station
29 August (Wednesday)	Edgemoor (Edgemoor Community Hall)	18:00 – 20:00	Acacia Power Station
31 August 2018 (Friday)	Midrand (Eskom Learning Academy)	11:00 – 13:00	All

The public meetings were announced through press advertisements published in national, regional and local newspapers addressed under Section 7, site notices addressed under Section 8 and by means of the BID distribution to pre-identified I&APs and registered I&APs addressed under Section 10. Loud hailing was also scheduled from 19 to 29 August 2018 in the respective areas of Sharpeville, outskirts of Sasolburg, Zamdela, Refenggotso, Siyathemba (Balfour), Grootvlei, Amersfoort/Ezamokuhle, Perdekop, Kwazamokuhle (Hendrina), Rietkuil, Pullen's Hope, outskirts of Ermelo, areas near Komati power station to prompt the communities of the scheduled public meetings.

The public meetings provided I&APs the opportunity to obtain information regarding the application, obtain clarity on information contained in the BID and provided I&APs the opportunity to raise comments, issues and concerns regarding the project. It allowed the project team to record comments and issues regarding the project.

On 23 August 2018, due to circumstances beyond NEC's control, public meetings in Ermelo, Thubelihle, Kriel, Phola and Emalahleni were cancelled as a result of community unrest in the area and a safety risk for the NEC and Eskom team. A notification to this effect was sent to registered I&APs on the project database via email on 23 August 2018. The notification highlighted that public meetings scheduled from 28 to 31 August 2018 would still continue as planned.

Bulk sms reminders were sent to I&APs in Hendrina on 24 August 2018 and to I&APs in Edgemoor and East London on 27 August 2018 as a reminder of the remaining scheduled public meetings.

The public meetings that ultimately took place from 20 to 31 August 2018 included:

- Vereeniging City Hall and Sharpeville Community Hall meetings on 20 August 2018;
- Siyathemba –, Thabakgoadi Community Hall as well as Zamdela (Harry Gwala Multipurpose Centre) meetings on 21 August 2018;
- Amersfoort Mayor's Hall meeting on 22 August 2018;
- Hendrina (Kosmos Hall), Kwazamokuhle (AME Church) and East London Museum meetings on 28 August 2018;
- Edgemoor Community Hall meeting on 29 August 2018;
- Midrand (Eskom Academy of Learning) meeting on 31 August 2018.

A second attempt was made to schedule a consolidated public meeting in Emalahleni at the City Hall on 4 October 2018 from 06:00pm to 08:00pm, yet the meeting was cancelled once more due to circumstances beyond NEC's control – safety risk concerns. A notification was sent out to this effect on 4 October 2018.

The minutes of completed public meetings were distributed for comments to attendees on 20, 21 and 25 September 2018 respectively. The minutes were finalised and distributed to attendees again on 10 October 2018.

Refer to **Appendix 8A** for Proof of Cancellation of public meetings (23, 24 August 2018 and 4 October 2018).

Refer to **Appendix 8B** for Proof of Bulk sms reminders to I&APs for 28 and 29 August 2018 public meetings.

Refer to **Appendix 9** for Minutes of the 1st Round of Public Meetings and related Attendance Registers.

12. PROJECT ANNOUNCEMENT TO DECLARED PRIORITY AREA TASK TEAMS

It is worth stating that Eskom in their own capacity as stakeholders in the Highveld– and Vaal Triangle Priority Area ITT teams, further announced the project and the commencement of the first round of public engagements for the project at the Sasolburg Air Quality Meeting on 15 August 2018, at the Sedibeng ITT meeting on 16 August 2018 and at the Highveld Priority Area ITT Meeting held at Nkangala District Municipality on 20 September 2018.

The PPP presentation for the first round of public engagements prepared by NEC was presented by Eskom at the respective ITT meetings to forum members. The opportunity to review and comment on the public documentation for the project was highlighted including methods to obtain further project information from NEC.

13. PUBLIC MEETINGS HELD AS PART OF SECOND ROUND OF PUBLIC ENGAGEMENT

As part of the second round of engagement another round of public engagements took place generally at the same public venues as used for the first round of engagement, excluding Edgemoor Community Hall, East London Museum and venues at Balfour and Grootvlei, since stations close to these venues have now been excluded from the postponement application.

