

ISSUES TRAIL
PROPOSED GAS TO POWER VIA POWERSHIP PROJECT – PORT OF
RICHARDS BAY, KZN
RECORD OF COMMENTS & QUESTIONS RAISED BY INTERESTED
AND/OR AFFECTED PARTIES AS OF THE 24 FEBRUARY 2021
EIA PHASE

This Issues Trail provides a record of comments, questions and requests received from Interested and/or Affected Parties (I&APs), Stakeholders, and Commenting Authorities received up to 24 February 2021 for inclusion in the draft Environmental Impact Assessment (EIA) Report, including the comments and response during the Scoping Phase. All further submissions received during the EIA phase, as part of the public participation process, will be similarly recorded, together with responses from the applicant, EAP and/or specialists, and submitted with the final EIA Report to the competent authority.

Please note that the contact details of private persons have been redacted in the interests of privacy (when requested). However, the version of the Comments & Response report that will be submitted to the component authority with the final EIA Report will show all contact details.

| RECORDS OF COMMENTS RAISED DURING BID DISTRIBUTION (21 September 2020) | | |
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| Date of Comment, format of comment, name of organisation/I&AP | Comment | Response from Triplo4/Applicant/Specialist |
| 21 September 2020 Email Freelance Environmental Journalist Mr Tony Carnie | <p>“Kindly register me as an IAP in respect of the EA and AEL applications for the Richards Bay powerships as advertised in the Zululand Observer.</p> <p>- I would also be grateful for copies of the BID and Draft Scoping Report as soon as they are available.</p> <p>- Can you also kindly advise whether Triplo4 is also submitting similar applications for Durban, Ngqura and Saldanha (and if so, please register me as an IAP for these projects too)</p> <p>My contact details are below. My interest is as an environmental journalist, informing other IAPs and the public at large about matters of significant public interest”</p> <p>“Is Triplo4 also applying for Karpower EA for Durban and Saldanha?”</p> | <p>TRIPLO4: We are conducting the EIA for Saldanha Bay, notification will be sent out today and you were added to the database. Currently no project is proposed in Durban.</p> <p>22 September 2020</p> |
| 21 September 2020 Email Richards Bay Ratepayers and Residents Association Mr. Jeremy Smith | <p>“Please remove me from your distribution list(s). I am no longer involved in EIA's etc.”</p> | <p>TRIPLO4: Noted with thanks and you'll be removed from the list. We were contacting you as a representative for the Richards Bay Ratepayers & Residents Association. Please advise if you can direct us to another contact for this association?</p> <p>22 September 2020</p> |
| 21 September 2020 Email Ezemvelo KZN Wildlife Principal Conservation Planner - Conservation Planning Mr. Dominic Wieners | <p>“Thank you for sending the application electronically. Please note that we are still constrained with our email systems for receiving applications in this manner. We are currently requesting that EAPs send the application on CD or flash stick to our Head Office Registry at Queen Elizabeth Park, together with a covering letter for our files as we need to keep a hardcopy reference to the application. In this way we are able to distribute the applications to Ezemvelo staff to review from their home offices. We thank you in advance for sending a CD to QEP for us to review. This is typically more relevant to BAR and Scoping EIA reports rather than BIDs.</p> <p>We appreciate your ongoing co-operation as we navigate these changing times.”</p> <p>“QEP is the Head Office for Ezemvelo, an acronym for Queen Elizabeth Park. The address details are in my signature below.”</p> | <p>TRIPLO4: Thanks for confirming receipt and your request below is noted - we will ensure to provide you with a CD/memory stick for the scoping report. I trust that the BID was received in order. Please also kindly advise who/what QEP is, so that we ensure sending the scoping report correctly.</p> <p>TRIPLO4: Noted with thanks.</p> <p>22 September 2020</p> |
| 22 September 2020 | | |

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| <p>22 September 2020</p> <p>Email</p> <p>Eskom Transmission Division Senior Consultant Environmental Management</p> <p>Mr. John Geeringh</p> | <p>“Please register me as an IAP for this project and keep me informed on the progress of this application. Please send me a KMZ file indicating the layout and the proposed grid connection to Bayside substation.”</p> | <p>TRIPLO4: Your registration request is noted, as also confirmed by my colleagues. Please find attached the KMZ file for the Port of Richards Bay, as requested.</p> <p>22 September 2020</p> |
| <p>22 September 2020</p> <p>Email</p> <p>Dept. Agriculture Forestry & Fisheries Sub Directorate: Forestry Regulations & Support</p> <p>Thembalakhe Sibozana</p> | <p>“This correspondence serves as a notice of receipt for the above document received on the 21st September 2020.”</p> | <p>TRIPLO4: Noted with thanks.</p> <p>22 September 2020</p> |
| <p>22 September 2020</p> <p>Email</p> <p>Zululand Observer Editor in Chief</p> <p>Mr. Dave Savides</p> | <p>“Is it possible to get high res .jpg pics especially Figure 2:”</p> | <p>TRIPLO4: Please find attached as requested - Figure 2 (preferred location) in a better resolution.</p> <p>22 September 2020</p> |
| <p>22 September 2020</p> <p>Email</p> <p>Dept. of Economic Development, Tourism and Environmental Affairs - Coastal Management</p> <p>Mr. Omar Parak</p> | <p>“Kindly keep me on mailing list for project”</p> | <p>TRIPLO4: Thank you Omar, appreciated.</p> <p>22 September 2020</p> |
| <p>22 September 2020</p> <p>Email</p> | <p>“Please register WESSA KwaZulu-Natal as an interested and affected party in respect of this application”</p> | <p>TRIPLO4: Your registration request is noted and you were added to our database.</p> |

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| WESSA KZN Mr. Pieter Burger | | 22 September 2020 |
| 22 September 2020 Email Energy Voice Africa & LNG Editor Mr. Edward Reed | "I would like to register as an interested party in the EIA process around the proposed gas-to-power plans at the Port of Richards Bay" | TRIPLO4: Your registration request is noted and you were added to our database 22 September 2020 |
| 22 September 2020 Email QS 2000 Plus – Quantity Surveyors and Project Managers Mr. Frans van der Walt | "Please can I be included as Interested and Affected Party in the EIA Process and be included in future correspondence in this regard" "Please could you share the information previously shared with others ? (the mail I was included in from Omar did not have the documents.)" | TRIPLO4: Your registration request is noted and you were added to our database TRIPLO4: No problem, please find attached the Background Information Document (BID) and the Notice of Application (NOA), both in English and isiZulu. 22 September 2020 |
| 22 September 2020 Email Dynamic Energy Consultants (Pty) Ltd Mr. Darryl Hunt | "Please register me as an interested and affected party for the Gas to Power via Powerships Project in Richards Bay" "Thank you. Are you aware of similar processes underway for Coega and Saldanha, and if so could you provide contact details to register as an IAAP if that isn't also Triplo4?" "Thank you very much." "Could you please provide me with the BID for Saldanha (and Richards Bay?)." | TRIPLO4: Your registration request is noted and you were added to our database. 22 September 2020 TRIPLO4: Triplo4 is conducting the EIA process for the projects in Saldanha Bay and Coega as well. I cc'd the team and they will add you to their databases. TRIPLO4: This email serves to confirm that you have been added to the database for the Saldanha project. 23 September 2020 |

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| 22 September 2020 Email Zululand Yacht Club Mr. Morgan Smit | <p>“Thank you for this. Your mail arrived without the mentioned attachment. I would certainly like to register as an Interested & Affected Party in this process. Please would you forward me the general information document and the I&AP registration form.”</p> <p>Thank you!”</p> | <p>TRIPLO4: NOA and BID was forwarded by Omar Parak to Morgan.</p> <p>22 September 2020</p> |
| 22 September 2020 Email Urban Econ Mr. Eugene De Beer | <p>“Please also send me the Background Information Document (BID) and Notice of Application (NOA), that went with this email.”</p> | <p>TRIPLO4: We added you to our database. It is noted that Omar already sent you the NOA and BID.</p> <p>TRIPLO4: I noticed now that Omar did not attach the NOA and BID - please therefore find attached these documents, in both English and isiZulu.</p> <p>Date : 22 September 2020</p> |
| 22 September 2020 Email Richards Bay Clean Air Association [NGO] Director and Founder Member Sandy Camminga | <p>“The Richards Bay Clean Air Association (RBCAA) acknowledges receipt of the EA and AEL Notification for the Proposed Karpowership Project.</p> <p>The RBCAA hereby registers as an Interested and Affected Party.”</p> | <p>TRIPLO4: Noted with thanks.</p> <p>22 September 2020</p> |
| 23 September 2020 Email Oceans and Coasts Funanani Ditinti | <p>“Kindly register Oceans and Coasts as interested and affected party for this project and reports for comments when available.</p> <p>Kindly use OCEIA@environment.gov.za email going forward for all communication related to Coastal EIA applications and related queries. I hope you find the above in order, and looking forward to your positive response.”</p> | <p>TRIPLO4: Your registration is noted, and you were identified as a stakeholder for this project and included in our database.</p> <p>23 September 2020</p> |
| 23 September 2020 Email Phangela Holdings (Pty) Ltd Mr. Willie Vogel | <p>“Herewith a friendly request to be included as an "Interested and Affected Party" in the EIA Process and be included in future correspondence in this regard.”</p> | <p>TRIPLO4: Your registration is noted with thanks.</p> <p>28 September 2020</p> |

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| <p>25 September 2020</p> <p>Email</p> <p>Resident</p> <p>Elizabeth Balcomb</p> | <p>1. "Please register me as an I and A party for the concerning idea to have floating ships in the Richard's bay harbor supplying power.</p> <p>2. A few questions, where are these ships coming from, who will be receiving income from them? What is the name of the company supplying these ships?</p> | <p>1. TRIPLO4: Your registration and the concerns raised are acknowledged, and we will revert.</p> <p>2. The following information about the origin of the ships and name of the company that owns them was added to the Scoping Report, in Section 1.2. The applicant is Karpowership SA Pty Ltd, a South African company 51% owned by Karpowership, a member of Karadeniz Energy Group, Istanbul, Turkey which owns, operates and builds Powerships (floating power plants). Since 2010, 25 Powerships have been completed with total installed capacity exceeding 4,100 MW globally with an additional 4,400 MW of Powerships either under construction or in the pipeline.</p> <p>The Powerships are already constructed and will be delivered fully equipped and functional to the Port of Richards Bay to generate power which will be sold to Eskom through the IPP procurement programme.</p> <p>The benefits of the project are described in Section 6.1 of the Scoping Report (Need and desirability). In addition to providing much needed additional electricity to the national grid, it will also create employment for South African citizens and provide contracts for local service providers. The applicant will prioritize employment of local people wherever possible, as well as developing local skills to make it possible in cases where those skills do not exist in the local workforce. There will be a significant number of local employees for both construction and operation period. Detailed job creation and other local economic development activities will be provided at preferred bidder stage during the EIA preparation (next phase).</p> |

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| | <p>3. Of greatest concern is the ocean is a very unstable and harsh environment. There will be corrosion and wear and tear continuously, and the risk of damage to pipes and cables is a given. I'm not sure who thinks it is ok for that gas to be leaking into the ocean, because this will happen within the first 5 years, and as time goes on, it is a definite. This gas causes cancer, brain lesions, lung issues and more in humans, and results in death. It will destroy the natural habitat in the harbor. This is a given. Could you tell me whose life you are prepared to take for this project please?</p> <p>Who will pay for the damage when the pipe gets corroded, or cracked in a storm, or when the cables get broken in a storm? Who will take full responsibility for environmental damage when the pipes leak? I'm not sure if you are aware of more frequent storms, and the predictions of more severe storms with more frequency?</p> | <p>3. The issues you raise about the safety risk and of the coastal waters are captured in the Preliminary Impact Assessment, Section 8.2 of the Scoping Report. As indicated in the Plan of Study (Section 9.3.1.12), a detailed risk assessment will be undertaken in the EIA phase (next phase), including the handling, transporting and storage of natural gas and the potential hazardous risk to people, property and the environment. In addition, also indicated in the Plan of Study (9.3.1.14), a detailed Coastal and Climate Change Assessment will be undertaken in the EIA phase.</p> <p>Preliminary mitigation measures are presented in Section 8.2 of the Scoping Report. These measures and others emanating from the risk assessment and other specialist reports will be incorporated into an Environmental Management Programme (EMPr) which will form part of the EIA Report. These draft reports will be made available for I&AP comment in the next phase of the EIA process.</p> <p>As added to the final Scoping Report (section 3.1.5.1 – fuel alternatives), operators of FSRU's and LNGC's must comply with comprehensive safety regulations and procedures to protect people from injury and ensure operational safety. Should any LNG be released and spill on water, it is not anticipated to cause harm to the aquatic life or damage the waterways, as LNG vaporizes rapidly in air, becoming buoyant at -110degC and disperses quickly. Similarly, the re-gassified NG, used as fuel in the Powership, is supplied at ambient temperature. As such, should a release occur, the NG would be much lighter than air and</p> |

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| | | <p>disperses immediately, removing the potential risk of fire.</p> <p>The design, procedures and cultures adopted in managing the transportation, storage and regasification of LNG will be undertaken with the primary purpose of 100% containment. Design features on-board the FSRU, Powerships and incoming LNGC's to re-fuel the FSRU are appropriately sighted gas detection systems within annular spaces surrounding the containment for advance warning of any contained leakages as well as in the open atmosphere to detect and mitigate the remote chance of any leakages during the transfer stages. These design features are backed-up with extremely robust, risk assessed procedures, practices and highly developed safety culture carried out by highly skilled specifically trained and competent staff (information added to Section 2.1.4 of the Final Scoping Report).</p> <p>With regards to storm event (as added to section 8.2.1.8 of the Final Scoping Report), while uncertainty exists concerning the specific frequency of future extreme events such as coastal storm surges, general global trends indicate that an increase in both the frequency and intensity of such events, particularly under a high-emissions scenario, should be expected. Proposed activities in exposed or risk-prone areas should therefore adopt a precautionary and risk-averse approach to both the design and location of infrastructure, to ensure that damage is avoided when extreme events occur. Good practice in this regard is to adopt a medium- to long-term approach (between 20 and 50 years) by adequately incorporating anticipated future conditions in the detailed design phase of infrastructure, such as subsea pipelines</p> |

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| | | <p>and transmission lines, that are proposed for installation in exposed areas. For coastal storm surges, this would likely entail designing proposed project infrastructure to withstand events with 1:50 year return periods, or possibly 1:100 year events to account for extreme scenarios.</p> <p>In terms of engineering (as added to section 2.1.2 of the Final Scoping Report), marine conditions derived for all design return periods include an allowance for potential climate change impacts (increases) on wind speeds, water levels and wave heights over the design life of the infrastructure.</p> <p>The maintenance of the gas pipeline was added to the Scoping Report (Section 2.1.4) as read below:</p> <p>The gas pipeline infrastructure is designed to require little to no maintenance during its design life. Relevant design features include the following:</p> <ul style="list-style-type: none"> • the subsea pipeline will be protected with a factory applied external coating as well as sacrificial anodes; • the external coating will be protected by a concrete weight coating which is designed to provide abrasion resistance, which is especially important during pipeline installation; and • the pipeline is designed to remain stable on the seabed, thereby mitigating against seabed abrasion and material fatigue. <p>Monitoring requirements will be included in the Environmental Management Programme (EMPr) in the EIA Report (next phase), including the following recommended inspections intervals to identify any additional maintenance requirements during the life of the facility:</p> |

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| | <p>4. Which government department is in charge of this? Who personally is pushing for this? I am positive that money has changes hands, and your company who is now supporting it will be implicated in this corruption. To take it further, when sickness and death happen because of this project, someone or some people will be liable for culpable homicide, because the industry has full knowledge that this gas is poisonous. Very soon we will have cases of ecocide opening in this country and those companies who have supported the Great Gas Grab will be held accountable.</p> <p>5. Is there a reason why the power has to be generated on the ocean? Why not build them on land?</p> <p>Here's to heritage day! And all human beings working towards a future where our environment doesn't kill us or our great grandchildren!"</p> | <ul style="list-style-type: none"> • Hoses: Annual diver inspection of hose connections, fittings and in-situ pressure test in accordance with OCIMF Guidelines; • PLEM: Annual diver inspection removing sand and silt and manually operating valves; • Pipeline: Annual visual inspection of pipeline by divers to verify the external integrity of the pipeline and its weight coating and to identify any localized changes in seabed levels; and • Pipeline integrity pigging inspection and bathymetric survey of the pipeline every 2 – 4 years. <p>4. The project being proposed by Karpowership SA Pty Ltd is in response to a Request for Qualification and Proposals for New Generation Capacity under the Risk Mitigation IPP Procurement Programme, Tender Number DMRE001/2020/21 published by the Department of Mineral Resources and Energy in August 2020 in accordance with the Electricity Regulation Act, the New Generation Capacity Regulations under that Act, the Integrated Resources Plan 2019 and the Ministerial Determination published by the Minister of Mineral resources and Energy with the concurrence of the National Energy Regulator of South Africa (NERSA). This procurement programme has been identified by the Department as the appropriate programme to procure the new generation capacity to ensure much needed energy security in a relatively short time.</p> <p>5. The reasons for the generation of power on the ocean, as opposed to building power plants on land, are captured in the Need and Desirability, Section 6.1 of the Scoping Report. As indicated</p> |

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| | | <p>in, and added to, the strategic overview (Environmental), the concept of powership, generating power on the ocean, has several benefits over land-based power plants, including small footprint (e.g. the same amount of output can be achieved in a much smaller area compared to land based power plants), significantly shorter timeframes for project delivery / adding capacity, as the powerships arrive already assembled and ready-to-operate, and land-based impacts are limited and of short term, associated with the establishment of the transmission line and the temporary assembly area for the gas pipeline.</p> <p>Thank you for your participation and I trust this response, as well as the details within the draft scoping report, have assisted in providing further clarity to the concerns raised. Please do not hesitate to contact us should you have any further queries.</p> <p>16 November 2020</p> |
| <p>28 September 2020</p> <p>Email</p> <p>Dynamic Energy Consultants (Pty) Ltd</p> <p>Mr. Darryl Hunt</p> | <p>“I have already received the BID for Coega.”</p> <p>“Receipt confirmed.”</p> <p>“Please can you assist with the Richard's Bay BID as well?”</p> | <p>TRIPLO4: Thank you for your email. As requested, please find attached and confirm receipt.</p> <p>28 September 2020</p> <p>TRIPLO4: Please find attached the BID for Richards Bay. Should you have any queries, please let us know.</p> <p>29 September 2020</p> |
| <p>30 September 2020</p> <p>Email</p> | <p>“The Department of Environment, Forestry and Fisheries appreciates the opportunity to register as an interested and affected party for the above-mentioned project. DEFF through the sub-directorate Forestry Regulations and Support is the authority mandated to implement the</p> | <p>TRIPLO4: Thank you for your email acknowledging receipt of the BID, and it is noted that you are unable to provide comments at this stage. The draft</p> |

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| <p>Dept. Agriculture Forestry & Fisheries Sub Directorate: Forestry Regulations & Support</p> <p>Thembalakhe Sibozana</p> | <p>National Forests Act No. 84 of 1998 by regulating the use of natural forests and protected trees species in terms of the said Act.</p> <p>With reference to the document received on 21/09/2020, the department will not be able to provide comments at this stage. DEFF will comment upon the receipt of an Environmental Impact Assessment Report stipulating how the natural forest or protected trees within the footprint will be affected.</p> <p>Should any further information be required, please do not hesitate to contact this office. This letter does not exempt you from considering other legislations.”</p> | <p>Scoping report will be out for 30 days comments from the 6th October to the 5th November 2020.</p> <p>01 October 2020</p> |
| <p>01 October 2020</p> <p>Email</p> <p>Umhlathuze Municipality Ward 2 Councillor</p> <p>Mr. Christo Botha</p> | | <p>TRIPLO4: I trust this email finds you well. We have been trying for few days to get hold of you telephonically but to no avail, and also left messages for you (Davesh from our office). We wanted to ensure that you received the EIA and AEL notification, and also to know if there are any other interested and affected parties you would like us to contact.</p> <p>In addition, please can you kindly assist us - the draft scoping report will be out for 30 days comments from next week Tuesday (6/10), and we're looking for a public place to leave a hard copy of the report (in addition to the electronic methods we'll be using). The public libraries are still close and we cannot get confirmation as to when it will be open. Can you please advise us on a suitable public place that we can place the hard copy at? Perhaps at the municipal building / city hall?</p> <p>Any guidance will be appreciated.</p> <p>01 October 2020</p> <p>TRIPLO4: Just following up on my email below, please kindly advice? We've been trying to call you but no answer.</p> |

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| <p>02 October 2020</p> <p>Email</p> <p>Centre for Environmental Rights</p> <p>Khumo Lesele</p> | <p>“I hope this finds you well</p> <p>May you kindly register the following parties as I&AP in the Karpowership Projects for Ports of Richards Bay and Saldhana Bay – including Ngqura, Durban.”</p> <table border="1" data-bbox="636 493 1435 1069"> <thead> <tr> <th>Name and Surname</th> <th>Organisation</th> <th>Email Address</th> </tr> </thead> <tbody> <tr> <td>Nicole Loser</td> <td>Centre for Environmental Rights</td> <td>nloser@cer.org.za</td> </tr> <tr> <td>Michelle Koyama</td> <td>Centre for Environmental Rights</td> <td>mkoyama@cer.org.za</td> </tr> <tr> <td>Timothy Lloyd</td> <td>Centre for Environmental Rights</td> <td>tlloyd@cer.org.za</td> </tr> <tr> <td>Dimakatso Sefatsa</td> <td>Centre for Environmental Rights</td> <td>dsefatsa@cer.org.za</td> </tr> <tr> <td>Khumo Lesele</td> <td>Centre for Environmental Rights</td> <td>klesele@cer.org.za</td> </tr> <tr> <td>Avena Jacklin</td> <td>groundWork</td> <td>avena@groundwork.org.za</td> </tr> </tbody> </table> <p>Please see addition to the list below.</p> <table border="1" data-bbox="636 1176 1435 1241"> <tbody> <tr> <td>Elana Greyling</td> <td>Earthlife Africa</td> <td>bububush@lantic.net</td> </tr> </tbody> </table> | Name and Surname | Organisation | Email Address | Nicole Loser | Centre for Environmental Rights | nloser@cer.org.za | Michelle Koyama | Centre for Environmental Rights | mkoyama@cer.org.za | Timothy Lloyd | Centre for Environmental Rights | tlloyd@cer.org.za | Dimakatso Sefatsa | Centre for Environmental Rights | dsefatsa@cer.org.za | Khumo Lesele | Centre for Environmental Rights | klesele@cer.org.za | Avena Jacklin | groundWork | avena@groundwork.org.za | Elana Greyling | Earthlife Africa | bububush@lantic.net | <p>02 October 2020</p> <p>TRIPLO4: Your registration request is noted and the list in the email below will be added to the I&APs database, for the projects in the Ports of Richards Bay, Saldanha and Ngqura.</p> <p>TRIPLO4: Your registration request is further noted, and the additional contact below will be added to the I&APs database, for the projects in the ports of Richards Bay, Saldanha and Ngqura.</p> <p>02 October 2020</p> |
| Name and Surname | Organisation | Email Address | | | | | | | | | | | | | | | | | | | | | | | | |
| Nicole Loser | Centre for Environmental Rights | nloser@cer.org.za | | | | | | | | | | | | | | | | | | | | | | | | |
| Michelle Koyama | Centre for Environmental Rights | mkoyama@cer.org.za | | | | | | | | | | | | | | | | | | | | | | | | |
| Timothy Lloyd | Centre for Environmental Rights | tlloyd@cer.org.za | | | | | | | | | | | | | | | | | | | | | | | | |
| Dimakatso Sefatsa | Centre for Environmental Rights | dsefatsa@cer.org.za | | | | | | | | | | | | | | | | | | | | | | | | |
| Khumo Lesele | Centre for Environmental Rights | klesele@cer.org.za | | | | | | | | | | | | | | | | | | | | | | | | |
| Avena Jacklin | groundWork | avena@groundwork.org.za | | | | | | | | | | | | | | | | | | | | | | | | |
| Elana Greyling | Earthlife Africa | bububush@lantic.net | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>06 October 2020</p> | <p>“Please can I register as an I&AP for the “Gas to Power via Powerships Project - Port of Richards Bay, KZN” ”</p> | <p>TRIPLO4: Your registration is acknowledged and you were added to the database.</p> | | | | | | | | | | | | | | | | | | | | | | | | |

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| Email Juwi Renewable Energies (Pty) Ltd Karen Low | | 06 October 2020 |
| 07 October 2020 Email Richards Bay Industrial Development Zone Ntando Mtshali | "Please kindly register me as an I&AP for the below Project." | TRIPLO4: We had registered you and sent you yesterday the link to review the draft scoping report and associated appendixes. 07 October 2020 |

| RECORDS OF COMMENTS RAISED DURING DRAFT SCOPING REPORT DISTRIBUTION (from the 7th October 2020) | | |
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| 07 October 2020 Email Bidvest Tank Terminals Priya Govender | "BTT would like to register as an I&AP. Kindly find the completed form attached." | TRIPLO4: Your registration request is noted and you were added to our database. I will forward you shortly the emails regarding the draft scoping report 30 days review, and the notification regarding the public webinar meeting. TRIPLO4: Good day, please take note of the email below and the cover letter attached. 07 October 2020 |
| 07 October 2020 Email Richards Bay Industrial Development Zone Nqobiswa Mwandla | "I would like to register as an I & AP on the project mentioned on the subject line." | TRIPLO4: Your registration request is noted you were added to the database. The notifications for the public webinar and the 30 days review of the draft scoping report were forwarded to you. 07 October 2020 TRIPLO4: Please refer to the email and the attached cover letter below. |

