NALEDZI ENVIRONMENTAL CONSULTANTS (Pty) Ltd

Company Registration no: 2018/217803/07

Public Participation Report

Application for Suspension of the New Plant Limits and Compliance timeframes of the Minimum Emission Standards (MES), for Eskom's Grootvlei Power Station.
Mpumalanga Highveld

Prepared for:

Eskom Holdings SOC Limited
Air Quality Centre of Excellence,
Environmental Management
Maxwell Drive, Sunninghill, Sandton
2157

20 March 2020

THIS PUBLIC PARTICITION REPORT HAS BEEN PREPARED FOR THE APPLICATION FOR SUSPENSION OF THE NEW PLANT LIMITS AND COMPLIANCE TIMEFRAME FOR NITROGEN OXIDE (NO_X) AND SULPHUR DIOXIDE (SO_2) IN TERMS OF THE MINIMUM EMISSION STANDARDS (MES) FOR ESKOM'S GROOTVLEI POWER STATION SITUATED IN THE MPUMALANGA HIGHVELD

Report prepared by:

Naledzi Environmental Consultants (Pty) Ltd (hereinafter NEC)
160 Marshall Street, Polokwane, 0700
Suite 320, Postnet Library Gardens, Private Bag X9307, Polokwane, 0700
South Africa
Tel: 015 296 3988
Fax: 015 296 4021

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).

Contact Details:

Name: Marissa Ilse Botha
Designation: Registered Professional Natural Scientist
(SACNASP Registration number: 117526) and
Public Participation Report Author
Cellphone: 084 226 5584
Email: botham@naledzi.co.za

DISCLAIMER

This Public Participation 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 Emission Limits Suspension application.

PROJECT INFORMATION

Title:	Application for Suspension of the New Plant Limits and Compliance Timeframes for NO_x and SO_2 in terms of the MES for Eskom's Grootvlei Power Station in the Mpumalanga Highveld Region
Author:	Marissa Botha
Status of Report:	Public Participation Report
First Issue:	March 2020
Applicant for Suspension request:	Eskom Holdings SOC Ltd
Independent Environmental Assessment Practitioner:	Naledzi Environmental Consultants (Pty) Ltd (NEC)

NALEDZI ENVIRONMENTAL CONSULTANTS (PTY) LTD:

Approved for Naledzi Environmental Consultants (Pty) Ltd

…….
Environmental Assessment Practitioner
Marissa Botha, *Pr.Sci.Nat*

ESKOM HOLDINGS LIMITED: Air Quality Centre of Excellence, Environmental Management

Approved for Eskom Holdings Limited by:

Eskom Environmental Manager
Deidre Herbst

Contents

PROJECT INFORMATION iii

1) INTRODUCTION 1

2) THIS DOCUMENT 3

3) SUMMARY OF TASKS COMPLETED FOR THE APPLICATION PPP 3

4) ENGAGEMENT WITH NATIONAL, DISTRICT AIR QUALITY OFFICER 5

5) ENGAGEMENT WITH LOCAL AUTHORITIES, WARD COUNCILLORS 6

6) NEWSPAPER ADVERTISEMENTS 7

7) SITE NOTICE PLACEMENT 7

8) INTERESTED AND AFFECTED PARTY DATABASE 8

9) DIRECT NOTIFICATION OF INTERESTED AND AFFECTED PARTIES 8

10) PUBLIC MEETINGS HELD AS PART OF THE FIRST ROUND OF PUBLIC ENGAGEMENT 9

11) PUBLIC MEETINGS SCHEDULED AS PART OF THE SECOND ROUND OF PUBLIC ENGAGEMENT 10

12) PROJECT ANNOUNCEMENT TO DECLARED PRIORITY AREA TASK TEAMS 10

13) COMMENTS FROM INTERESTED AND AFFECTED PARTIES 10

14) CONCLUSION 11

APPENDICES

Annexure 1A – Proof of emailed notification to NAQO and District AQO during 1st round of public engagements

