

Appendix C8:
Comments and Responses Report

PROPOSED GRID CONNECTION INFRASTRUCTURE FOR THE 400MW GAS-TO-POWER PLANT LOCATED IN THE RICHARDS BAY IDZ, ZONE 1F, KWAZULU-NATAL PROVINCE

COMMENTS AND RESPONSES REPORT

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The Environmental Impact Assessment and Public Participation process for the grid connection infrastructure for the 400MW Gas-To-Power plant development was announced on Friday, 13 November 2020. The announcement and notification letter served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments / queries that they might have.

The Scoping Report (SR) was made available for a 30-day review and comment period from **Friday, 13 November 2020** until **Monday, 14 December 2020**. All written comments received during the EIA process to date have been included in this Comments and Responses Report (C&RR) which is included in **Appendix C6** of the final Scoping Report.

LIST OF ABBREVIATIONS / ACRONYMS

C&RR	Comments and Responses Report	DEFF	Department of Environment, Forestry and Fisheries
I&APs	Interested and Affected Parties	OoS	Organs of State
RB IDZ	Richards Bay Industrial Development Zone		
SR	Scoping Report		

1. COMMENTS RECEIVED DURING THE COMMENCEMENT OF THE EIA AND THE SCOPING REPORT REVIEW PERIOD

1.1. *Organs of State*

NO.	COMMENT	RAISED BY	RESPONSE
1.	<p>The Department has the following comments for the above-mentioned project: <u>Public Participation Process</u></p> <p>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:</p> <ul style="list-style-type: none"> • 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 comment, 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. 	<p>Jay-Jay Mpelane Case Officer DEFF</p> <p>Letter: 10 December 2020</p>	<p>Poof of correspondence with the various stakeholders and proof of attempts to obtain comments from the stakeholders on the project are included in Appendix C4 (Organs of State) and Appendix C5 (Stakeholders / I&APs) of the final Scoping Report.</p> <p>Proof of correspondence with Organs of State and proof of attempts to obtain comments are included in Appendix C4 of the final Scoping Report.</p> <p>All written comments received during the commencement of the EIA process and the 30-day review and comment period of the Scoping Report from I&APs and Organs of State are captured in this C&RR which is included as a separate report to the final Scoping Report (Appendix C8).</p> <p>Comments submitted have been captured verbatim, as received, and have not been summarised. Appropriate responses have been included for all comments received.</p> <p>Site photos provided in Appendix C2 all indicate the location of where they were taken by virtue of short description and GPS coordinate of their location. In addition, the photos have been updated to include the date on which they were taken (all were placed on 12 November 2020).</p>

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	<ul style="list-style-type: none"> 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. 		<p>Appendix C1 contains a list of all I&APs identified during networking and those who had registered on the project. The database also includes the Organs of State and the commenting authorities.</p>
	<p>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.</p>		<p>Comment noted, no further action required.</p>
	<p>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.</p>		<p>Comment noted, no further action required.</p>
	<p>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.</p>		<p>Comment noted, no further action required.</p>
	<p>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</p>		<p>Comment noted, no further action required. Please note: following discussion with the landowners and technical assessment of the corridors, it was identified that an additional 35m is required to allow for appropriate placement of the power line within the RBIDZ Phase 1F. This additional 35m zone will also therefore be assessed in the EIA phase, in addition to the two alternative power line corridors of up to 200m in width.</p>

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	<p>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.</p>		
	<p><u>The following information is required:</u></p> <ul style="list-style-type: none"> 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. 		<p>Please refer to Chapter 6 of the Final Scoping report for a complete detailing of the potential impacts identified to date related to the proposed project. Mitigation measures will be detailed in the EIA phase following completion of the specialist assessments.</p>
	<ul style="list-style-type: none"> 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. 		<p>Please refer to Chapter 2 of the Final Scoping Report for a detailing of the two alternative power line corridors considered in the Scoping Phase. The grid connection corridors and switching station alternatives identified represent technically feasible areas for construction of the grid connection infrastructure. The specific location of the infrastructure within the identified preferred corridor and switching station site will be determined following the completion of the EIA process, landowner negotiation and final design.</p> <p>No recommendation regarding a preferred power line corridor has been made at this stage. Both alternatives and the broader switching station site will be assessed in detail in the EIA Phase and a recommendation regarding a preferred alternative made following the detailed assessment.</p>
	<ul style="list-style-type: none"> The total footprint (size) and the coordinates of the site for the proposed switching station. 		<p>Please refer to Table 1.1 of the Final Scoping Report, as well as Appendix E, for a detailing of the footprint and coordinates for the switching station.</p>
	<ul style="list-style-type: none"> Coordinates of the new proposed overhead power line and new required access roads. 		<p>Please refer to Table 1.1 of the Final Scoping Report, as well as Appendix E, for a detailing of the footprint and coordinates for the project infrastructure.</p>
	<ul style="list-style-type: none"> The associated infrastructure which will be linked to the proposed development shall be provided and also be mapped at an appropriate scale. 		<p>A final layout will be provided in the EIA phase assessment following refinement of the infrastructure based on environmental and technical considerations. The final layout will however remain within the assessed corridors.</p>

