

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 Draft Environmental Impact Report (DEIR) as well as during the ELC meeting held on 18 February 2021.

Comments are reproduced verbatim and are grouped according to CA. Responses to comments made on the DEIR and raised in the ELC meeting have been provided for in the Final Environmental Impact Report (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 Final 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	✓	✓
Mr Mulalo Tshikotshi	Department of Environmental Affairs: Ocean And Coast	Pollution Manager	✓	✓

Name	Organisation	Capacity	Notified	Registered
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	✓	✓
Ms Ncumisa Mnotoza	Department of Water & Sanitation	Water Quality Management	✓	✓

Name	Organisation	Capacity	Notified	Registered
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		✓	✓
Dr 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	✓	✓
Mr Elliot Motsoahole	TNPA	Environmental Management	✓	✓

Name	Organisation	Capacity	Notified	Registered
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 Allistair 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	✓	✓
Mr Wayne Poultan	Bosun Bricks	Coega SEZ tenant	✓	✓

Name	Organisation	Capacity	Notified	Registered
Mr Gonzalo Ramirez	Exccelerate 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	✓	✓
Charl De Lange	PE Cold Storage	Coega SEZ tenant	✓	✓

Name	Organisation	Capacity	Notified	Registered
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 Poulton	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	✓	✓
Sharaz Khan	Agni Steel	Coega SEZ tenant	✓	✓

Name	Organisation	Capacity	Notified	Registered
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	Unknown	✓	✓

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		✓	✓
Mr Ravin Ranjoo	Private		✓	✓
Ms Briega Williams	SAHRA	Heritage Officer	✓	✓
Ms Lesa La Grange	SAHRA	Manger	✓	✓
Mr Ruan Brand	SAHRA	Heritage Officer	✓	✓

Comments and Responses

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

- Comments and responses from DEFF and DEFF (Biodiversity Conservation) provided in Table 2;
- Comments and Responses raised by Competent Authorities and Stakeholders on the ELC presentation on 18 February 2021 provided in Table 3;
- Comments and Responses from IAPs provided in Table 4; and
- Comments and Responses from SAHRA provided in Table 5.

Table 2: DEFF and DEFF Biodiversity Conservation Comments and Responses on the Draft Environmental Impact Report for CDC Gas to Power Project

Date of comment, format of comment, Commentator	Comment	Response
Specific Comments		
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	The EAP must provide a detailed project description for each of the two phases of the development, the duration of each phase and must clearly outline which infrastructure and technology options are to be used for each phase.	The project description in the DEIR has been revised to remove reference to phasing as there is overlap in infrastructure required for the two phases as previously presented. If and when expansion of LNG storage and regasification capacity is required, it is proposed that the FSRU(s) will be replaced by onshore storage and regasification at the LNG and gas hub.
	Further to the above, the impacts, mitigation measures and recommendations for each phase must be clearly assessed and outlined in the report.	As explained above, a phased approach is not being applied for and the impact assessment and mitigation measures are not presented separately for each phase.
	The concluding remarks from the Marine Specialist seem to suggest	This recommendation relates mainly to cumulative impacts due to large

Date of comment, format of comment, Commentator	Comment	Response
	that further assessment of impacts is required considering the location of the Port within an area supporting one of the most abundant and diverse fish populations along the South African coastline and functioning as an important habitat for both juvenile and adult fish many of which are considered 'vulnerable', 'endangered' and 'critically endangered'.	volumes of water required for cooling / heating/ ballasting. The recommendation is that the effects on ichthyoplankton and fish populations should be investigated before the ships become operational.
	The final statement in section 6.8.1 of the draft EIAR that reads as follows "However, as noted earlier current ambient concentrations exceed NAAQS limits by a significant margin, and the power plan collectively, albeit marginally, exacerbate poor air quality." is contradictory to the findings of the Atmospheric Impact Report in support of the EIA for the proposed 3000MW Integrated Coega Gas-to Power Project, Zone 10: Coastal Power Station (South) submitted with the draft EIAR. The EAP is requested to provide clarity on the statement.	This statement has been removed from the EIR, in accordance with the specialist report.
	The colours used for Figure 6: Ecosystem and substratum types within Algoa Bay (adapted from Sink et al. 2019) from the Marine Specialist Report are too similar and are difficult to distinguish. Please ensure that all maps are clear and legible.	Figure 6 included in the Marine Specialist Report has been revised by the specialist to improve legibility.
	Recommendations provided by specialist reports must be considered and used to inform the preferred layout alternative.	Recommendations from specialists have been considered and are reproduced in the EIR. No recommendations in terms of layout have been made.
	The EMPr must include provision to make the following reports available to the Department and applicable competent authority on request: alien/invasive plant management report; plant rescue and protection report; and re-vegetation and habitat rehabilitation report.	Provision for these management plans has been included in the EMPr
	Please ensure that all mitigation recommendations are in line with applicable and most recent guidelines.	We believe all mitigation recommendations are in line with applicable and most recent guidelines.
Listed Activities		