Annexure 1B – Minutes of Mpumalanga Highveld and Vaal Triangle Authorities Engagement Meeting during 1st round of public engagements

Annexure 2 – Proof of notification to NAQO and GSDM AQO of continuance of Grootvlei Application and 2nd round of public engagements

Annexure 3 – Proof of correspondence with Dipaleseng Local Municipality during 1st round of public engagements and proof of notification of continuance of application process

Annexure 4 - Newspaper Tear Sheets

Annexure 5 – Photographic Proof of Site Notice Placement

Annexure 6 – I&AP Database

Annexure 7A – Copy of 2018 Eskom MES application process BID

Annexure 7B – Signed BID Distribution List

Annexure 8 – Minutes of Public Meetings

Annexure 9 – Issues and Response Report

LIST OF TABLES

Table 1: Public Libraries at which BID and Notification letters were placed surrounding Grootvlei power station ..... 9~~13~~

LIST OF ACRONYMS

MES	Minimum Emission Standards
NEM: AQA	National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004)
NEMA	National Environmental Management Act, 1998 (Act 107 of 1998)
EIA	Environmental Impact Assessment Regulations
EIR	Environmental Impact Report
PM	Particulate Matter
PM_{10}	Particulate Matter 10 micrometers or less in diameter
$PM_{2.5}$	Particulate Matter 2.5 micrometers or less in diameter/fine particles
SO_2	Sulphur Dioxide
NOx	Oxides of nitrogen
mg/Nm^3	Milligrams per cubic metre air`
AEL	Atmospheric Emission License
AIA	Atmospheric Impact Assessment
AIR	Atmospheric Impact Report
PPP	Public Participation Process
PP Report	Public Participation Process Report
BID	Background Information Document
IRR	Issues and Response Report
IRP	Integrated Resource Plan
I&AP	Interested and Affected Party
DEFF	Department of Environment, Forestry and Fisheries
NAQO	National Air Quality Officer
GSDM	Gert Sibande District Municipality
NEC	Naledzi Environmental Consultants (Pty) Ltd
Eskom	Eskom Holding SOC Ltd
HPA ITT	Highveld Priority Area Information Task Team
VTAPA ITT	Vaal Triangle Airshed Priority Area Information Task Team
FFP	Fabric Filter Plant

1) INTRODUCTION

Eskom has submitted an application for once-off suspension of the new plant minimum emission standard limits and compliance timeframe for Nitrogen Oxide (NO_x) and Sulphur Dioxide (SO_2) in terms of the Minimum Emission Standards (MES) to the National Air Quality Officer (NAQO), for Grootvlei Power Station. Grootvlei Power Station is located 15km southwest of Balfour in the Mpumalanga Highveld Region of South Africa.

In terms of the National Environmental Management: Air Quality Act 39 of 2004 (NEM:AQA) all Eskom power stations are requirement to meet the emission limits for pollutants Particulate Matter (PM), SO_2 and NO_x in terms of the MES (as amended by GNR 1207/31 October 2018) within the following two compliance timeframes (Table 1):

- 01 April 2015: Compliance with 'existing plant' standards
- 01 April 2020: Compliance with 'new plant' standards

Table 1: Coal fired plant Emission Limits ito MES

MES Compliance Timeframe	Max Release Rate (mg/Nm^3)		
	PM	SO_2	NO_x
April 2015	100	3500	1100
April 2020	50	1000	750

GNR 1207 provides for:

- Once-off postponement of compliance with the MES for new plant limits for 5 years from the date of issue, no once-off postponement will be valid beyond 31 March 2025;
- Once-off suspension for plants being decommissioned by 31 March 2030
- NAQO may grant alternate emission limits/emission load if certain conditions are met
- An application for such requests must be submitted by 31 March 2019

GN 1207 sets out the requirements for postponement/suspension applications and requires submission of the following to the NAQO:

1) Atmospheric Impact Assessment provided in a format of an Atmospheric Impact Report (AIR) (As per Section 30 of NEM:AQA) by a person registered as a professional engineer / professional natural scientist in the appropriate category;
2) A detailed justification and reason for the Application; and
3) Concluded public participation process (PPP) undertaken as specified in 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) made under Section 24 (5) of the afore mentioned Act

Eskom has installed a Fabric Filter Plant (FFP) at Grootvlei power station to reduce the station's particulate emissions. The station thus already achieves the new plant emission standard for PM and complies with the existing plant limit for NO_X and SO_2. But will not be able to comply with the new plant limit for NO_x and SO_2.