The purpose of the second round of public meetings for the process was as follows:

- to share the rationale for the postponement application process;
- present the findings of the AIR's which determined the implications of the application and to present Eskom's overall impact on the ambient air quality;

- To record comments and concerns regarding the application for inclusion in the IRR to form part of the record submitted to the NAQO for decision making.

Twelve (12) public meetings were scheduled from 20 to 29 November 2018-see Table 4. The schedule of public meetings was once more made available on the Naledzi website www.naledzi.co.za/publicdocuments.

Table 4: Public Meeting schedule for the second round of public engagements

DATE	VENUE	TIME	Power Station
20 November (Tue)	Kriel (Thubelihle Community Hall)	09:00 – 11:00	Kriel Matla
20 November (Tue)	Kriel (Volle Evangelie Church Hall)	18:00 – 20:00	Kriel Matla
21 November (Wed)	Ogies (Dutch Reformed Church Hall)	11:00 – 13:00	Kendal
21 November (Wed)	Emalahleni Banquet Hall (next to City Hall)	18:00 – 20:00	Kendal Duvha
22 November (Thu)	Hendrina (Kosmos Hall)	10:00 – 12:00	Hendrina
22 November (Thu)	Kwazamokuhle (AME Church)	15:00 – 17:00	Komati Arnot
23 November (Fri)	Midrand (Eskom Academy of Learning, Syndicate Room)	11:00 – 13:00	All
26 November (Mon)	Vereeniging (City Hall)	18:00 – 20:00	Lethabo
27 November (Tue)	Vereeniging (Sharpeville Community Hall)	10:00 – 12:00	Lethabo
27 November (Tue)	Zamdela (Harry Gwala Multipurpose Centre)	16:00 – 18:00	Lethabo
28 November (Wed)	Ermelo (Ella Du Bruyn Hall)	18:00 – 20:00	Camden
29 November (Thu)	Amersfoort (NG Church Hall)	11:00 – 13:00	Majuba

The public meetings were announced through press advertisements published in national, regional and local newspapers on 9 to 16 November 2018 including social media notices as addressed under Section 7, and by means of the Stakeholder Notification Letters distribution to pre-identified I&APs and registered I&APs addressed under Section 10. Loud hailing was also scheduled in the respective areas of Sharpeville, outskirts of Sasolburg, Zamdela and Refengkgotso, to prompt the communities of the scheduled public meetings.

Bulk sms reminders were sent to previous attendees of public meetings in Kwazamokuhle and Zamdela on 15 November 2018 as a reminder of the scheduled public meetings in their areas.

Refer to **Appendix 10** for Proof of Bulk sms reminders to I&APs for 22 and 27 November 2018 public meetings.

The minutes of the public meetings were distributed for comments to attendees on 23 and 24 January 2019. The minutes were finalised and distributed to attendees again on 7 February 2019.

Refer to **Appendix 11** for Minutes of the 2nd Round of Public Meetings and related Attendance Registers.

Important to note is key points of interest at majority of the public meetings were job opportunities available from Eskom power stations and tendering processes. This was true for the public meetings of Ogies, Thubelihle, Zamdela, Ermelo and at the Amersfoort Mayor's Hall. Limited issues were raised related to the air quality and the application process during these public meetings. At Kwazamokuhle the main issues of discussion evolved around Eskom's air quality offset pilot project implemented in the area including issues with the equipment tested at the pilot households. The attendees at the public meetings at Hendrina, Emalahleni, Kriel, Midrand, Vereeniging, Sharpeville and Amersfoort focused on air quality issues relevant to the application process.

Additionally, the public meeting at the Emalahleni Banquet Hall on 21 November 2018, Vereeniging City Hall on 26 November 2018, and Ermelo's Ella Du Bruyn Hall on 28 November 2018 were poorly attended. This was not the case for Ermelo in the 1st round of engagements as the 1st round Ermelo meeting was well attended yet attendees demanded to talk to Eskom regarding job opportunities and not regarding air quality issues.

Issues raised by attendees at these public meetings related to the poor attendance included:

- Three Rivers Councillor stated that it may be necessary to arrange another public meeting in the area of Vereeniging with key stakeholders from the area;
- Attendees at the Emalahleni Public Meeting criticised the poor attendance of the meeting and questioned the legitimacy thereof.