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	<ul style="list-style-type: none"> The application form and final Scoping must include only those activities which have been identified to be applicable to the project. in addition, the EAR must be sure whether the listed activity is applicable or not. 		<p>All appropriate listed activities have been included in the application form submitted to the department. The EIAR will detail the applicable listed activities as indicated in the application form.</p>
	<ul style="list-style-type: none"> 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. 		<p>Please refer to Chapter 6 of the Final Scoping Report, which details the plan of study and specialist assessments proposed in the EIA phase of the study.</p>
	<p>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 - 1) 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.</p>		<p>The final scoping report is compliant with the information and content requirements of Appendix 2 of the EIA regulations.</p>
	<p>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.</p>		<p>Comment noted, no further action required.</p>
	<p>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</p>		<p>Comment noted, no further action required.</p>

NO.	COMMENT	RAISED BY	RESPONSE
	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.		Comment noted, no further action required.
2.	<p>The City of uMhlatuze 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:</p> <p>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).</p> <p>2. The power will be evacuated via overhead infrastructure to a switching station south of the Eskom (Indus Power station).</p> <p>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.</p> <p>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)</p>	<p>Ms Sharin Govender (City of Umhlatuze)</p> <p>Letter: 14 December 2020</p>	<p>Comment noted, no further action required.</p> <p>Comment noted, no further action required.</p> <p>Comment noted, no further action required.</p> <p>Correct, the grid connection corridor traverses part of the proposed Eskom 3000 MW Combined Cycle Gas Turbine project location. The proponent is in discussions with Eskom to determine appropriate routing at this location. A final layout will be provided</p>

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	<p>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).</p> <p>6. The property description of the proposed switching station is not provided.</p>		<p>in the EIA phase assessment following refinement of the infrastructure based on environmental and technical considerations</p> <p>The applicant has been in contact, and continues to be in contact with the Municipality specifically towards preferred route selection and servitude discussions.</p> <p>All affected properties within the 500m switching station assessment zone and the grid connection corridors have been included in Appendix E: properties and coordinates of the final scoping report. For clarity, the switching station 500m assessment zone occupies the following properties:</p> <table border="1" data-bbox="1189 756 1955 1348"> <thead> <tr> <th>Erf / Farm</th> <th>Portion & Farm No.</th> <th>PARCEL_NO</th> <th>PORTION</th> </tr> </thead> <tbody> <tr> <td>Unnamed Erf</td> <td>5/11376</td> <td>11376</td> <td>5</td> </tr> <tr> <td>Unnamed Erf</td> <td>1/11376</td> <td>11376</td> <td>1</td> </tr> <tr> <td>Unnamed Erf</td> <td>11375</td> <td>11375</td> <td>0</td> </tr> <tr> <td>Unnamed Erf</td> <td>6698</td> <td>6698</td> <td>0</td> </tr> <tr> <td>Unnamed Erf</td> <td>7/5333</td> <td>5333</td> <td>7</td> </tr> <tr> <td>Unnamed Erf</td> <td>RE/5333</td> <td>5333</td> <td>0</td> </tr> <tr> <td>Unnamed Erf</td> <td>RE/5333</td> <td>5333</td> <td>0</td> </tr> <tr> <td>Unnamed Erf</td> <td>RE/397</td> <td>397</td> <td>0</td> </tr> <tr> <td>Unnamed Farm</td> <td>12/15825</td> <td>15825</td> <td>12</td> </tr> <tr> <td>Unnamed Farm</td> <td>RE/15825</td> <td>15825</td> <td>0</td> </tr> <tr> <td>Unnamed Farm</td> <td>RE/15825</td> <td>15825</td> <td>0</td> </tr> </tbody> </table>	Erf / Farm	Portion & Farm No.	PARCEL_NO	PORTION	Unnamed Erf	5/11376	11376	5	Unnamed Erf	1/11376	11376	1	Unnamed Erf	11375	11375	0	Unnamed Erf	6698	6698	0	Unnamed Erf	7/5333	5333	7	Unnamed Erf	RE/5333	5333	0	Unnamed Erf	RE/5333	5333	0	Unnamed Erf	RE/397	397	0	Unnamed Farm	12/15825	15825	12	Unnamed Farm	RE/15825	15825	0	Unnamed Farm	RE/15825	15825	0
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	7. The municipality consents to the undertaking of the Scoping/ EIA process on land owned by Council.		Comment noted with thanks, no further action required.
	Biodiversity 8. Ptn 1 11376 is reserved as a biodiversity offset, and accordingly zoned "Conservation" in terms of the uMhlatuze Scheme.		The grid connection corridors traverse part of portion 1 11376. The proponent is in discussions with Eskom to determine appropriate routing at this location. A final layout will be provided in the EIA phase assessment following refinement of the infrastructure based on environmental and technical considerations
	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.		Please refer to the Plan of Study located in Chapter 8 of the Final Scoping Report for the proposed terms of reference related to the wetland and ecological specialist studies for the EIA phase of the assessment. The terms of reference will also be informed by comments received by 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.		Comment noted, no further action required.