A 5 year postponement was issued to Grootvlei in 2015 in respect of compliance to the new plant NO_x and SO_2 limit. Eskom intends to shut down Grootvlei by no later than 2030. Three (3) of the six (6) power generating units have already been shutdown. Due to Grootvlei's

short remaining lifespan, units already shut down, and with final shutdown anticipated to be by 2030 there are no plans to upgrade any additional pollution abatement.

As per the amended MES regulations it is now necessary for Eskom to submit an unplanned application for suspension of the NO_x and SO_2 limits. Eskom has applied and received condonation from Minister of Environment, Forestry and Fisheries for the late submission of an application for Grootvlei until November 2019. Accordingly Eskom submitted Grootvlei's application already in November 2019 for once-off suspension of new plant emission limits and compliance timeframes in terms of MES for NOx and SO2, until station decommissioning (2028 to 2030) including proposed alternate limits (Table 2) for Grootvlei.

The previously granted postponements of limits will remain in place until 2025 and thereafter until decommissioning based on this request for suspension.

Table 2: Requested Emission Concentrations (mg/Nm3)

Station	PM10	NOX	SO2	Averaging period
Grootvlei	50	1,100	3,500	Daily
MES Limit from 2025 until decommissioning (no later than 2030)	new plant	existing plant		Daily

Naledzi Environmental Consultants (Pty) Ltd (NEC) was appointed by Eskom to facilitate the PPP in terms of the NEMA EIA Regulations of 2014 (as amended by GNR 326).

Regulation 40 under the NEMA EIA Regulations 2014 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 (IAPs) with favourable circumstances to comment 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.

Accordingly the PPP entails two rounds of consultation. The first round provides an opportunity to review a Background Information Document (BID) and comment on the approach in preparing the application, including attendance of public meetings. During the second round the application with, the Atmospheric Impact Report (AIR), AEL variation, the motivation for the application and Public Participation (PP) Report are made available for public review to facilitate comments on the draft application documentation.

Grootvlei power station initially formed part of the first round of public engagements for the 2018 Eskom MES postponement applications process which were submitted to the NAQO in November 2018 and 15 March 2019. The first round public participation's activities and comments for Grootvlei were recorded in the PP Report and Issues and Response Report (IRR) as part of the 2018 Eskom MES application process.

Eskom later decided to exclude Grootvlei from the second round of public engagements for the same process and deal with it separately because Grootvlei's Atmospheric Emission License specified different emission limits and compliance timeframes compared to the other coal fired power stations.

Grootvlei's application process has now resumed from the second round of public engagement whereby all other relevant notifications (newspaper notifications, notices, e-mails, sms-es) has been circulated to interested and affected parties (I&APs) and the application document, draft motivation, variation request, draft AIR, and PP Report has been made available for a 30 day public comment period.

The first round of engagements will not be repeated since this was addressed under the 2018 Eskom MES postponement application process, and details are included in the current application for continuity.

Eskom received condonation from the Minister of Environment, Forestry and Fisheries (DEFF) for the late submission of an application for Grootvlei until November 2019. For that reason Eskom already submitted an MES suspension application for Grootvlei's application in November 2019. In that application Eskom undertook to submit additional information to the NAQO including an updated Atmospheric Impact Report (AIR), motivation and reasons for the application, variation request and a consolidated Public Participation (PP) Report. This document is prepared as part of that process of submitting additional information.

