

Correspondence to Authorities

Ref: 4516 A
Enquiries: V.I. Prinsloo
Tel : 017 8195346
Fax: 0866090238

Anelle Lötter
Zitholele Consulting
PO Box 6002
HALFWAY HOUSE
1685

Fax 0866746121

Dear Anelle Lötter

KEY COMMENTING AUTHORITY REVIEW OF THE DRAFT SCOPING REPORT FOR A PROPOSED EXTENTION OF ASH DISPOSAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT CAMDEN POWER STATION (DEA REF: 12/12/20/2300):

Your letter reference 12670: Let-02, date 15 July 2011 refers.

The Mpumalanga Tourism and Parks Agency have the following concerns, the Terrestrial biodiversity of the farm are Highly significant in parts. See attached map from the Mpumalanga Biodiversity Conservation Plan (C-plan).

Highly significant/Important & Necessary areas are those where biodiversity has been heavily compromised and very few options remain to meet biodiversity targets. Natural vegetation cover in these areas should be maintained or restored. Decisions on land-use changes will require a biodiversity specialist study as part of the EIA (Lötter M.C. & Ferrar A.A., 2006).

As a result the following minimum requirements for an activity that may have a detrimental effect on the environment should be met by the applicant:

In order to promote a uniform standard in Environmental Management Plans the Mpumalanga Tourism and Parks Agency requires a minimum set of standards that will be required in the Scoping Report, EIA or EMPR. Minimum requirements are set for all applications. It is the responsibility of the consultant to give reasons why there should be exemption of any of the requirements in this document (e.g. the application is in an area where there already is severe disturbance of the natural biodiversity and that there will be no impacts on the specific area of environmental concern if the requirements are not met).

If impacts are major, they must be considered in conjunction with existing impacts of other projects and be regarded as a key concern. (EIA Guideline document).

Present and potential future cumulative and synergistic effects should all be taken into account (Aide Memoire).

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VEGETATION

1. A map indicating the total area (ha) of disturbance/transformation¹ on the property, including the proposed development.
2. A map indicating vegetation communities and sensitive areas on the property. The map should include the delineation of a 30m buffer zone around any sensitive areas.
3. A map indicating all surrounding land use on adjacent properties.
4. A list of threatened plants species (Red Data Listed) that may potentially occur in the area should be submitted.
5. A floristic survey should be conducted during the growing season with at least two visits undertaken (\pm November and \pm February). Visits during other seasons will be determined by the flowering and fruiting times of species that do not occur during the summer season.
6. The MTPA should be supplied with a list of all plant taxa encountered during the surveys. The following should be investigated: threatened species (Red Data Listed²), important medicinal species, protected species (Mpumalanga Conservation Act, 1989) as well as endemic taxa.
7. Plants that have been surveyed and which may be of conservation importance should be identified down to species level.
8. The MTPA should be supplied with a detailed list of all threatened species, including their locality information as well as details regarding date, GPS location and spatial resolution.
9. A list of threatened species that could potentially occur but were not found during site visits should be provided separately. In respect of each such species an opinion on the likelihood of that species occurring on the site and the reason for that opinion should be provided.
10. A list of alien plant species occurring on the property should be provided.
11. The invasion extent of category 1 & 2 plants (CARA: Act 43 of 1983, Regulation 15) should be investigated.
12. Any existing or planned eradication programs of alien vegetation should be indicated in the report.
13. Relocation plans of plants of conservation importance should be included and this relocation should be done by specialists that have expertise in the area of environmental concern (EIA Guideline Document).

¹ Transformation: any land use that results in a loss of biodiversity e.g. buildings, old lands, roads, dams etc. and excluding grazing or burning pressures.

² The MTPA is currently reassessing the threatened plant species of Mpumalanga and a preliminary list is available on request.

