

Ref: 4516 A

Enquiries: V.I. Prinsloo Tel: 017 8195346 Fax: 0866090238

Anelle Lötter Zitholele Consulting PO Box 6002 HALFWAY HOUSE 1685

Fax 0866746121

Dear Anelle Lötter

KEY COMMENTING AUTHORITY REVIEW OF THE DRAFT SCOPING REPORT FOR A PROPOSED EXTENTION OF ASH DISPOSAL FACILITIES AND ASSOCIATED INFTASTRUCTURE AT CAMDEN POWER STATION (DEA REF: 12/12/20/2300):

Your letter reference 12670: Let-02, date 15 July 2011 refers.

The Mpumalanga Tourism and Parks Agency have the following concerns, the Terrestrial biodiversity of the farm are Highly significant in parts. See attached map from the Mpumalanga Biodiversity Conservation Plan (C-plan).

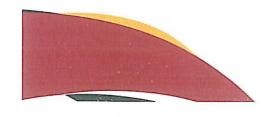
Highly significant/Important & Necessary areas are those where biodiversity has been heavily compromised and very few options remain to meet biodiversity targets. Natural vegetation cover in these areas should be maintained or restored. Decisions on land-use changes will require a biodiversity specialist study as part of the EIA (Lötter M.C. & Ferrar A.A., 2006).

As a result the following minimum requirements for an activity that may have a detrimental effect on the environment should be met by the applicant:

In order to promote a uniform standard in Environmental Management Plans the Mpumalanga Tourism and Parks Agency requires a minimum set of standards that will be required in the Scoping Report, EIA or EMPR. Minimum requirements are set for all applications. It is the responsibility of the consultant to give reasons why there should be exemption of any of the requirements in this document (e.g. the application is in an area where there already is severe disturbance of the natural biodiversity and that there will be no impacts on the specific area of environmental concern if the requirements are not met).

If impacts are major, they must be considered in conjunction with existing impacts of other projects and be regarded as a key concern. (EIA Guideline document).

Present and potential future cumulative and synergistic effects should all be taken into account (Aide Memoire).



# REGISTRATION AND COMMENT SHEET

013

## Environmental Impact Assessment and Waste Management License Application for a proposed extension of ash disposal facilities at Camden Power Station

Inserted in the Background information Document May 2011

### **EIA Public Participation Office**

Anelle Lötter/Florence Rambuda Zitholele Consulting (Pty) Ltd P O Box 6002, Halfway House, 1685 Tel: (011) 207 2076/2075 Fax: 086-676-9950

Email: <u>alotter@zitholele.co.za</u> or florencer@zitholele.co.za

Please complete by 17 June 2011 and return to the EIA Public Participation Office (as above)

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#### **VEGETATION**

- 1. A map indicating the total area (ha) of disturbance/transformation<sup>1</sup> on the property, including the proposed development.
- 2. A map indicating vegetation communities and sensitive areas on the property. The map should include the delineation of a 30m buffer zone around any sensitive areas.
- 3. A map indicating all surrounding land use on adjacent properties.
- 4. A list of threatened plants species (Red Data Listed) that may potentially occur in the area should be submitted.
- 5. A floristic survey should be conducted during the growing season with at least two visits undertaken (± November and ± February). Visits during other seasons will be determined by the flowering and fruiting times of species that do not occur during the summer season.
- 6. The MTPA should be supplied with a list of all plant taxa encountered during the surveys. The following should be investigated: threatened species (Red Data Listed²), important medicinal species, protected species (Mpumalanga Conservation Act, 1989) as well as endemic taxa.
- 7. Plants that have been surveyed and which may be of conservation importance should be identified down to species level.
- 8. The MTPA should be supplied with a detailed list of all threatened species, including their locality information as well as details regarding date, GPS location and spatial resolution.
- 9. A list of threatened species that could potentially occur but were not found during site visits should be provided separately. In respect of each such species an opinion on the likelihood of that species occurring on the site and the reason for that opinion should be provided.
- 10. A list of alien plant species occurring on the property should be provided.
- 11. The invasion extent of category 1 & 2 plants (CARA: Act 43 of 1983, Regulation 15) should be investigated.
- 12. Any existing or planned eradication programs of alien vegetation should be indicated in the report.
- 13. Relocation plans of plants of conservation importance should be included and this relocation should be done by specialists that have expertise in the area of environmental concern (EIA Guideline Document).

<sup>&</sup>lt;sup>1</sup> Transformation: any land use that results in a loss of biodiversity e.g. buildings, old lands, roads, dams etc. and excluding grazing or burning pressures.