2) THIS DOCUMENT

This PP Report summarises all the PPP activities conducted for Grootvlei power station as part of the first round public engagements for the 2018 Eskom MES application process. All the issues and comments recorded for Grootvlei power station as part of the 2018 application process have been pulled into a separate IRR for Grootvlei. . In some cases the responses have been updated from previous responses given more information is available and due to changes in planning approaches. Some parties submitted extensive comments on all the 2018 postponement applications, these issues and responses have not been included in this document but are viewable in the 2019 IRR final report.

The draft motivation, variation request, draft AIR and the PP Report has now been prepared in respect of Grootvlei's suspension application and the draft documents are subject to 30 days' public review and comment.

The PP Report and IRR will be updated upon the lapse of the 30 day public comment period to include activities conducted and comments solicited as part of the second round of public engagements.

3) SUMMARY OF ACTIVITIES COMPLETED FOR THE APPLICATION PPP

In summary the following activities were undertaken for Grootvlei as part of the first round of public engagements, for the 2018 Eskom MES postponement application process:

- The application was communicated to the Mpumalanga Highveld provincial air quality management officers and Gert Sibande District Atmospheric Emission

Licensing (AEL) authority telephonically on 6 July 2018 and via email on 10 July 2018 before any public announcements activities were undertaken.

- Grootvlei's application was addressed at the combined Mpumalanga Highveld Region and Vaal Triangle Region authorities' engagement meeting held on 30 July 2018 in Middelburg at the Nkangala District Municipality Offices.
- The application was further communicated telephonically and via email to the Dipaleseng Local Municipality's Speaker's office and ward councillors from 18 to 23 July 2018.
- Press advertisements announcing the application process, relevant to Grootvlei, were published on 8 and 10 August 2018 in the Beeld, Daily Sun and Heidelberg Heraut;
- Site notices were placed at public frequented places in Grootvlei town, Greylingstad and Balfour from 10 to 14 August 2018;
- All I&APs were notified of the application process with a BID and Comment and Registration Form to solicit comments and requesting I&APs to register on the application process database.
- The BID, Notification letter including Comments and Registration Forms were available for public review and comment from 13 August to 11 September 2018 at three (3) public libraries within proximity of Grootvlei power station including on the Naledzi website **www.naledzi.co.za/publicdocuments**;
- An I&AP Database was compiled and maintained;
- A Ward Councillor Briefing and two public meetings took place on 21 August 2018 at venues in Balfour, Siyathemba and Grootvlei town;

- Loud hailing was scheduled in Grootvlei town and Siyathemba for 19 August 2018 to prompt I&APs and local communities of the scheduled public meetings;

- Eskom in their capacity as stakeholders in the Highveld– and Vaal Triangle Priority Area Information Task Team (ITT), also announced the application process and the commencement of the 1st round of public engagements for the project, which included Grootvlei at the Sasolburg Air Quality Meeting on 15 August 2018 and at the Highveld Priority Area ITT Meeting held at Nkangala District Municipality on 20 September 2018.

- The minutes for the Ward Councillor Briefing and two public meetings held for Grootvlei were distributed for comment to attendees on 20 September 2018. The minutes were subsequently finalised and sent to attendees on 10 October 2018.

For the second round of public engagements (currently), the following has been done to announce the continuation of the Grootvlei application process and availability of the draft application documentation:

- The Gert Sibande District Air Quality Officer and the NAQO were informed of the continuation of the project on 10 and 18 February 2020 telephonically and via email;

- On 19 March 2020 a teleconference meeting took place between Eskom and the NAQO to talk over the application and envisaged process. The NAQO confirmed during the telecon that no further pre-application session was required between NEC and the NAQO, the telecon sufficed;

- The Dipaleseng Local Municipality Executive Mayor, Municipal Manager, Speaker, Ward Councillors and PR Councillors have been informed of the continuing of the application process telephonically and via email from 30 March to 1 April 2020.