Date of comment, format of comment, Commentator	Comment	Response
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed.	We believe that all, and only, the relevant listed activities have been applied for.
	If the activities applied for in the application form differ from those mentioned in the final EIA, 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.environment.gov.za/documents/forms .	Note that Listed activities (or the equivalent similar listed activities) that have already been authorised for the whole of the Coega SEZ are not included in the revised Application Form in Appendix B but have been listed in Section 2.1.2 of the FEIR for completeness, as previously agreed with the Competent Authority.
	It is imperative that the relevant authorities are continuously involved throughout the environmental impact assessment process as the development property possibly falls within geographically designated areas in terms of numerous GNR.985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.	The list of authorities (Table 1) that have been provided with opportunities to comment is provided in Appendix H of the Final EIR. Efforts made by SRK to obtain comments from the authorities have been included in Appendix G of the Final EIR The locations for the proposed development within the Coega SEZ do not fall within any geographical areas as defined in Listing Notice 3 of the EIA regulations. A map of sensitive environmental areas in the vicinity of the site is presented in for EIR (Figure 4-6).
Public Participation Process		
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	The final EIA must comply with all the conditions of the acceptance of the SR signed on 06 January 2021 and must address all comments contained in the final SR, the draft EIA and this letter.	The conditions of acceptance of the scoping report are reproduced in Appendix H2 with explanation and guidance on how these conditions have been addressed in the EIR. Appendix H1 and H2 addressed all the comments raised during the scoping phase and provides responses to how these comments have been addressed in the EIR.
	The EAP must provide proof that the key stakeholders received written notification of the propose activity as well as the amended draft EIA. These include this Department's Directorates: Climate Change, and Biodiversity and Conservation.	Proof of notification to all key stakeholders, and to registered IAPs, is attached to the EIR in Appendix G
Cumulative Assessment		
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	Should there be any other similar projects within a 30km radius of the proposed development site, t cumulative impact assessment for all identified and assessed impacts must be refined to indicate t following:	Cumulative impacts are addressed in section 6.8 including the specialist's recommendations and a specific statement regarding cumulative impacts are included in Section 7.2.

Date of comment, format of comment, Commentator	Comment	Response
	<ul style="list-style-type: none"> • Identified cumulative impacts must be clearly defined, and where possible the size of t identified impact must be quantified and indicated, i.e. hectares of cumulatively transform land. • Detailed process flow and proof must be provided, to indicate how the specialist recommendations, mitigation measures and conclusions from the various similar development 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 t proposed development. • A cumulative impact environmental statement on whether the proposed development must proceed. 	A cumulative map, showing the neighbouring energy developments (existing and proposed) is included as Figure 6.13, in the Final EIR.
Specialist Assessments		
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	Specialist declaration of interest forms must be attached to the final EIAR. You are therefore requested to submit original signed Specialist Declaration of Interest forms for each specialist study conducted. The forms are available on Departments website (please use the Departments template).	Specialist declarations of interest are appended to each specialist report in Appendix K.
Undertaking of an Oath		
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	Please note that the final EIAR must have an undertaking under oath/affirmation by the EAP.	An undertaking under oath by the EAP is provided in the application form, which is attached to this FEIR as Appendix B. An affirmation by the EAP, addressing the items listed in the regulation in more detail than reflected in the application form undertaking, is included on Page ii of the FEIR and addressed each of the items listed.
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	Based on the above, you are therefore required to include an undertaking under oath or affirmation by the EAP (administered by a Commissioner of Oaths) as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended, which states that the EIAR must include: “an undertaking under oath or affirmation by the EAP in relation to: <ul style="list-style-type: none"> • the correctness of the information provided in the reports; • the inclusion of comments and inputs from stakeholders and I&As; 	

