

Comments and Responses Table: CDC Gas to Power Gas Infrastructure Project

This Comments and Responses Table presents the comments and issues raised by Competent Authority (CA) on the Final Scoping Report (FSR) as well as during the ELC meeting held on 19 November 2020.

Comments are reproduced verbatim and are grouped according to CA. Responses to comments made on the FSR and raised in the ELC meeting have been provided for in the Draft Environmental Impact Report (EIR). It should be noted that comments raised during the ELC meeting undertaken on 18 February 2021 will be included and responded to in the Final EIR.

Responses to issues are provided by one or more of the following parties:

- SRK: responses recorded in the table are made by SRK, unless otherwise indicated. SRK responses are as a rule limited to issues that relate to the EIA process; and
- CDC design team: responses applicable to the proposed development.
- Relevant specialists contracted to the project: responses applicable to their particular scopes of work.

Copies of all original comments received by SRK during the EIA Phase (including the comments on the FSR) are collated in Appendix G of the Draft EIR

IAP Database

Table 1: Updated database of registered IAPs, Stakeholders and Authorities

Name	Organisation	Capacity	Notified	Registered
Mr Dayalan Govender	Department of Economic Development, Environmental Affairs & Tourism	Regional Manager	✓	✓
Mr Andries Struwig	Department of Economic Development, Environmental Affairs & Tourism	Assistant Director IEM	✓	✓
Mr Sibulele Nondoda	Department of Economic Development, Environmental Affairs & Tourism	Coastal Zone Management (Cacadu Region)	✓	✓
Mr Lyndon Mardon	Department of Economic Development, Environmental Affairs & Tourism	Manager: Air Quality	✓	✓
Dr Monde Mayekiso	Department of Environmental Affairs: Ocean And Coast	Coastal Pollution Management	✓	✓
Mrs Nitasha Baijnath-Pillay	Department of Environmental Affairs: Ocean And Coast	Coastal Pollution Management	✓	✓
Mr Reuben Molale	Department of Environmental Affairs: Ocean And Coast	Coastal Pollution Management	✓	✓
Dr Yazeed Peterson	Department of Environmental Affairs: Ocean And Coast	Coastal Pollution Management	✓	✓

Name	Organisation	Capacity	Notified	Registered
Mr Mulalo Tshikotshi	Department of Environmental Affairs: Ocean And Coast	Pollution Manager	✓	✓
Ms Milicent Solomons	Department of Environment Forestry and Fisheries	Director: Strategic Infrastructure Development	✓	✓
Mr Muhammad Essop	Department of Environment Forestry and Fisheries	Assistant Director –:Priority Infrastructure Projects	✓	✓
Mr Coenrad Agenbach	Department of Environment Forestry and Fisheries	Strategic Infrastructure Development	✓	✓
Mrs Masina Lotsoane	Department of Environment Forestry and Fisheries	Environmental Impact Management	✓	✓
Mr Wayne Hector	Department of Environment Forestry and Fisheries	Deputy Director: Strategic Infrastructure Development	✓	✓
Dr Thuli Mdluli	Department of Environment Forestry and Fisheries	Air Quality Manager	✓	✓
Ms Lerato Moha	Department of Environment Forestry and Fisheries	Air Quality	✓	✓
Mr Vumile Senene	Department of Environment Forestry and Fisheries	Air Quality	✓	✓
Adv Avhantodi Munyai	Department of Environment Forestry and Fisheries	Air Quality	✓	✓
Mr Olebogeng Matshediso	Department of Environment Forestry and Fisheries	Air Quality	✓	✓
Mr Stanley Tshitwamolomoni	Department of Environment Forestry and Fisheries	Biodiversity	✓	✓
Mr. Soeka Lekota	Department of Environment Forestry and Fisheries	Biodiversity		
Mr Sibonele Mbanjwa	Department of Environment Forestry and Fisheries	Climate Change adaptation	✓	✓
Mr Mapula Tshangela	Department of Environment Forestry and Fisheries	Climate Change mitigation	✓	✓
Mr Mactavish Makwarela	Department of Environment Forestry and Fisheries	Climate Change mitigation	✓	✓
Mr Jongikhaya Witi	Department of Environment Forestry and Fisheries	Climate Change monitoring and evaluation	✓	✓
Ms Phumeza Skepe	Department of Environment Forestry and Fisheries	Environmental Impact Management	✓	✓
Ms Marisa Bloem	Department of Water & Sanitation	Water Use Licences	✓	✓
Ms Thandi Mmachaka	Department of Water & Sanitation	Water Quality Management	✓	✓

