

**PROPOSED GAS TO POWER PLANT ON A SITE WITHIN THE RICHARDS BAY INDUSTRIAL DEVELOPMENT ZONE,  
KWAZULU-NATAL**

**COMMENTS AND RESPONSES REPORT**

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**COMMENTS RECEIVED: EIA PHASE**

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
<b>PUBLIC PARTICIPATION PROCESS &amp; I&amp;AP REGISTRATIONS</b>			
1.	Is the EIA report going to be presented at the Environmental Review Committee (ERC) meeting? The ERC is definitely a stakeholder in this process.	Joe Muller EM: Infrastructure Planning & Development	The EIA report will be presented to the ERC on Tuesday 17 May 2016.
2.	Will the EIA report be finalised at that stage?	Richards Bay Industrial Development Zone  Meeting: 22-04-2016	The draft EIA report is currently available for review. The draft EIA report was released into the public domain on 10 May 2016. The 30-day review period for the draft EIA report is from the 10 May 2016 – 9 June 2016.
3.	Will there be a public meeting?	Ndimiso Ngongoma Adjacent Landowner  Tata Steel  Meeting: 22-04-2016	A public meeting will be held on the 17 May 2016 at the Richards Bay Community Church in Richards Bay.
4.	Are you interacting with anyone from the local municipality?	Mr W. Mpofu PNR Manager: Planning	The Municipal Manager has been informed of the EIA process. Sharin Govender, the Project Manager: Environmental Planning, is the point of contact at the Municipality for this project.
5.	Is there a possibility of public meetings? Will the public meeting be held in the evening?	uThungulu District Municipality	A public meeting will be held on the 17 May 2016 at 17:30 at the Richards Bay Community Church, Richards Bay.
6.	Will we be receiving a hard copy of the Draft EIA report?		A CD copy of the draft EIA report will be sent to the District Municipality. A hard copy of the report will be available at the

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		Meeting: 22-04-2016	public library and the report will also be available on Savannah Environmental's website for download.
<b>PROJECT DETAILS AND ASSOCIATED INFRASTRUCTURE</b>			
7.	The gas infrastructure coming in to the site is included in our engineering design. I informed the developer that if the gas corridor is not implemented by the RBIDZ, then it should be included in this EIA process. Where would this project's gas corridor be located?	Joe Muller EM: Infrastructure Planning & Development  Richards Bay Industrial Development Zone  Meeting: 22-04-2016	This aspect of the project is still to be confirmed. The gas corridor will be assessed in a separate EIA process.
8.	Is this project located within the IDZ?	Cllr Allen Viljoen	The project is proposed to be located in Phase 1F of the RBIDZ.
9.	Where will the gas pipeline come from?	Ward Councillor – Ward 2	This is still to be confirmed by the project developer. A separate EIA process for the gas pipeline will be undertaken at a later stage.
10.	When you refer to two phases, is this referring to the different type fuel only that will be different?	City of uMhlathuze Municipality	The fuel types will differ per phase. Diesel or LPG will be used for the first phase, and LNG or natural gas will be utilised for the second phase.
11.	How high will the gas power plant be?	Meeting: 22-04-2016	The maximum height of the infrastructure will be approximately 15m.
12.	When are you anticipating to start the construction?	Ndumiso Ngongoma Adjacent Landowner  Tata Steel	The starting date of the proposed project, in terms of construction, is dependent upon receiving Environmental Authorisation from the Department of Environmental Affairs as well as the developer being a preferred bidder and receiving a license from NERSA.