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| 07 October 2020 Email Department of Water and Sanitation (DWS) Buthelezi Silindile | “Please note the correct email address for Mr Siyabonga Buthelezi is: ButheleziS2@dws.gov.za , I keep on receiving emails which are directed to him but with incorrect email address.” | 08 October 2020 TRIPLO4: It is noted and we will amend it accordingly on our side. Please advise if we must remove your email from the database? TRIPLO4: I checked my database again and we have the following addresses for DWS: buthelzis@dws.gov.za ButheleziS2@dws.gov.za HlabisaN2@dwa.gov.za mokoenan@dws.gov.za All correspondence has been sent to all of the above email addresses. if any should be removed, please kindly let me know. |
| 07 October 2020 Email Ezemvelo KZN Wildlife Principal Conservation Planner - Conservation Planning Mr. Dominic Wieners | “Kindly confirm whether a hard copy/covering letter and CD has been sent to QEP for our review?” Do you have any spatial coverages for the proposed powerlines etc.? | 07 October 2020 TRIPLO4: We are arranging to courier you the CD with a printed cover letter, and you will get it by tomorrow. Is there anything you would like me to send to you electronically so long? 07 October 2020 TRIPLO4: The project is located within an area zoned as Harbour. It is also an Estuarine Functional Zone, and contain CBA (irreplaceable). I attached an extract from Section 4 of the draft scoping report, describing the vegetation on site. Do let me know if you need anything further, otherwise you can view the report and appendixes in the CD that will be delivered to you tomorrow. |
| 08 October 2020 Email | | 07 October 2020 TRIPLO4: Please kindly take note of the notification below and attached cover letter. This email is sent to you now, as we got a "delivery failure" notification from the emails we sent to your |

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| Chief Directorate: Biodiversity Specialist Monitoring and Services Mmajwalane Iyvon Tladi | | organisation on the 6th October. If you can please confirm receipt of this email, it will be greatly appreciated. 08 October 2020 |
| 09 October 2020 Email SAHRA – Maritime and Underwater Cultural Heritage Briege Williams | <p>“Thanks for your email, myself and my colleague Lesa (copied in above) are in the Maritime and Underwater Cultural Heritage unit at SAHRA and as such we will be dealing with your cases.</p> <p>Please can I ask that for each project you create a case on SAHRIS and add the relevant documentation for review, I will then assign myself as case officer and issue a comment in due course.</p> <p>Please can you let me know once you have created the cases.</p> <p>If you need any further help or information please do not hesitate to contact me.”</p> | <p>Gavin Anderson HIA specialist on behalf of Triplo4: I did the HIA for the Richards Bay power project. This is a different project to that what is on SAHRIS.</p> <p>I am uploading the documentation for the project and do not want to duplicate applications, heritage departments, etc. Why would SAHRA be involved in this project instead of KZNARI? The powerline is on land, and the ship will be stationed in a recently made berth from c 2010. That is the ship is docked in an area that was originally land until the harbour was made (late 1970s) and then expanded in 2010. The land in question is originally above the admiralty reserve.</p> <p>Can you please assist? I do not mind including SAHRA in the application, but as I said I am trying to avoid duplications.</p> 12 October 2020 |
| 10 October 2020 Email KZN EDTEA – EIA section Richards Bay Muziwandile Mdamba | <p>“As a commenting state department, would you kindly send us a CD or any device to access this document. Our government server has so many restrictions unfortunately, making it very difficult to access the newer ways of accessing documents. I’ve tried to access it and failed.</p> <p>Secondly, any chance that the webinar is held under normal working hours, and rather separate sessions for key stakeholders and general public participants.”</p> | <p>TRIPLO4: Thank you for your queries. As requested, we are arranging a CD containing the draft scoping report and appendices to be courier to your office. You will receive it tomorrow. Please also note that the report and appendices are also available to be downloaded from our website (www.triplo4.com, under current project tab).</p> 12 October 2020 |
| 11 October 2020 Email | <p>“Please could you register Mainstream Renewable Power as an I&AP for the proposed Gas to Power via Powerships Project.</p> <p>Please add both myself and Eugene Marais to the database:</p> | <p>TRIPLO4: Your registration is noted and you were added to our database. Please note the notification below regarding reviewing the draft scoping report. Also make note of the public webinars scheduled</p> |

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| Mainstream Renewable Power Rebecca Thomas | Eugene Marais Head of Development: Africa +27 (0)73 871 5781 Eugene.Marais@mainstreamrp.com” | for Wednesday 14/10 at 10am or 6pm - a calendar invite will follow. 12 October 2020 |
| 12 October 2020 Email KZN EDTEA – EIA section Richards Bay Muziwandile Mdamba | “Thank you so much, I have received a revised invite today. We will attend the webinar.” | TRIPLO4: With regards to the webinars - we have scheduled 2 meetings for the 14/10/2020 - one in the morning 10:00-11:30 and one after working hours 18:00-19:30. Apologies if you're yet to receive the invite for the morning session, I was informed by the PPP facilitator (Phelamanga) that there are delays with the system in sending out the calendars invites, but you should receive it shortly (please keep an eye for an invite from this email address, namely ppprbay.triplo4@gmail.com). As a suggested way forward, will your department be able to attend the scheduled webinar - the morning session? We have not set up a separate meeting for key stakeholders, but we can revisit this need after the meeting sessions this week. 12 October 2020 |
| 12 October 2020 Email Aldine Armstrong Attorneys Aldine Armstrong | “I represent the Newlyn Group. Please register me, on behalf of the Newlyn Group, as a registered and interested party to the three EIA applications at Richards Bay, Saldanha and Coega for the Gas to Power Projects: Karpowership. Please use the contact details below. Newlyn’s interest is that they intend to bid into the Risk Mitigation Power Procurement Programme RFP. Please advise urgently on the Public participation schedule - I believe that there are going to be virtual meetings this week for all 3 projects. Please register me as an attendee, and send the log in details. Please copy Mr Marco Raffinetti into all correspondence and notices. Kindly acknowledge receipt.” | TRIPLO4: Your registration is noted and you and Mr Raffinetti were added to our I&APs database. Please note that the public virtual meetings for the Richards Bay project will be held this week - on the 14/10 at 10am and/or 6pm; meetings invites will be sent to you shortly. The virtual meetings for the Coega project are to be held tomorrow 13/10 and for the Saldanha Bay project on the 15/10, all in the same hours (10am and 6pm sessions). 12 October 2020 |

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| <p>12 October 2020 Email</p> <p>Wartsila South Africa Mr. Wayne Glossop</p> | <p>“Wartsila hereby wishes to request their registration as an I&AP for the ‘Proposed Powership at Port of Richards Bay, uMhlatuze Local Municipality, KZN’.</p> <p>Please find attached the completed form”</p> | <p>TRIPLO4: Your registration is noted and you were added to our database. Please note that public virtual meetings will be held this week - 14/10 at 10am and/or 6pm; meetings invites will be sent to you shortly.</p> <p>12 October</p> |
| <p>12 October 2020 Email</p> <p>SAHRA – Maritime and Underwater Cultural Heritage Briege Williams</p> | <p>“Thanks for your email, as I don’t really know anything about the project can you please send me a proposed plan of the works so I can see what areas are going to be affected. I will then be able to get back to you regarding your query.”</p> <p>“Thanks for the HIA, do you have anything that shows where the boat is going to be moored or how the powerline is going to be transferred to the boat, i.e. under the water on the seabed or over the water?”</p> <p>“Thanks for the below information. From what I can gather the only thing that is subsea is the gas pipeline, is that part of this application?”</p> | <p>Gavin Anderson HIA specialist on behalf of Tripo4: Thanks for getting back to me so soon. Attached is the report.</p> <p>Chen,</p> <p>Can you provide details? I think it is straight from ship overboard, and ship is stationed in new Berth.</p> <p>12 October 2020</p> <p>TRIPLO4: The powerline will be connected overhead from the moored powership to the proposed transmission line on land. I’m adding below relevant description extracted from the draft scoping report which you may find helpful: Karpowership proposes the generation of electricity from floating mobile Powerships moored in the Port of Richards Bay. Three ships will be berthed at any one time - a Floating Storage Regasification Unit (FSRU) and two Powerships. A Liquefied Natural Gas Carrier will supply the Liquefied Natural Gas (LNG) to the FSRU over a 1 to 2 day period approximately every 20 days. The LNG is then converted to Natural Gas (NG) and pumped from the FSRU to the Powership via a gas pipeline (subsea). The proposed design capacity for the Powerships are 540MW, which comprises of 27 gas engines having an approximate heat output of under 20MW each. The 3 steam turbines</p> |

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| | | <p>have a heat out of 15.45 MW each. The power that is generated is then converted by the on-board High Voltage substation and the electricity evacuated via a 132kV transmission line over a distance of approximately 3 km to the tie in point to the Eskom line, at a connection point (including an establishment of a switching station) in proximity to the existing Bayside Substation, which feeds into the national grid.</p> <p>12 October 2020</p> |
| <p>12 October 2020</p> <p>Email</p> <p>I&AP</p> <p>April Gehle</p> | <p>"I would like to have my comments below taken into account in connection with the Gas to Power project proposed at the Port of Ngqura (Coega).</p> <p>I would like to object to this development taking place at any of the proposed sites (Port of Ngqura, Richards Bay and Saldahna.</p> <p>My main objections are based on economics and climate change.</p> <p>I can- not understand the reasoning behind spending so much money in investing in a fossil fuel which is not sustainable, renewable or environmentally friendly. We currently do not even know how much gas is available to us in South Africa. To extract any available gas the process of hydraulic fracturing would most likely be utilized and that process would be and currently is being strongly opposed in South Africa and around the world. Many countries have actually banned the process of hydraulic fracturing because it is so detrimental to the environment, health and society.</p> | <p>TRIPLO4: Received with thanks.</p> <p>Acknowledged with thanks.</p> <p>As stated in the Draft Scoping Report, the proposed Project is responding to and aligned with a Request for Qualification and Proposals for New Generation Capacity under the Risk Mitigation IPP Procurement Programme, Tender Number DMRE001/2020/21 published by the Department of Mineral Resources and Energy in August 2020 in accordance with the Electricity Regulation Act, the New Generation Capacity Regulations under that act, the Integrated Resources Plan 2019 and the Ministerial Determination published by the Minister of Mineral resources and Energy with the concurrence of the National Energy Regulator of South Africa (NERSA). This procurement programme for much needed emergency power in South Africa is in accordance with South African law and policy which aims to alleviate the immediate and future capacity deficit as well as the limited, unreliable and poorly diversified provision</p> |

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| | <p>In your document it is stated gas can be shipped in from global sources. I do not believe it is in any countries best interest to possibly have to rely on their energy supply from another country. As an example the idea of piping gas from Mozambique (Operation Phakisa) could already be under threat from fighting within Mozambique.</p> <p>I propose the immense amounts of money needed to fund this project would be better utilized to fund projects which do utilize energy sources which are sustainable, renewable and more environmentally friendly, such as Wind, Solar and Hydro, sources which we have readily available in South Africa. Developing wind farms and solar farms for example would create energy in South African for South Africa and would create jobs in South Africa for South Africans.</p> <p>We would then not have to depend on other countries for some of our energy supply and we could then become world leaders in alternative Green Energy. Encouraging investment from other countries and rising our global status.</p> | <p>of power generating technology with its adverse environmental and economic impacts. While the source of the LNG gas has not been confirmed, the applicant has stated that it will be sourced from the international markets legally and will follow the country of origin's environmental processes. Section 3.1.5 of the report has been updated to state that the gas will be sourced from top tier international gas suppliers with relevant licenses and permissions for the supplier's full supply/value chain.</p> <p>Under the RMIPPPP, IPPs will be responsible for ensuring fuel supply for the Project. Karpowership SA will source LNG from the international markets, so, should a particular supply route come under threat for any reason, the LNG can be supplied from other geographical origins sources or via alternative routes as appropriate.</p> <p>Please refer to the response to Question 3. In addition, Karpowership projects will meet and exceed Economic Development qualification criteria stipulated within the RMIPPPP RFP. Our company slogan 'The Power of Friendship' encompasses the ethos to which we strive in all countries and regions in which we operate. Aside from engaging with local businesses, we are proud of our positive impact on local communities through both our social responsibility programs, tailored to the specific needs of the community, and the career opportunities that are provided.</p> <p>Karpowership projects create significant direct and indirect employment, driving knowledge and skills transfer across a broad spectrum of disciplines</p> |

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| | <p>I believe that if South Africa through its actions and policies such as the continuing use and promotion of future use of fossil fuels sends the world the message that our government is willing to compromise South Africa's people, environment and the global climate. This in turn opens us up to become the 'dumping ground' for the rest of the world's unwanted waste and pollution.</p> | <p>including some that are unique to floating power plants. We also emphasize youth development as the future of our business, industry, and the local economy. As a globally recognized leader with 1,800+ direct employees, we provide an opportunity for South Africans, which will make up the majority of our personnel, to develop specific skills and knowhow which will ultimately benefit the South African economy. They will also be provided with the opportunity to become part of an internationally diverse team, gaining and sharing experience and knowledge either locally or worldwide alongside industry leading colleagues.</p> <p>There will be a significant number of local employees for both the construction and operation period which will exceed the Economic Development criteria that must be reached under the terms of the RMIPPPP. We also believe that the job creation, including within the power generation function, will be comparatively more than a renewable energy project should our project be selected to proceed. Detailed job creation and other local economic development activities will be provided at preferred bidder stage during EIA preparation.</p> <p>Despite being a fossil fuel, natural Gas is considered to be a cleaner alternative for the generation of electricity. While we have included a discussion of how the proposed project relates to Government policy and law (See Section 5 of the Scoping Report), an evaluation of the policy and legal framework itself falls outside the scope of this assessment.</p> |

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| | <p>The argument often given in favor of gas is that gas is a suitable energy resource to utilize whilst the transition toward more sustainable and cleaner energy and a low carbon future. However natural gas is mostly methane, which has strong global warming impacts in its own right. Natural gas therefore only provides climate benefits over coal if the leakage is no more than 2-3%.</p> <p>Why spend all this time and money and resources on gas? Why not put the time and money and resources into the immediate transition to developing wind farms and solar farms. We already have South African Industries and Companies who with the right government backing of finances and policies could provide this country with power and training for many South Africans.</p> | <p>There is an extremely low risk of any leakages of gas from the FSRU, LNG Carriers (LNGCs) or from the Powership. The design, processes and procedures adopted in managing the transportation, storage and regasification of LNG are undertaken with the primary purpose of 100% containment.</p> <p>Design features on-board the FSRU, Powership and incoming LNGC's to re-fuel the FSRU include appropriately sighted gas detection systems within annular spaces surrounding the containment for advance warning of any contained leakages as well as in the open atmosphere to detect and mitigate the remote chance of any leakages during the transfer stages. These design features are backed-up with extremely robust, risk assessed procedures, practices and a highly developed safety culture carried out by highly skilled specifically trained and competent staff. This technology does, therefore, provide benefits over coal as you suggested.</p> <p>This is a policy issue that is considered to fall outside of the scope of the EIA process. The applicant, Karpowership is responding to a Request for Proposal to a Request for Qualification and Proposals for New Generation Capacity under the Risk Mitigation IPP Procurement Programme put out by the Department of Mineral Resources and Energy. This procurement programme has been identified by the Department as the appropriate programme to procure the new generation capacity to ensure energy security in a relatively short time. A description of the programme in relation to the legal and policy</p> |

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| | <p>Questions: Your document states there will be three ships one ... and two power ships. What if one power ship goes out of commission for any reason, how will that affect the power supply? How would this situation be dealt with?</p> | <p>framework is provided in Section 6 of the Scoping Report.</p> <p>Powerships are equipped with cutting-edge technologies, modular medium speed reciprocating engines for generation enabling reliable supply of electricity with minimal impacts from load profile and number of starts and stops.</p> <p>For all practical purposes, Powerships can maintain the same high efficiency even at partial loads by operation of a subset of the engines at full load and offer the shortest response times for load variations. This modular technology allows that, even if one or more engines are taken off-line, it is most likely that the Powerships can continue operating and meeting the contracted capacity requirements. The Powerships themselves have an operating lifespan of 25 years, which is longer than the 20-year PPA provided for under the RMIPPPP.</p> <p>Powerships also store onboard all key spare parts that may be required to keep the generation running, essentially eliminating the risk of downtime caused by sourcing of necessary parts during the lifespan of a project, either related to routine maintenance or unplanned maintenance that may be required.</p> <p>Another benefit of Karpowership over land based solutions is that, in the very unlikely event that a Powership falls completely out of commission, or if the buyers requirements change, we can quickly replace the vessel with another suitable Powership from our fleet to minimise any disruption to the power delivery.</p> |

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| | <p>What if weather prevents refueling or delivery of gas from global suppliers?</p> <p>What is back-up liquid fuel if there is no gas? Another fossil fuel?</p> <p>The global future of humanity is now more than ever dictated by our reaction and action toward climate change. Climate change is a threat to us all and the detrimental effects of the use of fossil fuels in particular have contributed greatly to major devastating and catastrophic events such as the intense droughts and flooding we are experiencing in South Africa. Now is the time to end using any fossil fuels.</p> | <p>The Floating Regasification and Storage Unit (FSRU) can hold enough liquified natural gas to allow the Powership to operate for approximately 40 days; expected arrival dates of the LNG Carriers transporting the LNG from the overseas market will be aligned (taking account of the prevailing weather conditions) with the expected usage profile, whilst ensuring that we maintain sufficient reserves in the FSRU in case of any short notice delays so that supply of LNG to the Powership will remain uninterrupted. Managing fuel inventory is a key part of any power supply contract and as such Karpowership undertakes this management role globally across our contract portfolio successfully.</p> <p>Please refer to our response to question 10.</p> <p>Many countries across the world have recognised the numerous benefits of LNG as a source of power generation and as a complement to renewables. LNG is the cleanest practical fuel source and provides a major reduction in greenhouse gas emissions. Furthermore, it offers countries a baseload mid-merit source of power that adds flexibility to introduce more renewable energy sources into the grid.</p> <p>Some examples: The United States, for one, has taken significant steps to add gas to their energy mix. Data released by the US Energy Information Administration reveals that that emissions from coal power plants peaked in 2005 and then fell by 43% by 2018, largely because of the introduction of new gas</p> |

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| | <p>South Africa signed the Paris Agreement and in my opinion the proposed project is not getting us on line for reaching targets by 2030, which is in less than ten years.</p> <p>Thank you for your time and attention.”</p> | <p>energy sources and the replacement of coal by other renewables.</p> <p>The Chinese government has also introduced initiatives to wean the country off its over-dependence on coal over the past few years, with the aim of reducing the proportion of coal in its energy mix to below 58% by the end of 2020. This has included a pledge to source 10% of its energy demands from natural gas by 2020. European countries such as Spain are also following directives to switch over to gas from current high pollutant fuels for power generation.</p> <p>This project addresses the aspects underlined under the Paris Agreement. South Africa has commitments to Climate Change Policies as well as commitments made under the Paris Agreement to reduce GHG emissions. The benefits of running the engine on Natural Gas include emission reductions of NOx, SOx, CO2, particulates, no smoke, reduced waste streams to meet the requirements of local or international legislations such as the Paris Agreement and its principles. Thank you again for your participation and I trust this response addresses all your enquiries. Please do not hesitate to contact us should you have any further queries.</p> <p>17 November 2020</p> |
| <p>13 October 2020</p> <p>Email</p> <p>SAHRA – Maritime and Underwater Cultural Heritage</p> | <p>“Sorry for all the questions, I just want to make sure I have all the info.”</p> | <p>TRIPLO4: Not a problem; the only subsea pipeline is the gas pipeline – connecting the FSRU to the powerships (all within the port), and it is part of the application. The preferred gas pipeline route is approx. 1400m long and will require an approx. 3m servitude.</p> |

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| Briege Williams | | <table border="1"> <thead> <tr> <th rowspan="2">Subsea Gas pipeline</th> <th colspan="2">GPS-COORDINATE</th> </tr> <tr> <th>Longitude</th> <th>Latitude</th> </tr> </thead> <tbody> <tr> <td>Gas pipeline Route Alternative 1 - Start point</td> <td>28°48' 4.70"S</td> <td>32° 2'29.01"E</td> </tr> <tr> <td>Gas pipeline Route Alternative 1 - End point</td> <td>28°47' 40.89" S</td> <td>32° 1'45.93"E</td> </tr> </tbody> </table> | Subsea Gas pipeline | GPS-COORDINATE | | Longitude | Latitude | Gas pipeline Route Alternative 1 - Start point | 28°48' 4.70"S | 32° 2'29.01"E | Gas pipeline Route Alternative 1 - End point | 28°47' 40.89" S | 32° 1'45.93"E |
| Subsea Gas pipeline | GPS-COORDINATE | | | | | | | | | | | | |
| | Longitude | Latitude | | | | | | | | | | | |
| Gas pipeline Route Alternative 1 - Start point | 28°48' 4.70"S | 32° 2'29.01"E | | | | | | | | | | | |
| Gas pipeline Route Alternative 1 - End point | 28°47' 40.89" S | 32° 1'45.93"E | | | | | | | | | | | |
| 14 October 2020 Email National Ports Authority (TNPA) Transnet Mr. Basil Ngcobo | <p>"Can I be provided with the documents that has been shared at this meeting or alternately be provided with the site where I can access this documents."</p> <p>"Kindly advise as to whether there is an option to copy and save these document on my files for later review."</p> | <p>13 October 2020</p> <p>TRIPLO4: Thanks Basil, your request is noted. For accessing the draft scoping report and appendices, please click on the link below – https://drive.google.com/drive/folders/1whLSj07Hetorq91DCOAqYcy7HPb8h8bq?usp=sharing</p> <p>You can also access it through our website, under current projects tab - https://www.triplo4.com/</p> <p>Once at Google drive (from the link provided or from the link in our website), you can download the documents and view it later (just select the document, right click, and one of the options is to download).</p> <p>Let me know if you need further assistance.</p> <p>14 October 2020</p> | | | | | | | | | | | |
| 14 October 2020 Email Oceans and Coasts | <p>"Kindly now that I have another meeting to attend starting same time with yours.</p> <p>Please record the meeting and send me the audio after the meeting.</p> | <p>TRIPLO4: Noted and will do.</p> <p>14 October 2020</p> | | | | | | | | | | | |

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| Funanani Ditinti | I hope you find the above in order." | |
| 14 October 2020 Email Freelance Environmental Journalist Mr. Tony Carnie. | "I attended the online meeting on the Richards Bay powerships plan this morning, but due to the format of slides being displayed for just a short period, I was unable to note the full title and spelling of "Claude T" the specialist consultant who presented the section on explosion risks. Can you please assist me with his full name, company and title?" | TRIPLO4: In regard to the query from Tony Carnie on 14 October 2020, before Triplo4 could respond, an article relating to the potential explosion risks was published by Mr Carnie on 18 October, which rendered the response obsolete. 18 November 2020 |
| 14 October 2020 Email Aldine Armstrong Attorneys Aldine Armstrong | "Yes, thanks but seemingly accepted too late and could not enter, and did not see this email. Please send me the recording." | TRIPLO4: Good evening, we noticed that you had accepted the meeting and querying whether you are intending to join the meeting? 14 October 2020 Phelamanga (PPP facilitator): We are sorry you were unable to join us on Wednesday evening for the Richards Bay evening session. Please note we were unfortunately unable to proceed with the meeting last night as we had no external stakeholders in attendance. The meeting was online with specialists for 30mins; and myself and Hantie Plomp (TRIPLO4 Triplo4) remained online a further 15mins, ending the session at 18:45. We did monitor all email boxes and cell phones to determine if there were any connectivity issues for any of the stakeholders – a practice we have undertaken for all meetings to date, hence the email confirmation sent to you at 18:27. We also reviewed the RSVP list for the evening session and noted that the majority of stakeholders who had RSVP'd had attended the morning session. As is practice if no I&APs attend, then the meeting is closed and noted that no participants |

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| | | <p>were present. We did note that Mr Marco Raffinetti from your office was able to be in attendance at the morning session. If you have any specific questions relating to the site which you had hoped to raise in the evening session please do send them through. The recordings from the morning session will be made available. The evening meeting was due to receive the same information from the same specialists as per the morning session.</p> <p>I trust this is all in order.</p> <p>15 October 2020</p> |
| <p>14 October 2020</p> <p>Email</p> <p>WESSA – Southern KZN</p> <p>Mr. Paddy Norman</p> | <p>“Tried to join the "teams" meeting, but there was no response when it said "someone should let you in soon".</p> <p>Therefore, please ensure that I am kept in the loop, registered as an I&AP, and that my concerns are recorded.</p> <p>Firstly, that the public participation excluded me. - I would have liked to hear all sides.</p> | <p>Phelamanga (PPP facilitator): Apologies it seems you might have had an incorrect link – we did send out a notice of the error and correct link. I have forwarded your queries and concerns to the team. Unfortunately we had no other attendees, we did check the email for any queries on the connectivity and there were none, with no attendees we called the meeting closed, at 18.30.</p> <p>We do note your queries and a number of them have been addressed in the presentation. The presentation from the meeting will be sent out. And you are welcome to listen to the video / audio recording of the meeting from this morning which included the same presentations and speakers as this evening.</p> <p>14 October 2020</p> <p>TRIPLO4: Please see below a link for the recordings of the meeting. https://drive.google.com/drive/folders/1w3qaPQRSudsUCp755TteRJq1jcLePsEb?usp=sharing</p> |