Date of comment, format of comment, Commentator	Comment	Response
	<ul style="list-style-type: none"> • the inclusion of inputs and recommendations from the specialist reports where relevant; and • any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties”. 	
Details and expertise of the EAP		
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	You are required to include the details and expertise of the EAP in the EIAR, including a curriculum vitae, in order to comply with the requirements of Appendix 3 of the NEMAL EIA Regulations, 2014, as amended	Detailed CVs of the EAP and the reviewer are attached in Appendix A.
Environmental Management Programme		
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	The EMPr must comply with Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended. <ul style="list-style-type: none"> • The EMPr must also include the following: <ul style="list-style-type: none"> • All recommendations and mitigation measures recorded in the EIAR and the specialist studies conducted. • The final site layout map. • Measures as dictated by the final site layout map and micro-siting. • An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process. • A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. • Measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants. 	It is believed that the EMPr addresses these requirements.
General		
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	The EIAR must provide the technical details for the proposed facility in a table format as well as their description and/or dimensions.	A table of technical details is provided in the project description in the FEIR (see Table 3.4)
Date received: 19/04/2021 Format: Letter	Please also ensure that the final EIAR includes the period for which the Environmental Authorisation is	A statement regarding the period for which authorisation is required is included in Section 7.7.

Date of comment, format of comment, Commentator	Comment	Response
Commentator: Department of Forestry, Fisheries and the Environment	required and the date on which the activity will be concluded as per Appendix 3 of the NEMA EIA Regulations, 2014, as amended.	
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	You are further reminded to comply with Regulation 23(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: "The applicant must within 106 days of the acceptance of the scoping report submit- to the competent authority - (a) an environmental impact assessment report inclusive of any specialist reports, and an EMPr, which must have 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."	The Draft EIR was made available for review by IAPs for a period of 30 days (from 15 March 2021 to 18 April 2021), and will be submitted to the competent authority within 106 days of acceptance of the scoping report (by 26 April 2021).
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	Should there be significant changes or new information that has been added to the EIAr or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 23(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: "The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority- (b) a notification in writing that the reports, and an EMPr, will be submitted within 156 days of acceptance of the scoping report by the competent authority, or where regulation 21(2) applies, within 156 days of receipt of application by the competent authority, as significant changes have been made or significant new information has been added to the environmental impact assessment report or EMPr, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised environmental impact assessment report or EMPr will be subjected to another public participation process of at least 30 days".	No significant changes have been made to the EIR or the EMPr. Changes to the report are limited to those to provide clarity regarding the expansion of the project.
Date received: 19/04/2021 Format: Letter	Should you fail to meet any of the timeframes stipulated in Regulation 23 of the NEMA EIA Regulations,	The EAP is aware of this.

Date of comment, format of comment, Commentator	Comment	Response
Commentator: Department of Forestry, Fisheries and the Environment	2014, as amended, your application will lapse.	
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment	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.	The applicant is aware of this.
Date received: 19/04/2021 Format: Letter Commentator: Department of Forestry, Fisheries and the Environment : Biodiversity Conservation	The Directorate Biodiversity Conservation has reviewed and evaluated the aforementioned report, therefore the following recommendations must be considered in the final report in order to minimize further loss of biodiversity: <ul style="list-style-type: none"> • High sensitive areas in close proximity to the development footprint must be demarcated as no-go areas i.e. IBA, CBA; • Vegetation clearing must be limited to the approved areas; • Alien Invasive Plant (AIP) Management and control Plan must be designed and implemented to prevent further loss of floral habitat and diversity as AIPs displace native species; • Erosion management, maintenance and rehabilitation plans of natural vegetation must be developed to mitigate on habitat degradation and consider all phases of the development and <ul style="list-style-type: none"> • Rehabilitation plan must include the ongoing monitoring and maintenance of the surrounding natural vegetation. 	<ul style="list-style-type: none"> • No go areas, including buffers, identified through the EIA process, around sensitive areas, are included on the sensitivity map in Figure 4-6 of the FEIR and in the EMPr; • This is specified in the EMPr and mitigation measures; • Provision for compilation and implementation of an AIP management and control plan has been included in the EMPr • Provision for an erosion management, maintenance and rehabilitation plan has been included in the EMPr; • Provision for a rehabilitation plan, including ongoing monitoring, has been included in the EMPr.

Table 3: Comments and Responses raised Competent Authorities and Stakeholders on the ELC presentation on 18 February 2021

Where relevant SRK has provided additional responses below to the comments raised during the ELC meeting.