At the Emalahleni Public Meeting, Naledzi committed to inform the Emalahleni Local Municipality of the poor attendance and request their inputs on how to improve the PPP and ensure broader PPP. On 6 December 2018, Naledzi sent a follow email to the Emalahleni Local Municipality to inform the local authority of the poor attendance of the meeting and requested a response. No response has been received date. The concerns raised at the public meeting have been highlighted in the meeting minutes and in this PP Report.

On 24 January 2019, Naledzi sent the minutes of the Vereeniging Public Meeting to Ms. Dalene Venter, Councillor for Three Rivers, and requested confirmation as to whether any further engagements were required in the Three Rivers area. No response has been received to date.

Refer to **Appendix 12** for Respective follow up emails to Emalahleni Local Municipality and the Three Rivers Councillor.

Fundamentally, the most important issues and concerns raised on the application process were submitted through written submissions from non-governmental organisations and environmental campaigners on the draft application documentation during public review and comment period. It was also highlighted at public meetings that attendance at such meetings was not the only avenue to participate in the project but that written submissions could be lodged on the draft application documents until 31 January 2019.

14. COMMENTS FROM INTERESTED AND AFFECTED PARTIES

Regulation 44 of the NEMA EIA Regulations of 2014 requires that the applicant must record comments of interested and affected parties in reports and plans, and such written comments, including responses to such comments and recordings of meetings are attached to reports and plans that are submitted to the decision making authority.

During the project announcement period NEC received multiple requests for registration of I&APs on the project database including extensive comments on the BID during August to September 2018. A multitude of comments were also solicited during the 1st round of public meetings. These comments were collated into an Issues and Response Report Version 1.

For the second round of engagement NEC has received extensive comments on the draft application documentation from 19 November 2018 until 4 February 2019. The comments were solicited at public meetings, submitted through emails, including written submissions by citizens, environmental campaigners, non-governmental organisations such as Greenpeace Africa, Life After Coal which is a joint campaign by Earthlife Africa Johannesburg, groundWork, and the Centre for Environmental Rights, also Vaal Environmental Justice Forum, agricultural forums namely the Mpumalanga Agricultural Union and Amersfoort District Union.

All the comments received on the draft application documentation (draft motivations, AIR's, health related cost benefit analysis, PP Report) at public meetings, through written submissions and or emails have been incorporated into the updated Issues and Response Report (IRR) namely IRR Version 2. The IRR Version 2 reflects all the comments recorded during the entire PPP for the application process and offers a response thereto. The IRR is included with the application documentation and is submitted to the NAQO for decision making.

Refer to **Appendix 13** for the Issues and Response Report (IRR) which is a stand-alone document to the PP Report.

All written submissions made by the above mentioned citizens, organisations and forums have been attached to the IRR as Annexure A and B.

15. CONCLUSION

All previous I&APs, I&APs from recent EIA Processes undertaken for the respective power stations, organs of state, respective power station stakeholder forum members including the Highveld Priority Area ITT members were notified about the Application for Postponement of the MES for Eskom's coal and liquid fuel-fired power station on 10 to 16 August 2018 through the following means:

- Engagement meetings with the atmospheric emission licensing authorities;
- Engagement with local authorities and ward councillors;
- Press advertisements in several national, regional and local newspapers in the Mpumalanga Highveld -, Vaal Triangle and Cape Region;
- Direct notification of I&APs have been undertaken by distributing a BID through emailed notifications to pre-identified, registered I&APs and to previous I&AP

Databases, availability of the BID on the Naledzi website
www.naledzi.co.za/publicdocuments

- Site Notices have been placed at conspicuous places which are accessible by the public in the project areas surrounding the various power stations;
- Loud hailing the project and scheduled public meetings in communities to prompt them of the first round public engagement meetings;

Eleven (11) public meetings were held during the public review period of the BID, in the areas of Vereeniging, Sharpeville, Balfour, Siyathemba, Grootvlei, Zamdela (Sasolburg), Amersfoort, Hendrina, Kwazamokuhle, East London, Edgemoed and Midrand from 20 to 31 August 2018.