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| | <p>Secondly, that in the balance of negative impacts account must be given and reliably quantified for the total supply chain. That must include the use of bunker and other fuel if gas comes by ship, or the construction impacts if the fuel arrives via a pipeline. Or both.</p> <p>Thirdly, the actual cost to the economy of overseas sourced energy, both fuel and infrastructure, bearing in mind the serious national debt situation, and Eskom's apparent ongoing financial inadequacies. Can South Africa actually afford this option?</p> | <p>I trust you find this is order. In addition, we have received your queries and will provide you with a response in due course.</p> <p>20 October 2020</p> <p>TRIPLO4: Thank you for the comments on behalf of WESSA, received by Triplo4 Sustainable Solutions (Pty) on the 14 October 2020. We hereby respond to them in the order they were raised. Your comments together with the responses will be included in the final Scoping Report that will be submitted to the competent authority, the Department of Environment, Forestry and Fisheries.</p> <p>With regards to the potential negative impacts, please refer to section 8.2.3 of the scoping report, indicating the preliminary impact assessment, focusing on each component of the proposed project. Construction impacts (short term) are associated with the establishment of the transmission line and switching station, as well the laying of the gas pipeline and the establishment of a temporary assembly area on land. These are included in tables 8.2.3.3, 8.2.3.5, 8.2.3.6 and 8.2.3.7. With regards to the total supply chain, at this early stage the fuel supplier is not required to be determined as yet, and therefore the associated impacts cannot be quantified and assessed.</p> <p>Comment is noted, however this matter falls outside of the scope of the EIA, as rules and regulations regarding procurement and tariff are within the Government's jurisdiction. The financial aspects of the proposals for New Generation</p> |

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| | <p>Finally, there are obviously safety and security issues. This coast is known for its shipwrecks, and even harbours are not guaranteed safe havens. Need I mention nurdles?</p> | <p>Capacity under the Risk Mitigation IPP Procurement Programme (Tender Number DMRE001/2020/21, published by the Department of Mineral Resources and Energy in August 2020) are evaluated through the tender evaluation process, against criteria, which the government had set. The tariffs bid by respondents to the RMIPPPP RFP process must be all inclusive of fuel costs, with evaluation conducted on the proposed tariff, thus irrespective of the origin of fuel, the tariff will have to be highly competitive in order to be successfully awarded.</p> <p>The issues you raise about the safety risk and of the coastal waters are captured in the Preliminary Impact Assessment, Section 8.2 of the Scoping Report. As indicated in the Plan of Study (9.3.1.14), a detailed Coastal and Climate Change Assessment will be undertaken in the EIA phase. Preliminary mitigation measures are presented in Section 8.2 of the Scoping Report. These measures and others emanating from the risk assessment and other specialist reports will be incorporated into an Environmental Management Programme (EMPr) which will form part of the EIA Report. These draft reports will be made available for I&AP comment in the next phase of the EIA process.</p> <p>With regards to storm event (as added to section 8.2.1.8 of the Final Scoping Report), while uncertainty exists concerning the specific frequency of future extreme events such as coastal storm surges, general global trends indicate that an increase in both the frequency and intensity of such events, particularly under a high-emissions scenario, should be expected.</p> |

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| | <p>Furthermore Turkey is in an ongoing confrontation with various allegedly terrorist groups, and a gas filled site accessible from the sea may be too tempting a target. We must consider the world around us, and the potential threats that already exist.</p> <p>That's all for now, although there is much more to be said.”</p> | <p>Proposed activities in exposed or risk-prone areas should therefore adopt a precautionary and risk-averse approach to both the design and location of infrastructure, to ensure that damage is avoided when extreme events occur. Good practice in this regard is to adopt a medium- to long-term approach (between 20 and 50 years) by adequately incorporating anticipated future conditions in the detailed design phase of infrastructure, such as subsea pipelines and transmission lines, that are proposed for installation in exposed areas. For coastal storm surges, this would likely entail designing proposed project infrastructure to withstand events with 1:50 year return periods, or possibly 1:100 year events to account for extreme scenarios.</p> <p>In terms of engineering (as added to section 2.1.2 of the Final Scoping Report), marine conditions derived for all design return periods include an allowance for potential climate change impacts (increases) on wind speeds, water levels and wave heights over the design life of the infrastructure.</p> <p>The applicant (Karpowership) is an international company, currently operating 25 Powerships around the world. Ample security plans and measures will be in place including independent security expert consultant assessments pre-arrival and at intervals during the operating period that will assess any changes in threat levels and recommend updates to measures that are in place to keep the project site secure.</p> <p>Thank you for your participation and I trust this response, as well as the details within the draft scoping report, have assisted in providing further clarity to the concerns raised.</p> |

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| | | 17 November 2020 |
| 15 October 2020 Email SAHRA – Maritime and Underwater Cultural Heritage Briege Williams | <p>“Having looked closely at the project, as you are following the NEMA scoping & EIA process for a listed activity SAHRA will need to provide a comment and a case needs to be created on SAHRIS for us to do that. The same will apply to the other 2 sites in Saldanha and Ngqura.”</p> <p>Please let me know if you need any further info.”</p> <p>“Yes please include SAHRA as we will comment on the subsea gas pipeline part of the application, as MUCH is nationally mandated it is always us who provides comments for developments below the high water mark that are part of the NEMA process. Provincial authorities have no remit over anything below the HWM.”</p> | <p>TRIPLO4: Noted with thanks, we will do so.</p> <p>15 October 2020</p> <p>Gavin Anderson on behalf of Triplo4: So I include you and Amafa.</p> <p>15 October 2020</p> |
| 16 October 2020 20 October 2020 Email Aldine Armstrong Attorneys Aldine Armstrong | <p>“Thank you Rose- all in order...no problem if the meeting did not proceed. I did try to log in at about 18.15, but I had not accepted the invitation, so I presume that is why you did not pick me up.”</p> <p>“Thank you, Hantie”</p> | <p>TRIPLO4: Please see below a link for the recordings of the meeting. https://drive.google.com/drive/folders/1w3qaPQRSudsUCp755TteRJq1jcLePsEb?usp=sharing I trust you find this is order.</p> <p>20 October 2020</p> |
| 16 October 2020 Email iGas Senior Project Manager Mr. Neville Ephraim | <p>“Hello, I did not get any Audio in this meeting.</p> <p>Please send me the presentation or the website where it can be downloaded.”</p> | <p>TRIPLO4: Please see below a link for the recordings of the meeting. https://drive.google.com/drive/folders/1w3qaPQRSudsUCp755TteRJq1jcLePsEb?usp=sharing I trust you find this is order.</p> <p>20 October 2020</p> |
| 19 October 2020 Email Mainstream Renewable Power | <p>“Please could you also add Mainstream to the Saldanha and Coega I&P Databases, and provide links to the respective Scoping Reports.”</p> | |

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| <p>Rebecca Thomas</p> <p>26 October 2020 Email</p> <p>Eskom SOC Land & Rights Officer (ST 1569) Asset Creation : Land Development KZN Operating Unit</p> <p>Samantha Naicker</p> | <p>“ESKOM DISTRIBUTION COMMENTS: WAYLEAVE APPLICATION REGISTERED FOR RICHARDS BAY PORT (BAYSIDE S/S)</p> <p>With reference to your emailed application and accompanying plans dated 02nd October 2020, we confirm that an investigation has been carried out with regard to the supply of electricity, as well as any encroachment into Eskom’s Servitudes, in respect to the application as set out above.</p> <p>Eskom 132-kV Overhead Power Lines & Bayside Substation are the only Eskom assets showing to exist on our system. The infrastructure is depicted on the attached diagram i.e. ER_INV_391/2020, traversing your area of interest. Eskom has no objection to the proposed environmental assessment, subject to the adherence of the following conditions.</p> <p>Building Restrictions for 132-kV Overhead Power Lines</p> <p>No building or structures may be erected or installed above or below the surface of the ground, neither may any material which might endanger the safety of this power line be place within 18 (eighteen) metres from the centre line of this power line, on either side (overall servitude width 36 metres), without prior written confirmation from Eskom. The Bayside Substation servitude area is approximately 0.733 hectares.</p> <p>The applicant will adhere to all relevant environmental legislation. Any cost incurred by Eskom as a result of non-compliance will be charged to the applicant. Dimensions and specifics will be in accordance to ESKOM standards so as to not obstruct Eskom’s existing infrastructure in any way.</p> <p>Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the servitude area by the applicant, his/her agent, contractors, employees, successors in title, and assigns. The applicant indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties</p> | <p>TRIPLO4: Thank you for the comments, all received in order.</p> <p>26 October 2020</p> |

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| | <p>and whether as a result of damage to or interruption of or interference with Eskom’s services or apparatus or otherwise.</p> <p>Eskom will not be held responsible for damage to the applicant’s equipment. The applicant’s attention is drawn to the Electricity Act, 1987, (Act 41 of 1987, as amended in 1994), Section 27(3), which stipulates that the applicant can be fined and/or imprisoned as a result of damage to Eskom’s apparatus.</p> <p>No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom’s apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the applicant must give at least seven working days prior notice of the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued.</p> <p>The clearances between Eskom’s live electrical equipment and the proposed construction work shall be observed as stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act 85 of 1993. Equipment shall be regarded electrically live and therefore dangerous at all times. Equipment shall be regarded electrically live and therefore dangerous at all times.</p> <p>Any third party servitudes encroaching on Eskom land shall be registered against Eskom’s Notaries deed at the applicant’s own cost. If such a servitude is brought into being, its existence should be endorsed on the Eskom servitude deed concerned, while the third party’s servitude deed must also include the rights of the affected Eskom servitude.</p> <p>A developer taking a new supply from Eskom, an increase of supply or line deviation is required to make an application to Eskom via the Eskom toll free number 0860037566. This application will be processed in terms of Eskom’s standard customer connection tariffs, conditions and policies at the developers cost</p> | |

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| | NB. Customers requiring a Substation or Power Lines to be installed for their purpose/supply their development must grant all servitudes (a piece of ground on the property to be developed) to Eskom at no cost. This is not an approval for construction works, prior to any construction activity the applicant is required to contact Eskom and detailed Surveyed Plans are to be submitted to this office.” | |
| 27 October 2020 Email Aldine Armstrong Attorneys Aldine Armstrong | “Kindly forward me the EIA application form with the necessary annexures for the Richards Bay Karpowership project that was submitted to the Department of Environmental Affairs. It does not appear on the link.” | |
| 28 October 2020 Email Green Connection (an Environmental Justice Non-Governmental Organisation) Adrian Leonard Pole | <p>“I write to you on behalf of Green Connection (an environmental justice non-governmental organisation) that is considering commenting on the Karpower Draft Scoping Reports.</p> <p>I would be grateful if you could provide me with the relevant links (alternative email addresses of the EAPs concerned) for the Karpower EIA documents relating to the applications for authorisation made in respect of the Ports of Saldanha, Richards Bay and Ngqura. I would also be grateful if you could confirm whether there are any other Ports in respect of which Karpower has applied for similar environmental authorisations?</p> <p>Also, I note that the covering letter for the Saldanha Draft Scoping Report indicates that it is available for public comment for a period of 30 days from 6 October 2020 to 4 November 2020. I would be grateful if you could confirm that this is correct, as on my calculations the due date for comment should be 5 November 2020? Regulation 3(1) of the NEMA EIA Regulations provides regarding timeframes that ‘when a period of days must in terms of these Regulations be reckoned from or after a particular day, that period must be reckoned as from the start of the day following that particular day to the end of the last day of the period...’.</p> <p>I look forward to hearing from you by return of email.”</p> | <p>TRIPLO4: Your request to register is noted and you have been added to our database for the proposed project at the port of Richards Bay. Please note the notification below, as circulated today to all registered I&APs:</p> <p>Dear Stakeholders and Registered I&AP’s, With regards to the draft Scoping Report for the proposed Gas to Power via Powership project at the Port of Richards Bay, KZN, we would like to update you that the date of the deadline for comments has been extended to Monday, 9th November 2020.</p> <p>As a reminder, the Draft Scoping Report and associated appendices is available via the Google Drive link below. Please refer to the link: https://drive.google.com/drive/folders/1whLSj07Hetorq91DCOAqYcy7HPb8h8bq?usp=sharing</p> <p>28 October 2020</p> |

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| | <p>“Green Connection is based in the Cape Province, and while it may comment on all three EIAs is most likely to comment regarding the Saldanha application. I would thus be grateful if you could add us to the databases for the proposed Saldanha and Ngqura as well, and would be grateful if you could confirm when comment is due for these EIAs (I have managed to find the Saldanha and Ngqura documents on the internet, and I see from 05. Appendix D – Public Participation Summary for Saldanha that the closing day for commenting is indicated as 5 November 2020, while the Ngqura Appendix D – Public Participation Summary indicates the same date).”</p> | |
| <p>29 October 2020</p> <p>Email</p> <p>SAHRA – Maritime and Underwater Cultural Heritage</p> <p>Briege Williams</p> | <p>“Have you uploaded this case onto SAHRIS yet?”</p> | <p>TRIPLO4: Thanks for the follow up; we have collated all the required information and will upload it on the system shortly. Once done, I will inform you.</p> <p>Gavin Anderson on behalf of Triplo4: I am busy finalising the upload. most of it is there already. I am just waiting for the KZNARI NID form and the BAR (that does not want to download)</p> <p>29 October 2020</p> |
| <p>29 October 2020</p> <p>Email</p> <p>Resident</p> <p>Mr. Bradley Formo</p> | <p>“I hereby wish it to be known that I do not support the proposed projects to provide gas to power in the form of ‘floating power stations’, as these floating power stations can cause considerable damage to the coastal environment and adversely affect the health of those living on the South African coast, as well as inland via air pollution.</p> | <p>TRIPLO4: Your comments are noted. In order to comment please can you register as an I&AP and declare your interest in the project.</p> <p>29 October 2020</p> <p>TRIPLO4: Thank you for the comments received by Triplo4 Sustainable Solutions (Pty) on the 29 October 2020. We hereby respond to them in the order they were raised. Your comments together with the responses will be included in the final Scoping Report that will be submitted to the competent authority, the Department of Environment, Forestry and Fisheries.</p> <p>The issues you raise regarding potential risks to the coastal environment and health of residents are captured in the Preliminary Impact</p> |

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| | | <p>Assessment, Section 8.2 of the Scoping Report, including the preliminary assessment of air quality impacts, which are anticipated to be of low significance.</p> <p>As indicated in the Plan of Study (Section 9.3.1.12), a detailed risk assessment will be undertaken in the EIA phase (next phase), including the handling, transporting and storage of natural gas and the potential hazardous risk to people, property and the environment. In addition, also indicated in the Plan of Study (9.3.1.14), a detailed Coastal and Climate Change Assessment, as well as a detailed Atmospheric Impact Assessment (9.3.1.1), will be undertaken in the EIA phase.</p> <p>Preliminary mitigation measures are presented in Section 8.2 of the Scoping Report. These measures and others emanating from the risk assessment and other specialist reports will be incorporated into an Environmental Management Programme (EMPr) which will form part of the EIA Report (next phase). These draft reports will be made available early next year for I&AP comment and you will be notified accordingly.</p> <p>As indicated in the Plan of Study (Section 9.3.1.12), a detailed risk assessment will be undertaken in the EIA phase (next phase), including the handling, transporting and storage of natural gas and the potential hazardous risk to people, property and the environment. In addition, also indicated in the Plan of Study (9.3.1.14), a detailed Coastal and Climate Change Assessment, as well as a detailed Atmospheric</p> |

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| | <p>I live in Margate, Kwa-Zulu Natal, and fear for the environmental damage that could occur, particularly of the project in Richards Bay. The currents along the coast all funnel towards the South Coast, which would mean that any water-based pollutants would have the chance of reaching our community.</p> | <p>Impact Assessment (9.3.1.1), will be undertaken in the EIA phase.</p> <p>Preliminary mitigation measures are presented in Section 8.2 of the Scoping Report. These measures and others emanating from the risk assessment and other specialist reports will be incorporated into an Environmental Management Programme (EMPr) which will form part of the EIA Report (next phase).</p> <p>These draft reports will be made available early next year for I&AP comment and you will be notified accordingly.</p> <p>With regards to potential risk of water-based pollutants, according to the applicant (and added to the final Scoping Report, section 3.1.5.1 – fuel alternatives), operators of floating carriers must comply with comprehensive safety regulations and procedures to ensure operational safety. Should any LNG be released and spill on water, it is not anticipated to cause harm to the aquatic life or damage the waterways, as LNG becomes buoyant at -110degC, thus rises quickly to the water surface and vaporizes rapidly in air, and disperses quickly as the gas is significantly lighter than air. Based on the above, potential spills would not be anticipated to spread very far from source within the Port, or reach the South Coast which is located approx. 250km away from the Port of Richards Bay.</p> <p>Further, There should not be any leakages of gas from the FSRU or from the LNG Carriers or from the Powership, The design, procedures and cultures adopted in managing the transportation, storage and regasification of LNG are undertaken with the primary purpose of 100% containment.</p> |

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| | <p>Our oceans are a valuable part of our tourism sector, if any of the Kwa-Zulu Natal coast were to suffer from substantial pollution, the environmental and economic impact would be catastrophic.</p> <p>For these reasons, I am opposing the proposal.”</p> | <p>Design features on-board the FSRU, Powership and incoming LNGC's to re-fuel the FSRU are appropriately sighted gas detection systems within annular spaces surrounding the containment for advance warning of any contained leakages as well as in the open atmosphere to detect and mitigate the remote chance of any leakages during the transfer stages. These design features are backed-up with extremely robust, risk assessed procedures, practices and highly developed safety culture carried out by highly skilled specifically trained and competent staff. This information was added to Section 2.1.1. of the Final Report.</p> <p>However, this issue will be assessed in more detail in the EIA phase (next phase). As indicated in the Plan of Study (Section 9.3.1.12), a detailed risk assessment will be undertaken, including the handling, transporting and storage of natural gas and the potential hazardous risk to people, property and the environment.</p> <p>Environmental and socio-economic impacts, as identified in the preliminary assessment in the Scoping Report (Section 8.2), will be further expanded in the next phase of the process (in the EIA Report), once more information is available from the various specialists' studies, as per the plan of study (Section 9.3.1). Including the Plan of Study are Marine Ecological Assessment (Section 9.3.1.4) and Socio-Economic Assessment (Section 9.3.1.6), as well as a detailed risk assessment (Section 9.3.1.12), as mentioned in the response above. Impacts scoring a high significance will receive more attention in the EIA Report in order to evaluate the impacts and the</p> |

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| | | <p>various measures to avoid or mitigate the potential impacts.</p> <p>Thank you for your participation and I trust this response, as well as the details within the draft scoping report, have assisted in providing further clarity to the concerns raised.</p> <p>17 November 2020</p> |
| <p>29 October 2020</p> <p>Email</p> <p>Aldine Armstrong Attorneys</p> <p>Aldine Armstrong</p> | <p>"The EAP is Savannah Environmental and Arlene Singh can be contacted as below. The Newlyn Group only have a project proposed for Richards Bay, but as the Risk Mitigation Power Procurement Programme is not limited to Richards Bay they have an interest in all projects that may be involved in the RMPPP."</p> | <p>TRIPLO4: Please can you send the contact details of the EAP who is /EAPs who are conducting the EIA processes for the Newlyn Group's proposed Risk Mitigation Power Procurement Programme projects as we, the EAP for the Karpowership projects, need to obtain information on the locality, technical components and predicted impacts for Newlyn Group's projects. I assume these are in the same Ports as the Karpowership projects given your client's request to register as an I&AP for all three processes.</p> <p>We require this information to be able to assess cumulative impacts as per the EIA Regulations, 2014 and as per DEFF's instructions.</p> <p>29 October 2020</p> |
| <p>02 November 2020</p> <p>Email</p> <p>SAHRA – Maritime and Underwater Cultural Heritage</p> | <p>"Thanks, I have assigned myself as case officer and will issue a comment ASAP."</p> <p>"Could you please upload the DSR for the above project as I need to see the information pertaining to the underwater gas pipeline connecting the ships"</p> | <p>TRIPLO4: Please be informed that the upload has been completed.</p> <p>02 November 2020</p> |

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| <p>Briege Williams</p> <p>02 November 2020</p> <p>Email</p> <p>Richards Bay Clean Air Association [NGO] Director and Founder Member</p> <p>Sandy Camminga</p> | <p>“Please may we receive the minutes of the virtual meetings held on 14 October?”</p> | <p>Phelamanga (PPP facilitator): Thanks for your email – The minutes are under review by the team and the various queries and comments that required follow up are being attended to. As soon as we have the minutes they will be distributed.</p> <p>05 November 2020</p> |
| <p>02 November 2020</p> <p>05 November 2020</p> <p>Email</p> <p>Aldine Armstrong Attorneys</p> <p>Aldine Armstrong</p> | <p>“It is our understanding from the public meeting that Landowner consent has not been acquired for the Richards Bay Karpowership project.</p> <p>Kindly confirm if this is the case. If this is the case, and as it is a peremptory requirement in terms of regulation 39 of the EIA regulations 2014, as amended, kindly advise on what basis the application has been accepted by DEFF in the absence of this. Please forward us the application form and acknowledgement letter from DEFF.”</p> <p>“The Department’s letter clarifies the position.”</p> | <p>TRIPLO4: In response to your request please find attached:</p> <ol style="list-style-type: none"> 1. A copy of the application form and appendices, except for Appendix 3 2. DEFF’s acknowledgement of receipt <p>Please note that in respect of your request for copies of landowner-related documentation, we will revert to you as soon as we have received guidance from DEFF.</p> <p>Date: 05 November 2020</p> |
| <p>02 November 2020</p> <p>EIAadmin@environment.gov.za; TSangweni@environment.gov.za</p> <p>DEFF</p> | <p>Please find herein the attached letters for the above mentioned. I hope you find all in order.</p> <p>The Application for Environmental Authorisation and draft Scoping Report (SR) dated October 2020 and received by the Department on 08 October 2020, refer.</p> | |

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| Thabile Sangweni | <p>This letter serves to inform you that the following information must be included in the final SR:</p> <p>a) <u>Listed Activities</u></p> <p>I. Please ensure that all relevant activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description.</p> <p>II. If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the department's application form template has been amended and can be downloaded from the following link https://www.environmental.gov.za/documents/forms.</p> <p>b) <u>Layout and Sensitivity Maps</u></p> <p>i. Please provide a layout map which indicated the following:</p> <p>a) Positions of the power island, steam turbine and generator, fuel storage tanks, water storage reservoir and tanks, water and gas supply pipelines;</p> <p>b) Permanent laydown area footprint;</p> <p>c) All supporting onsite infrastructure e.g. roads;</p> <p>d) Substation(s) and/or transformer(s) sites including their entire footprint;</p> <p>e) Connection routes (including pylon positions) to the distribution/transmission network; and</p> <p>f) All existing infrastructure on the site.</p> <p>ii. Please provide an environmental sensitivity map which indicates the following:</p> | <p>TRIPLO4: The following points are included in the Final Scoping Report (FSR), and references are made to each of the following comments. For ease of reference, any changes made to the Draft Scoping Report are indicated in blue text in the FSR.</p> <p>All relevant activities are captured in the Final Scoping Report (FSR), Section 2.2. These activities are the same as those in the application form and no changes were made.</p> <p>Layout map, inclusive of the above, was added to the FSR, Appendix A1, as per information that was available and could be sourced.</p> <p>Upon the request to add in existing infrastructure and industrial development surrounding the proposed project in the form of maps, Triplo4 tried to source this information from the local municipal GIS system and officials, however, this data could not be sourced due to lack of this GIS information on the municipal system and lack of response from the municipality GIS officials. Thus, in order to provide this information in the map, Triplo4 had to create its own individual files of these required infrastructure and industrial development based on the limited historic information that available.</p> <p>Environmental sensitivity map, inclusive of the above, was added to the FSR, Appendix A2, as per information that was relevant for the site, i.e. no</p> |

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| | <p>a) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;</p> <p>b) Buffer areas; and,</p> <p>c) All “no-go” areas.</p> <p>iii. The above layout map must be overlain with the sensitivity map and a cumulative map which shows neighbouring energy developments and existing grid infrastructure.</p> <p>c) <u>Public Participation Process</u></p> <p>i. Please ensure that all issues raised and comments received during the circulation of the draft SR from registered I&As and organs of state (<u>including this Department’s Climate Change Section</u>), which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR. Proof of correspondence with the various stakeholders must be included to the Department of the attempts that were made to obtain comments.</p> <p>ii. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p> <p>iii. A comments and response trail report (C&R) must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain</p> | <p>heritage sites were identified and thus were not added to the map. In addition, “no-go” areas were not determined as yet, and these will be assessed and determined during the EIA phase, upon receipt of findings from the specialists’ assessments.</p> <p>A combined map, overlaying the layout map, the sensitivity map and a cumulative map, was added to the FSR, Appendix A3. The identified neighbouring energy developments that were added to the map are based on input from I&APs and stakeholders.</p> <p>Comments & Responses Trail Report, as well as the proof of correspondence with I&APs and various stakeholders (inclusive of DEFF Climate Change / Air Quality Section), are appended to the FSR as Appendix D.</p> <p>The Public Participation Process was conducted in terms of these Regulations, as detailed in Section 7 of the FSR and associated appendices as referred to in this section.</p> <p>Comments & Responses Trail Report, as per the required format, is appended to the FSR as Appendix D.</p> |

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| | <p>from summarising comments made by I&Aps. All comments from I&Aps must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.</p> <p>iv. The final SR must provide evidence that all identified competent authorities have been given an opportunity to comment on the proposed development particularly, the KwaZulu-Natal Department of Economic, Tourism and Environmental Affairs, and the District and Local Municipalities.</p> <p>d) <u>Specialist Assessments.</u></p> <p>i. Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of infrastructure positions, and all other associated infrastructures that they have assessed and are recommending for authorisation.</p> <p>ii. The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p> <p>iii. Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons and where necessary, include further expert advice.</p> <p>e) <u>Cumulative Assessment</u></p> <p>i. If there are other similar Gas to Power plants proposed within a 30km radius of the proposed developments, a cumulative impact assessment must</p> | <p>All identified competent authorities have been given an opportunity to comment, including the KwaZulu-Natal Department of Economic, Tourism and Environmental Affairs, and the District and Local Municipalities. Evidence of this is appended to the FSR as Appendix D10 (I&APs correspondence) and Appendix D7 (I&APs database).</p> <p>We will ensure that these requirements are passed onto the respective specialists and that their reports meet the prescribed reporting requirements and your requirements listed above.</p> <p>These requirements pertaining to cumulative impacts were added to the FSR (refer to section 8.2.2), as well as to the scope of the specialists' studies, as part of the Plan of Study (section 9.3.1 of the FSR), and the cumulative impacts in terms</p> |

