

Appendix C6:  
Comments Received

## Organs of State

DEFF



## environment, forestry & fisheries

Department:  
Environment, Forestry and Fisheries  
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA , 0001 · Environment House, 473 Steve Biko Road, Arcadia, · PRETORIA

DEA Reference: 14/12/16/3/3/2/2035

Enquiries: Mr Jay-Jay Mpelane

Telephone: 012 399 9404, E-mail: [jmpelane@environment.gov.za](mailto:jmpelane@environment.gov.za)

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

Tel number: 011-656-3237  
E-Mail address: [joanne@savannahsa.com](mailto:joanne@savannahsa.com)

### PER MAIL / E-MAIL

Dear Ms Thomas

### COMMENTS ON THE DRAFT SCOPING REPORT FOR THE PROPOSED GRID CONNECTION INFRASTRUCTURE IN ORDER TO CONNECT THE AUTHORISED 400MW RBGP2 GAS TO POWER PLANT, RICHARDS BAY WITHIN THE JURISDICTION OF THE CITY OF UMLATHUZE LOCAL MUNICIPALITY AND THE KING CETSHWAYO DISTRICT MUNICIPALITY, KWAZULU-NATAL PROVINCE

The Draft Scoping Report (DSR) dated November 2020, received by this Department on, 13 November 2020 and acknowledged on 18 November 2020, refers. The Department has the following comments for the above mentioned project:

#### Public Participation Process

The EAP must also ensure that the Public Participation Process complies with all the requirements in terms Regulation 41 (1) to (7). These are not limited to the following:

- Please ensure that comments from all relevant stakeholders are submitted to the Department with the final Scoping report. Proof of correspondence with the various stakeholders must be included in the final Scoping report. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- Comments and response to all the issues raised by interested and affected parties must be incorporated with the final Scoping report.
- The site photos must include the date and place of advertisement.
- A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended; must be incorporated with the final Scoping report.

This Department noted that the applicant "Richards Bay Gas Power 2 (Pty) Ltd" received Environmental Authorisation in 2016 for a 400MW gas-to-power plant located within Zone 1F of the Richards Bay IDZ. This authorisation included the connection of this facility via a 132kV connection to the Indus Substation bordering the site. However, during the consultation with Eskom, it has been determined that the initial approved connection route is no longer feasible.

MS.

The proposed grid connection infrastructure includes development of an overhead power line and switching station to connect the authorised RBGP2 400MW gas-to-power facility to the national grid at a feasible grid connection point to the south of the power station site.

The power line will be constructed at 132kV or 275kV (and operated at 132kV) and will connect to the Eskom Substation via a 132kV switching station to a feasible connection point to the south of the power plant site. The proposed power line is ~8.5km long and includes an assessment corridor of 200m.

Two alternative power line corridors of up to 200m in width are being considered in the EIA process. The assessment of a wider corridor will allow for the optimisation of the power line within the corridor, avoiding environmental sensitivities and addressing any site-specific technical and landowner conditions. Only one feasible location for the switching station has been identified. Where existing roads along the power line servitude and to the switching station sites are not available, new access roads will be required to be constructed.

The following information is required:

- The EAP is also required to provide the potential impacts and mitigation measures of the proposed development which includes an overhead power line, switching station, and new required access roads.
- A clear comparison of all identified alternatives for the proposed grid connection infrastructure for the already approved 400MW gas-to-power plant must be incorporated with the final Scoping report. Furthermore, clear motivation for each alternative identified and assessed for the project and clear advantages for the preferred alternative as to why it proves to be the preferred as compared to other alternatives.
- The total footprint (size) and the coordinates of the site for the proposed switching station.
- Coordinates of the new proposed overhead power line and new required access roads.
- The associated infrastructure which will be linked to the proposed development shall be provided and also be mapped at an appropriate scale.
- The application form and final Scoping must include only those activities which have been identified to be applicable to the project. In addition, the EAP must be sure whether the listed activity is applicable or not.
- The EAP must ensure that all required **specialist studies** for the proposed grid connection infrastructure at a feasible grid connection point to the south of the power station site are identified and recommended for full assessment.