- The I&AP Database has been updated to ensure that all I&APs are still relevant including contact details and specific sensitive receptors i.e. schools, clinics, hospitals and old age homes within the modeling 60km modeling domain of Grootvlei power station have been added to the database;

- All I&APs on the updated database have been notified through a Stakeholder Notification Letter and Comment Sheet of the availability of the draft application documentation for public review and comment.

- The draft application documentation has further been made available for public review and comment on the Naledzi website: www.naledzi.co.za

- The public review period will be determined once the national lockdown has been lifted and will be announced through press advertisements in the same newspapers as for the first round of public engagement (Beeld, Daily Sun, Heidelberg/Nigel Heraut);

- An emailed notification confirming the public review period will also be sent to all registered interested and affected parties on the project database;

- It has not been possible for Naledzi to post site notices, place documents at public libraries or to schedule public meetings for the second round of public engagements due to South Africa being on national lockdown, government imposing restrictions and prohibitions on public gatherings including social distancing to combat the spread of Covid-19.

- Alternative means of engagement will be applied during the 30 day public review and comment period i.e. email communication, virtual meetings and teleconference meetings with key stakeholders. These are to be communicated during the review period.

4) ENGAGEMENT WITH NATIONAL, DISTRICT AND PROVINCIAL AIR QUALITY OFFICERS

As specified under Section 3 of this report, the Mpumalanga Highveld provincial air quality officers and Gert Sibande District AEL authority were consulted telephonically on 6 July 2018 and via email on 10 July 2018 during the first round of public engagements for the 2018 Eskom MES application process inclusive of Grootvlei. An authorities' engagement meeting followed on 30 July 2018 in Middelburg at the Nkangala District Municipality Offices to present the details of the application. (See **Annexure 1A** for proof of consultation with authorities and **Annexure 1B** for a copy of the Mpumalanga Highveld and Vaal authorities' engagement meeting)

On 11 November 2018 authorities were informed of Eskom's decision to exclude Grootvlei from the second round of public engagements of the process. Notification was given to I&APs and key stakeholder in the Stakeholder Notification which announced the availability of the draft application documents for the other 10 power stations for public review and comment.

For the second round of engagement, the continuance of the application has been announced to the Gert Sibande District Municipality Air Quality Officer and the NAQO telephonically on via email on 10 and 18 February 2020. The communication requested to engage with the authorities to discuss Eskom's position in respect of compliance with the MES timeframes and the process envisaged in support of the application. A pre application engagement session was scheduled with the NAQO for 31 March 2020 and GSDM were not able to schedule a meeting with NEC given they are on a disaster implementation plan for Covid-19. (See **Annexure 2** for correspondence with national and district AQO)

On 19 March 2020 Eskom conducted a teleconference meeting with the NAQO to discuss the PPP challenges faced on the application process due to the Covid-19 pandemic and the need for the pre-application session. The outcome of the discussion included:

- The PPP should be done as best as possible given the circumstances and must be described in the PP Report;
- No public meetings will be scheduled and no documents will be placed at public libraries instead a virtual meeting with key stakeholders or telephonic sessions can be scheduled to give feedback on issues raised.
- Given that Eskom and Naledzi are familiar with the application process and its requirements, Department of Environment, Forestry and Fisheries (DEFF) does not see it necessary to continue with a DEFF pre-application session;
- Eskom must fully comply with the Dispersion Modelling Regulations, the MES Regulations and ensure that DEFF issues on previous applications are adequately addressed in this application.
- The NAQO engagement with Naledzi for 31 March 2020 was therefore cancelled.

5) ENGAGEMENT WITH LOCAL AUTHORITIES AND WARD COUNCILLORS

Grootvlei's application was communicated to Dipaleseng Local Municipality's Speaker's office and councillors telephonically and via email from 18 to 23 July 2018 as part of the overall Eskom 2018 MES postponement application. The communication requested the authority to be informed of the project and requested inputs to determine suitable dates, times and venues to host the first round of public meetings to inform the public. The local authority was also informed on 11 November 2018 of Eskom's decision to exclude Grootvlei from the second round of public engagements.