<sup>&</sup>lt;sup>2</sup> The MTPA is currently reassessing the threatened plant species of Mpumalanga and a preliminary list is available on request.

#### **ANIMALS**

#### **Mammals**

- 1. The Mpumalanga Biobase Report should be consulted for obtaining background on the conservation value of land and areas of sensitivity within the Mpumalanga Province. This report is obtainable from the Mpumalanga Tourism and Parks Agency (MTPA).
- 2. A list of all potential species should be submitted. The following should be highlighted for threatened (Red Data) species.
  - i. International Red Data status (Latest version of IUCB Red Data List)
  - ii. National Red Data status (Latest version)
  - iii. Endemic status of each species
  - iv. Protection status of each species (Mpumalanga Nature Conservation Act 10 of 1998)
- 3. A full survey to determine species richness should be carried out. The time of year to conduct surveys should depend on the activity pattern of the species. The survey area should not be restricted the proposed site of development, but should include all habitat types over the entire property as well as adjacent areas. These surveys should be done by specialists with expertise in the area of environmental concern (EIA Guideline document).
- 4. A list of all species recorded during the survey should be supplied to the MTPA. Species data (GPS point locality, species name and date) should be forwarded to the MTPA.
- 5. Where total destruction is going to take place:
  - Specified faunal species must be captured and relocated to suitable habitat in the area.
  - ii. The operations must be handled by specialists with expertise in the area of environmental concern (GIS Guideline document).
  - iii. Species data (GIS point locality, species name and date) must be forwarded to the MTPA.
- Maps indicating
  - i. Areas of sensitivity
  - ii. Areas already disturbed/transformed<sup>3</sup> and size (ha)
  - iii. Proposed development and size
  - iv. Land-use on surrounding properties.
  - v. Location of important species as well as roosting and hibernation sites e.g. caves of ecological importance, in relation to the proposed development.
- 7. Recommendations on buffer zones will only be made once comprehensive species lists have been received and reviewed in the EMPR/Scoping Reports.
- 8. A list of threatened species that can potentially occur, but were not found during site visits or surveys should be provided. In respect of each such species an opinion on the likelihood of that species, occurring on the site and the reason for that opinion should be provided.

<sup>&</sup>lt;sup>3</sup> Transformation: any land use that results in a loss of biodiversity e.g. buildings, old lands, roads, dams etc. and excluding grazing or burning pressures.

- 9. A list of exotic/introduced vertebrate species occurring on the property should be provided.
- 10. An ethically accepted plan for the eradication or removal of any exotic/introduced species posing a threat to indigenous species should be included in the report.
- 11. Any existing and/or planned actions to prevent free movement/roaming of domestic animals such as dogs, cats, goats and pigs should be provided.

#### Birds

- 1. The Mpumalanga Biobase Report should be consulted for obtaining background on the conservation value of land and areas of sensitivity within the Mpumalanga Province. This report is obtainable from the Mpumalanga Tourism and Parks Agency (MTPA).
- 2. A list of all potential species should be submitted. The following should be highlighted for threatened (Red Data) species.
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- 4. A list of all species recorded during the survey should be supplied to the MTPA. Species data (GPS point locality, species name and date) should be forwarded to the MTPA.
- 5. Indicate in the report whether the proposed site falls within an Important Birding Area (IBA). Literature regarding the Important Bird Areas of Southern Africa (Barnes, 1998) is available from Bird Life South Africa.
- 6. Maps indicating
  - i. Areas of sensitivity Areas already disturbed/transformed<sup>4</sup> and size (ha)
  - ii. Proposed development and size
  - iii. Land-use on surrounding properties.
  - iv. Location of important species as well as roosting and hibernation sites e.g. caves of ecological importance, in relation to the proposed development.
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- 11. Any existing and/or planned actions to prevent free movement/roaming of domestic animals such as dogs, cats and exotic/introduced bird species should be provided.

#### Invertebrates

Evaluation and monitoring of invertebrate biodiversity should be included and should contain information on groups including ants, ground living beetles, (Tenebrionidae and Carabidae) termites, leafhoppers, spiders and scorpions.