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| | <p>be conducted for all identified and assessed impacts which must be refined to indicate the following:</p> <ol style="list-style-type: none"> a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land. b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. c) The cumulative impacts significance rating must be also inform the need and desirability of the proposed development. d) A cumulative impact environmental statement on whether the proposed development must proceed. | <p>of Atmospheric Impact Assessment will be addressed as per the below comments from the Air Quality Specialist (and as added to the Plan of Study, Section 9.3.1.1):</p> <ul style="list-style-type: none"> • The inclusion of emission from future and other sources in an assessment to assess their cumulative effect in an area is not deemed a practical exercise. The assessment that is being conducted for the proposed project and cumulative impacts are assessed using current ambient air quality data and the potential additive effect of the project. In the case on this proposed project, the predicted ambient concentrations resulting from LNG combustion are very low. It is unlikely that that they will make a measurable difference (within the accuracy of the monitoring equipment) to current ambient concentrations. In the specialist's opinion, a cumulative assessment including existing and future other sources will not provide an answer that is any different to that currently included in the scope of the Atmospheric Impact Assessment. • It very difficult to characterise fugitive emissions, transport (vehicles and shipping), wind dependant emissions like storage piles and open land, fires, agricultural emissions, and others that vary temporally and spatially. The complexity of the problem to develop an inclusive emission inventory to simulate ambient concentrations on an hourly basis and to assess these under worse-case meteorology can be appreciated. Always excluded is the contribution of emission sources outside the region of interest that also contribute to the areas air quality. In |

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| | <p>f) <u>Specific comments</u></p> <p>i. The proposed Air Quality and Climate Change specialist studies' terms of reference (TOR) must be made available to this Department's Climate Change and Air Quality Directorates for comments. Proof of correspondence must be included in the public participation report.</p> | <p>Richards Bay, this is particularly important as the background (not attributed to local sources) PM10 concentration is relatively high. The approach to include emissions for other sources in a cumulative assessment is flawed if all emissions are not included and characterised spatially and temporally.</p> <ul style="list-style-type: none"> • By comparison, ambient air quality monitoring is influenced by all possible contributing sources including those outside the area of interest, and measures continuously, i.e. during good dispersion conditions and in worse-case conditions. Assessing the modelled contribution of the project's emissions to the monitored (existing) ambient concentrations is far more meaningful and provides a sound science-based indication of what future ambient concentrations might if the project was operational in the area. <p>Please can you provide guidance on the acceptability of this approach for the air quality assessment , either as part the acceptance of the Scoping Report should this be your decision, or in separate correspondence.</p> <p>The assessments of cumulative impacts will be undertaken for the other specialists' studies during the next phase, and assessed in the EIA Report.</p> <p>The terms of reference (TOR), which outline the scope of the studies form part of the Plan of Study, as included in the Draft Scoping Report and was further updated in the FSR. Please refer to Section 9.3.1.1 for the scope of the Atmospheric Impact Assessment, and Section 9.3.1.14 for the scope of the Coastal and Climate Change Assessment. The Department's Climate Change and Air Quality</p> |

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| | <ul style="list-style-type: none"> ii. The EAP must identify and provide a map which shows this development and its associated infrastructure in relation to the other proposed facilities in the area. iii. The EAP must clearly identify and provide a final list of all applicable listed activities. If any activities are to be removed, motivation for their removal must be included in the final SR. iv. The legal opinion regarding landowner consent requirements by Webber Wentzel dated 05 October 2020 is noted. However, the EAP must as advised at the pre-application meeting held with this Department of 17 September 2020, submit signed landowner consents for all affected properties as prescribed in terms of Regulation 39(1) of the EIA Regulations, | <p>Directorate (Dr. Thulie N Khumalo), as well as several other officials from this department, were identified as stakeholders, and included in our database.</p> <p>The department was notified of the 30 days commenting period for the Draft Scoping Report, as well as the extensions of the commenting period, and specific follow ups were made with this department for comments on the Draft Scoping Report, however we are yet to receive any correspondence. Please refer to Appendix D for the stakeholders and IAPs database, as well as proof of follow ups with the Climate Change and Air Quality unit.</p> <p>A combined map, overlaying the layout map, the sensitivity map and a cumulative map, was added to the FSR, Appendix A3. The identified proposed facilities in the area that were added to the map are based on input from I&APs and stakeholders.</p> <p>All relevant activities are captured in the Final Scoping Report (FSR), Section 2.2. These activities are the same as those in the application form and the Draft Scoping Report, and no changes were made.</p> <p>Signed landowner consents are appended to the FSR, Appendix H3.</p> |

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| | <p>2014 as amended, and outlined in the application form.</p> <p>v. The land owner consent must address each and every portion of land affected by the proposed development, and consent must be obtained for this.</p> <p><u>General</u></p> <p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:</p> <p>“If S&EIR must be applied to the application, the applicant must within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”</p> <p>“You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping Reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p> <p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).</p> <p>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.”</p> | <p>Table 1-2 in Section 1.5 of the FSR indicates where in the FSR the reporting requirements of Appendix 2 have been met. In terms of the requirements prescribed by Regulation 21(1), the Comments and Response Trail Report in Appendix D indicates where in the FSR I&AP comments have been addressed and the changes that were made to the DSR are in blue text for ease of reference. The applicant is aware of the embargo prescribed by Section 24F.</p> <p>Thank you for your comments and I trust this response will assist in your consideration of the Final Scoping Report.</p> |
| <p>03 November 2020</p> <p>Triplo4 Email to -</p> | <p>“Thank you for the reminder, and the extension of timeframes for comments.</p> | <p>TRIPLO4: I hope this email finds you well. With reference to the notification below, please advise if your department will be submitting comments?</p> |

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| <p>KZN EDTEA – EIA section Richards Bay</p> <p>Muziwandile Mdamba</p> | <p>There is a gas to power project proposed in Richards Bay, which of course as you put it must be considered for cumulative impacts investigations.</p> <p>We will indicate if there are any further issues.”</p> | <p>In addition, please advise if you are aware of any other gas to power projects proposed within 30km of our proposed project, so that I can consider the cumulative impacts?</p> <p>03 November 2020</p> <p>TRIPLO4: Thanks for the feedback. Will you be able to share more details with me on the other proposed gas to power project, or put me in touch with the other EAP/applicant so that I can request information?</p> <p>04 November 2020</p> |
| <p>03 November 2020</p> <p>Triplo4 Email to -</p> <p>City of uMhlathuze Municipality: Environmental Planning</p> <p>Sharin Govender</p> | <p>No response to Triplo4 follow up email.</p> | <p>TRIPLO4: I hope this email finds you well. With reference to the notification below, please advise if your department will be submitting comments?</p> <p>In addition, please advise if you are aware of any other gas to power projects proposed within 30km of our proposed project, so that I can consider the cumulative impacts?</p> <p>03 November 2020</p> |
| <p>03 November 2020</p> <p>Triplo4 Email to -</p> <p>King Cetshwayo District Municipality (Air Quality)</p> <p>Noziphi Khathi</p> | <p>No response to Triplo4 follow up email.</p> | <p>TRIPLO4: I hope this email finds you well. With reference to the notification below, please advise if your department will be submitting comments?</p> <p>In addition, please advise if you are aware of any other gas to power projects proposed within 30km of our proposed project, so that I can consider the cumulative impacts?</p> <p>03 November 2020</p> |
| <p>03 November 2020</p> <p>Triplo4 Email to -</p> <p>King Cetshwayo District Municipality</p> | <p>No response to Triplo4 follow up email.</p> | <p>TRIPLO4: I hope this email finds you well. With reference to the notification below, please advise if your department will be submitting comments?</p> <p>In addition, please advise if you are aware of any other gas to power projects proposed within 30km</p> |

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| Londeka Ngcobo | | of our proposed project, so that I can consider the cumulative impacts? 03 November 2020 |
| 03 November 2020 Triplo4 Email to - City of uMhlathuze Municipality: Municipal Manager Thandiwe Mathebula | No response to Triplo4 follow up email. | TRIPLO4: I hope this email finds you well. With reference to the notification below, please advise if your department will be submitting comments? In addition, please advise if you are aware of any other gas to power projects proposed within 30km of our proposed project, so that I can consider the cumulative impacts? 03 November 2020 |
| 03 November 2020 Triplo4 Email to - City of uMhlathuze Municipality: Municipal Manager Senamile Masando | No response to Triplo4 follow up email. | TRIPLO4: I hope this email finds you well. With reference to the notification below, please advise if your department will be submitting comments? In addition, please advise if you are aware of any other gas to power projects proposed within 30km of our proposed project, so that I can consider the cumulative impacts? 03 November 2020 |
| 03 November 2020 Triplo4 Email to - City of uMhlathuze Municipality: Air Quality Gugu Gazu | No response to Triplo4 follow up email. | TRIPLO4: I hope this email finds you well. With reference to the notification below, please advise if your department will be submitting comments? In addition, please advise if you are aware of any other gas to power projects proposed within 30km of our proposed project, so that I can consider the cumulative impacts? 03 November 2020 |
| 03 November 2020 | | TRIPLO4: Kindly note the Draft Scoping Report and associated appendices are available via the Google Drive link below for the Port of Richards Bay: https://drive.google.com/drive/folders/1whLSj07Hatorq91DCOAqYcy7HPb8h8bq?usp=sharing |

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| <p>04 November 2020</p> <p>Email</p> <p>Resident</p> <p>Marilyn [REDACTED]</p> | <p>“Thank you for the documents.</p> <p>Is there a basic summary of the projects. This is not easily able to be identified without searching through the many google docs. The public requires this information before being able to comment.</p> <p>Please can you send me the email address to send comments to and the name of the person, and telephone number.</p> <p>I am unable to copy this information from the documents.</p> <p>Is it please possible to be able to read the documents in documents format and not google drive documents, I find this a difficult to navigate and I am sure also for others.</p> <p>Also it is difficult to be able to see all the documents as one has to open each one to see others.</p> <p>I have taken part in many such public participation processes – and where all the documents are easily able to be seen with their heading and the related links , and also where one can copy text.”</p> | <p>TRIPLO4: Thank you for your comments. Please note that the draft Scoping Report contains an executive summary, and I’m also attaching the Basic Information Document (BID) that was circulated on the 21/9/2020, when we initiated the Public Participation Process (PPP).</p> <p>The EAP contacts are as below: EAP: Hantie Plomp Telephone Number: 032 946 3213 Email Address: ppprbay.triplo4@gmail.com Fax Number: 032 946 0826</p> <p>The documents on the Google Drive are available to download, i.e. you don’t have to view it directly from the Google Drive, but rather download the draft scoping report and associated appendixes (as document pdf format, and not Google drive format), and review them. The documents are not edited version, therefore text cannot be copied directly. Also note that a hard copy of the draft scoping report and associated appendixes was placed at the Richards Bay library and can be used for review.</p> <p>Please note that the commenting period will end on the 9th Nov 2020, and also be reminded that an additional PPP with commenting period will be conducted during the next phase of the EIA process, for the draft Environmental Impact Report.</p> <p>04 November 2020</p> |
| <p>04 November 2020</p> <p>Email</p> | <p>“Please see the details regarding another gas to power project.”</p> <p>“APPLICATION FOR AMENDMENT OF AN ENVIRONMENTAL AUTHORISATION , ENVIRONMENTAL MANAGEMENT</p> | <p>TRIPLO4: Thank you, Muzi, much appreciated.</p> <p>04 November 2020</p> |

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| <p>KZN EDTEA – EIA section Richards Bay</p> <p>Muziwandile Mdamba</p> | <p>PROGRAMME UPDATE AND LAYOUT UPDATE FOR THE 400MW RICHARDS BAY GAS TO POWER ENERGY FACILITY LOCATED IN RICHARDS BAY, KWAZULU-NATAL PROVINCE</p> <p>(DEA REF.: 14/12/16/3/3/2/867)</p> <p>Dear Stakeholder and Interested and Affected Party,</p> <p>With reference to the attached notification letter sent on Thursday, 17 September 2020 attached to the e-mail notification below, this e-mail serves to inform you that the comment period for the Motivation Report is ending on Monday , 19 October 2020. As you may recall, the review and comment period for the MR was from Thursday, 17 September 2020 to Monday, 19 October 2020.</p> <p>Thank you to those Stakeholders and Interested and Affected Parties who submitted their written comments and those who had not yet submitted written comments, we kindly request that you do so before or on Monday, 19 October 2020.”</p> <p>Savannah Environmental Nicolene Venter Public Process</p> | |
| <p>04 November 2020</p> <p>Email</p> <p>SAHRA – Maritime and Underwater Cultural Heritage</p> <p>Briege Williams</p> | <p>“I have now issued a comment for the above case and uploaded it onto SAHRIS, I have also attached a PDF copy to this email. Please let me know if you have any queries.</p> <p>Final Decision – Case ID 15688 In terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999)</p> <p><u>Attention: Triplo4 Sustainable Solutions (Pty) Ltd</u> Power generating ship and related powerlines, Richards Bay, KZN</p> | <p>TRIPLO4: Thanks Briege, your comments are noted and captured. Just to provide further clarity, and as per Gavin's response below, the HIA report had included the laydown area for the gas pipelines (to be located near the starting point of the transmission line), and no findings reported.</p> <p>Gavin Anderson (Heritage Specialist) on behalf of Triplo4: The HIA report was included in the upload and this covered the pipelines.</p> <p>04 November 2020</p> |

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| | <p>The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Scoping Report and plan of study for EIA for the Proposed Gas to Power via Powership Project at Port of Richards Bay, uMhlathuze, KwaZulu-Natal, South Africa.</p> <p>The project entails the generation of electricity from floating mobile powerships moored in the Port of Richards Bay including three ships berthing during the project lifespan namely a Floating Storage Regasification Unit (FSRU), and two Powerships. A subsea gas pipeline will connect the FSRU to the powership and a transmission line from the powership will feed the substation and national grid.</p> <p>Although most of the proposed project is land based, the Maritime and Underwater Cultural Heritage (MUCH) unit is required to comment on the proposed subsea gas pipeline. The DSR indicates that there are two proposed alternative routes for the pipeline, route 1 (the preferred route) is approximately 1400m long and the 2nd alternative is 500m long. The pipeline will be brought to site in sections and assembled ready for installation though the installation method has yet to be established.</p> <p>As part of the project a Heritage Impact Assessment (HIA) was undertaken for the terrestrial based activity to assess any possible impacts on heritage, though no work was undertaken to assess any maritime impacts.</p> <p>Historic photos and maps produced in the HIA show the development of the port and how the area where the powerships will be located has been subject to extensive development in recent years to form a jetty and a mooring area. The subsea gas pipeline will be located in an area that has been previously dredged.</p> <p>Due to this high level of recent activity and development in the area the MUCH unit at SAHRA considers the possibility of any impact on maritime heritage resources to be low. However, the laydown area for the pipeline must be surveyed for heritage resources prior to the laying of the pipeline. Should the survey data reveal any resources of interest, input on mitigation of impacts to such resources must be sought from a suitably qualified specialist. The SAHRA reserves the right to impose no-go areas around any identified heritage resources and the potential</p> | |

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| | <p>for rerouting therefore exists. The applicant is therefore encouraged to undertake the survey during the early stages of the project to avoid unnecessary delays.</p> <p>While the possibility of encountering heritage resources is considered low, there is still a chance that historic remains could be uncovered during the works. In this case all works must cease and may not commence until SAHRA has been contacted to advise the way forward.</p> <p>Please note that all updates or changes to the project, all supporting documents, correspondence, and reports relating to the work must be uploaded to the case on SAHRIS in order to provide SAHRA with the opportunity to comment.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p> <p>The HIA does refer to the subsea gas pipeline being laid but does not show the location of the pipeline or discuss any maritime heritage resources that may be affected by the laying of the pipeline on the sea bed, but that's fine as a maritime HIA was not requested as part of the project. I was just referring to the HIA in terms of the historic maps and photos which were useful."</p> | <p>Gavin Anderson (Heritage Specialist) on behalf of Triplo4:</p> <p>Ok Thanks Briege.</p> <p>Yes I use these historical maps in all my work. Sorts out a lot of issues and queries.</p> <p>04 November 2020</p> |
| <p>05 November 2020</p> <p>Email</p> <p>Oceans and Coasts</p> <p>Funanani Ditinti, Judy Beaumont</p> | <p>"We'll adhere to your request.</p> <p>Kindly remove Mr Rueben going forward and only use the provided email for the three projects and any communication related to EIA applications Reports.</p> <p>Kindly use OCEIA@environment.gov.za email going forward for all communication related to Coastal EIA applications and related</p> | <p>TRIPLO4: Just to confirm that we have added the specific EIA email address (OCEIA@environment.gov.za) for the DEFF Oceans & Coast Branch to our database for each of the three EIA processes being conducted for the proposed gas to power via Powership projects in the Ports of Richards Bay (KZN), Saldanha (Western Cape) and Ngqura (Eastern Cape).</p> |

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| | queries. I hope you find the above in order, and looking forward to your positive response.” | <p>We had notified and sent links to the draft Scoping Reports to the officials copied in on this email, but will ensure that we use this email address for all EIA-related correspondence going forward for all three projects. For your convenience, and due to the large file sizes, herewith the three links in one email:</p> <ol style="list-style-type: none"> 1. Port of Richards Bay: https://drive.google.com/drive/folders/1whLSj07Hetorq91DCOAqYcy7HPb8h8bq?usp=sharing 2. Port of Ngqura: https://drive.google.com/drive/folders/1No7lhEADrLald_sGuOTLBY89LvpJojO2?usp=sharing 3. Port of Saldanha: https://drive.google.com/drive/folders/1jIKIO2RSc6OpNJL98HrUI2MUqAfuYNxl?usp=sharing <p>Please may we request that your comments be provided separately for each draft Scoping Report as they form part of three separate applications for environmental authorisation and atmospheric emissions licenses?</p> <p>We look forward to receiving your comment.</p> <p>05 November 2020</p> |
| <p>06 November 2020</p> <p>Email</p> <p>groundWork</p> <p>Climate and Energy Justice</p> <p>Avena Jacklin</p> | <p>“Last month groundWork requested to be registered as an IAP for all the Karpowership applications (i.e. for all the proposed sites) and have thus far only received correspondence and access to information regarding one site, i.e. Richards Bay.</p> <p>There are also other registered interested and affected parties that are also experiencing the same lack of information from Triplo4, they have not received correspondence on the submission dates and links to information for the sites they are interested in.</p> <p>Will you be extending the commenting period for all three sites to ensure that you have sorted out your confusion and allowing sufficient time for everyone to access the information and respond?”</p> | <p>TRIPLO4: Thank you for your comments, we hereby acknowledge receipt.</p> <p>06 November 2020</p> <p>TRIPLO4: Thank you for your email below.</p> <p>Please find attached responses to comments received on the Draft Scoping Report for the proposed Gas to Power Powership Projects at Port of Saldanha, Ngqura and Richards Bay.</p> |

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| | <p>“Herewith comments to Karpowership (Pty) Ltd.’s proposals for powerships at Richards Bay, Ngqura and Saldanha Bay An acknowledgement of receipt will be appreciated”</p> <p>COMMENTS ON: DRAFT SCOPING REPORTS FOR KARPOWERSHIP (PTY) LTDs PROPOSED GAS TO POWERSHIP PROJECT AT THE PORTS OF SALDANHA BAY (WESTERN CAPE), PORT OF NGQURA (EASTERN CAPE) AND RICHARD’S BAY (KWAZULU NATAL)</p> <p>1. groundWork¹ submits these comments to Karpowership (Pty) Ltd’s scoping reports of the proposed gas to power via powership projects (the “projects”) located at the Port of Saldhana Bay (Western Cape), Port of Ngqura (Eastern Cape) and Richard’s Bay (KwaZulu Natal).</p> <p>2. groundWork has a particular interest and expertise in environmental justice issues, and a long- standing history of working with, and representing, the interests of historically disadvantaged communities within South Africa</p> <p>3. We raise the following comments related to the scoping report: 3.1. the application must consider alternatives to the project that have become technologically and financially feasible as required by section 24O(1)(b)(iv) NEMA, including as part of its assessment of need and desirability. Section 24(4)(b) states that “procedures for the investigation, assessment and communication of the potential consequences or impacts of activities on the environment – must include, with respect to every application for an environmental authorisation and where applicable— (i) investigation of the potential consequences or impacts of the alternatives to the activity on the environment and assessment of the significance of those potential consequences or impacts, including the option of not implementing the activity” (emphasis added).</p> <p>4. The scoping report does not identify the need to assess cleaner renewable technology. The IRP 2010 -2030 is a policy document and cannot replace the obligation of the applicant to</p> | <p>Karpowership SA Pty Ltd is responding to a Request for Qualification and Proposals for New Generation Capacity under the Risk Mitigation IPP Procurement Programme, Tender Number DMRE001/2020/21 published by the Department of Mineral Resources and Energy in August 2020 in accordance with the Electricity Regulation Act, the New Generation Capacity Regulations under that act, the Integrated Resources Plan 2019 and the Ministerial Determination published by the Minister of Mineral resources and Energy with the concurrence of the National Energy Regulator of South Africa (NERSA). This procurement programme for much needed emergency power in</p> |

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| | <p>undertake a comprehensive assessment of technological alternatives. Nonetheless, the IRP 2010 – 2030 has since been replaced by the updated IRP 2019, and so should in any event not inform decision-making. Furthermore, the proposed project is in direct response to the 2000MW Risk Mitigation Independent Power Producers Procurement Programme, which calls for new generation capacity from a range of energy source technologies no later than December 2021. This falls within the IRP 2019’s allocation to generation capacity from sources designated as “other” (IRP, Table 5), not specifically gas.</p> <p>Thus, even by this flawed reasoning, there is nothing precluding consideration of the full range of potential technologies that are available to meet the capacity requirements in the IRP 2019 designated to other technologies for immediate term, including renewable and storage technologies – and these should be considered. Importantly, the existence of a macro-level electricity plan (the IRP) calling for particular generation capacity options cannot dispense with the applicant and the decision-makers’ obligations to assess the specific environmental impacts at project level and to consider those impacts in comparison with alternatives to the activities, including the option of not implementing the project at all. These are legal obligations, which cannot be dispensed with or overrun by the IRP.</p> <p>If the applicant were to assess alternatives, it would find that renewable with battery and other storage technology is technologically feasible to provide peak and mid-merit power at a cost- competitive rate with LNG or gas.</p> <p>5. the environmental impact assessment must adequately consider the climate change impacts of the project. Climate Change Impacts associated with the developments must assess the following:</p> <ul style="list-style-type: none"> • the impacts of the project’s GHG emissions, including an assessment of: <ul style="list-style-type: none"> - the indirect and full life-cycle emissions, these being the GHG emissions arising from extraction of gas; transportation of gas; construction of the plant, operation, and decommissioning; - cumulative emissions (i.e. the additive contribution of the project to pre-existing GHG emissions for South Africa); and | <p>South Africa is in accordance with South African law and policy.</p> <p>Karpowership’s business model provides for the generation of power using HFO’s or natural gas. HFO as an alternative fuel was addressed in the draft scoping report as a technological alternative. The use of natural gas as a cleaner technology was thus proposed as the most feasible alternative within Karpowership energy generation options. The option of not implementing the project has also been assessed in the draft scoping report.</p> |

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| | <ul style="list-style-type: none"> - the environmental and social cost of the GHG emissions i.e. the contribution of the project's GHG emissions to South Africa's climate costs and impacts; • the ways in which the project area will be impacted by climate change and the extent to which the project would aggravate these impacts. In other words, the project's impacts on the area's climate resilience and ability to adapt to a changed climate. Given that this is a long-term and large-scale project, consideration must be given to the ways in which climate change will impact on the area and communities where the project will be based, and how the project's own impacts will affect the area's resilience or vulnerability to the effects of climate change as they intensify; and • the ways in which the effects of climate change will impact on the project itself, and its ability to operate optimally and efficiently for its full anticipated lifespan. • The 2017 judgment in the case of Earthlife Africa Johannesburg v the Minister & Others ("the Thabametsi case") confirmed that a CCIA is a necessary component of an EIA for projects with climate impacts. In this case, the court acknowledged the need for a CCIA much broader than a mere assessment of anticipated emissions. It confirmed the need for a comprehensive assessment, which assesses, inter alia, the impacts of climate change on the project and the ways in which the project might aggravate the impacts of climate change in the area.¹ The Pretoria High Court concluded that "[w]ithout a full assessment of the climate change impact of the project, there was no rational basis for the Chief Director to endorse these baseless assertions" (emphasis added).² | <p>One of the key reasons that Karpowership has selected LNG as the fuel source for the proposed South African projects is the marked improvements to environmental impact over liquid fuel. Karpowership is also working towards switching all their global operations away from liquid fuel to LNG in due course for this very same reason.</p> <p>The use of gas as a fuel for power generation is entirely in line with the RMIPPPP, as a technology agnostic tender, and well-established government strategy, notably the National Resource Plan (IRP 2019). It is also noteworthy in this context that the profile of gas to power solutions make them highly suitable as a foundation within the energy mix upon which renewable energy portfolios can be strengthened.</p> <p>The benefits of running the Powership engines on LNG include emission reductions of NOx, SOx, CO2, particulates, no smoke, reduced waste streams and no need to use secondary emission reduction systems (and hence no consumption of reagents) to meet the requirements of local or international legislation. Additionally as, South Africa is generally a 'water poor' country. Powership solutions, unlike land-based power</p> |