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		Meeting: 22-04-2016	
13.	How many megawatts are you proposing?	Mr W. Mpofu PNR Manager:	The project will generate up to 400MW (300MW from the gas turbines, 150MW from the steam turbines) in total.
14.	Will it only be on these three properties in the IDZ area?	Planning	The project will be located on Erven 17455, 17443 and 17442 located within Zone 1F the RBIDZ.
15.	Is this project part of the IPP Programme?	uThungulu District Municipality	The project is to be developed in response to the Department of Energy's request for projects to be developed by Independent Power Producers in order to provide alternative power generation technologies as part of the technology mix for the country.
16.	In terms of fuel inputs, are you planning to use the railway?	Meeting: 22-04-2016	Fuel for phase 1 of the operation phase will transported to site via trucks.
<b>WATER</b>			
17.	The one issue which we have also raised to the project developer is the water supply. Infrastructure can accommodate their requirement, but with the drought the RBIDZ cannot guarantee water supply for the project. The infrastructure has been designed to meet their demand, but with the drought those demands cannot be guaranteed.	Joe Muller EM: Infrastructure Planning & Development  Richards Bay Industrial Development Zone  Meeting: 22-04-2016	Water volumes of between 50 000m <sup>3</sup> and 270 000m <sup>3</sup> <sup>1</sup> per annum are expected to be required for the project. The volume of water required will be supplied via the Richards Bay IDZ water supply network that has an allotment from the local water authority. Every effort is being made to reduce these volumes further, including the potential for recycling condensation from air cooled condensers if such equipment will form part of the final plant design.
18.	What capacity of water will be required? There is no water, as this is the worst drought in a 100 years as well as incompetency from the municipality. The dam will be empty by the end of October if there is not a drastic drop in consumption before that.	Cllr Allen Viljoen Ward Councillor – Ward 2	Water volumes of between 50 000m <sup>3</sup> and 270 000m <sup>3</sup> per annum are expected to be required for the project. The volume of water required will be supplied via the Richards Bay IDZ water supply network that has an allotment from the local water authority. Every effort is being made to reduce these volumes further,

<sup>1</sup> Exact water requirements are unconfirmed at this stage and are therefore best estimates. Once the final technology has been selected, water volumes will be confirmed.

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		City of uMhlathuze Municipality  Meeting: 22-04-2016	including the potential for recycling condensation from air cooled condensers if such equipment will form part of the final plant design. Please refer to Appendix X which is a letter of confirmationX
19.	Does this kind of activity have opportunities for recycling of water that has already been used?	Mr W. Mpofu PNR Manager: Planning  uThungulu District Municipality  Meeting: 22-04-2016	Every effort is being made to reduce the volumes required further, including the potential for recycling condensation from air cooled condensers if such equipment will form part of the final plant design.
<b>ECOLOGICAL IMPACTS</b>			
20.	You mentioned that you are also undertaking an ecological study?	Percy Langa Environmental Manager: SHEQ Business Unit  Richards Bay Industrial Development Zone	The proposed development will trigger listed activity 27 (among other listed activities) which involves ' <i>The clearance of an area of 1ha or more, but less than 20ha of indigenous vegetation</i> ' and a terrestrial ecological assessment has been identified during the scoping phase. Please refer to Appendix H of the EIA Report for the assessment.
21.	There are two wetlands identified on the site for the biomass projects. Joe Muller will forward you the new layout where you can actually see the wetlands.	Meeting: 22-04-2016	The report was received and used to inform the EIA for the gas to power plant taking cognisance of the wetlands offset.
22.	At this point in time, my main concern is regarding the wetlands. Surely this activity will require a water use licence. Once the EIA is out, then I'll be able to comment.	Ndimiso Ngongoma Adjacent Landowner	An EIA was undertaken for the Richards Bay IDZ Phase 1F by Nemai Consulting. Wetlands studies were carried out in detail and the findings of that EIA Report culminate in the Wetlands Offset. The EIA Report for the RBIDZ Phase 1F was used to inform the

