

MOTIVATION REPORT FOR THE ENVIRONMENTAL AUTHORISATION AMENDMENT, ENVIRONMENTAL MANAGEMENT PROGRAMME UPDATE AND LAYOUT UPDATE FOR THE 400MW RICHARDS BAY GAS TO POWER ENERGY FACILITY LOCATED IN RICHARDS BAY, KWAZULU-NATAL PROVINCE (DEA REF.: 14/12/16/3/3/2/867)

COMMENTS AND RESPONSE REPORT

TABLE OF CONTENT

	PAGE
1. COMMENTS RECEIVED DURING COMMENCEMENT OF THE EA AMENDMENT PROCESS.....	1

The notification informing registered Interested and Affected Parties (I&APs) of the application for amendment to the Environmental Authorisation, Environmental Management Programme (EMPr) update and layout update for the 400MW Richards Bay Gas to Power Energy Facility was announced on Thursday, 27 August 2020. The notification letter also served to invite comments from registered I&APs on the application to amend the Environmental Authorisation, layout update and EMPr update. Comments received are included in the table below.

The Motivation Report, EMPr Update and Layout Update are made available for a 30-day review and comment period from **Thursday, 17 September 2020** until **Monday, 19 October 2020**. The Comments and Response Report (C&RR) will be updated with comments received during the review and comment period and included in Appendix D5 of the Final Motivation Report.

LIST OF ABBREVIATIONS / ACRONYMS

CER	Centre for Environmental Rights	I&APs	Interested and Affected Parties
NPC	Non-Profit Company		

1. COMMENTS RECEIVED DURING COMMENCEMENT OF THE EA AMENDMENT PROCESS

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>The subject of your email is "Notification of Emissions Licence Application (AEL)", however the following is stated in your email; "Please find attached the following documents which will provide you with additional information regarding these projects:</p> <ul style="list-style-type: none"> • Notification of EA Amendment, EMPr Update, Layout Update and Public Participation Process notification letter; • Locality Map • Registration and Comment Form" <p>Your email did NOT have the following attached;</p> <ol style="list-style-type: none"> 1. Notification of EA Amendment 2. EMPr Update <p>Kindly provide the above documents.</p>	<p>Sandy Camminga Director & Founder Member Richards Bay Clean Air Association (NGO)</p> <p>E-mail: 27 August 2020</p>	<p>The confusion between the email subject line and the message text was acknowledged and rectified.</p> <p>The Environmental Authorisation (EA) Amendment, EMPr Update, and Layout Update notification letter together with the locality map were sent to the I&AP on 28 August 2020 (refer to Appendix D2).</p>
2.	<p>It is not clear from the notice what the proposed amendments to the environmental authorisation entail and when I&APs will be given an opportunity to comment on that. Could you clarify that please?</p>	<p>Nicole Loser Attorney CER NPC</p> <p>E-mail: 28-08-2020</p>	<p>The following amendments to the EA are proposed:</p> <ol style="list-style-type: none"> 1. A validity extension of the EA by five (5) years. 2. An update to the capacity and configuration of the power plant in the EA project description from: '300MW (fuelled) and 100MW (steam) in a combined cycle' to: 'a 400MW (fuelled) simple cycle process'. 3. The removal of various infrastructure which would become redundant with the use of a simple cycle process mentioned in the project description of the EA, which relate to a combine cycle (no longer applicable if amendment 2 is approved). 4. To include in the project description of the EA the use of Liquefied Natural Gas (LNG), Liquefied Petroleum Gas (LPG), Regasified Liquefied Natural Gas (RLNG) or pipeline gas as the fuel source (as assessed for the approved EA) for the project in addition to the specification of LNG (in various forms) in future (also as approved in the EA).