Name	Organisation	Capacity	Notified	Registered
Ms Ncumisa Mnotoza	Department of Water & Sanitation	Water Quality Management	✓	✓
Ms Babalwa Layini	Department of Agriculture, Forestry & Fisheries	Forestry Officer	✓	✓
Mr Sello Mokhanya	Eastern Cape Provincial Heritage Resources Agency	Heritage Officer	✓	✓
Mr Monde Manga	Department of Public Works	District Roads Engineer	✓	✓
Mr McDonald Mdhuli	Department of Mineral Resources	Environmental Management	✓	✓
Ms Deidre Thompson	Department of Mineral Resources	Deputy Director: Mine Environmental Management	✓	✓
Mr Azwihangwisi Mulaudzi	Department of Mineral Resources	Manager	✓	✓
Ms Brenda Ngebulana	Department of Mineral Resources	Acting Regional Manager	✓	✓
Mr Vusi Kubheka	Department of Mineral Resources	ASD: Mineral Regulation	✓	✓
Ms Ane Oosthuizen	Sanparks		✓	✓
Br Rob Milne	Sanparks		✓	✓
Adv Lungisa Malgas	SAHRA	Chief Executive Officer		
Mr Yolán Freeman	Endangered Wildlife Trust			
Mr Mark Anderson	Bird Life SA	Chief Executive Officer		
Ms Veronique Fyfe	G7 Renewable Energies (Pty) Ltd			
Mr Randall Moore	ECDOT	District Roads Engineer Sarah Baartman Region		
Mr Anton Rautenbach	Telkom SA	Wayleave Management EC	✓	✓
Ms Andrea Shirley	CDC	Environmental Management	✓	✓
Mr Graham Taylor	CDC	Spatial Development	✓	✓
Ms Khuthala Somdaka	CDC		✓	✓
Mr Duane Mouton	CDC		✓	✓
Ms Viwe Biyana	CDC		✓	✓
Mr Mandilakhe Mgodana	TNPA	Environmental Management	✓	✓
Mr Thulani Debeko	TNPA	Harbour Master	✓	✓

Name	Organisation	Capacity	Notified	Registered
Mr Elliot Motsoahole	TNPA	Environmental Management	✓	✓
Ms Renee de Klerk	TNPA	Environmental Officer	✓	✓
Mr Mpatisi Pantsi	TNPA	SHE Manager	✓	✓
Mr Chuma Mtati	Eskom	Distribution	✓	✓
Mr Raymond Couch	Telkom	Operations Manager	✓	✓
Ms Adele Bezuidenhout	Department of Labour	Operations	✓	✓
Ms Chumisa Njingana	SANRAL	Statutory Control Officer	✓	✓
Ms Annedene Bantom	Transnet	Operations Manager	✓	✓
Ms Bongji Stofile	SAMSA	Operations Manager	✓	✓
Ms Nivashni Govender	AfriSam (South Africa) (Pty) Ltd	Coega SEZ tenant	✓	✓
Mr John Drinkwater	Cerebos Ltd	Coega SEZ tenant	✓	✓
Mr Adrian Vardy	Dynamic Commodities	Coega SEZ tenant	✓	✓
Mr George Yerolemou	Acoustex	Coega SEZ tenant	✓	✓
Joy De Plessis	Sanitech	Coega SEZ tenant	✓	✓
Magna Van Blerk	Sanitech	Coega SEZ tenant	✓	✓
Frans Stapelberg	Stapelberg Prop Trust	Coega SEZ tenant	✓	✓
Aaron Lench	The Courier Guy	Coega SEZ tenant	✓	✓
Duane Calitz	Cape Concentrate	Coega SEZ tenant	✓	✓
JOY DE PLESSIS	UTI	Coega SEZ tenant	✓	✓
Mr Jamie Wates	UTI	Coega SEZ tenant	✓	✓
Mr Alistair Stallenberg	Digistics	Coega SEZ tenant	✓	✓
Mr Jackson Tutu	Digistics	Coega SEZ tenant	✓	✓
Mr Raymond Mumble	Digistics	Coega SEZ tenant	✓	✓
Mr Ashwin Langeveldt	Bosun Bricks	Coega SEZ tenant	✓	✓
Ms Chantell Spence	Bosun Bricks	Coega SEZ tenant	✓	✓

Name	Organisation	Capacity	Notified	Registered
Mr Wayne Poultan	Bosun Bricks	Coega SEZ tenant	✓	✓
Mr Gonzalo Ramirez	Ecxcelerate Energy	Coega SEZ tenant	✓	✓
Ellian Peterson	Discovery Health	Coega SEZ tenant	✓	✓
Hennie van Staden	Discovery Health	Coega SEZ tenant	✓	✓
Mr Bheki Mr Zondo	Discovery Health	Coega SEZ tenant	✓	✓
Mr David Pierre-Eugene	Discovery Health	Coega SEZ tenant	✓	✓
Mr Llewelyn Driver	Discovery Health	Coega SEZ tenant	✓	✓
Mr Patrick Barrett	Discovery Health	Coega SEZ tenant	✓	✓
Mrs Tamlyn Anne Ferreira	Discovery Health	Coega SEZ tenant	✓	✓
Mr Arnold Barnard	Famous Brands	Coega SEZ tenant	✓	✓
Ms Gloria January	Famous Brands	Coega SEZ tenant	✓	✓
Mr Johan Engelbrecht	Ibis	Coega SEZ tenant	✓	✓
Mr Bob Gale	Osho SA Cement	Coega SEZ tenant	✓	✓
Mr Herbert Ball	CorroMaster	Coega SEZ tenant	✓	✓
Ms Tarryn Shinn	CorroMaster	Coega SEZ tenant	✓	✓
Hendrick Du Preez	CEMZA	Coega SEZ tenant	✓	✓
Jose Espinosa	GMSA	Coega SEZ tenant	✓	✓
Adri De Meillon	Hella	Coega SEZ tenant	✓	✓
Donovan Theron	Hella	Coega SEZ tenant	✓	✓
Theo Theuner	Hella	Coega SEZ tenant	✓	✓
Philip Pieterse	Hichange Inv Pty Ltd	Coega SEZ tenant	✓	✓
Mariane Van Rooyen	HIMOINSA	Coega SEZ tenant	✓	✓
Martin Foster	HIMOINSA	Coega SEZ tenant	✓	✓
Steven Gottschalk	Holding 302-308 Pmona Pty Ltd	Coega SEZ tenant	✓	✓
Mr Kobus Bernardo	Redefine Properties	Landlord - GM	✓	✓
Coollen Griffith	Parmalat	Coega SEZ tenant	✓	✓
Lynette Barnard	Parmalat	Coega SEZ tenant	✓	✓