You are further reminded that the final Scoping report to be submitted to this Department must comply with all the requirements in terms of the "*content of the Scoping report*" in accordance with **Appendix 2** (a – l) of the EIA Regulations 2014. In other words, a scoping report must contain all information set out in Appendix 2 to these Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and Gazetted by the Minister in a government notice.

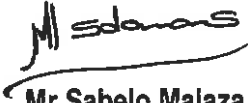
**Please note:**

These comments from this Department **does not exempt** the **EAP** from performing his/her duties as per required by the EIA Regulations 2014, as amended.

Further note that in terms of Regulation 45 of the EIA Regulations 2014, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No 107 of 1998, as amended, that no activity may commence prior to an environmental authorisation being granted by the Department.

Yours sincerely



**Mr Sabelo Malaza**  
**Chief Director: Integrated Environmental Authorisations**  
**Department of Environmental Affairs**  
**Letter signed by: Ms Millicent Solomons**  
**Designation: Director: Priority Infrastructure Projects**  
**Date: 10/12/2020.**

<b>CC:</b>	Jordi Fernandez Balague	Richards Bay Gas Power 2 (Pty) Ltd	Email: <a href="mailto:jordi@phakwegroup.co.za">jordi@phakwegroup.co.za</a>
	Mr Siza Sibande	Department of Economic Development, Tourism and Environmental Affairs	Email: <a href="mailto:siza.sibande@kznedtea.gov.za">siza.sibande@kznedtea.gov.za</a>

City of uMhlathuze

Your ref:

Contact: Sharin Govender

Our file ref:

In response to DMS No: 1437314

Date:

14 December 2020

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Savannah Environmental (Pty) Ltd  
PO Box 148  
SUNNINGHILL  
2157

**ATTENTION: Ms Nicolene Venter**

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

Dear Madam

## **COMMENTS ON THE PROPOSED 275/ 132 KV GRID CONNECTION FROM THE RICHARDS BAY GAS TO POWER PLANT ON IDZ 1F, RICHARDS BAY.**

The City of uMhlathuze has reviewed the draft Scoping Report, dated November 2020, in respect of the above application. We further refer to an email dated 14 December 2020 representatives of the applicant with regards to servitudes for the project. Accordingly submit the following comments for due consideration:

### **General**

1. It is noted that the proposed infrastructure will evacuate power from the proposed Gas to Power plant on IDZ 1F, which was subject to an independent EIA amendment application that the municipality commented on 19 October 2020 as per (**DMS 1426340**).
2. The power will be evacuated via overhead infrastructure to a switching station south of the Eskom (Indus Power station).
3. The project is submitted as part of a bid process in terms of the Risk Mitigation Independent Power Producer Procurement Programme of the Department of Energy.