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		Tata Steel  Meeting: 22-04-2016	EIA for the gas to power plant taking cognisance of the wetlands offset. The draft EIA report will be available on 10 May 2016.
<b>SOCIO-ECONOMIC IMPACTS</b>			
23.	North of the IDZ (approximately 2km) there is a planned mega housing development where there will be approximately 10 000 new houses in the area. It will be high density, 3-4 storey flats as well as houses. Semi-supported housing will also be there. There will be schools etc.	Cllr Allen Viljoen Ward Councillor – Ward 2  City of uMhlathuze Municipality  Meeting: 22-04-2016	It is noted that there is a planned housing development located approximately 2km north of the RBIDZ.
24.	In terms of Ecology, that whole area there has been timber farms and is now basically used for industrial purposes.	Cllr Allen Viljoen Ward Councillor – Ward 2	Comment noted, no response required.
25.	Will the employment be more highly skilled personnel?	City of uMhlathuze Municipality  Meeting: 22-04-2016	The proposed development is likely to create approximately 300-400 employment opportunities, depending on the final design of the power plant. Of this approximately 25% of the opportunities will be available to low-skilled workers (construction labourers, security staff etc.), 35% will be available to semi-skilled workers (drivers, equipment operators etc.), and 40% will be available to skilled personnel (engineers, land surveyors, project managers etc.). Majority of low-skilled and semi-skilled opportunities are likely to be available to local workers (±25%).
<b>TRAFFIC IMPACTS</b>			
26.	Regarding the traffic impact, we've just approved a weight restriction on construction vehicles. Here where the access road into the light industrial area will have a weight restriction of 10.9 tons. They will need to use	Cllr Allen Viljoen Ward Councillor – Ward 2	Comment noted. This has been considered within Section 6.1.4 and Section 6.2.4 of the Social Impact Assessment (SIA). The route which has been suggested by the Ward Councillor has been included as a mitigation measure.

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	the N2 and R34 road to access the IDZ area. The name of the road is North Central Arterial (R619) there is heavy traffic already and it becomes heavily congested. So the construction vehicles will need to divert their routes if they are planning to use the road with weight restriction. We would prefer if they use the N2 and the R34 (John Ross highway) into the industrial area.	City of uMhlathuze Municipality  Meeting: 22-04-2016	
27.	There is a lot of traffic on the R619. The road is majorly congested. It would be necessary for trucks to come into the IDZ from the south off the R34.	Mr W. Mpofu PNR Manager: Planning  uThungulu District Municipality  Meeting: 22-04-2016	Comment noted. This has been considered within Section 6.1.4 and Section 6.2.4 of the Social Impact Assessment (SIA). The route which has been suggested by the Ward Councillor has been included as a mitigation measure.
<b>NOISE IMPACTS</b>			
28.	What about noise and vibration impacting the residential area close by?	Cllr Allen Viljoen Ward Councillor – Ward 2  City of uMhlathuze Municipality  Meeting: 22-04-2016	A noise specialist has provided a letter stating that a noise impact assessment is not required (refer to Appendix E). The power plant is likely to be a mid-merit plant which would only generate noise during peak hours.
<b>AIR QUALITY IMPACTS</b>			
29.	The air quality might be an issue. Because we had some issues with Tata Steel, Foskor and Mondi.	Mr W. Mpofu PNR Manager: Planning	An Air Quality Impact Assessment has been undertaken as part of the EIA process (refer to Appendix G).



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		uThungulu District Municipality  Meeting: 22-04-2016	Two operational scenarios were assessed for the proposed gas to power plant generating the maximum output of 400MW:  Scenario 1: Power generation using diesel, which includes stack emissions and fugitive emissions from the diesel storage tanks  Scenario 2: Power generation using LNG, which only includes stack emissions as LNG will be piped in.  The effects of emissions of SO <sub>2</sub> , NO <sub>x</sub> , PM <sub>10</sub> , CO and benzene from these operational scenarios on the existing state of air quality were assessed by adding the predicted concentrations to the existing baseline, i.e. assessing the additive effect.  It is predicted with confidence, that the site operations will generate low emissions, low ambient concentrations, and low environmental impacts overall. Mitigation measures are recommended for construction and decommissioning activities only. It is a reasonable opinion that the project should be authorised considering the outcomes of this impact assessment.
<b>GENERAL</b>			
30.	What about the rezoning of the properties?	Mr W. Mpofu PNR Manager: Planning  uThungulu District Municipality  Meeting: 22-04-2016	The area is zoned for IDZ Industrial and the site is located within the RBIDZ. A rezoning application is therefore not required.