Name	Organisation	Capacity	Notified	Registered
Charl De Lange	PE Cold Storage	Coega SEZ tenant	✓	✓
Mr Craig Vaughn	PE Cold Storage	Coega SEZ tenant	✓	✓
Mr George Efstratiou	PE Cold Storage	Coega SEZ tenant	✓	✓
Mr Sean Kelly	PE Cold Storage	Coega SEZ tenant	✓	✓
Mr Johann Schlebusch	Coega Dairy	Coega SEZ tenant	✓	✓
Mr Victor Korsten	Coega Dairy	Coega SEZ tenant	✓	✓
Mr Mark Harris	Coega Dairy	Coega SEZ tenant	✓	✓
Ms Melissa Visser	Coega Dairy	Coega SEZ tenant	✓	✓
Mr Philip Nieman	Coega Dairy	Coega SEZ tenant	✓	✓
Ms Beth Hurr	Isuzu Motors	Coega SEZ tenant	✓	✓
Mr Gareth Woods	Ke Nako Concrete	Coega SEZ tenant	✓	✓
Mr Jerome Perils	Ke Nako Concrete	Coega SEZ tenant	✓	✓
Shaldon Chetty	MSC SEZ	Coega SEZ tenant	✓	✓
Mr Andro Stylianou	National Ship Chandlers	Coega SEZ tenant	✓	✓
Mr George Charalambous	National Ship Chandlers	Coega SEZ tenant	✓	✓
Mr Heinrich Vosloo	Dynamic Commodities	Coega SEZ tenant	✓	✓
Mr Marc Later	Dynamic Commodities	Coega SEZ tenant	✓	✓
Mr Murray Prince	Dynamic Commodities	Coega SEZ tenant	✓	✓
Mr Ben Fouche	BAIC SA	Coega SEZ tenant	✓	✓
Komkulu Schultz	BAIC SA	Coega SEZ tenant	✓	✓
Mr Wayne Poultan	Bosun Brick	Coega SEZ tenant	✓	✓
Ms Ashley Main	FAW	Coega SEZ tenant	✓	✓
Haiyang Yao	FAW	Coega SEZ tenant	✓	✓
Mr Jeremy Staltz	FAW	Coega SEZ tenant	✓	✓
Mr Louis Liu	FAW	Coega SEZ tenant	✓	✓
Andile Qwase	Afrox	Coega SEZ tenant	✓	✓
Dhiroshan Moodley	Agni Steel	Coega SEZ tenant	✓	✓
Hassan Kahn	Agni Steel	Coega SEZ tenant	✓	✓

Name	Organisation	Capacity	Notified	Registered
Sharaz Khan	Agni Steel	Coega SEZ tenant	✓	✓
Mr Karl McLachlan	APM Terminals	Coega SEZ tenant	✓	✓
Mr Len Mulders	Bacarac Foods	Coega SEZ tenant	✓	✓
Mr James Classen	Dedisa Peaking Power	Coega SEZ tenant	✓	✓
Ms Magriet Lombard	Dedisa Peaking Power	Coega SEZ tenant	✓	✓
Mr Mark Snyman	NTI	Coega SEZ tenant	✓	✓
Mr Charles Lumsden	Ocean Legacy Marine Engineering	Coega SEZ tenant	✓	✓
Mr Pieter Van Heerden	Ocean Legacy Marine Engineering	Coega SEZ tenant	✓	✓
Jurie Schoeman	Vector Logistics	Coega SEZ tenant	✓	✓
Rudo Stoltenkamp	Vector Logistics	Coega SEZ tenant	✓	✓
Sonia Gunn	Vector Logistics	Coega SEZ tenant	✓	✓
Mr Brian Windsor	WNS	Coega SEZ tenant	✓	✓
Ms Suria Peters	WNS	Coega SEZ tenant	✓	✓
Ms Beverly Brennan	Zacpack / CFR	Coega SEZ tenant	✓	✓
Mr Len Cowley	Zacpack / CFR	Coega SEZ tenant	✓	✓
Mr Hugo Badenhorst	PPC	Risk Manager	✓	✓
Mr Karl Heese	PPC	Risk Manager	✓	✓
Mr Vincent Ntuli	Air Products SA	Coega SEZ tenant	✓	✓
Mr JP van Wyk	Air Products SA	Regional Manager	✓	✓
Mr Sherwin Harris	Engie	Coega SEZ tenant	✓	✓
Ms Seshni Naidoo	Engie	Coega SEZ tenant	✓	✓
Mr Michael Steiner	Engie	Coega SEZ tenant	✓	✓
Mr Christophe Crillon	Engie	Coega SEZ tenant	✓	✓
Mr Tebogo More	Engie Southern Africa	Coega SEZ tenant	✓	✓
Dr Paul Martin	Private	Independent Environmental Control Officer	✓	✓
Ms Jenny Rump	Zwartkops Conservancy	Environmental Manager	✓	✓
Mr Morgan Griffiths	WESSA	Senior Conservation Officer	✓	✓