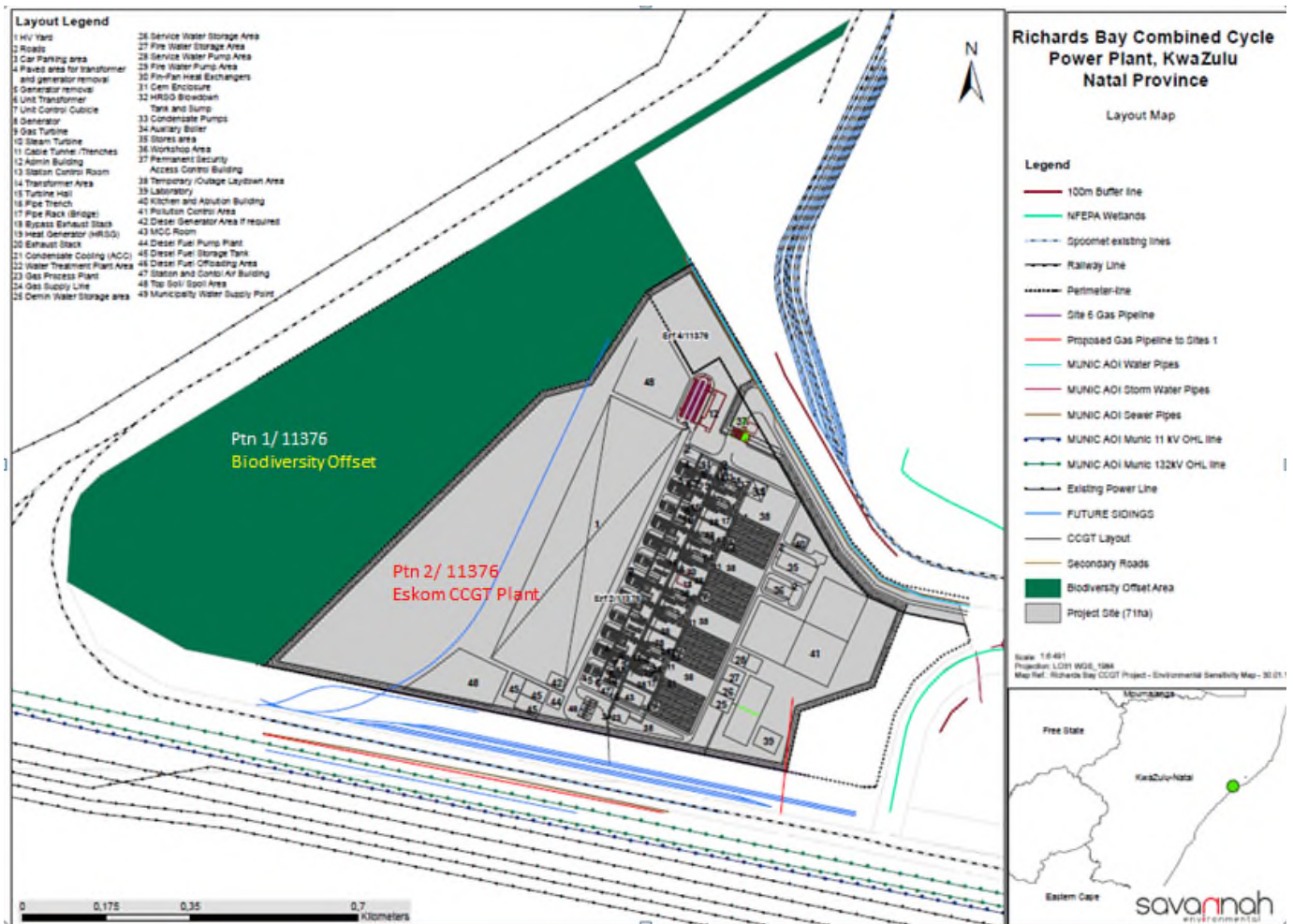
### **Property Administration**

4. Based on the drawings provided, the transmission lines traverse Ptn 2 and 3 / 11376 where the Eskom for the proposed 3000 MW Combined Cycle Gas Turbine (Figure 1).





5. The applicant is urged to liaise further with the Municipality for detailed planning of the preferred transmission route. This process, managed by the Property Administration unit of the Municipality, will continue until servitudes are registered in favour of the applicant. The contact person in this regard is Ms Sibongile Qulu ([Sibongile.Qulu@umhlathuze.gov.za](mailto:Sibongile.Qulu@umhlathuze.gov.za)).
6. The property description of the proposed switching station is not provided.
7. The municipality consents to the undertaking of the Scoping/ EIA process on land owned by Council.



**Figure 1: Savannah, March 2019: Eskom Combined Cycle Gas Turbine Layout on Phase 1D**

### Biodiversity

8. Ptn 1 11376 is reserved as a biodiversity offset, and accordingly zoned “Conservation” in terms of the uMhlathuze Scheme.
9. The ToR for ecology and wetland assessments must be discussed further and agreed upon with Department Environmental Affairs, Forestry and Fisheries; Ezemvelo KZN Wildlife and the Municipality.



## **Electrical and Energy Services**

10. The project is in principle supported by the Municipality as it is aligned with the National Resource Plan. Gas to Power specifically will contribute to energy security for the region and the country.

You are welcome to direct further queries regarding the above to Ms. Sharin Govender from the office of the Deputy Municipal Manager: City Development on Tel.: 035 9075174; Mobile: 0824504187; or email: [Sharin.Govender@umhlathuze.gov.za](mailto:Sharin.Govender@umhlathuze.gov.za).