NO.	COMMENT	RAISED BY	RESPONSE
			<p>5. The removal of diesel as a fuel source from the project description of the EA.</p> <p>6. The specification of up to 10 000 m³ of fuel storage which will be required for the power station – this is an increase from the approved 6 000 m³, up to a maximum storage capacity of 10 000 m³. The size of the tanks to be used will be confirmed in the final design of the facility.</p> <p>7. A replacement of the single reference to the wording, 'Mid-Merit' in the EA to correctly reflect 'Mid-Merit/Peaking', to ensure that both peaking and mid-merit options/scenarios have been considered for the development;</p> <p>8. A correction on the EA to specify Activity 2 of Listing Notice 2 in the EA.</p> <p>9. Amendment to conditions 14,15,16 and 17 of the approved EA to specify that the layout submitted and EMPr submitted have been approved.</p> <p>The I&APs are provided an opportunity to comment on the EMPr and layout, as well as the amendment documentation from 17 September 2020 to 19 October 2020. The due date for all written comments is thus 19 October 2020. A notification of the availability of these documents will be made on 17 September, with the documents provided for download from the Savannah Environmental website.</p>
3.	<p>Please register me as and I&AP. Please also supply us with the following information:</p> <p>1) The Environmental Authorisation you refer to</p> <p>2) What exactly you are proposing as amendments to the EA?</p>	<p>Avena Jacklin Climate & Energy Justice Campaign Manager groundwork</p> <p>E-mail: 28 August 2020</p>	<p>The I&AP was duly registered as an I&AP on the project database.</p> <p>A copy of the EA issued has been sent to the I&AP on 17 September 2020 for ease of reference.</p> <p>The following amendments to the EA are proposed:</p> <ol style="list-style-type: none"> 1. A validity extension of the EA by five (5) years. 2. An update to the capacity and configuration of the power plant in the EA project description from: '300MW (fuelled) and 100MW (steam) in a combined cycle' to: 'a 400MW (fuelled) simple cycle process'. 3. The removal of various infrastructure which would become redundant with the use of a simple cycle process mentioned in the project description of the EA, which relate to a combine cycle (no longer applicable if amendment 2 is approved).

NO.	COMMENT	RAISED BY	RESPONSE
			<p>4. To include in the project description of the EA the use of Liquefied Natural Gas (LNG), Liquefied Petroleum Gas (LPG), Regasified Liquefied Natural Gas (RLNG) or pipeline gas as the fuel source (as assessed for the approved EA) for the project in addition to the specification of LNG (in various forms) in future (also as approved in the EA).</p> <p>5. The removal of diesel as a fuel source from the project description of the EA.</p> <p>6. The specification of up to 10 000 m³ of fuel storage which will be required for the power station – this is an increase from the approved 6 000 m³, up to a maximum storage capacity of 10 000 m³. The size of the tanks to be used will be confirmed in the final design of the facility.</p> <p>7. A replacement of the single reference to the wording, 'Mid-Merit' in the EA to correctly reflect 'Mid-Merit/Peaking', to ensure that both peaking and mid-merit options/scenarios have been considered for the development;</p> <p>8. A correction on the EA to specify Activity 2 of Listing Notice 2 in the EA.</p> <p>9. Amendment to conditions 14,15,16 and 17 of the approved EA to specify that the layout submitted and EMPr submitted have been approved.</p>
	3) What exactly is the commenting period?		The I&APs are provided an opportunity to comment on the amendment documentation from 17 September 2020 to 19 October 2020. The due date for all written comments is thus the 19 th of October. A notification of the availability of these documents will be made on the 17 th of September, with the documents provided for download from the Savannah Environmental website.
	4) A copy of your public participation plan including any consultations made wrt Disaster Management (emergency procedures etc.)		The approved public participation plan for the amendment process was sent to the I&AP on 17 September 2020. No public meetings have been held to date, however all consultations conducted will be in accordance with the approved public participation plan communicated, which is in line with the Disaster Management Act.
	5) When will these documents be uploaded to your website?		Documents provided for download from the Savannah Environmental website will be available from 17 September 2020.
4.	You cannot separate the process of fracking and the use of gas to make power. The poisoning of the environment by the fracking process causes cancer	Elizabeth Balcomb	The interest in the project and comments submitted are appreciated.

NO.	COMMENT	RAISED BY	RESPONSE
	<p>and death to the environment and people where is performed.</p> <p>If this was truly an Environmental Assessment, there is no way that gas would be considered. It is poison gas, there will be leaking, the process of extraction causes eternal poisoning to the environment. Dead people can't use power. It is not moral to allow fracking to take place anywhere.</p> <p>This is your opportunity to be a beacon of light for forging a way into a new and better future, by closing the door on fracking. Please consider future generations who have to live in the world that you are busy creating.</p> <p>Please watch this: https://watchdocumentaries.com/gasland/ to be totally clear of the industry you will be supporting and promoting. It is not life friendly. In fact you are supporting corruption, greed, colonialism and oppression by continuing with this project. The water, air and soil around fracking sites and beyond are forever poisoned. This no environmental assessor can support.</p> <p>I hope you listen with your heart to this email. Your grandchildren will have a better life if you do.</p>	<p>E-mail: 01 September 2020</p>	<p>The Liquid Petroleum Gas that will be utilized as fuel in the Gas to Power plant does not proceed from a fracking process, and therefore this project is not associated with fracking.</p>