Commentator	Comments raised	Response (SRK, unless specified otherwise)
General comments		
Commentator: DG (DEDEAT)	The risk factor raised by Mr Mardon, must be considered. Land adjacent to the power stations must not be sterilised. Implications on future tenants must be considered. The risk to the environment must be considered, where environment includes fauna, flora and people.	Response: FS (CDC) Noted that a Risk Assessment is conducted during the EIA. However, once the final designs are available, the MHI study is done. If this indicates that additional land is required because of the risk beyond initial site boundaries, then this would have to be factored into the land availability and rental

Commentator	Comments raised	Response (SRK, unless specified otherwise)
		agreements with the power station developers. This is how the CDC has managed this in the past.
Commentator: DG (DEDEAT)	Can DEFF issue a conditional EA which is nullified if the MHI study concludes that the risk will go beyond the assessed boundaries?	Response: MS (DEFF) We do not want to pre-empt decisions, but conditions such as the above do not make sense. DEFF either grants or refuses the application. The MHI Regulations have their own requirements which must be complied with. From an environmental perspective, risks associated with the development must be assessed in the EIA. If the risk is not assessed and mitigation measures not proposed in the EIR process, this does not put the decision maker in a position to make an informed decision. This was conveyed to the EAP.
Commentator: DG (DEDEAT)	The noise issue overlaps all the energy projects and must be addressed.	A cumulative assessment of noise impacts is included in the DEIR
Commentator: DG (DEDEAT)	The issue of heated water being discharged into the Port, and the cumulative impact on the marine environment, must be addressed.	A marine ecology assessment was undertaken as part of the Gas infrastructure application and assesses impacts relating to discharges into the port.
Commentator: DG (DEDEAT)	The issue of managing stormwater is crucial and must be addressed in the EIA. Whilst there may be stormwater infrastructure in place in the SEZ, management of potentially polluted stormwater must be considered in the design of the stormwater infrastructure. This is applicable for all the power station projects.	A recommendation for site specific stormwater management plans, aligned with broader stormwater management plans for the SEZ, is included in the DEIR.
Commentator: DG (DEDEAT)	Concern noted about the carrying capacity of the Port of Ngqura to accommodate all these ships and FSRU's. The cumulative impact on the marine biodiversity of the Port is unknown. This is likely to be impacted on with the volume of warm water that will be discharged into the Port.	The marine ecology assessment undertaken as part of the Gas infrastructure application includes assessment of cumulative impacts on marine ecology in the port where applicable.
Commentator: ASh (CDC)	It hinges on the cumulative impact. Each of the projects has outlined the impact of their own development and why they can go ahead, but we haven't seen a cumulative assessment of all the projects. Granted, it may not yet be available. But without that, how to do make a decision on which can go ahead and which can't and where's the threshold. There are so many aspects to consider, e.g. temperature, noise, marine life, Damara terns.	Each of the specialists has assessed cumulative impacts of similar developments within the SEZ / 30 km radius, where relevant, as applicable to their particular study.
Commentator: MS (DEFF)	This is a valid issue that DEFF has been raising since these power plant applications have been coming in. The challenge DEFF has is the applications	

Commentator	Comments raised	Response (SRK, unless specified otherwise)
	are being dealt with on a "first in, first out" basis. These applications are not all at the same stage. The cumulative assessments will probably not come to the same significance ratings. Ultimately, if DEFF does not receive enough information on which to base an informed decision, then DEFF will be forced to issue a refusal. This would be a major risk to the IPP Programme.	
Commentator: MS (DEFF)	Concerned about the gas to power applications the role that Transnet will have to play.	Response: RdK (TNPA) TNPA has a separate unit that is engaging with the developers. There is an operator's license that has been issued to one of these gas to power developers. There has not been engagement from an EIA level, with the Harbour Master's Office for any of these gas to power applications, with respect to movement of vessels and the operational requirements. Lack of communication internally within TNPA but also between the gas to power developers, their consultants and the Harbour Master's Office.
Commentator: DG (DEDEAT)	Where does Transnet come into these decisions? How is TNPA dealing with the applications?	
Commentator: ZM (TNPA)	Support for what RdK has raised. The only interaction to date insofar as these developments are concerned, is requests from the consultants for access to the Port to conduct studies and site visits. There have been no meetings to discuss project plans.	
Comments relating to the process		
Commentator: MS (DEFF)	EAPs to look at the timeframes and ensure that deadlines are met.	Timeframes have been reviewed.
Commentator: Lyndon Mardon (DEDEAT)	Reference was made in the presentation to diesel being a clean fuel. The comment is misleading. None of the fossil fuels are clean fuels.	Agreed.
Commentator: Lyndon Mardon (DEDEAT)	Risks within and outside of the SEZ must be considered. It is trivia to say that the risks are acceptable because they do not impact on the general public. Everyone has the right to a safe environment. If the risks are such that your neighbouring operation is impacted, this is a significant risk. Risk is relative to your risk appetite. What is happening here is that someone has a high risk appetite and portraying this as acceptable. This is not a balanced approach.	The QRA study has assessed risks both inside and (where applicable) extending outside the SEZ.
Commentator: Andries Struwig (DEDEAT)	Is each power station project viable as a stand-alone project, and not dependant on each other? This must be confirmed.	In terms of process and infrastructure sharing, there are 4 applications in progress; 3 power plant applications and one for the over-arching gas infrastructure. The 3 power plants are not dependant on each other; i.e. they can operate undependably of each other. The gas infrastructure; however, is required to supply piped gas to the power plants, so without the gas infrastructure (FSRU, pipelines, etc), there will be no piped gas to the power plants and an alternative arrangement would need to be made to get gas to their sites. That is why Mulilo, the