Name	Organisation	Capacity	Notified	Registered
Dr Chantell Bezuidenhout	EOH Coastal & Environmental Services	Principal Consultant	✓	✓
Dr Mike Cohen	CEN IEM Unit	Principal Consultant	✓	✓
Dr Philip Whittington	East London Museum	Research Associate	✓	✓
Mr Gonzalo Ramirez	Excelerate Energy	Interested Party	✓	✓
Mr Gavin Eales	Glendore Sand & Stone	Interested Party	✓	✓
Mr Bertus van Niekerk	Mulilo Thermal Project Development	Interested Party	✓	✓
Mr Thomas Jachens	AfriCoast	Interested Party	✓	✓
Ms Sherina Shaw	Leads 2 Business	Interested Party	✓	✓
Cllr Nomazulu Mthi	Nelson Mandela Bay Municipality	Ward 53 Councillor	✓	✓
Mr Khaled El-Jabi	Nelson Mandela Bay Ratepayers Association	Ratepayers Association	✓	✓
Mr Johan Potgieter	Nelson Mandela Bay Municipality	Disaster Management	✓	✓
Mrs Joannie Black	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Ms Buyiswa Deliwe	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Mrs Jill Miller	Nelson Mandela Bay Municipality	Environmental Manager	✓	✓
Ms Rosa Blaauw	Nelson Mandela Bay Municipality	Environmental Manager	✓	✓
Mr Sizwe Mvunelwa	Nelson Mandela Bay Municipality	Executive Director: Public Health	✓	✓
Mr Peter Neilson	Nelson Mandela Bay Municipality	Electricity	✓	✓
Mr Barry Martin	Nelson Mandela Bay Municipality	Water & Sanitation	✓	✓
Mr Patric Nodwele	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Mr Anderson Mancotywa	Nelson Mandela Bay Municipality	Fish Water Flats WWTW	✓	✓
Mr Shane Brown	Nelson Mandela Bay Municipality	Director: Disaster Management	✓	✓
Mr Kobus Slabbert	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Mr Patric Nodwele	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Mr Templeton Titima	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Ms Natasha	Dynamic food	Unkwnown	✓	✓

Name	Organisation	Capacity	Notified	Registered
Mr Thomas Blystad	Blystad Energy	Unknown	✓	✓
Ms Estelle Pillay	L2B	Regional Content Researcher projects	✓	✓
Mr Tim Foxen	Monetgas	Senior Advisor, Monetizing Gas Africa Inc.	✓	✓
Ms Christelle du Plessis	Habitat Link Consulting		✓	✓

Comments and Responses

Comments received from CA on the FSR BID (with subsequent updates to responses) are as follows:

- SANPARKS provided in **Table 2**;
- DEFF provided in Table 3;
- DEFF (Biodiversity Conservation) provided in Table 4;
- Comments and Responses raised Competent Authorities and Stakeholders on the ELC presentation on 19 November 2020 provided in Table 5 .

Table 2: SANPARKS Comments and Responses on the Final Scoping Report for CDC Gas to Power Project (specific application not noted and therefore assumed to apply to all four applications)

Date of comment, format of comment, Commentator	Comment	Response
PPP Process		
Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks	<p>It has come to SANParks attention that the Scoping reports of the above projects have been completed without consultation with SANParks, a key stakeholder and direct neighbour to the proposed developments. This despite.</p> <p>i. the Environmental Assessment Practitioner SRK identifying the adjacent protected area in several documents for the Coega Development Corporation (CDC) applications; and</p> <p>i. the applicant (the CDC) and SANParks being long standing neighbours and having regular interactions on many development applications past and current.</p> <p>SANParks objects in principle to the public participation process followed, as overlooking a direct neighbour and key stakeholder is a flawed process.</p>	SRK has registered and notified SANPARKS as soon as the EAP became aware that they were not yet registered. All neighbouring landowners and IAPs legally required to be notified of the EIA process in terms of the NEMA EIA regulations (2014, as amended) have been notified and registered as IAPs. SANPARKS does not fall into that category, however the EAP recognises the important role SANPARKS plays in the area and supports their ongoing participation in the EIA process.
Zone 10 and Gas Infrastructure Applications		
Date Received: 18/11/2020 Format: Letter	SANParks objects to the number and location of the power stations and proposes that the infrastructure be	i. The selection of site locations for the zone 10 power plants and gas infrastructure is outside the