The municipality's Executive Mayor, Municipal Manager, Speaker, Ward Councillors and PR Councillors were informed of the continuing of the Grootvlei application telephonically and via email from 30 March to 1 April 2020. (See Annexure 3 for proof of correspondence with the Dipaleseng Local Authority during the first round of public engagements and proof of notification of continuance of the application process)

The municipality has also now been informed of the availability of the draft application documents through an emailed notification.

6) 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.

Press advertisements announcing the Grootvlei application were published as part of the overall Eskom 2018 MES application process in August 2018 and 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 13 of the Heidelberg Heraut on 8 August 2018 in English

A generic press advertisement was published in each of the above specified newspapers.

Please refer to **Annexure 4** for the newspaper tear sheets for Beeld, Daily Sun and Heidelberg Heraut. For the second round of public engagement, newspaper advertisements will be placed in the same newspapers on 1 July 2020.

7) 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.

Site notices were placed in the Grootvlei area at places conspicuous to and accessible by the public in August 2018 as part of the first round of public engagements of the overall Eskom 2018 MES application process. Site notices were placed at the following public places in proximity to Grootvlei power station:

- Grootvlei-, Greylingstad- and Balfour Public Library in English, Afrikaans, Zulu and Sesotho;

For the second round of public engagements no site notices have been placed in the project area in line with government's prohibitions of public gatherings and social distancing to limit to spread of COVID-19. Alternatively direct notifications have been emailed to I&APs and key stakeholders, a notice has been placed on the Dipaleseng Local Municipality website and on the official Dipaleseng Facebook page. Additionally, to reach the local communities, a

notification has been sent to community members via the municipal ward councillor Whatsapp Groups.

Please refer to **Annexure 5** for Photographic Proof of Site Notice Placement for the first round of public engagements.

8) INTERESTED AND AFFECTED PARTY DATABASE

Regulation 42 of the NEMA EIA Regulations of 2014 requires that a register of interested and affected parties is compiled, maintained and 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.

I&APs relevant to Grootvlei power station has been extracted from the Eskom 2018 MES application process for use in this application. The I&AP Database has also been updated during March 2020 to ensure that all contact details are correct and parties are still applicable. Specific sensitive receptors i.e. schools, clinics, hospitals and old age homes within the modeling 60km modeling domain of Grootvlei power station have also been added to the database. The sensitive receptors have been identified from the existing sensitive receptors list of Andrew Gray and through identification of facilities in the vicinity of the power station on Google Earth Satellite Imagery. The I&AP Database will be further extended during the second round of public engagements by advertising and publicizing the process. The database would remain open for the duration of the PPP. Refer to **Annexure 6** for the I&AP Database.

9) 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.

Registered I&APs were notified of Grootvlei's application with the circulation of the 2018 Eskom MES Postponement Application process BID and Comment and Registration Form, requesting I&APs to register on the database. All I&APs registered on the previous MES

Postponement application process database, on recent EIA Processes undertaken for activities at power stations, including the Highveld Priority Area ITT forum were notified.

The BID, with attached Comments and Registration Form was emailed to the list of pre-identified and registered I&APs. The BID and form were hand delivered from 10 to 16 August 2018 to twenty five public libraries in the Mpumalanga Highveld and Vaal Region, of which three public libraries (Table 1) were in proximity to the Grootvlei power station

Table 1: Public Libraries at which BID and Notification letters were placed surrounding Grootvlei power station

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

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 **Annexure 7A** for a copy of the BID and **Annexure 7B** for the Signed BID Distribution List.

Electronic copies of the current (2020) draft application documentation for the Grootvlei power station together with the comment form have been made available to all I&APs on the Naledzi website www.naledzi.co.za/publicdocuments. The Notification letter of the availability of the draft documentation has been made available in English, Afrikaans, Zulu and Sesotho.