#### **WETLANDS**

With reference to the meeting held in this regard on 03/02/2004 the following is important:

- 1. A wetland specialist should assess the condition of the wetland.
- 2. A thorough integrity study should be done on wetlands and the following must be indicated:
  - i. Detailed map of delineated wetlands on the property as well as upstream and downstream thereof.
  - ii. Detailed map of all the wetland types, indicating regionally scarce wetland habitat type/s if any.
  - iii. Indicate the size of the wetland.
  - iv. Indicate the different hydrological habitats (percentage) i.e. permanent, seasonal and/or temporary wetland areas.
  - v. Indicate the roughness of the wetland surface (according to Manning's roughness coefficient)
  - vi. Indicate which drivers support the existence of the wetland.
  - vii. Indicate and map the soil forms on the property highlighting hydric soils.
  - viii. Indicate the erodability of the soil (K-value)
  - ix. Indicate problem areas in the wetland (e.g. eroded areas, drains, roads, power lines, alien invasive plants etc.) giving the percentage and level of impact thereof on the wetland.
  - x. Indicate terrain unit/s on which the wetland occur.
  - xi. State the landform setting/s which best describe the wetland
  - xii. Give information regarding the downstream situation (e.g. number of people dependant on the water, size of floodable property downstream)
- 3. Identify and describe the functions provided by the wetland.
  - i. Habitat functions (biodiversity, grazing, nesting sites, etc.).
  - ii. Water quality functions (water purification etc).
  - iii. Hydrologic functions (flood attenuation, water supply, etc).
- Catchment information.
  - i. Surface area of the wetland catchment.

- ii. Percentage of the wetland catchment occupied by the wetland itself.
- iii. Cumulative loss of wetlands in the catchment.
- iv. Mean annual runoff generated by the catchment.
- v. Land cover in the surrounding catchment and the approximate percentage area under each.
- vi. Sediment input into the wetland.
- vii. Nutrient/toxicant input into the wetland.
- 5. Indicate the direct benefits derived by local communities from the wetland (e.g. is the wetland culturally important and why?)
- 6. Describe the biodiversity of the wetland.
  - i. Vegetation surveys.
  - ii. Invertebrate surveys
  - iii. Bird surveys during different seasons of the year (indicate wetland dependant birds and especially the importance of the wetland for migratory, nomadic and breeding birds).
  - iv. Mammal survey (Large and small mammals).
  - v. Fish survey.
  - vi. Amphibian survey (must be done shortly after rain)
  - vii. Identify unique communities (e.g. an unusually high number of marsh owls, although common, will be unique).
- 7. Indicate the availability of alternative sites with less important habitat for the proposed development

Kind regards

Dr N Motete

**Acting Chief Executive Officer** 

Date: 31 Aug 2011

#### REGISTRASIE- EN KOMMENTAARBLAD

# Omgewingsimpakbepaling en Aansoek vir Afvalbestuurslisensie vir voorgestelde uitbreiding van aswegdoenfasiliteite by die Camden-kragstasie

Ingevoeg in die Agtergrondinligtingsdokument

Mei 2011

MNR

TITEL

#### OIB Kantoor vir Openbare Deelname

Anelle Lötter/Florence Rambuda Zitholele Consulting (Edms) Bpk Posbus 6002, Halfway House, 1685 Tel: 011 207 2076/2075 Faks: 086 676 9950

E-pos: <u>alotter@zitholele.co.za</u> of <u>florencer@zitholele.co.za</u>

Vul asb in en stuur teen 17 Junie 2011 terug aan die OIB Kantoor vir Openbare Deelname (soos hierbo)

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# REGISTRATION AND COMMENT SHEET

## Environmental Impact Assessment and Waste Management License Application for a proposed extension of ash disposal facilities at Camden Power Station

Inserted in the Background Information Document May 2011

## **EIA Public Participation Office**

Anelle Lötter/Florence Rambuda Zitholele Consulting (Pty) Ltd P O Box 6002, Halfway House, 1685 Tel: (011) 207 2076/2075 Fax: 086-676-9950 Email: <u>alotter@zitholele.co.za</u> or

Email: <u>alotter@zitholele.co.za</u> or <u>florencer@zitholele.co.za</u>

Please complete by 17 June 2011 and return to the EIA Public Participation Office (as above)

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THANK YOU FOR YOUR CONTRIBUTION

# REGISTRASIE- EN KOMMENTAARBLAD

# Omgewingsimpakbepaling en Aansoek vir Afvalbestuurslisensie vir voorgestelde uitbreiding van aswegdoenfasiliteite by die Camden-kragstasie

Ingevoeg in die Agtergrondinligtingsdokument Mei 2011

#### OIB Kantoor vir Openbare Deelname

Anelle Lötter/Florence Rambuda Zitholele Consulting (Edms) Bpk Posbus 6002, Halfway House, 1685 Tel: 011 207 2076/2075 Faks: 086 676 9950

E-pos: alotter@zitholele.co.za of florencer@zitholele.co.za

Vul asb in en stuur teen 17 Junie 2011 terug aan die OIB Kantoor vir Openbare Deelname (soos hierbo)

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