1.2. Interested and Affected Parties

NO.	COMMENT	RAISED BY	RESPONSE
1.	The fisher communities must be notified and consulted with.	Avena Jacklin Groundwork Telephonically: 10 December 2020	The public participation plan that has been approved by DEFF takes into consideration members of the community that may not have access to the internet. The plan was designed to allow for the continuation of the public participation process and prevent the spread of COVID-19 simultaneously. As many proposed projects are located within areas that are surrounded by rural communities, informal settlements etc, aspects for continued public participation were taken into consideration for this plan this also includes obtaining relevant

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	<p>The subsistence farmers along the canals must also be notified and consulted with</p> <p>groundWork will delay the process if the above-mentioned communities are not notified and consulted with.</p>		<p>information via whatsapp, sms, telephonic calls and “please call me” to indicate which communication tool may be available to the communities and to communicate their preference of communication tool to use. In which case Savannah Environmental will call the interested party back and attend to the query, which will be included in the applicable public participation appendices of the final Scoping Report. Savannah Enviromental's contact details have been made available in the newspaper advert covering all possible interested and/or affected parties, including communities, and site notices around the project site for which no internet access is required. Process notices were also placed throughout the study area at i.e. filling stations and shopping Centres (Refer to Appendix C2 of the FSR).</p> <p>In addition, the nature of the project (grid connection infrastructure) includes the placement of a switching station and an overhead power line, which does not inherently present any impact to fishing activities within the greater Richards Bay area. Furthermore, land use within the proposed study area and grid connection corridors will likely remain unaffected and compatible with that of the overhead power line represented by this project as the powerline infrastructure will not impede fishing activities within the broader Richards Bay area.</p> <p>The project team will consult with the fisher and any other community representatives should such a request be submitted.</p> <p>Additional to the above response, no subsistence farmers have been identified along the two proposed power line corridors and the proposed corridors do not traverse / cross any canals.</p> <p>The project team will comply with the approved Public Participation Plan and regulations pertaining to Public Participation in order to reach and notify affected communities.</p>
2.	The RB IDZ Environmental team will submit comments on Monday, 14 December 2020.	Percy Langa Environmental Manager RB IDZ	The team acknowledge the submission date of comments on the SR. All crossings of railway infrastructure will be conducted in accordance with the requirements of Transnet in conjunction with the proponent.

NO.	COMMENT	RAISED BY	RESPONSE
	<p>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).</p> <p>Map is included in Appendix C6 of the final SR.</p>	<p>E-mail: 13 December 2020</p>	
3.	<p>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.</p>	<p>Vuledzani Thanyani Environmental Advisor Eskom Holdings SOC Ltd</p> <p>E-mail: 14 December 2020</p>	<p>Eskom's acknowledgement that the current proposed corridors for the grid connection infrastructure do not impact on Eskom's approved corridors is noted.</p> <p>As advised, should Eskom's approved corridor be impacted by this application, the project team will consult with Eskom at that time.</p>
4.	<p>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).</p> <p>Eskom remains available for meetings to discuss the challenges and agree on amicable infrastructure co-existence.</p>	<p>Tobile Bokwe Senior Environmental Manager Eskom Holdings SOC Ltd</p> <p>E-mail: 14 December 2020</p>	<p>The proponent is in discussions with Eskom to determine appropriate routing at this location. A final layout will be provided in the EIA phase assessment following refinement of the infrastructure based on environmental and technical considerations.</p>