Date of comment, format of comment, Commentator	Comment	Response
<p>Commentator: South African National Parks</p>	<p>consolidated and relocated to correct zones as approved by the 2007 ROD on the basis that:</p> <ul style="list-style-type: none"> i. The proposed type of development for Zone 10 is in contravention of the approved zonation of the Change in Land Use Record of Decision (ROD) issued in 2007. The ROD states that Zone 10 is designated as low intensity industry “mariculture and aquaculture cluster”, subject to a high level of environmental control, while Zones 11 and 12 are designated energy clusters; and ii. Zone 10 is considered to be environmentally sensitive due to the physical characteristics (on the coast and in a dunefield) and for visual and aesthetic reasons (Final Scoping Report 2006, as referred to in the ROD conditions). <p>SANParks would welcome a site visit with DEFF and the Environmental Assessment Practitioner SRK to investigate Alternatives.</p>	<p>scope of this EIA and location alternatives therefore were not considered. It is SRK’s understanding that the sites were selected based on strategic planning by CDC for the area.</p> <ul style="list-style-type: none"> ii. It is agreed that Zone 10 is environmentally sensitive for various reasons, and SRK is of the opinion that this has been taken into account in the assessment of relevant impacts in the zone 10 area. <p>A site visit with DEFF is yet to be scheduled prior to submission of the FEIR. Should the applicant and DEFF be in agreement, SANPARKS will be invited to this site visit, otherwise a separate site visit with SANPARKS will be organised.</p>
<p>Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks</p>	<p>SANParks are concerned over the possible impacts from this project on the St Croix and Bird Islands within the Addo Elephant National Park MPA, and African penguin population in particular, in such close proximity to the coast.</p>	<p>Impacts on the marine environment have been included as part of the DEIR for the proposed Gas Infrastructure. Note that the potential impact of various seawater intakes and discharges to the coastal area (outside the port) are assessed separately via the CDC’s Marine Pipeline Servitude EIA.</p>
General comments		
<p>Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks</p>	<p>SANParks requests that modelling and risk assessment in requirement of the Major Hazardous Installation regulations of 2001 (Gazette regulations No. 7122) need to be completed. This need to include environmental impacts on adjacent sensitive environments, specifically for the FSRU in the port.</p>	<p>A quantitative risk assessment has been undertaken by a specialist as part of the EIA process, and the results thereof are reported in Chapter 6 of the DEIR, and the full specialist study report is provided in Appendix K.2.</p>
<p>Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks</p>	<p>Failure of transfer hoses – The developer need to ensure that appropriate containment and mop up gear and a on the ground response team is available, and indicate what type of resources and manpower will be on standby, on site, during all operational hours. Operational procedures in the case of failure need to be explicit. It is essential that these failures be contained around the ship and within the Port breakwater, and</p>	<p>This impact has been taken into account in the Marine Ecological Impact assessment that was undertaken as part of the Gas Infrastructure EIA – refer to Appendix K6 and chapter 6 of the CDC’s Gas infrastructure DEIR.</p>

Date of comment, format of comment, Commentator	Comment	Response
	not be released into the greater Algoa bay, or MPA.	
Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks	Fire and Vapour cloud explosions - Gas explosions from LNG infrastructure may cause significant damage to surrounding structures due to blast waves. Explosions will in most cases, generate blast waves. Modelling from another current gas to power application indicated that a blast and cloud explosion will reach the Addo MPA boundary and come within less than 200m from Jahleel island. The Specialist studies need to clearly model/indicate the area of "Cloud" vs "blast wave" and potential energy load to be expected from such a blast. As well as indications of different prevailing wind conditions on impact on cloud and blast size and direction, and identify if any of these will reach Jahleel island.	A quantitative risk assessment has been undertaken by a specialist as part of the EIA process, taking into account fire and vapour cloud explosions, and modelling for the worst case scenario (including climatic conditions). The results thereof are reported in Chapter 6 of the DEIR, and the full specialist study report is provided in Appendix K.2.
Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks	Noise - The level of marine noise need to be assessed, and dispersion or travel distances and associated risk indicated. Penguins have been shown to be noise sensitive, and it is likely that noise disturbance impacts on their feeding behaviour (Pichegru et al 2017).	A noise study was undertaken as part of the DEIR, however the study did note uncertainties regarding noise impacts on ecological receptors (both marine and terrestrial). It is assumed that noise associated with operation of the port and ship entering and leaving it was taken into account in the authorisation of the port itself.
Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks	Visual impacts from two power stations including other gas infrastructure directly on the coast.	Assessment of visual impacts is reported on in chapter 6 of the DEIR and takes proximity to the coast into account.
Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks	Air quality - SANParks are concerned over the emissions and the contribution to the cumulative air quality in the Coega SEZ, and Carbon emissions in general. SANParks requests that air emissions be kept within National limits and according to best practise.	An air quality impact assessment was undertaken as part of the EIA, and impacts on air quality (both from the project and cumulatively from other similar projects in the area) are reported in Chapter 6 of the DEIR. The full specialist report is provided as Appendix K1 of the DEIR.
Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks	SANParks are concerned about the proposed impacts of these projects, as well as those environmental impacts not taken into consideration. Addo Elephant National Park MPA is the last stronghold of the African Penguin in the world and any further cumulative impacts can add to the pressures on this species.	Impacts on marine ecology are included in chapter 6 of the of the Gas Infrastructure DEIR and the full specialist study report is provided as Appendix K6. Note that impacts relating to seawater intakes and discharges are covered under the Marine Pipeline Servitude EIA and not this one.
Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks	SANParks are particularly concerned about cumulative impacts of more than one (6 current applications) Power generation plants. (The CDC applications (3 power stations), the Karpower gas to powership application; the DNG (PTY) LTD Gas	The Cumulative impact Assessment included in Chapter 6 of the DEIR has taken into account cumulative impacts of other similar developments proposed for the area.

Date of comment, format of comment, Commentator	Comment	Response
	to power station development as well as the Engie SA powerplant).	
Date Received: 18/11/2020 Format: Letter Commentator: South African National Parks	SANParks requests the Department of Environment, Forestry and Fisheries to carefully consider the number of power stations as well as the location of these plants, the likely impacts on and the adjacency of the Addo Elephant National Park and MPA.	The Cumulative impact Assessment included in Chapter 6 of the DEIR has taken into account cumulative impacts of other similar developments proposed for the area. The proximity of the zone 10 sites and gas infrastructure to the MPA is noted taken into account in the impact assessment provided in the DEIR.