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| | <p>6. the application must adequately assess socio-economic impacts of the project. It is expected that over 20 years, 40 people will be employed at the power plant. Most of these jobs are high-skilled positions, and there is no assessment of the feasibility of having these positions filled by the local community. There are also several communities that can be potentially harmed from the power plant, including fishing communities. These include subsistence fishers, recreational fishers, and fishers that depend on fishing for their livelihoods. The socio-economic impacts assessment must comprehensively assess the potential risks and costs of the power plant to these and other local communities that subsist on natural resources nearby to the project site.</p> | <p>plants, do not use water from the country's watercourse for cooling or other operational purposes. They use sea water for cooling in a once through system and therefore have no impact whatsoever on any drought scenario.</p> <p>A detailed Climate Change Adaptation Assessment and Greenhouse Gas Emission Assessment will be included in the draft EIA Phase.</p> <p>Karpowership's company slogan 'The Power of Friendship' encompasses the ethos to which they strive in all countries and regions in which they operate. Aside from engaging with local businesses, they have a positive impact on local communities through both their social responsibility programs, tailored to the specific needs of the community, and the career opportunities that are provided.</p> <p>Karpowership projects create significant direct and indirect employment, driving knowledge and skills transfer across a broad spectrum of disciplines including some that are unique to floating power plants. Karpowership emphasizes youth development as the future of our business, industry, and the local economy. As a globally recognized leader with 1,800+ direct employees, Karpowership provide an opportunity for South Africans, which will make up the majority of their personnel, to develop specific skills and knowhow which will ultimately benefit the South African economy. They will also be provided with the opportunity to become part of an internationally diverse team, gaining and sharing experience and</p> |

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| | <p>7. Public participation must be sufficient, and information related to the project must be easily accessible to all affected communities. Communities such as residential, informal settlements and other land users in the area must be notified or included in the list of potentially affected parties. Fisher communities, small scale fishers, small scale fishing co-ops and informal fishers that are dependent on the oceans for their livelihoods and food security were not notified and made aware of the proposed development. Communities were also excluded from any online and digital consultation as they are unable to afford the technology and data to access this information.</p> | <p>knowledge either locally or worldwide alongside industry leading colleagues.</p> <p>There will be a significant number of local employees for both the construction and operation period which will exceed the Economic Development criteria that must be reached under the terms of the RMIPPPP. The job creation, including within the power generation function, will be comparatively more than a renewable energy project should our project be selected to proceed. Detailed job creation and other local economic development activities will be provided at preferred bidder stage during EIA preparation.</p> <p>We disagree with your statement that the public participation process for the EIA process to date has failed to reach the majority of Interested and Affected Parties (I&APs). The projects in all three areas have been advertised in the respective local newspapers not only in English, but also isiZulu (Richards Bay), iXhosa and Afrikaans (Ngqura) and Afrikaans (Saldanha Bay) calling on potential I&APs to register and participate in the EIA process. We also put up site notices, and notified all I&APs specified in the EIA Regulations, 20014, including landowners and occupiers of land, municipalities, ward councillors, ratepayer associations and relevant organs of state. We also note that a number of community-based organisations such as yourselves, and the Eastern Cape Network, WESSA, West Coast Bird Life, Bird Life, Cape Biosphere, Saldanha Water Quality Trust Forum, Green Point, South Durban Community Environmental Alliance, Oceans not Oil, SANCOB, etc have registered as I&APs who</p> |

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| | <p>8. In summary, the EIA must at a minimum, assess alternative renewable technologies, as well as climate and cumulative impacts, considering the critical and substantial developments highlighted above.</p> <p>1 See para 44, Thabametsi judgment. 2 Para 101, Thabametsi judgment. The “baseless assertions” to which reference is made are the statements in Thabametsi’s EIR - on which the Chief Director relied exclusively - that the climate change impacts of the project were relatively small and low.”</p> | <p>in turn purport to represent a large number of other community-based organisations and communities.</p> <p>We have also liaised with local councillors and other local stakeholders to find out where it is best to put up notices, leave flyers and place the hard copy of the draft Scoping Report for easy public access. We agree that the Covid-19 pandemic has definitely made it more challenging to run public participation processes, but are of the view that our process does provide reasonable opportunity to I&APs, and this has been confirmed by DEFF in approving the public participation plan.</p> <p>Please also note that all three projects fall within Ports and Industrial Developments Zones where public access is highly restricted because of the nature of the industrial activities within these sites. We have however notified the nearest ward councillors, and ratepayers associations to ensure that neighbouring residents are represented in the EIA process, even if they themselves have not seen the notices and advertisements that have been locally placed.</p> <p>The requirements pertaining to cumulative impacts will be addressed in the EIA Phase. TNPA Port Planning will be taken into consideration.</p> <p>Thank you for your comments.</p> <p>17 November 2020</p> |
| 09 November 2020 Email DEFF | | <p>TRIPLO4: I hope this email finds you all well. With reference to the notification below, please advise if your department (Climate Change and Air Quality) will be submitting comments? Note that the</p> |

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| Dr. Thuli Mdluli Thabile Sangweni Muhammad Essop Coenrad Agenbach Milicent Solomons | | extended commenting period is closing today, 9th November 2020. 09 November 2020 |
| 09 November 2020 Email I&AP Marilyn [REDACTED] | <p>"Submission on Scoping Reports and Environmental Authorisation for Proposed Powerships for the Ports of Coega, Richards bay, Saldanha Bay</p> <p>As I have the same concerns for all three projects, I submit my comments as one for the Scoping Reports and Environmental Authorisation, and for the Atmospheric Emission Licence for the Port of Ngqura for:</p> <p>Coega Project number: E-BL01.200444.</p> <p>Richards Bay Project Number E-BL01.200446,</p> <p>Saldanha Bay, Project Number: E-BL01.200445</p> <p>I have the same concerns for all three projects.</p> <p>These are extreme polluting global warming GHG emitting industrial projects using natural gas that is 80% more potent as a GHG than coal.</p> | <p>TRIPLO4: The use of natural gas is a cleaner alternative to coal. Natural gas boil off of LNG on board the FSRU is not flared or vented. The natural boil off is used as fuel for the operation of the FSRU and if in excess, is prioritised for export to the Powership for use in the generation of electrical power. In the event that BOG is in excess of the base load demand, then arrangements are provided on-board the FSRU for this excess BOG to be burnt in a specialised internal process. Under normal operations it is anticipated that the demand for gas will be significantly in excess of the natural boil off resulting in liquid LNG being re-gassified for export to the Powership. Section 2.1.1 of the Draft Scoping Report will be updated to include this</p> |

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| | <p>I believe that there is no need or desirability for such extreme global warming GHG emitting projects in South Africa.</p> <p>I do not believe that the DEFF should accept the scoping reports, and should not grant the applications for their Environmental Authorisation</p> <p>I do not believe that DEFF should grant an Atmosphere Emission Licences for the Port of Ngqura, nor grant one for any of these projects – as knowingly DEFF would be permitting tons of toxic GHG emissions into the air, and impacting the health of all who breathe this toxic air, including all wildlife, insects, birds etc.</p> | <p>explanation. In addition, a Carbon Footprint analysis will be conducted during the EIA phase.</p> <p>Reference is made to Section 1.2 of the Draft Scoping Report. In terms of the Integrated Resource Plan (IRP), government in its determination in the energy generation methodologies provides for a diversified energy mix that reduces reliance on a single or a few renewable and gas to energy projects. The RFP states that Gas to Power technologies provide the flexibilities required to complement renewable energy.</p> <p>This is at the discretion of the DEFF who has to act in accordance with the EIA Regulations, 2014. Specifically, Regulation 22 requires that the competent must either accept the scoping report, with or without conditions, and advise the applicant to proceed or continue with the tasks contemplated in the plan of study for environmental impact assessment; or refuse environmental authorisation if the proposed activity is in conflict with a prohibition contained in legislation; or the scoping report does not substantially comply with the prescribed reporting requirements.</p> <p>As per Section 8.2 of the Draft Scoping Report, air emissions from the operation of engines and turbines to produce energy was assessed in Preliminary Impact Assessment. The specialist findings regarding GHG emissions and the associated environmental impacts and mitigation measures will be presented in a specialist report as part of the EIA Report for public comment in the next phase of the EIA process. Thereafter, the final EIA Report will be submitted to DEFF for a decision on the application.</p> |

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| | <p>This is not an emergency situation, our sun supplies clean sustainable energy. Fossil fuels are not sustainable.</p> <p>The emissions will be highly toxic and produce high amounts of extreme GHG for the 25 year permits 24 hours a day.</p> <p>There is no Health Impact Assessment mentioned or included.</p> <p>The safety of the project cannot be guaranteed with the extreme explosive nature of natural gas.</p> <p>What is the explosive zone? This is not included. The amount of LNG and gas in close proximity to ports and communities puts many lives in danger of any gas leaks, LNG leaks and extreme explosions.</p> | <p>Reference is made to Section 1.2 of the Draft Scoping Report. As above, in terms of the Integrated Resource Plan (IRP), government in its determination in the energy generation methodologies provides for a diversified energy mix that reduces reliance on a single or a few renewable and gas to energy projects. The RFP states that Gas to Power technologies provide the flexibilities required to complement renewable energy.</p> <p>As stated above, the specialist findings regarding GHG emissions and the associated environmental impacts and mitigation measures will be presented in a specialist report as part of the EIA Report for public comment in the next phase of the EIA process. Thereafter, the final EIA Report will be submitted to DEFF for a decision on the application. Please note that the RMIPPPP does not allow for a PPA of longer than 20 years, with 16.5 hours per day dispatch periods.</p> <p>As indicated in the Plan of Study (Section 9.3.1.12), a detailed risk assessment will be undertaken in the EIA phase (next phase), including the handling, transporting and storage of natural gas and the potential hazardous risk to people, property and the environment.</p> <p>As above, a Risk Assessment, which will include the explosive zone, is being conducted and the findings presented as part of the EIA Report for comment during the EIA phase as described in the Section 9, Plan of Study for the EIA Phase in the Scoping Report.</p> |

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| | <p>With a 25 year permit this will lock the fracked gas producing country of origin and impacted communities into another 25 years of toxic dangerous fracking, impacting lives and livelihoods, with known serious health impacts, poisoning their water and air, among other known harms and dangers of fracking.</p> <p>SA will in essence be importing blood gas.</p> <p>South Africa, a signatory to the Paris Agreement publicly signed and committed on an international platform to REDUCE our global warming greenhouse gas emissions.</p> <p>These proposed projects will individually and collectively INCREASE South Africa's GHG emissions, in total disregard of our international commitment to reduce greenhouse gas emissions.</p> <p>The Department of Environment, Farming and Fisheries in the assessment of GHG emissions for these three projects must also take into account the total GHG emissions of in the development of these projects, and over the 25 years permit period, and in decommissioning, and also must also include take into account the total GHG emissions from the shale extraction to processing plants converting gas to LNG, to transport to SA and all related processes in SA.</p> <p>Total GHG emissions for 25 years- Country of origin drilling and extraction and all related activities and processes, e.g. compressor stations, venting, flaring, processing, trucks, transport, processing plants -gas to LNG Transport by ships to SA for 25 years, ships are extreme emitters of GHG.</p> <p>In South Africa for 25 years</p> | <p>The lifespan of the proposed project is 20 years. While the source of the LNG gas has not been confirmed, the applicant has stated that it will be sourced legally and follow the country of origin's environmental processes. Section 3.1.5 of the report has been updated to state that the gas will be sourced from top tier international gas suppliers with relevant licenses and permissions for the supplier's full supply/value chain.</p> <p>As per Section 3.1.5.1 of the Draft Scoping Report, the benefits of running the engine on LNG include emission reductions of NOx, SOx, CO2, particulates, no smoke, reduced waste streams, no need to use secondary emission reduction system (and hence no consumption of reagents) to meet the requirements of local or international legislations. All proposed projects' operations are in compliance with standards stated in environmental permits.</p> <p>A Carbon Footprint Assessment will be undertaken during the EIA Phase taking into account the GHG emissions. However, as the gas will be imported from outside of South Africa, the impacts associated with sourcing of gas are not considered to be within the scope of this project.</p> <p>As indicated in the Plan of Study (Section 9.3.1.12), a detailed risk assessment will be undertaken in the EIA phase (next phase), including the handling, transporting and storage of</p> |

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| | <p>All related processes and related activities in SA offshore and onshore, development of infrastructures, regassification, emissions in processing Natural Gas to power, pipelines, trucks, transport etc</p> <p>There are many serious environmental impacts that would not be able to be mitigated.</p> <p>Impacts on marine life, air, sea, waterways, shore water areas, noise, lights, safety- NG liquid and gas leaks, explosion, high toxic emissions, rise in sea temperatures 4C to 15C as indicated would be extremely harmful with major impacts to marine life and plants.</p> <p>I believe that these are extreme toxic and dangerous and proposed project, with impacts beyond the control of DEFF.</p> <p>I do not permit my contact details to be included in the EIA reports that will be accessible to the public.”</p> | <p>natural gas and the potential hazardous risk to people, property and the environment. In addition, as per Section 9.2.1.14, a detailed Coastal and Climate Change Assessment, and an Atmospheric Impact Assessment (9.3.1.1), will be undertaken in the EIA phase.</p> <p>Please refer to Section 9.2 which includes a list of specialist studies for the EIA phase. The Marine Ecological Assessment, Noise Impact Assessment and Risk Assessment will be undertaken and will include recommendations to mitigate the impacts identified as well as identify any residual risks and how these will be managed and monitored.</p> <p>If DEFF decides to authorise the project on the basis of the EIA findings, including I&AP comment, it will stipulate a number of conditions in addition to the mitigation measures contained in the EMPr. Failure to comply with the licence conditions and the EMPr is an offence and there are a number of enforcement measures available to DEFF should this transpire.</p> <p>We confirm that your contact details will not be made public and will only be provided to DEFF as part of the I&AP register as required by the EIA Regulations, 2014.</p> <p>07 November 2020</p> |
| <p>09 November 2020</p> <p>17 November 2020</p> <p>Email</p> <p>DEFF: Oceans and Coasts</p> | <p>“SUBJECT: COMMENTS ON THE DRAFT SCOPING REPORT REGARDING THE ENVIRONMENTAL AUTHORISATION AND AN ATMOSPHERIC EMISSION LICENCE FOR PROPOSED POWERSHIP AT THE PORT OF RICHARDS BAY AT UMHLATHUZE LOCAL MUNICIPALITY, KING CETSHWAYO DISTRICT, KWAZULU-NATAL</p> | <p>Triplo4: Thank you for the email and we await your comments for Coega. We have received your comments for Richards Bay.</p> <p>09 November 2020</p> <p>Dear Acting Director,</p> |

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| | <p>The Oceans & Coast (O&C) Branch of the Department of Environment, Forestry and Fisheries (DEFF) has reviewed the Draft Scoping Report on the application for an Environmental Authorisation and an Atmospheric Emission Licence for Proposed Power Ship at Port of Richards Bay at Umhlatuze Local Municipality, King Cetshwayo District, Kwazulu-Natal in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), (“NEMA”). DEFF has provided inputs based on coastal considerations and objectives in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“ICM Act”).</p> <p>1. The Environmental Assessment Practitioner (EAP) must take note that the O&C Branch of the DEFF has a mandate to protect the ecological integrity, natural character and the economic, social and aesthetic value of the coastal zone; as well as to protect people, property and economic activities from risks arising from dynamic coastal processes. It further ensures that the use of natural resources in the coastal zone and development associated with the coastal zone is socially and economically justifiable and ecologically sustainable.</p> <p>Furthermore, the EAP is reminded that comments and recommendations as provided below are intended to ensure the achievement of the objectives of the ICM Act and guarantees that the coastal environment will be protected and conserved throughout all phases of the Proposed Power Ship at Port of Richards Bay.</p> <p>2. National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“ICM Act”) Sections to</p> | <p>Thank you for the comments from the Oceans & Coast (O&C) Branch of the Department of Environment, Forestry and Fisheries (DEFF), as received by Triplo4 Sustainable Solutions (Pty) on the 09 November 2020. We hereby address them in the order they were raised.</p> <p>Noted and your provided input is addressed as per the following comments and responses.</p> <p>The Department’s mandate and the objectives of the comments and recommendations provided to ensure the achievement of the objectives of the ICM Act are acknowledged.</p> <p>The factors that the CA must consider in terms of coastal activities are noted. Preliminary mitigation measures are presented in Section 8.2 of the</p> |

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| | <p>be adhered to and implemented by the applicant and Competent Authority (CA):</p> <p>2.1 Section 63 of the ICM Act: Environmental authorisations for coastal activities</p> <p>(1) Where an environmental authorisation in terms of Chapter 5 of the National Environmental Management Act is required for coastal activities, the competent authority must take into account all relevant factors, including -</p> <ul style="list-style-type: none"> (a) the representations made by the applicant and by interested and affected parties; (b) the extent to which the applicant has in the past complied with similar authorisations; (c) whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas; (d) the estuarine management plans, coastal management programmes, coastal management lines and coastal management objectives applicable in the area; [Para. (d) substituted by s. 33 of Act 36/2014 w.e.f. 1 May 2015] (e) the socio-economic impact if the activity - <ul style="list-style-type: none"> (i) is authorised; (ii) is not authorised; (f) [Para. (f) deleted by s. 33 of Act 36/2014 w.e.f. 1 May 2015] (g) the likely impact of coastal environmental processes on the proposed activity; [Para. (g) amended by s. 33 of Act 36/2014 w.e.f. 1 May 2015] (h) whether the development or activity- | <p>Scoping Report. These measures and others emanating from the coastal and climate change assessment, risk assessment and other specialist reports as outline in the Plan of Study (section 9.3.1 of the Scoping Report) will be incorporated into an Environmental Management Programme (EMPr) which will form part of the EIA Report (next phase). These draft reports will be made available early next year for Stakeholders and I&AP comment and your department will be notified accordingly.</p> <p>Please also note that no development of piers is proposed for this project. Please refer to section 2.1 of the Scoping Report, outlining the proposed activities, including the Powerships, gas pipeline and the transmission line on land.</p> |

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| | <p>(i) is situated within coastal public property and is inconsistent with the objective of conserving and enhancing coastal public property for the benefit of current and future generations;</p> <p>(ii) is situated within the coastal protection zone and is inconsistent with the purpose for which a coastal protection zone is established as set out in section 17;</p> <p>(iii) is situated within coastal access land and is inconsistent with the purpose for which coastal access land is designated as set out in section 18;</p> <p>(iv) is likely to cause irreversible or long-lasting adverse effects to any aspect of the coastal environment that cannot satisfactorily be mitigated;</p> <p>(v) is likely to be significantly damaged or prejudiced by dynamic coastal processes;</p> <p>(vi) would substantially prejudice the achievement of any coastal management objective; or</p> <p>(vii) would be contrary to the interests of the whole community;</p> <p>[Para. (h) substituted by s. 33 of Act 36/2014 w.e.f. 1 May 2015]</p> <p>(i) whether the very nature of the proposed activity or development requires it to be located within coastal public property, the coastal protection zone or coastal access land;</p> <p>[Para. (i) added by s. 33 of Act 36/2014 w.e.f. 1 May 2015]</p> <p>(j) whether the proposed activity or development will provide important services to the public when using coastal public property, the coastal protection zone, coastal access land or a coastal protected area; and</p> <p>[Para. (j) added by s. 33 of Act 36/2014 w.e.f. 1 May 2015]</p> <p>(k) the objects of this Act, where applicable.</p> <p>[Para. (k) added by s. 33 of Act 36/2014 w.e.f. 1 May 2015]</p> <p>(2) [Subs. (2) deleted by s. 33 of Act 36/2014 w.e.f. 1 May 2015]</p> <p>(3) [Subs. (3) deleted by s. 33 of Act 36/2014 w.e.f. 1 May 2015]</p> <p>(4) [Subs. (4) deleted by s. 33 of Act 36/2014 w.e.f. 1 May 2015]</p> | |

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| | <p>(5) The competent authority must ensure that the terms and conditions of any environmental authorisation are consistent with any applicable coastal management programmes and promote the attainment of coastal management objectives in the area concerned.</p> <p>(6) Where an environmental authorisation is not required for coastal activities, the Minister may, by notice in the Gazette list such activities requiring a permit or licence.</p> <p>Considering what the CA must take into account in terms of Section 63 of the ICM Act, it should be noted that we strongly recommend that, before an EA is granted, the CA must ensure that sufficient measures to avoid, manage, minimize and mitigate potential impacts in the coastal zone have been identified, addressed and provided adequately within the Environmental Management Programme report (EMPr) and EA application by assessing:</p> <p>“The proposed Power Ship at Port of Richards Bay development and related operation of</p> <p>(iii) any structure or infrastructure on, below or along the sea bed; item 26: Development</p> <p>(i) in the sea; (ii) in an estuary; (iii) within the littoral active zone: (iv) in front of a development setback, or (v) below, within above 100 m inland of the HWM; in respect of</p> <p>(b) piers.”</p> <p>2.2 Coastal Water Discharge (CDW): From the assessment of activities associated with the proposed Power Ship at Port of Richards Bay and supporting information provided we are of the opinion that the propose activities will not require a Coastal Waters Discharge Permit (“CWDP”) in terms of section 69 of the ICM Act Therefore, written authorisation from this Department will thus not be required prior to the commencement of the said proposal.</p> <p>2.3 Dumping at Sea (DaS) requirement: We are of the view that the proposed Power Ship at Port of Richards Bay would require a Dumping Permit in terms of section 71 of the ICM Act to dispose of the dredged material at sea. Please be advised that the Transnet National Port Authority’s existing permit cannot be used as the NIFPP activities</p> | <p>The confirmation that the proposed activities will not require a Coastal Waters Discharge Permit is noted.</p> <p>Please note that no dredging is required, as the mooring locations are positioned in sufficient water depth to safely accommodate the moored vessels (indicated in Section 2.1.2 of the Scoping Report). Therefore, the Dumping Permit as well as adherence and implementation of Section 70, 71,</p> |

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| | <p>would require a separate dumping at sea permit. A dumping at sea application form with the relevant specialist studies, including a sediment study must be submitted to the Department to initiate the process.</p> <p>Furthermore, we recommend the applicant to ensure adherence and implementation of Section 70,71,72 and 73 of the ICM Act. For further engagement on requirements and process to follow, the applicant must consult this Department. DEFF: Branch O&C contact to obtain an CDW permit ypeterson@environment.gov.za / jedutoit@environment.gov.za</p> <ul style="list-style-type: none"> Spills and Leaks Management: "The report states that the FSRU is refueled through vessels specially fitted for the purpose of carrying LNG and fueling the FSRU. Refueling would be required approximately every 20 days, depending on the power generation capacity and output of the Power ship." Therefore, the applicant must ensure treatment and remediation are undertaken by making sure that the appointed CEO and employees are aware of the procedure to be followed, necessary materials and equipment are available, for dealing with spills and leaks, which includes notifying the Engineer and the relevant authorities. Should spills and leaks transpires, the applicant must consult this department DEFF: Branch O&C must be part of the relevant authorities to be notified ypeterson@environment.gov.za <p>O&C Branch Conditions to include in the EMPr and Environmental Authorisation:</p> <ul style="list-style-type: none"> The applicant must take into account, adhere to and implement the relevant section of the ICM Act applicable to this proposed Power Ship at Port of Richards Bay; | <p>72 and 73 of the ICM Act are not applicable for this proposed project.</p> <p>These measures to manage spills and leaks will be incorporated into the Environmental Management Programme (EMPr) which will form part of the EIA Report (next phase). Added to the final Scoping Report (section 3.1.5.1 – fuel alternatives), is the requirement for operators of FSRU's and LNGC's to comply with comprehensive safety regulations and procedures to protect people from injury and ensure operational safety. Should any LNG be released and spilled into the Port waters, it is not anticipated to cause harm to the aquatic life or damage the waterways, as LNG becomes buoyant at -110degC and disperses rapidly as the vapour is significantly lighter than air,. Similarly, the re-gassified NG, used as fuel in the Powership, is supplied at ambient temperature. As such, should a release occur, the NG would be much lighter than air and would disperse immediately, removing any significant potential risk of fire. The above will be confirmed through the risk assessment specialist study, as part of the EIA process.</p> <p>These measures will be included in the Environmental Management Programme (EMPr) which will form part of the EIA Report (next phase).</p> |

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| | <ul style="list-style-type: none"> • No construction activities with the potential to affect the general public's enjoyment of the coast should be scheduled during peak season; • Construction periods to be scheduled avoiding heavy rain and storm seasons. Historical data must be used for best time period allocation; • We concur with the proposed 200m offset from the water line to the moored vessels to be maintained from the Sand-spit area that has been identified as sensitive, and recommends for this condition to form part of the EA conditions; • Clearing of vegetation to allow for the towers to be erected should only be carried out where its only necessary to avoid loss of vegetation carry out work to retain as much vegetation as possible so that the area can continue to function and offer services in the best sustainable way as possible; • Routes options for the transmission lines should be planned to avoid area that has been identified as sensitive and offer important functions, such as habitat, breeding areas, areas where natural resources that are considered of important status occur and migration route. The use of existing servitudes is encouraged wherever possible to minimize impacts on natural vegetation; • The report states that the "proposed methodology to install the subsea gas pipeline will be to international best practices and in conjunction with the specific expertise of the Marine Contractor that will be appointed to undertake the construction works". The EAP is requested to provide a detailed methodology documentation, with advantages and disadvantages of the proposed methodologies, including comparison of alternative methods that's can be used and have ability and capacity to produce the same results. The options presented should take into account the methodologies proposed to be implemented and the receiving environment and impacts associated with the proposed Gas Power Project, Port of Richards Bay methodologies proposed and potential threat to sustainability of natural environment and function of natural ecosystem; | <p>A detailed methodology documentation, with advantages and disadvantages of the proposed methodologies for the installation of the gas pipeline will be included in the EIA Report (next phase).</p> <p>The proposed site location and layout alternatives are outlined in the Draft Scoping Report, sections</p> |