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ANIMALS

Mammals

1. The Mpumalanga Biobase Report should be consulted for obtaining background on the conservation value of land and areas of sensitivity within the Mpumalanga Province. This report is obtainable from the Mpumalanga Tourism and Parks Agency (MTPA).
2. A list of all potential species should be submitted. The following should be highlighted for threatened (Red Data) species.
 - i. International Red Data status (Latest version of IUCN Red Data List)
 - ii. National Red Data status (Latest version)
 - iii. Endemic status of each species
 - iv. Protection status of each species (Mpumalanga Nature Conservation Act 10 of 1998)
3. A full survey to determine species richness should be carried out. The time of year to conduct surveys should depend on the activity pattern of the species. The survey area should not be restricted to the proposed site of development, but should include all habitat types over the entire property as well as adjacent areas. These surveys should be done by specialists with expertise in the area of environmental concern (EIA Guideline document).
4. A list of all species recorded during the survey should be supplied to the MTPA. Species data (GPS point locality, species name and date) should be forwarded to the MTPA.
5. Where total destruction is going to take place:
 - i. Specified faunal species must be captured and relocated to suitable habitat in the area.
 - ii. The operations must be handled by specialists with expertise in the area of environmental concern (EIA Guideline document).
 - iii. Species data (GPS point locality, species name and date) must be forwarded to the MTPA.
6. Maps indicating
 - i. Areas of sensitivity
 - ii. Areas already disturbed/transformed³ and size (ha)
 - iii. Proposed development and size
 - iv. Land-use on surrounding properties.
 - v. Location of important species as well as roosting and hibernation sites e.g. caves of ecological importance, in relation to the proposed development.
7. Recommendations on buffer zones will only be made once comprehensive species lists have been received and reviewed in the EMPR/Scoping Reports.
8. A list of threatened species that can potentially occur, but were not found during site visits or surveys should be provided. In respect of each such species an opinion on the likelihood of that species, occurring on the site and the reason for that opinion should be provided.

³ Transformation: any land use that results in a loss of biodiversity e.g. buildings, old lands, roads, dams etc. and excluding grazing or burning pressures.

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9. A list of exotic/introduced vertebrate species occurring on the property should be provided.
10. An ethically accepted plan for the eradication or removal of any exotic/introduced species posing a threat to indigenous species should be included in the report.
11. Any existing and/or planned actions to prevent free movement/roaming of domestic animals such as dogs, cats, goats and pigs should be provided.

Birds

1. The Mpumalanga Biobase Report should be consulted for obtaining background on the conservation value of land and areas of sensitivity within the Mpumalanga Province. This report is obtainable from the Mpumalanga Tourism and Parks Agency (MTPA).
2. A list of all potential species should be submitted. The following should be highlighted for threatened (Red Data) species.
 - i. International Red Data status (Latest version of IUCN Red Data List)
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4. A list of all species recorded during the survey should be supplied to the MTPA. Species data (GPS point locality, species name and date) should be forwarded to the MTPA.
5. Indicate in the report whether the proposed site falls within an Important Birding Area (IBA). Literature regarding the Important Bird Areas of Southern Africa (Barnes, 1998) is available from Bird Life South Africa.
6. Maps indicating
 - i. Areas of sensitivity Areas already disturbed/transformed⁴ and size (ha)
 - ii. Proposed development and size
 - iii. Land-use on surrounding properties.
 - iv. Location of important species as well as roosting and hibernation sites e.g. caves of ecological importance, in relation to the proposed development.
7. Recommendations on buffer zones will only be made once comprehensive species lists have been received and reviewed in the EMPR/Scoping Reports.

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10. An ethically accepted plan for the eradication or removal of any exotic/introduced species posing a threat to indigenous species should be included in the report.
11. Any existing and/or planned actions to prevent free movement/roaming of domestic animals such as dogs, cats and exotic/introduced bird species should be provided.

Invertebrates

Evaluation and monitoring of invertebrate biodiversity should be included and should contain information on groups including ants, ground living beetles, (Tenebrionidae and Carabidae) termites, leafhoppers, spiders and scorpions.