No documentation has been made available at public venues given the prohibitions imposed by government to combat the spread of COVID-19.

10) PUBLIC MEETINGS HELD AS PART OF THE FIRST ROUND OF PUBLIC ENGAGEMENT

Two (2) public meetings including a Ward Councillors Briefing were held on 21 August 2018 for Grootvlei power station. The meetings took place as follows:

- 21 Augusut 2018 at Balfour Council Chambers at 09:00 – 10:00;
- 21 August 2018 at Balfour Siyathemba Community Hall from 11:00 – 13:00 and at the Thabagoadi Community Hall at Grootvlei from 15:00 – 17:00;

The schedule of public meetings was available on the Naledzi website www.naledzi.co.za/publicdocuments.

The public meetings were announced through press advertisements published in national, regional and local newspaper addressed under Section 6, site notices addressed under Section 7 and by means of the BID distribution to pre-identified I&APs and registered I&APs addressed under Section 9. Loud hailing was also effected on 19 August 2018 in the area of

Siyathemba (Balfour) and Grootvlei, to prompt I&APs and communities to attend the public meetings relevant to Grootvlei power station.

These specific two public meetings provided I&APs the opportunity to obtain information regarding the Grootvlei's application, obtain clarity on information contained in the BID and provided I&APs the opportunity to raise comments, issues and concerns regarding the application. It allowed the project team to record comments and issues relevant to the application.

The minutes for the Balfour Ward Councillors Briefing including the two public meetings were prepared and distributed for comments to attendees after which the minutes were finalised. Refer to **Annexure 8** for the Minutes of the Public Meetings and related Attendance Registers held for Grootvlei power station.

11) PUBLIC MEETINGS SCHEDULED AS PART OF THE SECOND ROUND OF PUBLIC ENGAGEMENT

No public meetings have been scheduled for the second round of public engagements for Grootvlei power station due to prohibitions on public gatherings to prevent the possible spread of COVID-19. Alternative means of engagement will be applied during the 30 day public review and comment period i.e. email communication, virtual meetings and teleconference meetings with key stakeholders. These will be communicated during the public review period and recorded in the updated PP Report.

12) PROJECT ANNOUNCEMENT TO DECLARED PRIORITY AREA TASK TEAMS

It is worth stating that during the overall 2018 MES application process, Eskom in their own capacity as stakeholders in the Highveld Priority Area ITT team, 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, which included Grootvlei, 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) 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.

All comments raised during the first round of public engagement for Grootvlei power station as part of the overall Eskom 2018 MES application process have been extracted and summarised in a separate IRR for this application. Refer to **Annexure 9** for the IRR.

14) CONCLUSION

All registered I&APs from the 2018 MES application process, organs of state, power station stakeholder forum members, the Highveld Priority Area ITT members were informed of Grootvlei's application from 10 to 16 August 2018 through the following tasks conducted as part of the overall 2018 MES application process:

- Engagement meetings with the atmospheric emission licensing authorities;
- Engagement with local authorities and ward councillors;
- Press advertisement in a national, regional and local newspaper in the Mpumalanga
- 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;

A Ward Councillor Briefing and two public meetings were held during the public review period of the BID, in the areas of Balfour, Siyathemba and Grootvlei on 21 August 2018.

I&APs were notified on 11 November 2018 of Eskom's decision to exclude Grootvlei from the second round of public engagements for the Eskom 2018 MES application process.

During March 2020, the I&AP Database has been updated to ensure that all contact details are correct, parties are still applicable and to add specific sensitive receptors i.e. schools, clinics, hospitals and old age homes within the modeling 60km modeling domain of Grootvlei power station.

All I&APs on the updated database have now been informed of the continuation of the Grootvlei application and availability of the draft application documentation for review and comment. Notifications have been sent via email and through newspaper advertisements placed in the same newspapers as for the first round of consultation. Notifications have been prepared in Afrikaans, English, Zulu and Sesotho.