**COMMENTS RECEIVED DURING THE SCOPING PHASE**

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<b>ENVIRONMENTAL IMPACT ASSESSMENT PROCESS</b>			
31.	How far are you in the EIA process for each project?	Sandy Camminga Director  Richards Bay Clean Air Association  Meeting: 11-08-2015	The project is in the Scoping phase of the EIA process. No information has been distributed to Interested and Affected Parties (I&APs) as yet. Stakeholders are currently being identified and an I&AP database has been compiled. A process notification letter and background information document will be distributed to I&APs in due course. The Scoping report will be made available for public review before the end of the year (2015).
<b>I&amp;AP REGISTRATION AND PUBLIC PARTICIPATION PROCESS</b>			
32.	As per our telephonic discussion please register Franz Schmidt cc on the email and myself Ndumiso Ngongoma as interested and affected parties for the proposed development of Richards Bay Gas Power 1 Gas to Power Facility	Ndumiso Ngongoma Specialist: Environment, Quality & Systems  Tata Steel  Email: 9-08-2015	The details of Ndumiso Ngongoma and Franz Schmidt were added to the register of I&APs.
33.	Please include me in the stakeholder information for this project.	Louwaine Swarts  EOH Mthombo  Email: 17-11-2015	Louwaine Swarts details were added to the register of I&APs.

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34.	Further to the recent Notice in the media about the above project, I would appreciate if you could add me as Interested and Affected Party and if I could request all background information.	Frans van der Walt  QS2000 Plus (Quantity Surveyors & Project Managers  Email: 02-12-2015	Frans van der Walt's details were added to the I&AP database. The background information document was sent via email.
35.	Are there going to be any Public Meetings held? We need to debate the appropriateness of the locality and desirability of establishing a Power Plant within an IDZ.	Frans van der Walt  QS2000 Plus (Quantity Surveyors & Project Managers  Email: 04-12-2015	Public Meetings will be held in the first quarter of 2016. The dates are still to be confirmed. Frans van der Walt was reminded to send his written comments/concerns regarding the locality of the proposed Power Plant to include in the Scoping Report which will be submitted to the National Department of Environmental Affairs. No further comment has been received from Mr Van der Walt to date.
<b>AIR QUALITY</b>			
36.	Section 1F is in close proximity to residential and business areas. The impacts to these areas, air quality and noise in particular, will need to be assessed in the EIAs.	Sandy Camminga Director  Richards Bay Clean Air Association	Comment noted. An air quality impact assessment and social impact assessment will be undertaken in the EIA.
37.	Will cumulative air quality impacts be assessed? The RBIDZ is located within a hotspot in terms of pollution load. Although one project may well be within guidelines or standards, adding additional projects may have a negative impact on air quality within the region.	Meeting: 11-08-2015	In terms of the requirements of the EIA Regulations, an assessment of the cumulative air quality impacts will be undertaken.