WETLANDS

With reference to the meeting held in this regard on 03/02/2004 the following is important:

1. A wetland specialist should assess the condition of the wetland.
2. A thorough integrity study should be done on wetlands and the following must be indicated:
 - i. Detailed map of delineated wetlands on the property as well as upstream and downstream thereof.
 - ii. Detailed map of all the wetland types, indicating regionally scarce wetland habitat type/s if any.
 - iii. Indicate the size of the wetland.
 - iv. Indicate the different hydrological habitats (percentage) i.e. permanent, seasonal and/or temporary wetland areas.
 - v. Indicate the roughness of the wetland surface (according to Manning's roughness coefficient)
 - vi. Indicate which drivers support the existence of the wetland.
 - vii. Indicate and map the soil forms on the property highlighting hydric soils.
 - viii. Indicate the erodability of the soil (K-value)
 - ix. Indicate problem areas in the wetland (e.g. eroded areas, drains, roads, power lines, alien invasive plants etc.) giving the percentage and level of impact thereof on the wetland.
 - x. Indicate terrain unit/s on which the wetland occur.
 - xi. State the landform setting/s which best describe the wetland
 - xii. Give information regarding the downstream situation (e.g. number of people dependant on the water, size of floodable property downstream)
3. Identify and describe the functions provided by the wetland.
 - i. Habitat functions (biodiversity, grazing, nesting sites, etc.).
 - ii. Water quality functions (water purification etc).
 - iii. Hydrologic functions (flood attenuation, water supply, etc).
4. Catchment information.
 - i. Surface area of the wetland catchment.

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- ii. Percentage of the wetland catchment occupied by the wetland itself.
 - iii. Cumulative loss of wetlands in the catchment.
 - iv. Mean annual runoff generated by the catchment.
 - v. Land cover in the surrounding catchment and the approximate percentage area under each.
 - vi. Sediment input into the wetland.
 - vii. Nutrient/toxicant input into the wetland.
5. Indicate the direct benefits derived by local communities from the wetland (e.g. is the wetland culturally important and why?)
6. Describe the biodiversity of the wetland.
- i. Vegetation surveys.
 - ii. Invertebrate surveys
 - iii. Bird surveys during different seasons of the year (indicate wetland dependant birds and especially the importance of the wetland for migratory, nomadic and breeding birds).
 - iv. Mammal survey (Large and small mammals).
 - v. Fish survey.
 - vi. Amphibian survey (must be done shortly after rain)
 - vii. Identify unique communities (e.g. an unusually high number of marsh owls, although common, will be unique).
7. Indicate the availability of alternative sites with less important habitat for the proposed development