Table 3: DEFF Comments and Responses on the Final Scoping Report for CDC Gas to Power Project

Date of comment, format of comment, Commentator	Comment	Response
Listed Activities		
Date Received: 06/01/2021 Format: Letter Commentator: Department of Environment, Forestry and Fisheries.	The EIAR must provide an assessment of the impacts and mitigation measures of each of the listed activities applied for	This is included in Chapter 6 of the DEIR.
	The listed activities represented in the EIAR and the application form must be the same and correct.	The listed activities applied for have been reviewed and to SRK's knowledge are correct. Activities that are triggered but which have already been authorised via similar listed activities (and therefore not applied for) as also listed in the DEIR, clearly stating that they are not applied for.
	The EIAR must assess the correct sub listed activities for each listed activity applied for.	The listed activities applied for have been reviewed and to SRK's knowledge are correct, and assessed in the DEIR.
	Listing Notice 1, Item 24 of the EIA Regulations 2014 (As amended) included in the application form is not applicable to this development and must be removed from the application form.	This listed activity has been removed from the DEIR and application form (a revised version of which will be submitted with the FEIR)
Public Participation		
Date Received: 06/01/2021 Format: Letter Commentator: Department of Environment, Forestry and Fisheries.	Please ensure that comments from all relevant stakeholders are submitted to the Department with the EIAR. This includes but is not limited to the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism; the Department of Environment, Forestry and Fisheries: Climate Change; the provincial Department of Agriculture; SANRAL, TNPA, the Nelson Mandela Bay Metropolitan Municipality, the Department of Water and Sanitation (DWS), the South African Heritage Resources Agency (SAHRA), the Endangered Wildlife	Comments on the FSR are included as Appendix H2 of the DEIR, and any comments on the DEIR will be incorporated and provided with the FEIR. All stakeholders listed in the comment are included on the IAP database for the project.

Date of comment, format of comment, Commentator	Comment	Response
	Trust (EWT), Birdlife SA, and the Department of Environment, Forestry and Fisheries: Directorate Biodiversity and Conservation.	
	Please ensure that all issues raised, and comments received during the circulation of the draft SR and draft EIAR from registered I&APs and organs of state which have jurisdiction in respect of the proposed activity are adequately addressed in the final EIAR. Proof of correspondence with the various stakeholders must be included in the final EIAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.	Comments on the FSR are included as Appendix H2 of the DEIR, and any comments on the DEIR will be incorporated and provided with the FEIR. All correspondence with stakeholders on the various reports is included in Appendix G, which will be updated with correspondence on the DEIR, in the FEIR, as well as a proof of attempts to obtain comments.
	A Comments and Response trail report (C&R) must be submitted with the final EIAR. The C&R report must incorporate all comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Appendix 1 of this comments letter. Please refrain 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&APs' comments.	All comments and responses, in the specified format, are included in the Comments and responses report (Appendix H of the DEIR) and original comments are included in Appendix G.
	Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.	This has been done.
	The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations, 2014, as amended.	To SRK's knowledge this has been done.
	The EAP is requested to contact the Department to make the necessary arrangements to conduct a site inspection prior to the submission of the final EIAR.	This will be done during the 30 day comment period on the DEIR.
Alternatives		
Date Received: 06/01/2021 Format: Letter Commentator: Department of Environment, Forestry and Fisheries.	Please provide a description of each of the preferred alternative type and provide detailed motivation on why it is preferred.	Descriptions of the technology options applied for, and alternatives that were considered are provided in Chapter 3 and Section 6.3 of the DEIR.
	The applicant must determine the need for decommissioning of lines. This information must inform whether there is a need to update the application form and/or to amend the	For the zone 13 site, interim decommissioning of the LNG tanks for phase 1 may be required and this has been included in the assessment. For the other CDC gas to power projects,

Date of comment, format of comment, Commentator	Comment	Response
	terms of reference for the specialist studies.	no interim decommissioning is applied for, as confirmed by the applicant.
Layout & Sensitivity Maps		
Date Received: 06/01/2021 Format: Letter Commentator: Department of Environment, Forestry and Fisheries.	The EIAR must provide coordinate points for the proposed development site (note that if the site has numerous bend points, at each bend point coordinates must be provided) as well as the start, middle and end point of all linear activities.	Co-ordinates are provided in the Applicant's details table on Pg i of the DEIR and will be provided on the application form.
	Please provide a layout map which indicates the following: <ol style="list-style-type: none"> Positions of the power island, steam turbine and generator, fuel storage tanks, water storage reservoir and tanks, water and gas supply pipelines; Permanent laydown area footprint; All supporting onsite infrastructure e.g. roads (existing and proposed); Substation(s) and/or transformer(s) sites including their entire footprint; Connection routes (including pylon positions) to the distribution/transmission network; and All existing infrastructure on the site. 	Layout maps, indicating these features where applicable, are included as Appendix I of the DEIR, and will be included in the updated Application form (to be submitted with the FEIR). There is no substation required for the CDC gas to power project as proposed.
	Please provide an environmental sensitivity map which indicates the following: <ol style="list-style-type: none"> The location of sensitive environmental features on site e.g. Marine Protected Areas, CBAs, heritage sites, wetlands, drainage lines etc. that will be affected; Buffer areas; and, All "no-go" areas. 	The environmental sensitivity map included as Figure 4-6 of the DEIR includes the features mentioned, including buffer / no-go areas.
	The above layout map must be overlain with the sensitivity map and a cumulative map which shows neighbouring energy developments and existing grid infrastructure.	A map showing the proposed development relative to other similar developments proposed in the area and included in the cumulative impact assessment is provided in Section 6.8
Specialist Assessments		
Date Received: 06/01/2021 Format: Letter Commentator: Department of Environment, Forestry and Fisheries.	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.	This is included in the specialist study reports in Appendix K of the DEIR.