Yours faithfully

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

**DEPUTY MUNICIPAL MANAGER: CITY DEVELOPMENT**

DMS 1438674



Interested and Affected Parties

## GROUNDWORK

## Nicolene Venter

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**From:** Public Process <publicprocess@savannahsa.com>  
**Sent:** Sunday, December 13, 2020 8:38 PM  
**To:** Avena Jacklin  
**Cc:** Nicolene Venter; Ronald Baloyi; savannahenvironmentalsa@gmail.com; Nicolene Venter  
**Subject:** Transmission Infrastructure for the 400MW RB Gas-To-Power project – Confirmation of telephone call

**PROPOSED TRANSMISSION INFRASTRUCTURE FOR THE 400MW GAS-TO-POWER LOCATED IN RBIDZ ZONE 1F,  
KWAZULU-NATAL PROVINCE  
DEA Ref. No.: 14/12/16/3/3/2/2035**

Dear Avena,

Thank you for taking my call on Thursday morning, 10 December 2020 in which we enquired whether groundWork will be submitting formal written comments on the Scoping Report for the above-mentioned project.

On behalf of groundWork, you submitted the following three (3) comments and confirmed that this is groundWork's formal comments:

- The fisher communities must be notified and consulted with.
- The subsistence farmers along the canals must also be notified and consulted with.
- groundWork will delay the process if the above-communities are not notified and consulted with.

As confirmed, we will include these comments in the comments and responses report of the final Scoping Report for submission to the Department of Environment, Forestry and Fisheries.

Looking forward to a collaborated consultation process during the impact phase.

Kind regards,

RICHARDS BAY INDUSTRIAL DEVELOPMENT ZONE  
(IDZ)

## Nicolene Venter

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**From:** Savannah Public Process  
**Sent:** Sunday, December 13, 2020 5:11 PM  
**To:** Percy Langa  
**Cc:** Ronald Baloyi; Nicolene Venter; Nqobiswa Mwandla  
**Subject:** RE: 400MW TRANSMISSION INFRASTRUCTURE: Comments on Scoping Report & Corridors

Hi Percy,

Thank you for your feedback below – it is appreciated and enjoy your leave.

Looking forward to your team's comments.

Kind regards,

---

**From:** Percy Langa <Percy.Langa@rbidz.co.za>  
**Sent:** Sunday, December 13, 2020 10:20 AM  
**To:** Savannah Public Process <publicprocess@savannahsa.com>  
**Cc:** Nicolene Venter <nicolene@savannahsa.com>; Ronald Baloyi <Ronald@savannahsa.com>; Nicolene Venter <nicolene@savannahsa.com>; Nqobiswa Mwandla <Nqobiswa.Mwandla@rbidz.co.za>  
**Subject:** RE: 400MW TRANSMISSION INFRASTRUCTURE: Comments on Scoping Report & Corridors

Hi Nicolene,

I have requested my team to submit comments to you tomorrow (I am already on leave). From my side, please note that the power lines will intersect the rail line for 1F at this GPS point: 28°44'19.80"S, 32°1'9.24"E (also see map below).



Regards,  
Percy

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**From:** Public Process [<mailto:publicprocess@savannahsa.com>]

**Sent:** Friday, 11 December 2020 17:15

**To:** Percy Langa <[Percy.Langa@rbidz.co.za](mailto:Percy.Langa@rbidz.co.za)>

**Cc:** [nicolene@savannahsa.com](mailto:nicolene@savannahsa.com); [ronald@savannahsa.com](mailto:ronald@savannahsa.com); Nicolene Venter <[nicolene@savannahsa.com](mailto:nicolene@savannahsa.com)>

**Subject:** 400MW TRANSMISSION INFRASTRUCTURE: Comments on Scoping Report & Corridors



ESKOM

## Savannah Public Process

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**From:** Vuledzani Thanyani <ThanyaV@eskom.co.za>  
**Sent:** Monday, December 14, 2020 10:44 AM  
**To:** Savannah Public Process  
**Cc:** Nicolene Venter; Ronald Baloyi; Nicolene Venter; Annah Kawadza  
**Subject:** RE: 400MW TRANSMISSION INFRASTRUCTURE: Comments on Scoping Report & Corridors

Good morning Nicolene

It was a pleasure talking to you yesterday afternoon. As discussed, your proposed power line infrastructure as shown on KMZ files shared with us do not seem to impact on our approved corridor. We therefore do not have any objection to your proposed power lines. We advise that any future impact on our approved corridor should be discussed with our office prior to finalization and that an application to connect to Eskom infrastructure should be sent to Eskom