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| | <ul style="list-style-type: none"> Furthermore, the EAP is requested to provide a detailed documentation on comparison of the proposed site location alternative, with advantages and disadvantages of both site locations. The options presented should take into account the location of the proposed sites, the receiving environment and impacts associated with the proposed Gas to Power Project, Port of Richards Bay and potential threat to sustainability of natural environment and function of natural ecosystem; “Temporary site facility onshore will be required for the assembly and launching of the gas pipeline. The location of the facility will be selected at a location in the port which was previously used as temporary construct sites for previous projects, in order to reduce new impacts, and will be completely removed after installation of the pipeline, to reinstate the site to its original topographical and environmental condition, as has been done previously”. It is our recommendation that planning for the establishment of the proposed temporal site, the applicant must ensure that the site is not planned to be established within or next to areas that have been identified as sensitive, and that no activities that have potential of causing disturbance or putting pressure on our vulnerable natural resources are allowed to be carried out; The specialists to be appointed by the applicant for conducting the assessment and producing specialist reports (stated within the report) and recommendations, needs to pay particular attention to assessing impacts associated with the proposed Gas to Power Project, Port Of Richards Bay, insofar as ensuring that proposed activities, associated impacts, proposed site locations, proposed methodologies and technology to be used and implemented are taken into account, to make an informed decision and recommendations to be implemented for this project; “The report states that the Power ships will use seawater for cooling the gen-sets and Optionally the steam turbine generators and fresh water generators. The total intake/outlet flow rates range from 2.4 rn3/s to 11.4 rn3/s and the increase in temperature (AT) range from 40C to 150 C. No chemicals such as chlorine are discharged with the | <p>3.1.1 and 3.1.3. These alternatives will be further assessed upon receipt of findings from the specialists’ assessments, and will be included in the EIA Report (next phase).</p> <p>The proposed temporary assembly site will be determined based on the engineering requirements, as well as the receiving environment to avoid or mitigate disturbance to sensitive areas. This will be further assessed during the EIA phase, upon further input from the specialists’ assessments.</p> <p>The scope of work for the specialists’ assessments include the consideration of the proposed activities, associated impacts, proposed site locations, proposed methodologies and technology to be used and implemented, as per the Plan of Study, Section 9.3.1 of the Scoping Report.</p> <p>Only seawater will be used for the cooling systems on the ships.</p> |

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| | <p>cooling water". During the virtual meetings it was reported that only sea water will be used for this proposed Power Ship at Port of Richards Bay. The EAP is required to provide confirmation of this;</p> <ul style="list-style-type: none"> The applicant is advised to bear in mind that the coast is dynamic and characterized by natural processes, such as flooding, sea level rise, accretion, erosion, and storm sedges influenced by the climate change. The proposed site location for this project has potential of being affected by almost all of these natural processes. Therefore, design and plan of the proposed Gas to Power Project, Port of Richards Bay will need to take into account climate change and coastal processes, and how the proposed project will be affected by it. Furthermore, the design must pay special attention to lifespan (short and long-term), location where structures and equipment will be placed, the methodology and technology to be applied during all phases of this proposed project; | <p>A Coastal and Climate Change Assessment will be conducted for the next phase, as per the Plan of Study in the Scoping Report, section 9.3.1.14. As indicated in Section 4.5.2 of the Draft Scoping Report, sea level rise and the projected increase in severe storms pose the most significant climate change threat to the project. This is a concern for the Richards Bay site, as tropical storms in the Indian Ocean are projected to increase in intensity. This risk is somewhat mitigated by the location of the floating platforms within the existing port.</p> <p>With regards to storm event (as added to section 8.2.1.8 of the Final Scoping Report), while uncertainty exists concerning the specific frequency of future extreme events such as coastal storm surges, general global trends indicate that an increase in both the frequency and intensity of such events, particularly under a high-emissions scenario, should be expected.</p> <p>Proposed activities in exposed or risk-prone areas should therefore adopt a precautionary and risk-averse approach to both the design and location of infrastructure, to ensure that damage is avoided when extreme events occur. Good practice in this regard is to adopt a medium- to long-term approach (between 20 and 50 years) by adequately incorporating anticipated future conditions in the detailed design phase of infrastructure, such as subsea pipelines and transmission lines, that are proposed for installation in exposed areas. For coastal storm surges, this would likely entail designing proposed project infrastructure to withstand events with 1:50</p> |

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| | <ul style="list-style-type: none"> The EAP must explain how the proposed Gas to Power Project, Port of Richards Bay will have an impact on the mixing zone and how will the proposed project be affected by being placed, with specific attention paid to the two proposed site locations for the project; The applicant must be made aware that construction and maintenance responsibilities of the proposed Gas to Power Project, Port of Richards Bay will be of the applicants' burden. Should the area experience any natural/un-natural disasters, and as a result of such debris or loose equipment's from activities associated with this proposed project which may end up washed up to the coast and sea, the applicant will be held liable for the clean-up and rehabilitation of the area. Also, should any member of the public suffer injuries as a result of applicant's negligence, the applicant will be liable. The CA must state clearly within the condition of the EA that no Organ of State will be held liable for the maintenance and upkeep of the proposed stabilization structure; There are notable spelling errors in the document that the EAP is kindly advised to revisit before releasing the documents for public review; | <p>year return periods, or possibly 1:100 year events to account for extreme scenarios.</p> <p>In terms of engineering (as added to section 2.1.2 of the Final Scoping Report), marine conditions derived for all design return periods include an allowance for potential climate change impacts (increases) on wind speeds, water levels and wave heights over the design life of the infrastructure.</p> <p>Impacts on the mixing zone are captured in the preliminary impact assessment in the Draft Scoping Report, Section 8.2.3. These will be further assessed with input from the specialists' assessments during the EIA phase.</p> <p>The applicant is aware of the construction and maintenance responsibilities and liabilities.</p> <p>Spelling errors in the document have been identified and corrected.</p> <p>Recommendation for the CA to consider and thus brought to the CA attention through the Comments</p> |

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| | <ul style="list-style-type: none"> Due to the demand for public safety, failure by the responsible contractor to reinstate the site location where the maintenance works will be taking place that falls within the coastal area, we recommend that the competent authority gives power to the Local Municipality to issue a notice instructing the applicant to undertake the work within a specific time period. The Local Municipality should also be given permission to reserves the rights to proceed with maintenance works and recover the costs from the applicant should the applicant fail to comply". It is recommended that such condition should form part of the EA conditions to be adhered and implemented; Vehicles and machinery have potential of releasing fuel, oil, and emissions while in operation. It is our view that the concentrations will be low if vehicles and machinery that will be used are continuously maintained well and inspected regularly by the building contractor. We recommend this condition to be included in the final MMP. Additionally, no vehicles and machinery must be refueled within sensitive coastal areas; The proposed site is within Richards Bay Harbour and close proximity to the sensitive mangroves and the sandbanks in the port. The alternatives suggest moving the ships along the proposed pipeline. Furthermore, according to the NBA (2018) Richards Bay (an estuarine embayment) and Umhlathuze Estuary (a permanently open estuary) are nationally important estuarine biodiversity areas, supporting globally important critical habitats (mangroves and eelgrass) and are important nursery areas supporting fisheries across the wider KwaZulu-Natal coast. It is our view that the proposed Gas to Power Project, Port of Richards Bay have potential of causing negative impacts that will affect the Richards Bay Port and the Umhlathuze estuary (which is a protected nature reserve). Therefore, it is our recommendation that the Estuarine specialist/ assessment report should identify threats that will arise from implementing the proposed project and provide mitigation measures. The provided findings and recommendations must take into account the proposed site locations, activities to be undertaken, alternatives, time frames, proximity to sensitive and vulnerable environment and ecosystems; | <p>& Responses Trail Report document, appended to the Final Scoping Report.</p> <p>This condition will be included in the EMPr (next phase).</p> <p>An Estuarine Impact Assessment will be conducted and findings included in the EIA Report (next phase), as per the Plan of Study in the Draft Scoping Report, Section 9.3.1.13.</p> <p>An Ecological Assessment and Marine Ecological Assessment will be conducted and findings</p> |

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| | <ul style="list-style-type: none"> • Construction should be scheduled to avoid local species breeding seasons. Historical data must be used to identify local species and check previous breeding seasons and movements that has potential of being affected by this proposed Gas to Power Project, Port of Richards Bay; • Parking areas should not be utilized for the stockpiling of any construction material or for any other construction-related activity; • We recommend that the applicant must appoint a Control Environmental Officer (CEO) who will ensure that the identified mitigation measures and recommendations are considered, adhered to, and implemented. Furthermore, the CEO will be responsible for undertaking site inspections to ensure compliance with the EA conditions to ensure that the marine ecosystem will be protected and conserved during construction and maintenance phases throughout all phases of this proposed Gas to Power Project, Port of Richards Bay; • The Power ships generate electricity via liquid natural gas and heavy fuel oil. An oil spill may likely occur. Liquid natural gas is highly flammable. Therefore, the applicant and the appointed Control Environmental Officer must ensure that employees are aware of the procedures to be followed, and necessary materials and equipment is available for responding to spills, leaks and general maintenance; • List of Specialist / Assessment Reports to be conducted with findings and recommendations for this proposed Gas to Power Project, Port of Richards Bay required/supported by the DEFF: <ul style="list-style-type: none"> ➢ Wetland Delineation and Functionality ➢ Terrestrial Ecological ➢ Estuarine Impacts ➢ Coastal and Climate Change Impact ➢ Geo-hydrological, Hydrology & Hydro-pedology ➢ Hydrological & 1: 100 Year Flood line | <p>included in the EIA Report (next phase), as per the Plan of Study in the Draft Scoping Report, Section 9.3.1.3 and 9.3.1.4, and relevant data on breeding seasons and construction schedule will be included in the EMPr (next phase).</p> <p>This condition will be included in the EMPr (next phase).</p> <p>This condition will be included in the EMPr (next phase).</p> <p>Although the Powerships can use either liquid natural gas or heavy fuel oil to generate electricity, they will only use liquid natural gas for this project. Response measures to spills and leaks and maintenance requirements will be included in the EMPr (next phase) with input from the specialists' assessments during the EIA phase.</p> <p>The above list of studies are included in the Plan of Study in the Draft Scoping Report, Sections 9.2 and 9.3.</p> |

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| | <ul style="list-style-type: none"> ➤ Aquatic Aspects ➤ Major Hazardous Installation ➤ Marine Ecology ➤ Socio-Economic Impact ➤ pollution impacts ➤ Noise ➤ Avifauna <ul style="list-style-type: none"> • The marine environment serves a critical role in protecting and conserving ecological species of importance and ensures a sustainable use of natural resources to ecological and economic benefits to the public. Therefore, you are kindly reminded of the duty of care towards the environment, as required in terms of section 58 of the ICM Act read together with 28 of NEMA which states that “Every person who causes, has caused or may cause adverse effect on the coastal environment must take reasonable measures to prevent such adverse effect from continuing, recurring or occurring or, in so far as such harm to the coastal environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such adverse effect on the coastal environment.” by taking into consideration and implement recommendations provided in this document recommending measures to be undertaken to ensure the coastal zone is protected, preserved and managed throughout all phases of the proposed Gas to Power Project; • Kindly note that the activity may not commence prior to an environmental authorisation being granted by the CA. It is an offence in terms of section 49A “NEMA” for a person to commence with a listed activity unless the CA has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable to a fine not exceeding 10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment; and • Please be advised that there is an EIA Unit that facilitate EIA comments on behalf of the Oceans and Coast Branch. Kindly forward request of EIA Comments to, Email: OCEia@environment.gov.za | <p>An EMPr will be developed (next phase) with measures to ensure that the coastal zone is protected, preserved and managed throughout all phases of the proposed Gas to Power Project.</p> <p>The proposed project will not commence prior to an environmental authorisation being granted by the CA, or any other licence that is required for this project.</p> <p>The EIA Unit and its contact details have been included on the I&AP register.</p> |

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| | <p>We will provide additional comments in the next public participation phase.</p> <p>These comments must be sent to the CA for consideration and implementation, and the EAP is kindly requested to submit proof of such submission to us.</p> <p>Kindly note that the Department reserves the right to revise its comments and request further information based on any additional information that might be received. All future correspondence and documentation (hard copy and an electronic copy) must be submitted to our office via OCeia@environment.gov.za / or Physical Address: Department of Environment Affairs (DEA), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.”</p> <p>“Thank you.”</p> | <p>The EIA Unit will be notified of the next public participation phase, anticipated to commence early next year.</p> <p>These comments are captured in the Comments & Response Trail Report, as appended to the Final Scoping Report to be submitted to the CA. We will provide proof of submission as requested.</p> <p>All future correspondence and documentation (electronic copies) will be submitted to your office via OCeia@environment.gov.za.</p> <p>Thank you for your comments and I trust this response has adequately addressed them. Please do not hesitate to contact us should you have any further queries.</p> <p>17 November 2020</p> |
| <p>09 November 2020</p> <p>Email</p> <p>SDCEA (The South Durban Community Environmental Alliance)</p> <p>Sherelee Odayar</p> | <p>“COMMENTS ON: DRAFT SCOPING REPORTS FOR KARPOWERSHIP (PTY) LTDs PROPOSED GAS TO POWERSHIP PROJECT AT THE PORTS OF SALDANHA BAY (WESTERN CAPE), PORT OF NGQURA (EASTERN CAPE) AND RICHARD’S BAY (KWAZULU NATAL)</p> <p>1. INTRODUCTION</p> <p>The South Durban Community Environmental Alliance (“SDCEA”) is a non-governmental organisation representing 17 community and environmental organisations concerned with environmental justice and sustainable development in South Durban and KwaZulu-Natal. SDCEA represents vulnerable and disadvantaged persons whose lives and livelihoods depend on the protection of the coastal ecosystems of KwaZulu-Natal, in the vicinity of Durban. Its members include the following institutions:</p> | <p>Triplo4: This email is to acknowledge receipt of comments</p> <p>09 November 2020</p> <p>TRIPLO4: <u>Privatisation of electricity generation</u></p> <p>While we have evaluated the need and desirability of the proposed Karpowership’s projects within South Africa’s legislative and policy framework, assessing the merit of such legislation and policy is beyond the scope of the EIA process. <i>Please also refer to Karpowership’s response to your concerns.</i></p> <p><u>Climate change assessment</u></p> |

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| | <p>a. Earthlife Africa – Durban b. Clairwood Ratepayers Association c. Umkomaas Anti-Pollution Watchdogs d. Isipingo Environment Committee e. Airport Farmers Association f. KZN Subsistence Fishermen Forum g. Active Citizens Forum h. Merebank Ratepayers Association i. Mayine j. Poor Flat Dwellers k. Isipingo Ratepayers Association l. Silverglen Civic Association m. Wentworth Development Forum n. Treasure Beach Environmental Forum o. Christ the King Church p. Ubunye Bama Hostels q. Bluff Ridge Conservancy</p> <p>2. The SDCEA has for the last two decades participated in forums for the improvement of environmental management in KZN and in particular, in the industrial areas south of Durban.</p> <p>3. SDCEA has considered the Draft Scoping Report and Plan of study for EIA dated October 2020, and submits the comments that follow, for your consideration.</p> <p>The South Durban Community Environmental Alliance is opposed to the approval of a Scoping Report filed by Kapowership and Triplo4 Sustainable Solutions.</p> <p>The concerns are that there should be no further privatisation of an essential service – electricity generation – especially in the case of a company Karpowership that is notorious for unethical socio-environmental-economic behavior in relation to its supply of electricity, and especially in a time of climate catastrophe where Karpowership’s claims to be a lower-emissions source of power stand in contrast to the need for full decarbonisation and demethanisation of energy generation. The privatisation of electricity generation is bad public</p> | <p>In addition to Karpowership’s response, a detailed Climate Change Adaptation Assessment and Greenhouse Gas Emission Assessment will be included in the draft EIA Phase.</p> |

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| | <p>policy, given that the price paid to international operators – especially as the South African currency declines – is unreasonably high, and the potential to address other public policy objectives is reduced.</p> <p>In the case of Karpowership, the firm’s recent behaviour gives us pause, including its climate denialism in the Scoping Report, as discussed below.</p> <p>The main comparison Karpowership vessel to ones being proposed in South Africa is one operating in Mozambique, which is a joint venture with ship-builder Mitsui – the company responsible for a massively destructive oil spill by its ship Wakashio in Mauritius on 25 July 2020, for which it continues to evade full responsibility.</p> <p>According to Forbes magazine’s reporter, “Both Nagashiki and Mitsui OSK Lines issued apologies when the Wakashio first hit Mauritius’ reefs and kept referring to a response bound by ‘applicable law.’ This appears to characterize their approach, which they see as a legal one. Rather than acting ethically and transparently, their actions do not match their words. By withholding such information from the public domain that are crucial to the legal hearings of the Captain, this has further added to the atmosphere of mistrust in the country against these Japanese entities. (https://www.forbes.com/sites/nishandegnarain/2020/10/19/late-st-satellite-analysis-reveals-new-theory-for-deadly-wakashio-oil-spill-in-mauritius/?sh=67a1ed204ab1 19 October 2020)”</p> <p>The mistrust for Mitsui is also appropriate for Karpowership and its owner, Karadeniz Holdings, which in recent days, cut off power to the Sudanese government, due to the country’s inability to pay its high prices. The Karpowership SA handlings of the climate crisis and of public participation are exemplars of what should be avoided when new energy generation is considered.</p> <p>Karpowership climate denialism must be rejected</p> <p>The Karpowership proposal is exceptional for its climate denialism, at a time the greenhouse gas threat to the African continent is acute –</p> | |

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| | <p>with Nelson Mandela Bay itself suffering periodic Day Zero conditions as drought causes water shortages. Moreover, the carbon-intensity of the South African economy must be urgently reversed. This is also an imperative recognised by the President Ramaphosa's Economic Advisory Council, whose October 2020 statement specifically</p> | |

condemned the “more expensive power ships” that in 2020 appeared on the horizon:

South African Presidential Economic Advisory Council, “Briefing Notes on Key Policy Questions for South Africa’s Economic Recovery” (October 2020, pp.34-41):

Instead of aiming to bring online the low hanging fruit of short-lead-time, already developed and permitted renewable projects, the widely held view in the industry is that the “emergency” RMIPPP RFP is “extremely complicated” and appears to be specially written for more expensive power ships and gas-to-power projects and to exclude competition from renewables projects. None of these projects have environmental permits and will involve complex consultative and approval processes through our ports. This will delay their development and create significant risk that they will not be online by December 2021 and therefore not compliant with the legal requirements of the risk mitigation determination. They will also by their nature be more expensive. For these reasons it is expected that, if this procurement succeeds, it will result in expensive power and not meet the needs of our power emergency...

The electricity sector faces an almost perfect storm that has fundamentally disrupted its legacy technologies, strategies and business model. These forces include:

- the technical and financial failure of the centralised megaproject business model;
- a fundamental revolution in the sector’s technological paradigm driven by:
 - (a) the emergence of lowcost renewable energy and storage technologies; and
 - (b) the fourth industrial revolution including digital information and artificial intelligence technologies;
- the extreme economic risk and vulnerability created by our excessive dependence on coal in the context of the climate crisis and growing global pressures for rapid decarbonisation...

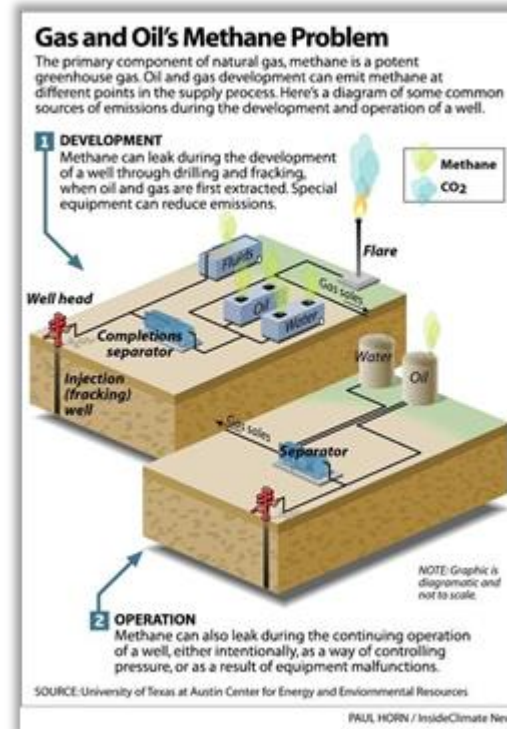
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Appropriate responses to the immediate challenge in the electricity sector will also support the achievements of the broader transition imperatives for South Africa's carbon intensive energy economy. Electrification will increasingly replace fossil fuels in transport and other industrial sectors, and over time renewable energy will displace coal as our main source of primary energy... To avoid being locked-in to a high-carbon path, and to actively turn our backs on stagnant innovation landscapes, policy must ensure that investments into low-carbon innovation are rewarded.



The CO₂-equivalent output of LNG depends upon the degree of systemic gas leakage – and again, the origins of Karpowership (and hence extraction and flaring emissions) are not specified in the Scoping Report – as well as the methane combustion process in the electricity generation itself. There is rising scientific concern regarding the climate-related damage done from methane (CH₄), whose global warming potential is more than 100 times that of the same mass of CO₂ on a 20-year time frame

with aerosol impacts included. The CH₄ leakage and other greenhouse gas emissions associated with Karpowership generation

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| | <p>are of crucial importance for South Africa, which has an extremely constrained carbon budget it must stay within to avert global climate catastrophe. It is unacceptable that the Karpowership trivialises these concerns, when they are urgent to address to avert our and other species' extinction.</p> <p>Rather than confront this reality, the Karpowership Draft Scoping Report is simply in denial about the climate crisis, aside from recognising that South Africa's Indian Ocean Coast has been subject to extreme storms.</p> <p>Revealingly, the Scoping Report offers no details of what degree of wind and storm surges a Karpowership (even one sheltered in a harbour) can withstand. Given that wind gusts of more than 200km/hour were witnessed in Cyclones Idai and Kenneth in March-April 2019 up the coast in Mozambique, given the winds and torrents of rain that were sufficient to dislodge containers from a ship in the Durban harbour in October 2017, and given the more than 70 deaths attributed to the extreme conditions in Durban and its South Coast in March 2019, there are naturally worries that Karpowerships will not withstand the new conditions of extreme weather. There are no specifications about these conditions, and especially how the accompanying highly-sensitive ship-to-shore electricity lines and gas pipelines will survive another extreme event.</p> <p>Moreover, not only do we see the Karpowership as a dangerous and unreliable source during such events, it is increasingly obvious that the company is a climate-denialist source of emissions that will not only pollute the atmosphere but take a much larger share of South Africa's carbon budget than is acceptable.</p> <p>The Karpowership SA Scoping Report is notable by how little is said about these emissions, either in the main study in two tokenistic, dismissing paragraphs, or in the Appendix C 'Impact Matrix' listing risks:</p> | |

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Appendix C: **Appendix C: Impact Matrix** (bottom line deals with Climate Change)

| ASPECT | NEW ASPECT DESCRIPTION | IMPACT ASSESSMENT | | | | MITIGATION OF IMPACTS | | | | IMPACT ASSESSMENT | | | | OVERALL SIGNIFICANCE | |
|-------------------------------|---|-------------------|--------|----------|-----------|-----------------------|--------------|-------------|--------------|-------------------|--------|----------|-----------|----------------------|-------------------------|
| | | SEVERITY | EXTENT | DURATION | FREQUENCY | AVOIDANCE | MINIMISATION | RESTORATION | COMPENSATION | SEVERITY | EXTENT | DURATION | FREQUENCY | | |
| ENVIRONMENTAL ASPECTS | | | | | | | | | | | | | | | |
| NOISE | | | | | | | | | | | | | | | |
| Working | Activities during the construction phase | 4.5 | L | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | Medium |
| Construction Phase | Use of 100-tonne excavator for re-landfilling | 4.1 | L | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | Low |
| Health of the Bay (HOB) | Change of HOB from medium assessment due to water loading | 4.2 | L | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | Very Low |
| Water Environment | Change in the water environment | 4.2 | L | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | Very Low |
| Air Quality | Construction site and work from existing infrastructure being described for the site | 4.2 | L | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | Low |
| Visual Amenity | The energy generation or gas delivery visual amenity with the project | 4.2 | L | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | Medium/Low (Short-term) |
| Wildlife Management | Wildlife management during construction | 4.2 | L | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | Very Low |
| Ecology | Use of 100-tonne excavator for re-landfilling or production energy, 20% PVE and PVE2 and others | 4.2 | L | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | Very Low |
| CLIMATE CHANGE ASPECTS | | | | | | | | | | | | | | | |
| Change of the Bay (HOB) | Construction or re-landfilling | 4.2 | L | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | Very Low |
| Green Change | Construction or re-landfilling | 4.2 | L | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | 4.2 | Low |

p.51

4.9.3 Climate Change Aspects

Regarding the climate change aspect, the Port of Ngqura site is considered to have a low sensitivity and associated risk with regard to climate change adaptation (Thermis Environmental- Coastal Impact Assessment, 2020). The only notable concerns is the increased incidence of extreme storms. These risks are minor because of the nature of the floating infrastructure and its location within the port. Again, the potential for the project to exacerbate existing climate change concerns is low, but cognisance must be taken of the increased fire risk associated with the 8.5km 132KV transmission line as well as the current and projected water stress during the operational phase of the project.

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| | <ul style="list-style-type: none"> ▪ The additive effect of the contribution from the Karpowership Project is predicted to be very small and the potential increase in ambient concentrations is highly unlikely to result in exceedances of the National Ambient Air Quality Standards (NAAQS). The severity of the additive impact associated with SO2 and PM is predicted to be insignificant, and small for NO2. ▪ Spatial Scale - In all cases the predicted ambient concentrations are low relative to the NAAQS and the highest predicted concentrations occur over the Coega SEZ. ▪ Consequences - the consequence of increased ambient concentrations of SO2, NO2 and PM10 from emissions from the Karpowership Project is predicted to be low. ▪ Frequency - impacts are unlikely to occur and the frequency is therefore predicted to be very low. ▪ Probability - the probability of impacts occurring is unlikely and is therefore predicted to be almost never. ▪ Likelihood - likelihood of air quality impacts occurring is also low. ▪ Significance - the significance of any impacts is predicted to be very low. <p>8.2.4 Climate Change</p> <p>These potential impacts are, however, mitigatable with appropriate management measures. The likelihood and significance of the above risks is rated as low and the project is likely to result in an overall increase in adaptive capacity rather than a decrease. Any climate change risks associated with the Port of Ngqura site are thus considered to be low and fully mitigatable with the implementation of appropriate measures (Thermis Environmental- Coastal Impact Assessment, 2020).</p> <p>Our concerns are widely acknowledged by experts, e.g. those asked by the Mail&Guardian in October 2020 about the merits of gas as a 'bridge' from coal to renewable:</p> | |

Leading energy experts comment on risks of Karpowership and natural gas bias

Mail&Guardian, 21 October 2020

Richard Worthington, the project manager of climate and energy at the South African office of the [Friedrich-Ebert-Stiftung](#), agrees with the advisory council's assessment. "I would say that people who pay attention are extremely worried about a big push to natural gas in South Africa," he said.