Date of comment, format of comment, Commentator	Comment	Response
	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.	This is included in the specialist study reports in Appendix K of the DEIR, as well as the assumptions and limitations in Section 1.6 of the DEIR.
	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 expertise advice.	No contradictory recommendations have been provided by specialists.
Cumulative Assessment		
<p>Date Received: 06/01/2021 Format: Letter Commentator: Department of Environment, Forestry and Fisheries.</p>	<p>As there are other similar Gas to Power plants proposed within a 30km radius of the proposed development site, a cumulative impact assessment must be conducted for all identified and assessed impacts which must be refined to indicate the following:</p> <ol style="list-style-type: none"> 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. 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. The cumulative impacts significance rating must also inform the need and desirability of the proposed development. A cumulative impact environmental statement on whether the proposed development must proceed. 	<p>A cumulative impact assessment, taking into account similar proposed developments in the area, is provided in Section 6.8 of the DEIR, and a statement on cumulative impacts is included in Chapter 7.</p>
General		
<p>Date Received: 06/01/2021 Format: Letter Commentator: Department of Environment, Forestry and Fisheries.</p>	<p>The EIAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions.</p>	<p>The applicant has provided a table with additional details on the layouts provided, as far as possible. This is included with the layout drawings provided in Appendix I of the DEIR.</p>
	<p>The EAP must provide landowner consent for all farm portions affected by the proposed project, whether the project component is linear or not, i.e.</p>	<p>Landowner consent from TNPA is included with the Application form for</p>

Date of comment, format of comment, Commentator	Comment	Response
	all farm portions where the access road, facility and associated infrastructure is to be located.	the Gas Infrastructure. All other properties are CDC owned.
	A construction and operational phase EMP that includes mitigation and monitoring measures must be submitted with the final EIA.	This is included as Appendix L of the DEIR

Table 4 : DEFF (Biodiversity Conservation Comments and Responses on the Final Scoping Report for CDC Gas to Power Project

Date of comment, format of comment, Commentator	Comment	Response
Listed Activities		
<p>Date Received: 14/01/2021</p> <p>Format: Letter</p> <p>Commentator: Mr Seoka Lekota</p> <p>Directorate: Biodiversity Conservation</p>	<p>The Final Scoping Report & Plan Study must also include the following as guidelines considered and ensure that the proposed project is in compliance with their requirements:</p> <p>All relevant provincial biodiversity plans;</p>	<p>The following biodiversity plans are relevant to the site locations and are considered in Chapter 4 of the Draft EIR:</p> <ul style="list-style-type: none"> • Mucina & Rutherford vegetation types (2006); • NMBM Bioregional Plan; and the • Coega Open Space Management Plan (OSMP). <p>The Coega OSMP considered the draft version of the NMBM Bioregional plan and is consistent with the Final Bioregional Plan.</p> <p>The Eastern Cape Biodiversity and Conservation Plan identifies the project site as a Critical Biodiversity Area. However, authorisation for the transformation of the site has previously been granted and the development of the site is consistent with the finer scale Coega OSMP and NMBM Bioregional Plan.</p>
	NEMBA National List of Threatened Ecosystem that are threatened and in need of protection;	The National List of Threatened Ecosystems (SANBI BGIS, accessed 17/11/2020) does not identify any threatened ecosystems on the project site or in close proximity to the project site. The closest threatened ecosystem is Albany Alluvial Vegetation associated with the Coega River, north of the N2.
	Draft Species Environmental Assessment guideline;	<p>No specialist studies requiring the assessment of specific species have been identified during the scoping study and consequently these guidelines will not be applicable in this instance.</p> <p>While a number of species of special concern are likely to be present in and around the project area, these have largely been documented already via other projects in the area and it is</p>

Date of comment, format of comment, Commentator	Comment	Response
		proposed that relevant management measures to protect these species are included in the EMPr.
	National Climate Change Adaption Strategy Version UE110, 13 November 2019; and	Consideration of the National Climate Change Adaptation Strategy has been included in Chapter 2 of the DEIR.
	The site locality maps illustrating the ecological sensitivity, Open Space Management Plan (OSMP), and different alternatives.	A map of ecological sensitivity (Figure 4-6 in the DEIR) and the OSMP is included.
	In order to minimize the loss of biodiversity, the Draft EIA Report including the specialist studies must clearly describe how different stages of the mitigation hierarchy was applied.	It is noted that transformation of the site has already been authorised as part of the authorisation for the broader SEZ, and therefore clearing of vegetation is not specifically applied for as a listed activity and will not be assessed as part of this EIA. Mitigation measures to minimise biodiversity loss and to manage species of special concern that may be present on the site will however be included in the EMPr.
	The Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@environment.gov.za for the attention of Mr. Soeka Lekota.	These contact details have been added to the IAP database.