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	It is therefore critical to undertake cumulative air quality studies.		
38.	<p>The comments provided below are based on the Richards Bay Clean Air Association's (RBCAA) review of the Draft Scoping Report, prepared by Savannah Environmental (Pty) Ltd, and dated 29 May 2015.</p> <p><b>1) PROJECT INFORMATION:</b></p> <ul style="list-style-type: none"> <li>» In response to the need for additional electricity supply to the national grid, and in line with Government's goal to procure electricity from Independent Power Producers (IPPs), Transnet is currently working with the Department of Energy Independent Power Producer (IPP) office to help expedite the 3126MW Ministerial determination for Gas IPPs.</li> <li>» In response to this initiative Richards Bay Gas to Power 2 (Pty) Ltd is proposing the construction of a gas-fired power station within IDZ 1F, which is located within an area identified as being sensitive from a health impact perspective.</li> <li>» The facility will have a maximum capacity of 300MW and will feed into the Indus Substation which has the capacity to accommodate the 300MW to be generated.</li> <li>» <u>The facility will be developed in 2 phases;</u> Phase 1: Will operate a wide variety of fuels, including diesel, Heavy Fuel Oil (HFO), Light Fuel Oil (LFO) and Liquefied Petroleum Gas (LPG).</li> </ul>	<p>Sandy Camminga Chairman EIA Committee</p> <p>Richards Bay Clean Air Association</p> <p>Letter: 7-01-2016</p>	

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	<p>Phase 2: Will operate with Liquid Natural Gas (LNG).</p> <ul style="list-style-type: none"> <li>» The main infrastructure associated with the proposed facility will include                             <ul style="list-style-type: none"> <li>a) Interim fuel storage facilities (4 x 10 000m<sup>3</sup> tanks) will be required until the gas infrastructure is constructed by Transnet.</li> <li>b) Multiple 50MW engine halls, each hall comprising 6 engines. The stacks associated with the engine halls will be up to 30m in height.</li> </ul> </li> <li>» A new 132kV power line to connect to Municipal grid, connecting directly to the Indus Substation bordering the site. The proposed gas to power plant will use between 50 000m<sup>3</sup> and 265 000m<sup>3</sup> of water per annum.</li> <li>» The following uncertainties are associated with the proposed project                             <ul style="list-style-type: none"> <li>a) The preferred technology has not been determined.</li> <li>b) Preferred fuel source has not been selected.</li> <li>c) There is currently no LNG facility, therefore other fuel types are being considered for Phase 1.</li> <li>d) Phase 2 is dependent on the approval and construction of the LNG facility in the Port, for which an EIA is currently being undertaken.</li> </ul> </li> </ul>		

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	<p>» The most significant risk associated with the proposed project is the potential for increase in air quality impacts. Combined emissions are expected to be potentially significant.</p> <p><b>2) ISSUES \ CONCERNS</b></p> <p><b>i. Phase 1:</b></p> <p>The DSR provides very limited information on this phase of the project. Phase 1 will not run as a "gas to power" facility, but will instead utilise fuels such as HFO and diesel.</p> <p>There is no discussion in the DSR regarding the specialist studies that will be undertaken to determine the impacts of this phase of the project, which we believe will have the most significant impact on human health and air quality.</p> <p>This phase of the project must be fully assessed. For this to be done in a comprehensive manner, qualified air quality specialists must be appointed to do a comprehensive air quality impact assessment and to model to expected plumes. This must form part of the Environmental Impact Report, which needs to be assessed by registered I &amp; AP's.</p> <p><b>ii. Phase 2:</b></p>		<p>2) i. Heavy Fuel Oil (HFO) has been eliminated from the possible fuel list for Phase 1 due to the negative nature of possible emissions. The report has been amended to clarify the scope of study for the air quality assessment during the EIA Phase to include both Phases 1 and 2 of the project. The air quality assessment will be undertaken by Mark Zunckel and team of uMoya-NILU Consulting (Pty) Ltd, who has more than 15 years experience in the air quality assessment field. Results of this study will be included in the EIA Report which will be made available to the public for review and comment.</p> <p>ii. Comments noted as part of the process. The EIA for the LNG infrastructure is jointly being undertaken by the Department of Energy and Transnet for the establishment of berth's for both FSRU's and refuelling vessels. Fuel</p>