The draft application documentation, draft AIR's, health related cost benefit analysis and PP Report for the respective power stations were made available to I&APs for comment from 19 November 2018 to 4 February 2019 and all the registered I&APs were notified of the availability of the draft reports for review and comment, via email, through newspaper advertisements placed in the same newspapers as used for the 1st round of public was made available to I&APs for comment and all the registered I&APs were notified of the availability of the draft reports for review and comment, via email and through newspaper advertisements placed in the same newspapers as for the first round of consultation (excluding Heidelberg Heraut and Cape Region) and through Social Media notices. The notifications made clear that Grootvlei power station, Acacia power station and Port Rex power stations are excluded from the present application process.

Another round of public meetings took place for the second round of public engagement generally at the same public venues as used for the first round of consultation. Public meetings were held from 20 to 29 November 2018.

Extensive comments have been submitted on the draft application documentation. The comments were solicited at public meetings, submitted through emails, including written submissions by citizens, environmental campaigners, non-governmental organizations such as Greenpeace Africa, Life After Coal which is a joint campaign by Earthlife Africa Johannesburg, groundWork, and the Centre for Environmental Rights, also Vaal Environmental Justice Forum, agricultural forums namely the Mpumalanga Agricultural Union and Amersfoort District Union.

In a nutshell the sentiments from the public:

In a nutshell the sentiment from the public regarding Eskom's postponement from the MES compliance timeframes are that Eskom has had ample opportunity, since 2010, to take the necessary steps to plan and budget for the legal compliance. It has failed to take the necessary steps, based on extra time granted in its previous postponement, to comply with the MES. All the power stations applying for postponement, suspension or alternative limits are situated in the Mpumalanga Highveld Priority Area and Vaal Triangle Airshed Priority Area which already have severely-degraded air quality. Eskom's air pollution is responsible for more than 333 deaths every year and causes thousands of cases of bronchitis and asthma in adults and children annually.

Environmental campaigners believe that Eskom's ageing power stations must be decommissioned without delay but must include a fair and inclusive social and labour closure plan to ensure a just transition to cleaner energy.

Non-government organizations submit that the impacts of granting Eskom leniency to comply with the MES will have fatal consequences; especially for the health and wellbeing of people living in South Africa and severely undermine people's Constitutional rights.

Life After Coal Campaign, HEJN, and VEJA rejects Eskom's applications indicating that power stations that cannot comply with the MES should not operate and/or their decommissioning should be expedited.

During the public engagement meetings most of the concerns raised by the general public related to the need for economic opportunities associated with Eskom's operations (jobs or tenders).

Findings of the Atmospheric Impact Assessment:

Based on a review of the monitoring data material compliance with the NAAQS is evident for NO_x and SO₂ although for some stations and some years, data recovery was less than the required 80%. As such compliance is implied rather than assured. NAAQS non-compliance is associated with a range of pollution sources with PM in particular being linked to low-level sources such as household fuel burning. Whilst implementation of the Eskom emission reduction plan will reduce emissions it is when this is combined with the early shutdown and decommissioning of stations that the most significant emission reductions can be seen with concomitant improvements in air quality predicted using dispersion modelling.

Eskom response:

Eskom states that it has for many years worked to reduce its emissions from power stations. Emissions from the power stations have decreased significantly since the 1980's and it is installing emission abatement equipment at power stations to improve its emissions but has several challenges. To implement all the necessary emission abatement equipment at the power stations has cost implications and other implications for South Africa as a country.

Eskom has an Emission Reduction Plan (ERP) in place which will see a reduction in emissions. In the past Eskom focused on PM abatement. Implementation of the ERP will see a reduction in emissions of PM by 58%, SO₂ by 66% and NO_x by 46% by the year 2035. In addition Eskom will shutdown and close 5 power stations which will significantly improve the air quality by 2035. There will be a reduction in relative emissions from 2020 with implementation of Eskom ERP and power station decommissioning.

Eskom has considered the costs and benefits of compliance with the MES and recognises that there are health impacts related to its PM emissions. Eskom plans to reduce its emissions through the ERP and the cost to achieve it is R 46 billion and a 2-3% electricity tariff increase. If Eskom is to implement full compliance with the MES it will cost R 187 Billion and a 7-10% tariff increase.