Kind regards  
Vuledzani Thanyani

---

**From:** Public Process <publicprocess@savannahsa.com>  
**Sent:** Friday, 11 December 2020 17:04  
**To:** Vuledzani Thanyani <ThanyaV@eskom.co.za>  
**Cc:** nicolene@savannahsa.com; ronald@savannahsa.com; Nicolene Venter <nicolene@savannahsa.com>  
**Subject:** 400MW TRANSMISSION INFRASTRUCTURE: Comments on Scoping Report & Corridors

Dear Vuledzani,

Thank you for taking my call this afternoon enquiring whether you, on behalf of Eskom, will be submitting written comments on the Scoping Report and the proposed two corridors, i.e. whether it will impact on Eskom's proposed corridors and/or infrastructures.

Please do not hesitate to contact us should you require any information.

Kind regards,

savannah  
environmental

t: 011 656 3237  
f: 086 684 0547

**Nicolene Venter**  
Public Process

e: [publicprocess@savannahsa.com](mailto:publicprocess@savannahsa.com)  
c: +27 (0) 60 978 8396

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

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## Nicolene Venter

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**From:** Tobile Bokwe <BokweTT@eskom.co.za>  
**Sent:** Monday, December 14, 2020 2:53 PM  
**To:** Nicolene Venter; Jo-Anne Thomas  
**Cc:** Vuledzani Thanyani; Gerhard Brits; Koogendran Govender; Nwabisa Mehlomakulu; Reggie Chippe; Vincent M Chauke; Mpho Muswubi  
**Subject:** RE: 400MW TRANSMISSION INFRASTRUCTURE: Comments on Scoping Report & Corridors  
**Attachments:** TX overlap ECG plant.png  
**Importance:** High

Good afternoon Nicolene, Jo-Anne,  
Eskom had overlaid the proposed lines against the Eskom plant site, and they traverse the site (*as shown in attachment*). Eskom would object to these lines running the site, and recommends deviations that avoid the site ([also see communication from Koogendran, below](#)).  
Eskom remains available for meetings to discuss the challenges and agree on amicable infrastructure co-existence.  
Kind regards,  
Tobile

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**From:** Koogendran Govender  
**Sent:** 14 December 2020 02:45 PM  
**To:** Gerhard Brits; Tobile Bokwe; Mpho Muswubi; Nwabisa Mehlomakulu; Vincent M Chauke; Reggie Chippe  
**Cc:** Vuledzani Thanyani  
**Subject:** RE: 400MW TRANSMISSION INFRASTRUCTURE: Comments on Scoping Report & Corridors

Good day

@Gerhard, thanks for the information

@Tobile, we would have to object as it is over our site.

Regards,  
Koogendran

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**From:** Gerhard Brits  
**Sent:** 14 December 2020 02:42 PM  
**To:** Koogendran Govender; Tobile Bokwe; Mpho Muswubi; Nwabisa Mehlomakulu; Vincent M Chauke; Reggie Chippe  
**Cc:** Vuledzani Thanyani  
**Subject:** RE: 400MW TRANSMISSION INFRASTRUCTURE: Comments on Scoping Report & Corridors

Hi

Please see the attached as requested. Let me know if there is any changes you would like.

Both lines cross the planned plant.

Regards

Gerhard Brits

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**From:** Nicolene Venter [<mailto:nicolene@savannahsa.com>]  
**Sent:** 14 December 2020 11:57 AM  
**To:** Tobile Bokwe  
**Cc:** Gideon Raath; Ronald Baloyi  
**Subject:** 400MW TRANSMISSION INFRASTRUCTURE: Comments on Scoping Report & Corridors

Dear Tobile,

Hope you are keeping well!

Tobile, we would like to enquire whether Eskom will submit any additional comments regarding the possible impact, if any, that the proposed corridors might have on Eskom's proposed power station site.

The comment period is ending today and we are finalising the comments and responses report and will be submitting the final Scoping Report to the DEFF today.

Looking forward hearing from you.

Kind regards,



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f: +27 (0) 86 684 0547

**Nicolene Venter**  
Public Participation and Social  
Consultant

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

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