"There's long been concern about underestimation of the full carbon footprint of gas developments, particularly from methane leakage. Recently concerns are focusing more on transition risk and potential for stranded assets," he says.

"I believe the aggressive (though low-key) push for the [Karpowerships](#) [floating power plants], despite costs, is premised on an anachronistic enthusiasm for 'gas industrialisation' (as former energy minister Tina Joemat-Pettersson used to call it) that is in deep denial of current reality and risks."

Gas is a fossil fuel with significant global warming potential, say experts.

Alex Lenferna, a climate justice campaigner at [350.org](#), envisages gas as the "next battleground" in South Africa. "Gas is the new coal, so to speak. It's the new big source of pollution and is also the new source of centralised fossil fuel projects, which are centres for patronage and corruption in ways renewable energy is not ... The president's economic recovery plan was all about shortening environmental regulations and tapping into South Africa's vast oil and gas reserves."

There's clearly a determination within the department of mineral resources and energy to drive a gas agenda, alongside "clean coal", says David Hallows of environmental justice action group groundWork.

"This is, of course, in the absence of any public debate. A decision was clearly made but when, where and by who is obscure. So we get invited to participate in the strategic environmental assessment for gas pipeline corridors — but 'no go' is not seriously entertained. And we now have a whole slate of environmental impact assessments for individual gas power projects."

<https://mg.co.za/environment/2020-10-21-gas-sas-next-battleground/>

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| | <p>Public Participation</p> <p>a. Karpowership SA's public participation has been farcical because it has failed to reach majority of the Interested and Affected parties. SDCEA does not consider the public participation process being conducted by Triplo 4 to meet the objectives and requirements of the Constitution, for just administrative action, and of NEMA. NEMA requires that I&APs are provided with reasonable and adequate opportunities for participation by both the public and stakeholders as interested and affected parties (I&APs). In particular, in the principles set out in section 2, all people must have an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured. NEMA therefore promotes inclusive, effective, reasonable and adequate participation in the EIA process. SDCEA does not believe that online public meetings and documents only being available electronically achieves equitable and effective participation, particularly in respect of vulnerable and disadvantaged persons, including those who do not have access to internet or devices needed to participate.</p> <p>b. Whilst it is stated in the Scoping Report that the Public Participation Plan has been approved by the case officer in terms of the Directions from the Minister of Environment, Forestry and Fisheries of 5 June 2020 regarding measures to address, prevent and combat the spread of COVID-19 relating to Environmental Management Permits and Licences, it is also explicitly set out that "at all times it must be ensured that reasonable opportunity is provided for public participation and that all administrative actions are reasonable".</p> <p>c. On the information contained in the Scoping Report, not all potential I&APs have been identified, or are able to participate in online meetings or access online reports. There are many communities in South Africa who have not been notified or consulted in any reasonable manner.</p> | <p><u>Public Participation</u> We disagree with your statement that the public participation process for the EIA process to date has failed to reach the majority of Interested and Affected Parties (I&APs). The projects in all three areas have been advertised in the respective local newspapers not only in English, but also isiZulu (Richards Bay), iXhosa and Afrikaans (Ngqura) and Afrikaans (Saldanha Bay) calling on potential I&APs to register and participate in the EIA process.</p> <p>We also put up site notices, and notified all I&APs specified in the EIA Regulations, 20014, including landowners and occupiers of land, municipalities, ward councillors, ratepayer associations and relevant organs of state. We also note that a number of community-based organisations such as yourselves, and the Eastern Cape Network, WESSA, West Coast Bird Life, Bird Life, Cape Biosphere, Saldanha Water Quality Trust Forum, Green Point, Groundworks, Oceans not Oil, SANCOB, etc have registered as I&APs who in turn purport to represent a large number of other community-based organisations and communities.</p> <p>We have also liaised with local councillors and other local stakeholders to find out where it is best to put up notices, leave flyers and place the hard copy of the draft Scoping Report for easy public access. We agree that the Covid-19 pandemic has definitely made it more challenging to run public participation processes, but are of the view that our process does provide reasonable opportunity to</p> |

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| | <p>SDCEA also requests:</p> <p>A. that the applicants disclose the legal compliance reports relating to their existing operations in South Africa; and that the Applicant's source, amount and conditions of funding for the project is disclosed, accompanied by appropriate documentary proof.</p> <p>B. SDCEA further requests copies of all minutes of meetings and correspondence with PASA, DMRE and all other organs of state related to this application and the proposed activities.</p> | <p>I&APs, and this has been confirmed by DEFF in approving the public participation plan.</p> <p>Please also note that all three projects fall within Ports and Industrial Developments Zones where public access is highly restricted because of the nature of the industrial activities within these sites. We have however notified the nearest ward councillors, and ratepayers associations to ensure that neighbouring residents are represented in the EIA process, even if they themselves have not seen the notices and advertisements that have been locally placed.</p> <p>We attach a copy of the I&AP registers and kindly ask that alert us to any people or organisations who you know of through your networks who are likely to be affected by or have an interest in the Karpowership projects but who are not on these registers, so that we may contact them and invite their participation in the EIA process.</p> <p>A. <i>Please refer to Karpowership's response to this request.</i></p> <p>B. The minutes of meetings and correspondence from organs of state as part of the EIA process to date form part of the public participation record that has been appended to the Final Scoping Report for submission to DEFF. It will also be made publically available on Triplo4's website in due course.</p> |

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| | <p>C. During the EIA phase, need and desirability should be assessed taking into account alternative energy sources for the South African context, to give effect to “strategic concerns such as climate change, food security, as well as the sustainability in supply of natural resources and the status of our ecosystem services”. The competent authority must be provided with a comparative assessment of alternative technologies, including renewables, to provide the energy needs of South Africa.</p> <p>D. Further, the Scoping Report does not at this stage indicate how employment opportunities will be assessed. SDCEA submits that the EIA Report should include an accurate and detailed assessment of the employment opportunities to be created by the activities, including:</p> <ul style="list-style-type: none"> • the skill level required for any employment opportunities; • Who will be recruited to fill these positions (Will they be skilled or unskilled labour? Will South Africans be employed to fill these positions, or will they be international recruits?); • What the duration and long-terms impacts of these positions will be; and • Details of skills transfer and training of unskilled or less-skilled persons. <p>E. SDCEA has noted a tendency for marine impact assessments in offshore applications to rely on desktop research, based only on readily available information, without any primary research, and which fails to adequately assess the impacts of proposed exploration activities on coastal and marine ecosystems.</p> <p>F. An in-depth marine impact assessment should consider the impacts of all activities on marine and coastal ecosystems. This should include consideration of, inter alia, depletion of fish stocks, protected</p> | <p>C. While we have discussed the need and desirability of Karpowership’s proposed projects in relation to South Africa’s international agreements, domestic policy and legislative framework, including alternative energy sources and alternative technologies in the Scoping Report (see Section/s 3, 5 & 6), and will do so again in the EIA Report, providing DEFF with “a comparative assessment of alternative technologies, including renewables, to provide the energy needs of South Africa” is considered beyond the scope of the EIA process for this project.</p> <p>D. More detailed information about employment will be included in the EIA Report and social impact assessment report.</p> <p>E. A detailed ToR for Coastal and Marine ecosystems is proposed for the EIA Phase. Additionally, no exploration activities are proposed for the project.</p> |

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| | <p>marine species (particularly where stocks are in decline or in recovery), and marine protected areas. Further, the EAP should investigate the impacts on canyons, estuaries, wetlands and nurseries which serve as breeding grounds for South Africa's rich biodiversity.</p> <p>G. Primary research activities must be carried to inform the impact assessment, and raw data of all research should be included in the reports for public scrutiny.</p> <p>H. The Scoping Report contains little detail on the how incidents will be managed and mitigated, and SDCEA expects the EAP to provide detailed information about the response teams, resources, equipment and management, mitigation and response mechanisms.</p> <p>I. Given the potential environmental impacts of the proposed activities, and the devastating potential of a failure, SDCEA requests that all specialist reports:</p> <ul style="list-style-type: none"> • are prepared by specialists not in the employ of the EAP company; • include the terms of reference for the appointment of each specialist; • make available all raw data and information relied upon to form any conclusions or opinions; and • In accordance with good practice, are subject to independent specialist review. | <p>F. Refer to Section 9 (Plan of Study) of the Scoping Report which included a detailed list of the specialist studies that will be undertaken as part of the EIA Phase.</p> <p>G. The specialist assessments are being undertaken in compliance with the content requirements of Appendix 6 to the EIA Regulations and will be included as part of the EIA Phase.</p> <p>H. The EIA Report will include an Environmental Management Programme containing impact management outcome and actions to mitigate potential impacts, including those necessary to respond to incidents. These will be drawn from the specialist recommendations as well as input from the relevant landowners and managers, including the TNPA and the respective industrial development zones, namely the Coega Development Corporation.</p> <p>I. The EIA Regulations, 2014 (as amended) prescribe the requirements for specialists and specialist reports. Specifically, the Regulations allows for specialist to be employed by the same company as the EAP. In the case of the EIA process for the Karpowership projects, it is only the wetland specialist who is employed by Triplo4. Appendix 6 of the EIA Regulations requires that each specialist report</p> |

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| | <p>J. Firstly, we note that the proposed specialist studies do not include an economic impact assessment. In our view, this will constitute a fatal flaw. We therefore request that a comprehensive specialist economic impact assessment, in addition to a social impact assessment. These assessments should consider the social and economic impacts on, inter alia:</p> <ul style="list-style-type: none"> • local businesses and economies, particular in the event of a of an incident arising from the proposed activities; • all persons whose livelihoods are ocean-based, including those in fishing, commercial fishing, mariculture, tourism and recreation, shipping and transportation, whale-watching, ports and harbours, ship and boat-building, major recreation and sporting events, renewable energy production (wind and wave) and aquarium fishing; • the livelihoods of fisherfolk, as well as the mechanisms for compensation in the event that they are detrimentally impacted; and • Revenue resulting from local and international sale of marine resources, and industries which rely on the marine resources (fishmongers, canning, seafood restaurants, etc.) which could be significantly affected impacts on fish stocks. <p>K. The economic impact assessment should also consider natural capital accounting. South Africa suffers enormous annual</p> | <p>contains an indication of the scope of, and the purpose for which, the report was prepared.</p> <p>It also requires that the specialist reports indicate the quality and age of base data used for the specialist report and a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used. Certainly where there is a request for information that is not readily accessible in the specialist reports, we will make this information available. Currently, there is no legal requirement for specialist studies to be independently reviewed.</p> <p>J. A socio-economic impact assessment will be included as part of the EIA Phase. ToR will consider relevant economic impacts. A number of these aspects are not relevant to the project.</p> |

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| | resource losses in the form of depleted natural capital. But unlike primary commodity producers Norway, Canada or Australia, whose local firms and parastatal agency engage in extraction and then circulate the profits, this occurs in South Africa without foreign or local corporations making compensating reinvestments, or paying adequate taxes and royalties. For the African continent as a whole, this outflow of uncompensated natural capital depletion has amounted to roughly \$150 billion per annum over the past two decades, according to the World Bank's Changing Wealth of Nations ¹⁰ accounts published in 2018." | <p>K. Karpowership SA is a South African Company and compliance with SARS will be ensured. The proposed project is not built on a model where natural capital is utilised and results in natural resource losses. Refer to point D in Karpowership's response.</p> <p>16 November 2020</p> |
| <p>09 November 2020</p> <p>Email</p> <p>Anchor Energy</p> <p>Fiona Moir</p> | <p>"Please can you register the following persons on your IAP database for the Karpowership - Gas to Power Project - Port of Richards Bay.</p> <p>Christopher Mumby; chris@anchorenergy.co.za</p> <p>Fiona Moir; fiona@anchorenergy.co.za"</p> | <p>TRIPLO4: Your registration is acknowledged and you and Chris are now added to our database. Please note that the commenting period for the scoping report is completed, but you will be afforded an opportunity to comment in the EIA phase (next phase).</p> <p>As advertised, please kindly use this email address, namely ppprbay.triplo4@gmail.com, for communication related to this project.</p> <p>11 November 2020</p> |
| <p>10 November 2020</p> <p>Email</p> <p>RBCAA (Richards Bay Clean Air Association)</p> <p>Sandy Camminga</p> | <p>"Kindly receive the RBCAA's submission the DSR for the proposed Karpowership Project.</p> <p>As discussed telephonically with your office late yesterday afternoon, we were unable to meet yesterday's deadline due to technical issues.</p> <p>Thank you for your patience in this regard."</p> <p>The comments provided below are based on the Richards Bay Clean Air Association's (RBCAA's) review of the Draft Scoping Report (DSR) for the proposed Karpowership SA (Pty) Ltd Gas to Power via Powership.</p> | <p>Triplo4: Thank you for your comments, we hereby acknowledge receipt.</p> <p>10 November 2020</p> <p>TRIPLO4: Thank you for the comments on behalf of the Richards Bay Clean Air Association (RBCAA), received by Triplo4 Sustainable Solutions (Pty) on the 10 November 2020. We hereby respond to them in the order they were raised. Your comments, together with the responses, will be included in the final Scoping Report that will be submitted to the competent</p> |

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| | <p>PROJECT DESCRIPTION</p> <p>Karpowership SA (Pty) Ltd proposes to develop an LNG floating gas-to-power plant within the Port of Richards Bay. Three ships will be berthed during the project lifespan. A Floating Storage Regasification Unit (FSRU) and two Powerships. A Liquefied Natural Gas Carrier (LNGC) carrier will supply Liquefied Natural Gas (LNG) to the FSRU on a short-term basis. The natural gas will be pumped from the FSRU to the Powership via the development and operation of a subsea gas pipeline.</p> <p>The proposed design capacity for the Richards Bay Powership is 540MW (Although the BID states 554MW), which comprises of 27 gas engines. Electricity will be evacuated from the ship via a 132kV transmission line over a distance of approximately 3km, from the Richards Bay Port to the Bayside substation, to supply the national grid.</p> <p>COMMENTS</p> <p>1. Minutes of virtual Stakeholder Meeting held on 14th October: The minutes have to-date not been made available to Stakeholders. The RBCAA requested the minutes on 2nd November, and on 5th November we were informed that the minutes were still under review.</p> | <p>authority, the Department of Environment, Forestry and Fisheries.</p> <p>1. Minutes from the Webinar were finalised and circulated on the 14th November 2020 to all Stakeholders and registered I&APs. The minutes reflect the discussions held at the webinar, including your comment below on the Air Dispersion Modelling, as presented by Dr. Mark Zunckel from uMoya-Nilu (Air Quality Specialist): Ms Camminga from RBCAA had brought to attention that the study these findings were based on, ran up until 2017. However, in a WSP study performed from 2017 to 2019, it shows a considerable increase in PM₁₀ exceedances at different monitoring stations. There have been additional developments. She requested that this be considered in these studies.</p> <p>Following the meeting, Dr. Zunckel provided the following response below, which has been</p> |

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| | <p>2. Draft Scoping Report: The quality of the DSR in terms of legibility is an issue. Maps are unclear and legends are illegible.</p> | <p>appended to the minutes, and incorporated into the Final Scoping Report (Section 9.3.1.1): The baseline ambient air quality in Richards Bay for the proposed project was based on published data from 2004 to 2017. For PM₁₀ this data showed no exceedances and indicated a relatively high background concentration. The data referred to in the study performed from 2017 to 2019 showed an increase in PM₁₀ concentration in Richards Bay over this period. It is agreed that this more recent information adds to the understanding of background PM₁₀ concentrations.</p> <p>It must be noted that emissions of particulates from the proposed project are very low and the maximum predicted increase in PM₁₀ concentrations is less than 1 µg/m³. Regardless of the increase in ambient PM₁₀ concentrations shown by the 2017-2019 study, the proposed project will not result in a measurable increase in PM₁₀ concentrations in Richards Bay and will not introduce exceedances of the NAAQS. The specialist Atmospheric Impact Assessment Report will be made available for comment during the EIA process.</p> <p>2. In order to reduce the size of the document, the images were compressed which may have impacted on their quality. To resolve this, we have appended the layout maps in an appendix A for submission to DEFF as part of the final Scoping Report. We will adopt a similar approach in the EIA phase by appending the specialist reports, inclusive of maps, to the draft EIA Report in order to ensure good quality of these images.</p> |

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| | <p>3. Project Motivation: The BID states that; <i>“The proposed project is of utmost national strategic importance as it forms part of National Government’s intent to address the debilitation economic impacts of both the energy crisis as well as the COVID-19 pandemic on the country. The Richards Bay Port was identified as a preferred location as it meets the specifications for the proposed powership project and occurs within a close proximity to the Richards Bay Industrial Development Zone (RBIDZ)”</i></p> <p>The above is reiterated in the DSR. It is not understood what relevance the proximity to the RBIDZ has on this application. Neither do we understand what relevance the COVID-19 pandemic has as a motivation for this project. In our opinion both references are disingenuous and designed to exaggerate the benefits of the proposed project.</p> <ul style="list-style-type: none"> • How does this project benefit the RBIDZ ? • What debilitating economic impact of the COVID -19 pandemic is this project addressing? <p>4. Capacity: The BID states 554MW and the DSR states 540MW. Please can we have clarification?</p> <p>5. Project Lifespan: What is the lifespan of the Project?</p> <p>6. Liquefied Natural Gas Carrier (LNGC - Re-Fueling Vessel): There is no information in the DSR regarding the location of the LNGC, and associated impacts.</p> | <p>3. By the time the Draft Scoping Report was completed, the gravity of the Covid-19 pandemic and associated restrictions had eased, and so the reference to the pandemic was for the most parts removed. The only reference to it in the Draft Scoping Report is in relation to the public participation process (see sections 7.1 and 9.5.1). With regards to the proximity to Richards Bay Industrial Development Zone (RBIDZ), this was mentioned to put the project in a spatial/ land use perspective – the proposed site is within the port and adjacent to the RBIDZ, and as such, the site is within an area considered as economic hub, planned and used for industrial activities.</p> <p>4. The figure in the Draft Scoping Report (i.e. 540MW) is the correct one.</p> <p>5. The RMIPPPP stipulates a PPA term of 20 years, thus the lifespan of the project is 20 years. This was added to project description in the Final Scoping Report (Section 2.1).</p> <p>6. The location of the LNGC, when re-fuelling, is adjacent to the Floating Storage Regasification Unit (FSRU) as indicated in Figures 3-3 and 3-4 in the Draft Scoping Report. The LNGC will stay in this location within the port only during the re-fuelling, and thereafter will leave the port.</p> |

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| | <p>7. Request for Proposals Criteria (RFP): The DSR states that; <i>“The RFP stipulates stringent environmental, social and economic criteria, for example, the shift from coal and LPG to NG as a cleaner and more cost effective resource, BBBEE criteria and skills development.”</i></p> <p>The following information needs to be provided; a) How exactly is the proposed project going to meet BBBEE criteria? b) How many jobs will be created during construction and operation? c) Exactly what skills development will the proposed project bring to the local community?</p> | <p>7. According to Karpowership, projects will meet and exceed Economic Development qualification criteria stipulated within the RMIPPPP RFP. Karpowership will engage with local businesses and award contracts to local service providers for maintenance aspects as well as waste management, food and other daily consumables, They take pride in their positive impact on local communities through both social responsibility programs, tailored to the specific needs of the community, and the career opportunities that are provided.</p> <p>Karpowership projects create significant direct and indirect employment, driving knowledge and skills transfer across a broad spectrum of disciplines including some that are unique to floating power plants.</p> <p>Karpowership also emphasizes youth development as the future of our business, industry, and the local economy. As a globally recognized leader with 1,800+ direct employees, they provide an opportunity for South Africans, which will make up the majority of their personnel, to develop specific skills and knowhow which will ultimately benefit the South African economy. They will also be provided with the opportunity to become part of an internationally diverse team, gaining and sharing experience and knowledge either locally or worldwide alongside industry leading colleagues.</p> <p>There will be a significant number of local employees for both the construction and operation period which will exceed the Economic Development criteria that must be reached under</p> |

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| | <p>8. Transmission Lines Alternatives: Figures 3-7 and 3-8 on page 44: The DSR references outdated Google Earth imagery from 2004 and 2006, which misleads the reader into assuming that the area is currently disturbed, when in fact 2020 imagery disproves this assertion. Why was outdated imagery presented?</p> | <p>the terms of the RMIPPPP. They also believe that the job creation, including within the power generation function, will be comparatively more than a renewable energy project should the project be selected to proceed. Detailed job creation and other local economic development activities will be provided at preferred bidder stage during EIA preparation.</p> <p>This information was added to the Final Scoping Report, under Section 6.1 – Need and Desirability - Socio-economic.</p> <p>8. The imagery used in Figure 3-6 in the Draft Scoping Report (Transmission line route alternatives) is current as it is from 2020. As explained in Section 3.1.3.1 of the Draft Scoping Report, Figures 3-7 and 3-8 based on 2004 and 2006 imagery, were included to show how the area has transformed over time.</p> |

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Figure 3-7: Imagery from 2004 indicated that the area of the transmission lines has been disturbed



Figure 3-8: Imagery from 2006 indicated that the area of the transmission lines has been disturbed.

Google Earth imagery for 2020

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| |  <p>9. Fuel Alternatives: The DSR states that; <i>“The powerships engine technology provides for dual fuel usage and is capable of utilizing both Liquid Natural Gas and Heavy Fuel Oil as primary fuel sources. The powership generation process proposes the use of internationally sourced LNG gas supply.”</i></p> <p>There must be a guarantee that HFO will not be used under any circumstances. Not even as backup fuel should there be a shortage of LNG.</p> <p>10. Location: The proposed location places the Powership downwind of Port activities that generate significant dust. How will this impact on the operation of the proposed Powerships?</p> | <p>9. The power generation units can operate on both HFO and Gas as per their design. However Karpowership SA can and will give assurances that the operating fuel for power generation will be from LNG only and will NOT consume HFO for any part of the generation process. All our licenses, permits and approvals are for the consumption and use of LNG only. This clarity was added to the Final Scoping Report, Section 3.1.5 – Fuel Alternatives.</p> <p>10. The Powership’s Charge Air Filter (CAF) systems are designed and equipped with both wet and dry filtration systems, so that they can operate in such environments, including the location where organic or inorganic dusts exists. The workmanship or maintenance intervals of the CAF systems may be affected by the pollutant concentrations, but operations can still continue. The CAF system has proved itself at other locations, for example in Guinea Conakry) where the Powership is operating next to an iron ore exporting harbour. The CAF system information</p> |

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| | <p>11. Risk Assessment: Must include the assessment of the City's Disaster Management capacity, as well as the Port's capacity to respond to an incident at the facility.</p> <p>12. AEL Application: When is the AEL application process going to commence?</p> <p>13. Estuarine, Aquatic, Wetland, Vegetation, Marine Ecology & Climate Change Impacts: The RBCAA reserves comment on the above potential impacts until the specialist studies have been undertaken.</p> <p>14. Air Quality: The DSR states that an Atmospheric Impact Assessment has been undertaken by uMoya-NILU Consulting (Pty) Ltd. The report has not been made available during the Scoping phase. The listed assessment criteria provided on page 140 of the DSR does not reference cumulative and fugitive impacts.</p> | <p>was added to the description of the Powerships, Section 2.1.1 of the Final Scoping Report.</p> <p>11. Assessment of the City's Disaster Management capacity, as well as the Port's capacity to respond to an incident at the facility, will be included in the EIA phase (next phase). This was added to the Risk Assessment scope, Section 9.3.1.12.</p> <p>12. The Public Participation Process has commenced for the AEL, as per advertisements and notifications as part of the EIA process for environmental authorisation. The application for the AEL on SAAELIP will be made during the EIA phase (concurrently), and the licence can only be issued upon receipt of an environmental authorisation.</p> <p>13. Specialist studies will be included in the EIA Report (next phase), which will be made available to I&APs for comments for a period of 30 days, as indicated in the Plan of Study, Section 9.5.1 of the Draft Scoping Report.</p> <p>14. Cumulative impacts in terms of Atmospheric Impact Assessment will be addressed in the EIA phase, as per the below comments from the Air Quality Specialist (and as added to the Plan of Study, Section 9.3.1.1):</p> <p>a) The inclusion of emission from future and other sources in an assessment to assess their</p> |

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| | <p>The following must be assessed as part of the air quality specialist study;</p> <p>a) Cumulative Impact Assessment must include emissions from developments that have received authorisation i.e. Richards Bay Gas to Power, Eskom CCPP, Elegant Afro Chemicals Chlor-Alkali Plant, Hulamin (previously Isizinda) expansions, and the Mondi Upgrade.</p> <p>b) Fugitive Emissions</p> <p>The potential for a gas release resulting from a system failure during transfer and operation must be quantified.</p> | <p>cumulative effect in an area is not deemed a practical exercise. The assessment that is being conducted for the proposed project and cumulative impacts are assessed using current ambient air quality data and the potential additive effect of the project. In the case on this proposed project, the predicted ambient concentrations resulting from LNG combustion are very low. It is unlikely that that they will make a measurable difference (within the accuracy of the monitoring equipment) to current ambient concentrations. In the specialist's opinion, a cumulative assessment including existing and future other sources will not provide an answer that is any different to that currently included in the scope of the Atmospheric Impact Assessment.</p> <p>b) It very difficult to characterise fugitive emissions, transport (vehicles and shipping), wind dependant emissions like storage piles and open land, fires, agricultural emissions, and others that vary temporally and spatially. The complexity of the problem to develop an inclusive emission inventory to simulate ambient concentrations on an hourly basis and to assess these under worse-case meteorology can be appreciated. Always excluded is the contribution of emission sources outside the region of interest that also contribute to the areas air quality. In Richards Bay, this is particularly important as the background (not attributed to local sources) PM10 concentration is relatively high. The approach to include emissions for other sources in a cumulative assessment is flawed if all emissions are not included and characterised spatially and temporally.</p> <p>c) By comparison, ambient air quality monitoring is influenced by all possible</p> |