Table 5: Comments and Responses raised Competent Authorities and Stakeholders on the ELC presentation on 19 November 2020

Date of comment, format of comment, Commentator	Comment	Response
Date Received: 19/11/2020 Format: Meeting Commentator: Muhammad Essop (DEFF)	The best environmental option must be put forward and recommended. Not all options will be preferred and therefore not all options will be approved.	The options applied for and a comparison of their impacts, and recommendations in that regard, in terms of greenhouse gas emissions (the main differentiating factor from an environmental impacts perspective), is provided as part of the climate change study in Section 6.7 of the Power Plant DEIRs and climate change report (Appendix K3).
Date Received: 19/11/2020 Format: Meeting Commentator: Muhammad Essop (DEFF)	An issue of the cooling system is within the draft of the report, on one side wet cooling is recommended and that dry cooling is not a feasible option, but on the other side dry cooling is favoured and this is causing confusion on what technology needs to be used.	Dry (air) cooling is applied for and feasible for all 3 power plants. Wet cooling is also applied for as an option for the Zone 10 power plants, should the MPS be authorised.

Date of comment, format of comment, Commentator	Comment	Response
Date Received: 19/11/2020 Format: Meeting Commentator: Muhammad Essop (DEFF)	Not yet sure on how to deal with the issue of overlapping projects, thus further discussion is required.	It is assumed this refers to projects by other applicants overlapping with the CDC gas to power project, and that this will be dealt with via the RMIPPPP, in that not all bidders will be assigned preferred bidder status.
Date Received: 19/11/2020 Format: Meeting Commentator: Lyndon Mardon (DEDEAT)	Outdated information is being quoted in the scoping reports, especially with regard to water availability.	This information has been updated in Chapter 4 of the DEIR.
Date Received: 19/11/2020 Format: Meeting Commentator: Lyndon Mardon (DEDEAT)	In the scoping report, the air quality study was referred to but not yet available to comment on.	The air quality specialist reports is provided as Appendix K1 of the DEIR.
Date Received: 19/11/2020 Format: Meeting Commentator: Lyndon Mardon (DEDEAT)	When discussing / raising Climate Change impacts, there is only reference to the carbon footprint, but the report must also reference Climate Change mitigation.	This has been addressed in the Climate change report (refer to Chapter 6 of the DEIR and appendix K3 for full specialist report).
Date Received: 19/11/2020 Format: Meeting Commentator: Andries Struwig (DEDEAT)	The issue of carbon capture and storage (CCS) must be addressed. How will the DEFF view this?	MS (DEFF): DEFF will consider, but will be guided by the outcome of the Climate Change assessment and also recommendations from our DEFF Climate Change colleagues.
Date Received: 19/11/2020 Format: Meeting Commentator: Viwe Biyana (CDC)	The concerns raised by the ELC members are noted and will be addressed in the next phase of the EIA.	No additional comment required.
Date Received: 19/11/2020 Format: Meeting Commentator: Viwe Biyana (CDC)	Regarding the Damara tern breeding area, the buffer zone around the breeding area has been increased to 200m.	This is noted and indicated on the environmental sensitivity map (Figure 4.6 of the DEIR)
Date Received: 19/11/2020 Format: Meeting Commentator: Lyndon Mardon (DEDEAT)	The geological features do exist in the area for carbon capture, as it was considered as a possible site for carbon capture. This does not mean it shouldn't be looked at further because there are significant issues that are occurring in the area with the power stations with all the developments and it should be considered at the strategic level.	Carbon capture is not considered and does not form part of the current application.
Date Received: 19/11/2020 Format: Meeting Commentator: Andrea Shirley (CDC)	How is DEFF approaching, on a strategic scale, the review of the power generation project applications?	MS (DEFF): There are overlapping applications in an area; however, DEFF is looking at each application on its own merit, but also assessing cumulatively.
Date Received: 19/11/2020 Format: Meeting Commentator: Andrea Shirley (CDC)	How will DEFF handle from a timeframe perspective, all these Gas to Power Project applications?	MS (DEFF): Applications will be dealt with on a first come first served basis, as long as they comply with the EIA legislative requirements. Some applications may be refused.
Date Received: 19/11/2020 Format: Meeting	Has the CDC and Transnet granted landowner consent to these other Gas to Power applicants?	VB (CDC): Confirmed that none of the emergency power projects have landowner consent from the CDC.

Date of comment, format of comment, Commentator	Comment	Response
Commentator: Muhammad Essop (DEFF)		[SRK] the exception to this with regard to the CDC gas to power applications, is Phase 1 of the Zone 13 power plant site, for which Mulilo has obtained consent from CDC.
Date Received: 19/11/2020 Format: Meeting Commentator: Lyndon Mardon (DEDEAT)	Strongly recommend that the ELC consider bringing in Climate Change specialists (from National DEFF) to provide input into these discussions. RSA has international obligations iro meeting our peak, plateau and decline obligations.	<p>MS (DEFF): confirmed that DEFF is working closely with their air quality team to ensure input.</p> <p>ASh (CDC): Recommended that DEFF (MS) invite the necessary expertise (Climate Change – representatives from Climate Change Adaption and Climate Change Mitigation teams) to the next ELC meeting in February 2021.</p> <p>MS (DEFF): Noted and confirmed. Requested that the ELC chair provide a formal email request for DEFF to invite the expertise to attend the next ELC meeting to provide the necessary guidance, input and expertise.</p>