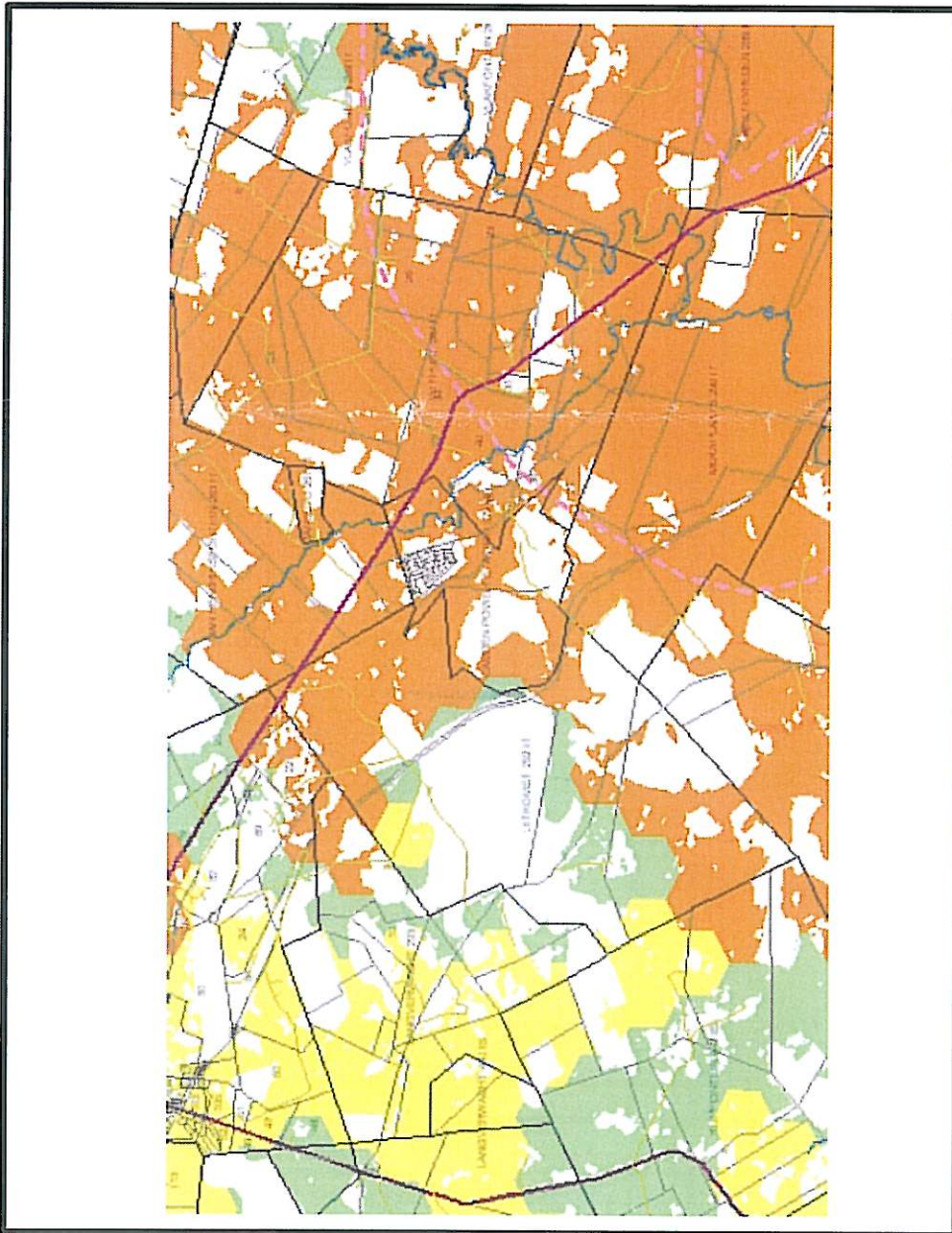
Kind regards



Dr N Motete
Acting Chief Executive Officer

Date: 31 AUG 2011

Map Title



- Towns (TOWN)
- Roads (all) (FEAT_TYPE)
 - ARTERIAL ROUTE
 - MAIN ROAD
 - NATIONAL FREEWAY
 - NATIONAL ROUTE
 - ON-OFF RAMP
 - OTHER ACCESS
 - SECONDARY ROAD
 - STREET
 - UNDER CONSTRUCTION
- Rivers (All)
- Farms (FARMNAME)
- Farm_portions (SUB_NO)
- Terrestrial Ecological corridors
- terrestrial biodiversity assessment (ASSESSMEI)
 - 1 - Protected
 - 2 - Irreplaceable
 - 3 - Highly Significant
 - 4 - Important & Necessary
 - 5 - Least Concern
 - 6 - No Natural Habitat Remaining





Ref: LUA 13/252
Unit: LUA/SS
Enquiries: F.N. Krige
Tel/ Fax: 013 2540279
E-Mail: frans@mtpa.co.za

Attention: Ms. Nicolene Venter

Zitholele Consulting
P.O.Box 6002
Halfway House
1685

Fax: 086-676-9950
E-mail: mail@zitholele.co.za

Dear Ms. Venter

SUBJECT: MTPA COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR A PROPOSED EXTENSION OF ASH DISPOSAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT CAMDEN POWER STATION, NEAR ERMELO, MPUMALANGA.

With reference to your correspondence reference: 12670: Let-02 and DEA Ref: 12/12/20/2300 of date 20 March 2013 herewith our comments:

MTPA has no objection to the proposed development or to the sensitivity of the site. The preferred site 1 is supported for the new ash disposal facility and a proper liner with a lifespan longer than 30 years is recommended.

Furthermore we thank you for the professional reporting plans.

Kind Regards

A handwritten signature in black ink, appearing to read "J. Eksteen", is written over a dotted line.

.....
MR. J. EKSTEEN
ACTING: SENIOR MANAGER SS
DATE: 12/04/2013

Confidentiality Notice: This internal memo contains information which may be legally privileged. This information is intended for the sole purpose of the addressee named above. Any copying, disclosure or action taken on reliance of the memo information is strictly prohibited.