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| | <p>Will a detecting agent (Mercaptan) be added to the LNG, and if so at what point?</p> <p>It is not stated what period of monitoring data has been used in undertaking the air quality assessment. The data set must be current i.e. 2016 – 2019.</p> <p>The DSR states that <i>“Monitoring has shown ambient SO2 levels to be relatively low in the Richards Bay and below the NAAQS. “The RBCAA <u>disagrees</u> with this statement. SO2 exceedances have been, and continue to be measured at the two (2) ambient monitoring stations closest to the Port, namely Harbour West and Scorpio.</i></p> <p>In view of the above, the finding that air quality impacts resulting from the Karpowership Project are predicted to be “very low” is deemed premature.</p> | <p>contributing sources including those outside the area of interest, and measures continuously, i.e. during good dispersion conditions and in worse-case conditions. Assessing the modelled contribution of the project’s emissions to the monitored (existing) ambient concentrations is far more meaningful and provides a sound science-based indication of what future ambient concentrations might if the project was operational in the area.</p> <p>As reported by the applicant, leakages of gas from the FSRU, the LNG Carriers or the Powership are not anticipated, due to the design and procedures adopted by the applicant in managing the transportation, storage and regasification of LNG, undertaken with the primary purpose of 100% containment. Design features on-board the FSRU, Powership and incoming LNGC’s to re-fuel the FSRU are appropriately sighted gas detection systems within annular spaces surrounding the containment for advance warning of any contained leakages, as well as in the open atmosphere, to detect and mitigate the remote chance of any leakages during the transfer stages. This information was added to section 2.1.4 of the Final Scoping Report.</p> <p>These mitigation measures and others emanating from the risk assessment and other specialist reports will be incorporated into an Environmental Management Programme (EMPr) which will form part of the EIA Report (next phase). These draft reports will be made available early next year for I&AP comment, and you will be notified accordingly.</p> |

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| | <p>Thank you for affording the RBCAA the opportunity to comment. The RBCAA reserves the right to provide further comment should additional information become available.”</p> | <p>No odor will be added to the natural gas. Odorising agents are normally only added for gas distribution into a gas network, going to domestic properties. The proposed gas pipeline is only connected to the Powership and will have no connections to the wider network.</p> <p>According to Dr Zunckel, the Air Quality Specialist, the baseline ambient air quality in Richards Bay for the proposed project is based on published data from 2004 to 2017. It is agreed that this more recent information will add somewhat to the understanding of background ambient concentrations, but will not add anything to assessment conclusions, as the emissions are very low and predicted ambient concentrations will not add a measurable (within the capability of instruments) to the ambient concentrations. The specialist report will be made available for I&AP comment as part of the draft EIA Report in the next phase.</p> <p>The Air Quality Specialist disagrees with this statement. The Powership combusts LNG to generate power, and LNG has only trace amounts of sulphur, if any. LNG is the cleanest fuel possible, and the combustion of LNG does not result in SO2 emissions of any significance. Similarly, particulate emissions are very low. The maximum predicted SO2 concentrations resulting for the proposed project is well below 1 µg/m3, and it goes without saying that the predicted concentrations are less than this elsewhere over Richards Bay. The specialist therefore concludes that it is by no means premature to predict impacts resulting from the proposed project to be very low. The above</p> |

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| | | <p>information pertaining to the LNG emissions was added to the Final Scoping Report, Section 3.1.5.1 – Fuel Alternative, LNG. As mentioned, the specialist report will be available for I&AP comment as part of the draft EIA Report in the next phase.</p> <p>Thank you for your participation and I trust this response had assisted in providing further clarity to the concerns raised.</p> <p>17 November 2020</p> |
| <p>13 November 2020</p> <p>Email</p> <p>SAHRA – Maritime and Underwater Cultural Heritage</p> <p>Briege Williams</p> | <p>“I am just reading through the DSR for the above project and I have noticed that the subsea gas pipeline is stated as being 600cm in diameter....is this correct as this seems huge!”</p> <p>“Thanks for getting back to me, I did wonder if it was a typo and was meant to read 600mm.”</p> | <p>TRIPLO4: Thank you for the query, I double check again and the diameter of the proposed gas pipeline is 24 inch, which is equivalent to approx. 60cm (600mm). The DSR for Richards Bat site indicates 3m servitude, which accommodates the size of the pipeline. The size of the diameter will be clearly indicated as 24 inch in the final Scoping Report.</p> <p>I hope this provides clarity.</p> <p>13 November 2020</p> |

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| <p>17 November 2020</p> <p>Email</p> <p>City of uMhlathuze Municipality: Environmental Planning</p> <p>Sharin Govender</p> | <p>"I do not have your colleague, Chen Read's, email or any rep from the proponent. This was meant for them as well.</p> <p>The attached questionnaire, which I have taken the liberty to compile, refers.</p> <p>We held an internal meeting with internal role players of the Municipality this Monday, where we discussed the dire need for Integrated planning on Gas to power applications currently under review. I will be consolidating the info for our internal planning purposes and to make a presentation to our Executive Management and the IDZ/ Port Liaison committee.</p> <p>Feel free to leave out segments of the questionnaire that you find is classified and which compromise the IPP bid process.</p> <p>I would appreciate the info by Friday please.</p> <p>For the record, I will be sending this out to to 5 other Gas to Power application teams, including two more that we will be meeting with this week."</p> | <p>TRIPLO4: Thank you for your email, we are busy compiling the response.</p> <p>As you mentioned 5 other Gas to Power application, can you provide the contact details of EAP or the name of the projects as we were requested by the competent authority to account for cumulative impacts from other projects.</p> <p>Your assistance will be appreciated.</p> <p>18 November 2020</p> |
| <p>18 November 2020</p> | <p>"Sorry its 4 others (5 with Karpowership) and two more in the investor pipeliné which we still to meet on.</p> <p>The applications underway are :</p> <ol style="list-style-type: none"> 1. Richards Bay Gas to Power - IDZ 1 F - EAP Savannah 2. Eskom 3000 MV CAPP - IDZ 1D - EAP Savannah 3. Phinda 450 MW - Erf 184 Alton Rbay - Savannah 4. Nseleni Independent Floating Power Plant - Port/ old Bayside complex - SE Solutions 5. Karpowership - Triplo4" | <p>TRIPLO4: Thanks Sharin, much appreciated.</p> <p>Please find attached completed questionnaire and associated appendices.</p> <p>Please let us know if you have any queries.</p> <p>19 November 2020</p> |
| <p>20 November 2020</p> | <p>"I really appreciate the assistance from you and the team."</p> | |
| <p>19 November 2020</p> <p>Email</p> | <p>"Please will you register the following as I&AP's for the above project in Richards Bay Harbour.</p> | <p>TRIPLO4: The request for registrations is noted and these contacts were added to our database. Please note that Birdlife was already identified as an I&AP (a different contact person) and was</p> |

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| <p>CRUZ Environmental</p> <p>Prof. Digby Cyrus</p> | <ol style="list-style-type: none"> 1. Prof Digby Cyrus, CRUZ Environmental, e-mail: CRUZ-E@planetcoms.co.za 2. Wader Quest International, Contact Person: Rick Simpson, e-mail waderquest@gmail.com 3. Wader Quest South African Chapter, Contact Person: Sue Oertli, e-mail oertli68@gmail.com 4. Peter Sharland, contact e-mail: sharlandp@gmail.com 5. Dr Melissa Lewis, Policy & Advocacy Programme Manager, BirdLife South Africa e-mail: Melissa.Lewis@birdlife.org.za 6. Carron Dove, Secretary, BirdLife Port Natal, e-mail info@blpn.org 7. Carole Hills, Chairperson, BirdLife Zululand, e-mail: carole.hills@gmail.com 8. Dr Paul Rollinson, BirdLife Zululand, e-mail: pauldouglasrollinson@gmail.com <p>“Further to my e-mail below can you please use rick.simpson@waderquest.net as the contact for Wader Quest International, Contact Person: Rick Simpson.”</p> | <p>notified of the EIA/AEL application and the public participation for the Draft Scoping Report. Kindly further note that the public participation for the scoping report had concluded, but you all be notified and afforded an opportunity to comment on the next phase, namely the EIA report, anticipated early next year.</p> <p>20 November 2020</p> |
| <p>20 November 2020</p> <p>Email</p> <p>SAHRA – Maritime and Underwater Cultural Heritage</p> <p>Briege Williams</p> | <p>“I have seen on SHRAIS that an HIA has been uploaded by Jonathan Kaplan for the Port of Ngqura powership project but the DSR has not been included. As the HIA addresses only the land based heritage we will need to see the DSR and other relevant documents to review the impact to the seabed as I am assuming, like Saldana and Richards Bay, that there will be a gas pipeline? The procedure will be the same for this case as the previous two, please can you upload the relevant docs so that I will be able to issue a comment.</p> <p>In the meantime I will change the case status back to “Draft” and once the documents have been uploaded you can change it to “Submitted” and I will assign myself as case officer.</p> | <p>TRIPLO4: The below is noted with thanks, I have forwarded it to the assigned consultant for the Port of Ngqura /Coega site, and she will get back to you. The projects are similar at all 3 ports, but I’m not sure if in Coega the proposed gas pipeline is on the seabed or tied to the breakwater.</p> <p>With regards to the Richards Bay site – please advise if all is in order on your side or do you require anything else? Note that the Final Scoping Report was submitted to DEFF this week – not</p> |

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| | Thanks for your help.” | sure if you require the final to be uploaded on your system? 20 November 2020 |
| 20 November 2020 Email Richards Bay Industrial Development Zone (RBIDZ) – Legal Manager/Company Secretary Keith Harvey | <p>“The Richards Bay Industrial Development Zone Company SOC Ltd, in conjunction with the KwaZulu-Natal Department of Economic Development, Tourism and Environmental Affairs appointed EPCM Bonisana (Pty) Ltd to conduct a feasibility study to assess the viability of establishing an oil and gas hub connected to the deep-sea port of Richards Bay.</p> <p>The next Public Participation Session for the above project will be held virtually on 30 November 2020 from 09:00 to 15:00 (South African Standard Time).</p> <p>The study has identified and done a high-level feasibility on approximately 18 opportunities including a white product storage facility, white product facility, refinery, gas power plant, CNG filling station, LNG barge, OCGT plant, FSRU, conversion of Lilly Line, rig repair facility, multi-product pipeline to Durban, power wheeling, LNG export facility, dry dock and petrochemical complex.</p> <p>At the session on 30 November presentations will be made and discussions conducted on the following:</p> <ul style="list-style-type: none"> • Presentation - Summary of Previous Reports • Presentation - Labour Market and Skills Development Assessment • Presentation - Socio- Economic Impact Assessment • Presentation - Implementation Plan • Presentation - Financial Plan <p>Details of the session: Date: Monday, 30 Nov 2020</p> | <p>Thank you for the session on Monday. Please advise if the presentations will be circulated? we have missed some discussions</p> <p>02 December 2020</p> |

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| Email I&AP Liandra Bertolli | "I am an EAP as we as a vegetation ecologist and work in Richards Bay quite a bit :)" | I&APs database for all 3 Karpowership projects going forward. 07 January 2021 |
| 10 December 2020 14 December 2020 Email Aldine Armstrong Attorneys Aldine Armstrong | <p>"Please urgently forward us a copy of, or link to, the final scoping report for the Karpower Ship Gas Project. Kindly also forward us a copy of the Transnet landowner's consent that is required to be submitted with your final scoping report."</p> <p>"I refer to my email below. We have been advised that the final scoping report has been submitted to DEFF for the Richards Bay Karpowership project. If so we have not been notified of same by Triplo4 or provided with a copy. Kindly confirm whether the report has been submitted and please provide us with a copy. We also await a copy of the land owner consent from Transnet issued under the NEMA regulations and under the National Ports Act." "Dear Hantie Please urgently forward us a copy of, or link to, the final scoping report for the Karpower Ship Gas Project. Kindly also forward us a copy of the Transnet landowner's consent that is required to be submitted with your final scoping report."</p> | <p>TRIPLO4: We confirm that the final Scoping Report for the Karpowership project at Richards Bay has been submitted to DEFF.</p> <p>Please find the link below for a copy of this report, inclusive of annexures and landowner consents, except for Annexure D containing the Public Participation with I&AP database, correspondence and Comments and Response Report.</p> <p>https://drive.google.com/drive/folders/1dv9nzQtWq76dFjMEMKFaCut5xPoZOS1?usp=sharing</p> <p>We are busy redacting the contact details of private persons in these annexures in the interest of privacy, and once done, we will send these to you. 14 December 2020</p> <p>TRIPLO4: Please can you confirm receipt of my e-mail submitted at 13:13, as per trailing e-mail. We are still busy with the redacting of private details and will submit these documents as soon as completed.</p> <p>TRIPLO4: Thank you for the confirmation. Much appreciated.</p> |
| 14 December 2020 | "Confirm receipt thanks Hantie." | |

| RECORDS OF COMMENTS RAISED AFTER FINAL SCOPING REPORT SUBMISSION (from the 17 November 2020) | | |
|--|---|--|
| Date of Comment, format of comment, name of organisation/I&AP | Comment | Response from Triplo4/Applicant/Specialist |
| Email Newlyn Group Marco Rafinetti 15 December 2020 Aldine Armstrong Attorneys Aldine Armstrong | “Yes, thank you Hantie. I had battled to access the link, but it is working now.” | 14 December 2020 TRIPLO4: Thank you Aldine for confirming. 14 December 2020 TRIPLO4: With reference to the trail below, please note that Appendix D had been added to the drive, you can use the same link provided below. https://drive.google.com/drive/folders/1dv9nzQtWq76dFjMEMKFaCut5xPoZOS1?usp=sharing 15 December 2020 |
| 07 January 2021 Email I&AP Liandra Bertolli | “Thank you so much. Please may you send me the Impacts assessments?” | TRIPLO4: The impact assessment will be released for public review and comments during the EIA phase of the projects, and as a registered I&AP, you will be notified. 07 January 2021 |

| RECORDS OF COMMENTS RAISED AFTER NOTIFICATION OF ACCEPTANCE OF FINAL SCOPING REPORT SUBMISSION (from the 19 JANUARY 2021) | | |
|--|----------------|---|
| Date of Comment, format of comment, name of organisation/I&AP | Comment | Response from Triplo4/Applicant/Specialist |
| | | TRIPLO: Dear all registered I&APs and Stakeholders, Kindly see attached the notification of acceptance of the scoping report and plan of study for the |

RECORDS OF COMMENTS RAISED AFTER NOTIFICATION OF ACCEPTANCE OF FINAL SCOPING REPORT SUBMISSION (from the 19 JANUARY 2021)

| Date of Comment, format of comment, name of organisation/I&AP | Comment | Response from Triplo4/Applicant/Specialist |
|---|--|---|
| <p>19 January 2021</p> <p>Email</p> <p>I&AP</p> <p>Elizabeth Balcomb</p> | <p>“Please consider the environment before printing this email!! Are you serious? How about: please consider the environment before poisoning the air, water and soil with methane and radioactivity! You dont give a shit about the environment! You're a brain washed greedy arsehole whose grandchildren will die because of your actions! A terrible year to you, full of pain abd”</p> | <p>proposed Gas to Power Powership Project at the Port of Richards Bay.</p> <p>19 January 2021</p> <p>No response was provided to this personal and vile curse.</p> |
| <p>22 January 2021</p> <p>Email</p> <p>Redrocket Energy</p> <p>Magdalena Logan</p> <p>Janine Brasington</p> <p>22 January 2021</p> | <p>“Good morning Ms. Plomp,</p> <p>I hope that this email finds you well.</p> <p>Please could you kindly register my Colleague, Janine Brasington and myself, as an Interested and Affected Party (I&AP) for the Karpowership Scoping and EIA Processes for the following three projects of interest:</p> <ol style="list-style-type: none"> 1) Karpowership Gas to Power – Port of Ngqura 2) Karpowership Gas to Power – Port of Richards Bay 3) Karpowership Gas to Power – Port of Saldanha Bay” <p>“Thank you for the email.</p> <p>Our interest is to track the process and understand the impacts associated with the proposed technology.”</p> | <p>TRIPLO4: Reference is made to your request below.</p> <p>Kindly specify your interest in the Proposed Gas to Power Powership Project at the Port of Richards Bay.</p> <p>Please note that the Scoping Phase has been concluded and the Final Scoping report was approved by DEFF as per the notice attached.</p> <p>All communication regarding the Richards Bay project can be directed to this email address.</p> <p>22 January 2021</p> |

RECORDS OF COMMENTS RAISED AFTER NOTIFICATION OF DRAFT ENVIRONMENTAL IMPACT REPORTING PHASE (from the 22 FEBRUARY 2021)

| Date of Comment, format of comment, name of organisation/I&AP | Comment | Response from Triplo4/Applicant/Specialist |
|---|--|---|
| <p>22 February 2021</p> <p>Email</p> | <p>“Dear BLPN member or visitor</p> <p>Many thanks for your email. Please note that this email box will be monitored only intermittently between the 15 February and 5</p> | <p>Triplo4: Automatic “Out of Office Response” was noted and the email was forwarded to the alternative contact provided.</p> |

RECORDS OF COMMENTS RAISED AFTER NOTIFICATION OF DRAFT ENVIRONMENTAL IMPACT REPORTING PHASE (from the 22 FEBRUARY 2021)

| Date of Comment, format of comment, name of organisation/I&AP | Comment | Response from Triplo4/Applicant/Specialist |
|---|---|--|
| <p>Birdlife Port Natal Nicolette Forbes</p> | <p>March. This means you will get a response but not an IMMEDIATE reply so please be patient. If you have an urgent query please contact the Vice-Chair Mike du Trevou (mikedut@mweb.co.za) or Activities Co-ordinator Jane Morris (janette@mweb.co.za)</p> <p>In the meantime our activities will continue through March, If you wish to query your membership invoice or payment please contact Shireen Gould at BirdLife South Africa (membership@birdlife.org.za)."</p> | <p>24 February 2021</p> |
| <p>22 February 2021 Email KZN Department Of Transport Michele Schmid</p> | <p>"Good day, Should you be following up on your application, I do apologise for the delay in our response. I shall get a response to you as soon as possible. Thank you for your patience & understanding. Please forward all new applications to Judy Reddy (224 Prince Alfred Street, PMB), (email: judy.reddy@kzntransport.gov.za)."</p> | <p>Automatic "Out of Office Response" was noted and the email was distributed on the 22 February 2021.</p> |
| <p>22 February 2021 Email Dept. Agriculture Forestry & Fisheries Sub Directorate: Forestry Regulations & Support Thembalakhe Sibozana</p> | <p>"Good Afternoon Hantie Plomp, The department will comment upon the receipt of the copy of the report. Please send through the link for the meeting."</p> | <p>TRIPLO4: Dear Thembalakhe, Noted and the link to the meeting will be circulated closer to the time of the meeting. 24 February 2021</p> |
| <p>22 February 2021 Email SAHRIS Briege Williams</p> | <p>"Please can you upload the EIR onto SAHRIS for comment under case ID 15688. Please let me know if you need any assistance."</p> | <p>TRIPLO4: Thank you, we will upload as requested. 24 February 2021</p> |
| <p>22 February 2021</p> | <p>"Good day</p> | <p>TRIPLO4: Thank you, we will upload as requested.</p> |

RECORDS OF COMMENTS RAISED AFTER NOTIFICATION OF DRAFT ENVIRONMENTAL IMPACT REPORTING PHASE (from the 22 FEBRUARY 2021)

| Date of Comment, format of comment, name of organisation/I&AP | Comment | Response from Triplo4/Applicant/Specialist | | | |
|--|---|--|-------|------------------------|--|
| <p>Email</p> <p>Archaeology Research and Compliance/Permits</p> <p>KwaZulu –Natal Amafa and Research Institute</p> <p>Bernadet Pawandiwa</p> | <p>Thank you for notifying us. Please upload the documents onto the SAHRIS facility.”</p> | <p>24 February 2021</p> | | | |
| <p>23 February 2021</p> <p>Email</p> <p>Intern: Biodiversity Mainstreaming EIA</p> <p>Department of Environment, Forestry & Fisheries</p> <p>Aulicia Maifo</p> | <p>“Good morning Chen</p> <p>Hope you are well.</p> <p>DEFF Directorate: Biodiversity Conservation hereby acknowledge the receipt of the invitation to review and comment on the proposed Gas-To-Power powership project Draft Environmental Impact Assessment Report (DEIA). Kindly note that this project has been allocated to the officers, Ms. Mmatlala Rabothata and Ms. Tsholofelo Sekonko (both copied on this email).</p> <p>Please note that all Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of Mr Seoka Lekota.”</p> | <p>TRIPLO4: Dear Aulicia,</p> <p>Thank you for the acknowledgement and we will follow your instructions below when distributing the draft EIA report.</p> <p>23 February 2021</p> | | | |
| <p>23 February 2021</p> <p>Email</p> <p>Transnet Port Terminals – Richards Bay</p> <p>Themba Sithole</p> | <p>“Good day Mrs Plomp</p> <p>Hope this mail finds you well. As Richards Bay Port Terminal , we would like to register as Interested and Affected Parties (I&APs). Please assist with the process”</p> | <p>TRIPLO4: Good afternoon Themba,</p> <p>Please note that you and your colleagues who were cc'd on your email below have been added to the database. Also note that the following people from Transnet were already registered as I&APs for this project. I trust al is in order.</p> <table border="1" data-bbox="1429 1331 2069 1423"> <tr> <td data-bbox="1429 1331 1541 1423">Thami</td> <td data-bbox="1541 1331 1675 1423">Sithole (Port Manager)</td> <td data-bbox="1675 1331 2069 1423">Thami.Sithole@transnet.net</td> </tr> </table> | Thami | Sithole (Port Manager) | Thami.Sithole@transnet.net |
| Thami | Sithole (Port Manager) | Thami.Sithole@transnet.net | | | |

RECORDS OF COMMENTS RAISED AFTER NOTIFICATION OF DRAFT ENVIRONMENTAL IMPACT REPORTING PHASE (from the 22 FEBRUARY 2021)

| Date of Comment, format of comment, name of organisation/I&AP | Comment | Response from Triplo4/Applicant/Specialist | | | | | | | | | | | | | | | | | | |
|---|--|--|-------|--------|--|------|-------|--|----------|--------|--|---------|--------|--|-------|-----------|--|--------|----------|--|
| | | <table border="1"> <tr> <td>Basil</td> <td>Ngcobo</td> <td>Basil.Ngcobo@transnet.net</td> </tr> <tr> <td>Vuyo</td> <td>Keswa</td> <td>Vuyo.Keswa@transnet.net</td> </tr> <tr> <td>Ntombela</td> <td>Martha</td> <td>Martha.Ntombela@transnet.net</td> </tr> <tr> <td>Lungile</td> <td>Nyembe</td> <td>Lungile.Nyembe@transnet.net</td> </tr> <tr> <td>Mbali</td> <td>Mathenjwa</td> <td>Mbali.Mathenjwa@transnet.net</td> </tr> <tr> <td>Ayanda</td> <td>Somagaca</td> <td>Ayanda.somagaca@transnet.net</td> </tr> </table> <p>23 February 2021</p> | Basil | Ngcobo | Basil.Ngcobo@transnet.net | Vuyo | Keswa | Vuyo.Keswa@transnet.net | Ntombela | Martha | Martha.Ntombela@transnet.net | Lungile | Nyembe | Lungile.Nyembe@transnet.net | Mbali | Mathenjwa | Mbali.Mathenjwa@transnet.net | Ayanda | Somagaca | Ayanda.somagaca@transnet.net |
| Basil | Ngcobo | Basil.Ngcobo@transnet.net | | | | | | | | | | | | | | | | | | |
| Vuyo | Keswa | Vuyo.Keswa@transnet.net | | | | | | | | | | | | | | | | | | |
| Ntombela | Martha | Martha.Ntombela@transnet.net | | | | | | | | | | | | | | | | | | |
| Lungile | Nyembe | Lungile.Nyembe@transnet.net | | | | | | | | | | | | | | | | | | |
| Mbali | Mathenjwa | Mbali.Mathenjwa@transnet.net | | | | | | | | | | | | | | | | | | |
| Ayanda | Somagaca | Ayanda.somagaca@transnet.net | | | | | | | | | | | | | | | | | | |
| <p>23 February 2021</p> <p>Email</p> <p>Dynamic Energy</p> <p>Darryl Hunt</p> | <p>“Hi there</p> <p>I confirm receipt.</p> <p>Many thanks”</p> | <p>TRIPLO4: Dear I&APs and Stakeholders,</p> <p>Please note that due to delivery failure we received from your email, we are forwarding the notification again - kindly refer to the email below and attachment.”</p> <p>23 February 2021</p> | | | | | | | | | | | | | | | | | | |
| <p>24 February 2021</p> <p>Email</p> <p>University of Cape Town</p> <p>Aphiwe Moshani</p> | <p>“To whom it may concern</p> <p>Can you kindly direct me to the appropriate platform for I&AP registration for the proposed gas to power powership project at the port of Richards Bay.”</p> <p>“Dear Hantie</p> | <p>TRIPLO4: Dear Aphiwe,</p> <p>Your registration request is acknowledged and we have added you to the I&APs database. Please can you kindly declare your interest in this project?</p> <p>24 February 2021</p> | | | | | | | | | | | | | | | | | | |

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| Date of Comment, format of comment, name of organisation/I&AP | Comment | Response from Triplo4/Applicant/Specialist |
|---|--|--|
| | Thank you. My interest in the project is in my capacity as a coastal communities researcher at the University of Cape Town.” | |