No public meetings have been scheduled for the second round of public engagements for Grootvlei due to prohibitions imposed by government to prevent the possible spread of COVID-19. Alternative means of engagement will be applied during the 30 day public review and comment period i.e. emailed communication, virtual meetings and teleconference meetings with key stakeholders.

The next steps in the Grootvlei Suspension application process will entail finalising the PP Report and IRR which will record and consolidate all the comments and issues received during the last round of engagement for the PPP. The concluded PP Report and IRR would be submitted together with the motivation, variation request and AIR to the NAQO for approval. I&APs will be notified of the submission and will have access to the final documents placed on the NEC website. I&APs will also be notified of the decision made by the NAQO.

ANNEXURE 1A

PROOF OF EMAILED PROJECT NOTIFICATION TO NATIONAL AND DISTRICT AIR QUALITY OFFICERS DURING 1ST ROUND OF PUBLIC ENGAGEMENTS

ANNEXURE 1B

MINUTES OF MPUMALANGA HIGHVELD AND VAAL TRIANGLE AUTHORITIES ENGAGEMENT MEETING AND ATTENDANC REGISTER RELEVANT TO 1ST ROUND OF PUBLIC ENGAGMENTS

ANNEXURE 2

PROOF OF EMAILED NOTIFICATION TO NATIONAL AND DISTRICT AQO REGARDING CONTINUANCE OF GROOTVLEI APPLICATION FOR 2ND ROUND OF PUBLIC ENGAGEMENTS

ANNEXURE 3

PROOF OF CORRESPONDENCE WITH DIPALESENG LOCAL AUTHORITY DURING THE 1ST AND 2ND ROUND OF PUBLIC ENGAGEMENT

ANNEXURE 4

NEWSPAPER ADVERTISEMENT TEAR SHEETS

ANNEXURE 5

PHOTOGRAPHIC PROOF OF SITE NOTICE PLACEMENT

ANNEXURE 6

I&AP DATABASE

ANNEXURE 7A

COPY OF BID

ANNEXURE 7B

SIGNED BID DISTRIBUTION LIST

ANNEXURE 8

COPY OF PUBLIC MEETING MINUTES AND RELATED

ATTENDANCE REGISTERS

ANNEXURE 9

ISSUES AND RESPONSE REPORT (IRR) – STAND ALONE DOCUMENT

The END .....

NALEDZI
ENVIRONMENTAL CONSULTANTS (Pty) Ltd

About Us: www.naledzi.co.za

Background

Naledzi Environmental Consultants (NEC) was established in 2003 as an Environmental Consulting firm of choice. It is an employee owned and managed company, with an equal number of dedicated, enthusiastic, well-trained and experienced young male and female professionals. Naledzi is a 100% black owned and managed company with a Level 1 BEE rating.

Vision

To provide quality environmental services, maximizing shareholder value and stakeholders' satisfaction.

Mission

We will channel sizeable amount of resources towards the development of staff skills, conduct our business professionally by utilizing all available regulatory, self-regulatory and market based tools in appropriate combination to affect the best outcome in each project.

Core values and work ethics

We undertake to provide quality services right, efficiently, honestly and transparently towards sustainable customer experience. We also undertake to work only on projects for which we are qualified and accredited to perform. All these would be done in accordance with internationally recognised systems and in compliance with the latest national, provincial and local legislative frameworks and other requirements.

You can find us at:

Polokwane – Head Office
160 Marshall Street
Polokwane
0700
Tel: 083 410 1477,
E-mail: info@naledzi.co.za

Or visit us at our satellite branches:

Thabazimbi – Limpopo
1 Oudekraal Estaste,
95 Hamerkop Street
Thabazimbi, 0387
Tel: 084 226 5584
Email: botham@naledzi.co.za

Centurion – Gauteng
Building 9, Cambridge Office Park, 5
Bauhinia Street,
Highveld Techno Park,
Centurion
Tel: 083 410 1477,
E-mail: info@naledzi.co.za