Patiswa Mnqokoyi

From: Mandla Ndlovu [mandla.izinyosi@gmail.com]
Sent: 25 April 2013 04:39 PM
To: Jan Dirk Brak
Cc: Warren Kok; Nicolene Venter
Subject: Document for Proposed Extension of Ash Disposal Facilities at Camden Power Station

Hi,

Further comments:

Why you don't employ other measures to reduce ash waste like to use it to make other products/material,i.e Bricks, Charcoal,etc

regards

On Wednesday, April 24, 2013, Jan Dirk Brak <Janb@zitholele.co.za> wrote:

> Good evening Mandla,

>

>

>

> Thank you for the comment. I will put it into the CRR that will be attached to the final document. I will also ensure that you get a copy of the final CRR.

>

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>

> Good evening.

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>

> Kind Regards,

>

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>

> Jan-Dirk Brak [BSc. (Geography)]

>

> Environmental Practitioner

>

> Block B, Thandanani Park, Matuka Close, Halfway Gardens, Midrand, 1685, RSA

>

> T: +27 11 207 2060 D: +27 11 088 8403 F: +27 86 676 9950 C: +27 82 806 7217

>

> E: janb@zitholele.co.za W: www.zitholele.co.za

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>

> From: Mandla Ndlovu [mailto:mandla.izinyosi@gmail.com]

> Sent: 24 April 2013 05:20 PM

> To: Jan Dirk Brak

> Cc: Warren Kok; Nicolene Venter

> Subject: Re: Document for Proposed Extension of Ash Disposal Facilities at Camden Power Station

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>

> Hi,

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> My comments are as follows:

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> I'm not supporting the extension ash disposal facilities at Site 2 & 3 as proposed in your concept map because they are too close to my farm. I'm doing farming, they are people staying on the farm and I'm busy building dwelling apartments and accommodation facilities.

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> Regards

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> MB Ndlovu

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> Tel: 083 564 5192

>

> Owner of Portion 29 (a Portion of Portion3) of the Farm WITPUNT 267 - Just behind and bordering Camden Power Stationh

>

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>

> On Tue, Apr 16, 2013 at 1:11 PM, Jan Dirk Brak <Janb@zitholele.co.za> wrote:

>

> Good day Mandla,

>

>

>

> I would like to remind you that we have a Public Meeting Tomorrow at Indawo Game Reserve to present the Draft Environmental Impact Report to the public.

>

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> There will be two meetings:

>

> · 10:00-12:00

>

> · 18:00-20:00

>

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>

> The document is rather big, so I will attach a link to our website where the document is stored as well. If you have any further questions and comments, you are welcome to attend the meeting tomorrow. I will also

have CD's available with copies of the document on it.

>

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>

> <http://www.zitholele.co.za/camden-power-station>

>

>

Jan Dirk Brak

From: Patiswa Mnqokoyi
Sent: 31 May 2013 01:45 PM
To: Jan Dirk Brak
Cc: Warren Kok; Nicolene Venter
Subject: FW: Camden Power Station Ash Expansion Facility - Minutes of public meetings

Good Day,

Please see below.

Kind Regards,

Patiswa Mnqokoyi [Cert. Public Relations and Marketing]
Divisional Administrator
Block B, Thandanani Park, Matuka Close, Halfway Gardens, Midrand, 1685, RSA
T: +27 11 207 2060 **D:** +27 11 207 2074 **F:** +27 86 676 9950 **C:** +27 72 184 8653
E: patiswam@zitholele.co.za **W:** www.zitholele.co.za



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From: Phiwo B. Nkosi [<mailto:PhiwoBN@gsibande.gov.za>]
Sent: 31 May 2013 01:32 PM
To: Patiswa Mnqokoyi
Subject: FW: Camden Power Station Ash Expansion Facility - Minutes of public meetings

Good Day

The GSDM hereby confirms the minutes to be an accurate representation of the deliberations of the meeting.

From: Wisdom Mpofu
Sent: Monday, May 27, 2013 5:19 PM
To: Phiwo B. Nkosi
Subject: FW: Camden Power Station Ash Expansion Facility - Minutes of public meetings

Action Pliz Phiwo

W

From: Patiswa Mnqokoyi [<mailto:Patiswam@zitholele.co.za>]
Sent: 27 May 2013 01:08 PM
To: Florence Rambuda
Subject: Camden Power Station Ash Expansion Facility - Minutes of public meetings

Good day Dear Stakeholder,

Please find attached the minutes from the two public meetings hosted by Zitholele Consulting on Wednesday 17 April 2013 at Indawo Lodge, Ermelo.