Section 11 of the MES regulations makes provision for postponement of the compliance timeframe. It is in line with this provision that Eskom is submitting an application for postponement and following the required application process. Eskom believes it is within the legislative framework for DEA to issue a postponement decision. The application will be assessed by DEA which will make the decision.

Conclusion:

Naledzi Environmental Consultants Pty Ltd submits that due process has been followed and Public Participation has been undertaken with interested and affected parties in accordance to the EIA Regulations of 2014 Regulations 40-44.

Therefore, this Public Participation Report (PP Report) and Issues and Response Report (IRR) was finalised on 18 February 2019 and records and consolidates all the comments and issues raised at the public meetings and all written submissions received during the PPP. The IRR also offers responses to issues raised on the application process. The concluded PP Report and IRR Version 2 are herewith submitted together with the finalised application documents to the National Air Quality Officer (NAQO) for decision making.

I&APs have been notified of the submission and have access to the final application documents on the Naledzi website. I&APs will also be notified of the decision made by the NAQO.

APPENDIX 1 –

PROOF OF DEA's CONSULTATION STANCE

APPENDIX 2A –

**2A(1) MINUTES OF MPUMALANGA HIGHVELD AND VAAL TRIANGLE AUTHORITIES
ENGAGEMENT MEETING AND ATTENDANC REGISTER**

**2A(2) MINUTES OF WESTERN CAPE AUTHORITIES ENGAGEMENT MEETING AND
ATTENDANCE REGISTER**

APPENDIX 2B –

PROOF OF CANCELLED EASTERN CAPE AUTHORITIES MEETING

APPENDIX 3A –

PROOF OF LOCAL AUTHORITY AND WARD COUNCILLOR CONSULTATION

APPENDIX 3B –

MINUTES OF EMALAHLENI WARD COUNCILLORS BRIEFING,

17 AUGUST 2018

APPENDIX 3C –

MINUTES OF BALFOUR WARD COUNCILLORS BRIEFING,

21 AUGUST 2018

APPENDIX 3D –

**PROOF OF LOCAL AUTHORITY AND WARD COUNCILLOR
CONSULTATION_2ND ROUND OF ENGAGEMENT**

APPENDIX 4

NEWSPAPER TEAR SHEETS AND SOCIAL MEDIA NOTICES

APPENDIX 5

PHOTOGRAPHIC PROOF OF SITE NOTICE PLACEMENT

APPENDIX 6

I&AP DATABASE

APPENDIX 7A

BACKGROUND INFORMATION DOCUMENT (BID)

APPENDIX 7B

STAKEHOLDER NOTIFICATION LETTER OF AVAILABILITY OF DRAFT APPLICATION DOCUMENTATION FOR PUBLIC REVIEW AND COMMENT

APPENDIX 7C

SIGNED BID DISTRIBUTION LIST AND

SIGNED DRAFT APPLICATION DOCUMENTS DISTRIBUTION LIST

APPENDIX 7D

PROOF OF DIRECT NOTIFICATION TO I&APS

APPENDIX 8A

PROOF OF PUBLIC MEETING CANCELLATIONS

(23 AND 24 AUGUST 2018 AND 4 OCTOBER 2018)

APPENDIX 8B

**PROOF OF BULK SMS REMINDERS TO I&APS FOR PUBLIC MEETINGS
SCHEDULED FOR 28 – 29 AUGUST 2018**

APPENDIX 9

**MINUTES OF THE PUBLIC MEETINGS AND RELATED
ATTENDANCE REGISTERS**

APPENDIX 10

BULK SMS REMINDERS FOR ZAMDELA AND KWAZAMOKUHLE PUBLIC MEEITNGS_2ND ROUND OF PUBLIC ENGAGEMENT

APPENDIX 11

**MINUTES OF THE 2ND ROUND OF PUBLIC MEETINGS AND RELATED
ATTENDANCE REGISTERS**

APPENDIX 12

**EMALAHLENI LOCAL MUNICIPALITY FOLLOW UP EMAIL AND
THREE RIVERS COUNCILLOR FOLLOW UP EMAIL**

APPENDIX 13

ISSUES AND RESPONSE REPORT VERSION 2