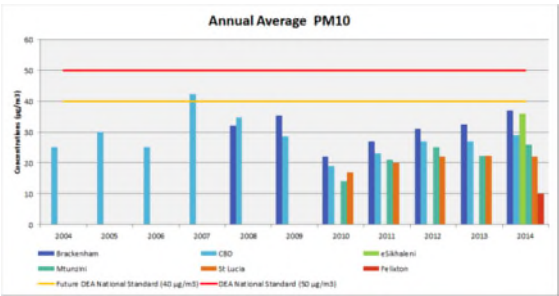
NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
	<p>Phase 2 which is the “gas to power” component is solely dependent on the availability of gas from the LNG infrastructure proposed for the Port of Richards Bay, for which an EIA is currently being undertaken.</p> <p>The LNG facility has been presented as the second phase of the Gas IPP Procurement Programme, developed by DoE through the IPP Office, and in collaboration with Transnet.</p> <p><u>This raises 2 issues of concern:</u></p> <ol style="list-style-type: none"> <li>1) That Phase 1 of the Richards Bay Gas to Power 2 (Pty) Ltd project may be implemented before the LNG facility materializes, resulting in a lengthy delay in the implementation of Phase 2.</li> <li>2) The possibility exists that the LNG facility may never materialize, in which case Phase 2 of the proposed Gas to Power Plant will not be implemented. This would result in long term negative impacts on air quality and human health.</li> </ol> <p>The concerns are heightened by the absence of timelines for the implementation of Phase 2, and the absence of a limitation on the operational period for Phase 1.</p> <p>In view of the above, it is the position of the RBCAA that any authorisation which may be issued for the proposed Gas to Power Plant, should be issued subject to the</p>		<p>Storage and Regasification Units (or FSRU’s) can be deployed within a relatively short time-frame (12 to 18 months) which coincides with the proposed build program of the proposed gas power plant. The FSRU does however depend on Transnet completing the berth and associated land based (pipelines) infrastructure, as proposed within their EIA.</p> <p>The proposed LNG infrastructure is envisaged by DoE and Transnet to serve the greater Gas Economy of the area, and South Africa as a whole.</p> <p>Already many industrial clients within Richards Bay utilize “methane rich gas” as piped by SASOL from their Secunda facility through the only existing gas transmission line in South Africa, the Lilly Line, with a large pent up demand for additional gas, when and if available, to reduce their dependency on electricity generated from coal more than 500km away. These clients include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Mondi</li> <li>• South 32</li> <li>• FOSKOR</li> </ul> <p>In addition, by connecting to the existing Lilly Line, natural gas can then be piped inline and south towards Durban, where some obvious clients could include the AVON Peaking plant which currently consumes vast amounts of diesel on an hourly basis.</p>

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	<p>authorisation and development of the LNG facility in the Port.</p> <p><b>iii. Fuels:</b></p> <p>1) The report does not discuss how the fuels will be transported to the site and what the potential impacts of this would be. A Traffic Impact Assessment may be required.</p> <p>2) A thorough assessment of fuel type and source, relating to Phase 1, is required in order to determine the impacts on human health, air quality and climate change.</p> <p><b>iv. Water Availability / Demand:</b></p> <p>Water availability is a significant constraint. It is the view of the RBCAA that the proposed Power Plant's water requirements of between 50 000m<sup>3</sup> and 265 000m<sup>3</sup> is significant under the current drought situation, and that current contracted users have been operating under water restrictions.</p> <p>When this project was initially presented it was submitted that a desalination plant was being proposed to support the water demand.</p>		<p>iii. A dedicated "multi Fuel Pipeline" will be constructed from the proposed power plant site to both the Transnet Gas Hub as well as the Liquid Bulk Terminal within the port. Existing Gas pipeline servitudes will be utilised and / or upgraded for this purpose. The gas will serve not only the proposed power plant, but also other new locators within the Richards Bay IDZ Zone 1F.</p> <p>Impacts associated with the fuel type and source in order to determine the impacts on human health, air quality and climate change will be undertaken as part of the air quality impact assessment.</p> <p>iv. A letter of commitment to water provision by the Mhlathuze Water Board is included within Appendix F of the FSR.</p> <p>The proposed gas power plant's design has been refined in the interim, and the water requirements are now pegged between 50 000m<sup>3</sup> and 65 000m<sup>3</sup> per annum. The majority of the water will be utilized for emission reduction purposes.</p> <p>Although desalination was considered initially, further engagement with various stakeholders identified alternative sources of water, namely industrial and sewerage effluent in large enough quantities (in excess of 2 000 000m<sup>3</sup> per month) that is currently being discharged into the ocean. As such, various other water reuse and</p>