The meetings objective was to present the Draft Environmental Impact Report to the public.

The public has the opportunity to review the minutes, and to verify if the comments made were captured correctly.

Please direct your comments to the public participation office or myself at your earliest convenience.

The Zitholele team is currently busy compiling the Final Environmental Impact Report (FEIR). The availability of the FEIR will be announced to the public in due course.

Kind Regards,

Jan-Dirk Brak [BSc. (Geography)]

Environmental Practitioner

Block B, Thandanani Park, Matuka Close, Halfway Gardens, Midrand, 1685, RSA

T: +27 11 207 2060 **D:** +27 11 088 8403 **F:** +27 86 676 9950 **C:** +27 82 806 7217

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<p>REGISTRATION AND COMMENT SHEET</p> <p>Environmental Impact Assessment and Waste Management License Application for a proposed extension of ash disposal facilities at Camden Power Station</p> <p>Inserted in the Background Information Document May 2011</p>	<p>EIA Public Participation Office</p> <p>Anelle Lötter/Florence Rambuda Zitholele Consulting (Pty) Ltd P O Box 6002, Halfway House, 1685 Tel: (011) 207 2076/2075 Fax: 086-676-9950 Email: alotter@zitholele.co.za or florencer@zitholele.co.za</p>
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Please complete by 17 June 2011 and return to the EIA Public Participation Office (as above)

TITLE	MR	FIRST NAME	JAPHYA BORCIANI		
INITIALS	J.B.	SURNAME	MALUNGISA		
ORGANISATION	DEPT OF LABOUR	EMAIL	japhyam@labour.gov.za		
POSTAL ADDRESS	PRIVATE BANGA 7263 WITBANK 1035				
TEL NO	0829071158	POSTAL CODE	1035		
DATE	07/06/2011	FAX NO	0865277146		
Please formally register me as an interested and affected party (I&AP) so that I may receive further information and notifications during the Environmental Impact Assessment process				YES	NO
I would like my notifications by				Letter (mail)	
				Email	
				Fax	
				Telephone	
				Paper copies	
I would like to receive documents for comment as follows				By email	
				On CD	
				PAPER COPIES	
In terms of Regulations GNR 543 - 546 – Government Gazette No. 33306 of 18 June 2010 (EIA process regulations) I disclose below any direct business, financial, personal or other interest that I may have in the approval or refusal of the application:					

COMMENTS (please use separate sheets if you wish)

Any comments you may have at this stage:

Currently NO comment.

Please ask the following of my colleagues/friends/neighbours to register for this project:

THANK YOU FOR YOUR CONTRIBUTION

Patiswa Mnqokoyi

From: Warren Kok
Sent: 26 April 2013 07:29 AM
To: Mandla Ndlovu; Jan Dirk Brak
Cc: Nicolene Venter
Subject: RE: Document for Proposed Extension of Ash Disposal Facilities at Camden Power Station


Dear Mr Ndlovu,

Many thanks for your comments, which will be appropriately registered in the Comments Response Report and reported as part of the official record of the project. In response to your enquiry "Why you don't employ other measures to reduce ash waste like to use it to make other products/material,i.e Bricks, Charcoal,etc" I can respond by indicating that Eskom do have initiatives ongoing for the investigation and implementation of projects for reuse of the ash generated at their power stations. Unfortunately the volume of ash is just too high to dispose of all of it in this manner. Currently Eskom manage to re-purpose about 5% of the ash generated at power stations across South Africa. Thus ash disposal / storage facilities will are still required.

I trust this answers your question, but please feel free to contact us again should you have any further enquiries.

Kind Regards,

Warren Kok [B.A. (Hons) (Geography and Environmental Management), EAP]
Divisional Leader: Environmental Management Services
Block B, Thandanani Park, Matuka Close, Halfway Gardens, Midrand, 1685, RSA
T: +27 11 207 2060 **D:** +27 11 207 2073 **F:** +27 86 676 9950 **C:** +27 71 250 5371
E: warrenk@zitholele.co.za **W:** www.zitholele.co.za

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