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	<p>However, it is noted that the DSR reads that "Water is to be sourced from Umhlathuze Water Works." (We assume this should read as "Mhlathuze").</p> <p>If this is the case, it is advised that a letter of commitment to water provision by the Mhlathuze Water Board is included in the Environmental Impact Report.</p> <p>In view of the above, are we to assume that a desalination plant is now no longer a consideration?</p> <p><b>v. Local Policy and Planning:</b></p> <p>This development does not appear to be in line with uMhlathuze Local Municipality (ULM) planning and policy aims as reflected in the Integrated Development Plan (IDP) (2012-2017), with one of the key issues identified within the situational analysis being that; "the most suitable solution to the energy crisis is to reduce the demand for energy and at the same time investigate alternative renewable energy resources." – Gas is a non-renewable resource and will contribute towards climate change.</p> <p><b>vi. Alternative Site:</b></p> <p>The area is characterised by poor air quality, with IDZ 1F identified as being sensitive from a health perspective. An alternative site needs to be assessed given that the combined emissions from the proposed facility are expected to be potentially significant.</p>		<p>recycling related projects are in the planning phases with respective stakeholders to optimise the existing effluent, whilst simultaneously reducing the impact on marine ecology. A separate desalination project is still being investigated, but as a separate and stand-alone project.</p> <p>v. While reduction in use and demand side management are the best solutions for the energy crisis, the need for additional electricity generation from various sources has been identified at national policy level.</p> <p>vi. No alternative sites within the IDZ are available for consideration for the establishment of the project. Impacts on air quality and human health will be assessed in detail in the EIA process in order to inform the feasibility of the project at the proposed location.</p>

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	<p><b>3) AIR QUALITY</b></p> <p><b>3.1 Impacts on Ambient Air Quality:</b></p> <p>The report does not identify impacts and emissions associated with Phase 1 of the proposed project.</p> <p>Section 6.2.5 of the report (page 73) only discusses emissions and impacts associated with natural gas, which is Phase 2 of the proposed development.</p> <p><b>3.2 Air Quality Impact Assessment (AQIA):</b></p> <p>It is understood that a detailed AQIA will be undertaken, and will include the assessment of cumulative impacts.</p> <p>The AQIA must include a comprehensive assessment and modelling of Phase 1, independent of Phase 2.</p> <p>The RBCAA offers their assistance in providing baseline data for input into the study.</p> <p><b>3.3 Air Quality Status:</b></p> <p>The report reads that RBCAA data indicates that “despite the concentration of major industry, ambient concentrations of SO<sub>2</sub> and PM<sub>10</sub> comply with NAAQS...”</p> <p><u>In response the RBCAA submits that;</u></p>		<p>3.1. Emissions and impacts associated with Phase 1 of the project are expected to be similar to those associated with Phase 2, although impacts could be higher. The report has been amended to clarify the scope of study for the air quality assessment during the EIA Phase to include both Phases 1 and 2 of the project.</p> <p>3.2. The air quality assessment will be undertaken by Mark Zunckel and team of uMoya-NILU Consulting (Pty) Ltd. This study will include an assessment of all phases of the project. The offer of assistance from the Richards Bay Clean Air Association is noted with thanks.</p> <p>3.3. Comment noted. This information has been included within the report.</p>

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
	<p>2014 data shows an increasing trend in annual average PM10 concentrations, which is particularly noticeable at Brackenham.</p>  <p>In 2014 the RBCAA recorded Twenty Six (26) Exceedances of the AQA Daily Standard 75 µg/m<sup>3</sup>, which is non-compliant with the number of permissible exceedances (4).</p> <p>Fourteen (14) of the exceedances were recorded at the RBCAA Brackenham station, which is located in close proximity to IDZ 1F.</p> <p><b>4) CONCLUSION:</b></p> <p>Richards Bay is characterised by poor air quality, with IDZ 1F located within an area identified as being sensitive from a health impact perspective.</p> <p>Phase 1 of the power plant will utilise fuel sources other than LNG, which have the potential to significantly impact on air quality and human health.</p>		

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	<p>While we accept that generation of power is needed to ensure the sustainability of existing industry and to attract new industry to the area, the RBCAA remains of the opinion that IDZ 1F is not suitable for the development of high impact industries from an air quality, and human health perspective.</p> <p>In view of the above, it is unlikely that the RBCAA would support Phase 1 of the project as currently proposed.</p> <p>Thank you for affording the Richards Bay Clean Air Association (RBCAA) the opportunity to comment on the above proposed project.</p> <p>The RBCAA reserves the right to provide further comment should additional information become available.</p>		
<b>WATER</b>			
39.	There is no water available from the City of Umhlathuze Local Municipality. Other water sources will need to be investigated.	Sandy Camminga Director  Richards Bay Clean Air Association  Meeting: 11-08-2015	The developer is investigating the possibility of constructing a desalination plant which would supply water to the projects.
40.	Will the brine from the desalination plant be discharged into the marine environment? It would be beneficial if the brine could be used by other industries within the	Sharin Govender Environmental Manager	Comment noted. The intention is to sell the brine to industries in KwaZulu-Natal where feasible. The brine will be within the required limits in order to be discharged into the sea if required.

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
	RBIDZ. This would mitigate negative or detrimental impacts to the catchment and marine environment.	City of Umhlathuze  Meeting: 11-08-2015	
41.	Where would the abstraction point for the desalination plant be?	Sandy Camminga Director  Richards Bay Clean Air Association  Meeting: 11-08-2015	Mhlathuze Water has five (5) research tests points varying in distance. The furthest test point is approximately 5km out at sea and the closest one is approximately 500m from the shoreline. More research needs to be undertaken before we can confirm the location of the abstraction point.
<b>IMPACTS TO TELKOM INFRASTRUCTURE</b>			
42.	No wireless systems affected by this project.	Leonard Shaw Specialist Network Architecture and Planning  Telkom  Email: 17-1102015	Noted. No response required.
<b>HERITAGE IMPACTS</b>			
43.	We have reviewed your application for comment and the Heritage Screener by Mariagrazia Galimberti of Cedar Towers who concludes that the proposed	Bernadet Pawandiwa Senior Heritage Officer	Comments are noted. No response required.

NO.	ISSUE/COMMENT	ISSUE RAISED BY	RESPONSE
	<p>development occurs in a largely disturbed area underlain by sediments with a low fossil sensitivity.</p> <p>Since the site is not likely to yield heritage resources due to disturbance, Amafa has no further comment on the development. The development may proceed as planned.</p> <p>You are also required to adhere to the below-mentioned standard conditions: Conditions:</p> <ol style="list-style-type: none"> <li>1) Amafa should be contacted if any heritage objects are identified during earthmoving activities and all development should cease until further notice.</li> <li>2) No structures older than sixty years or parts thereof are allowed to be demolished altered or extended without a permit from Amafa.</li> <li>3) No activities are allowed within 50m of a site, which contains rock art.</li> <li>4) Sources of all natural materials (including topsoil, sands, natural gravels, crushed stone, asphalt, etc.) must be obtained in a sustainable manner and in compliance with the heritage legislation.</li> </ol>	<p>Amafa Heritage KwaZulu-Natal</p> <p>Letter: 11-12-2015</p>	