Commentator	Comments raised	Response (SRK, unless specified otherwise)
		developer for Phase 1 of the Zone 13 power plant, is proposing to store LNG and regasify it on the site. For Phase 1 (Mulilo) of the Zone 13 power plant, it would be able to operate independently of the gas infrastructure and the Zone 10 power plants.
Commentator: MS (DEFF)	I would like to reiterate the importance of engagement with DWS with regards to the water issues that were raised in this meeting and previously. Similarly, DEFF spoke to some members of the CDC earlier this week as regards the air quality component to ensure all air quality aspects are clarified.	DWS representatives are on the IAP database and have been provided with draft reports for comment.
Commentator: MS (DEFF)	It is important that we clarify, we are dealing with separate applications. Mulilo was mentioned earlier in the presentation; this is a process that would follow the issuing of any environmental authorisation (EA). In terms of shared infrastructure, the question was raised whether EA's can be split between various IPP's. This becomes an important aspect that must be reported on in the EIR's for the applications.	In terms of splitting the EAs, the Zone 13 power plant application requires further discussion. There is a single application that was made for the entire 1000MW. Mulilo's portion of the site is for 200MW (Phase 1 of the Zone 13 power plant). Need to clarify with the DEFF what the process would be; i.e. either transferring the EA to Mulilo, or splitting off a portion of the EA.
Commentator: MS (DEFF)	The EAP has a responsibility, in terms of the Zone 13 EIA application and implications and the relation to the Risk Mitigation Procurement Programme, to be able to advise the client (CDC). The EAP can engage the DEFF directly on this issue.	Requested advice from the DEFF in terms of the splitting of the Zone 13 Environmental Authorisation for different users, e.g. Mulilo. We have looked at the Regulations; we think it's possible in law, or not precluded in law. There is a time issue into the procurement programme. We have alerted Mulilo to the issue. We are looking for guidance from the DEFF.
Commentator: Lyndon Mardon (DEDEAT)	There is an environmental approval for a 60 MLD desalination plant at Coega. However, there is an EIA currently underway for the marine pipelines that will abstract seawater for the plant and discharge brine from the plant. Is your water situation therefore really solved before the marine pipeline project has been approved?	Recognise the concern regarding the dependency of the desalination plant on the marine pipelines.
Comments relating to infrastructure		
Commentator: Lyndon Mardon (DEDEAT)	The study areas covers a significant area. There is no consideration for stormwater mitigation. This must be considered.	A recommendation for site specific stormwater management plans, aligned with broader stormwater management plans for the SEZ, is included in the DEIR.
Commentator: Andries Struwig (DEDEAT)	Is it possible to relocate the Zone 10S power station further north, away from the beach? It is understood that there are strategic planning issues involved, but if land is not yet set aside for a specific investor, there should be no reason why it cannot be shifted. If you look at the Zone 10S site, it is not level.	The site selection was not part of the EIA and hence SRK was not involved in the strategic planning of the SEZ. CDC would be better placed to respond to this concern. FS (CDC) - The Coega Development Framework Plan Rev1 (2006), Coega

Commentator	Comments raised	Response (SRK, unless specified otherwise)
	The platform would need to be built up, with significant cut and fill. The elevation seems to vary from 7m to 32m across the site.	East Masterplan & Open space management plan and requirements for Gas to Power plant requirements have been used to assess and identify the most suitable locations for the Gas to Power projects. In determining a suitable site location elevation, topography and geological conditions were assessed.
Commentator: Andries Struwig (DEDEAT)	This means that this process is not flexible in terms of alternative sites, because the EIA is being done on a pre-selected site. Therefore, whatever comment anyone raises on this Zone 10S site, is then disregarded on the basis that it doesn't fit in with the strategic planning for the power stations in the SEZ.	The locations of the Zone 10 power plants may be shifted slightly north however the topography of the area and required infrastructure servicing the sites restrict the degree to which these sites are able to be shifted. Our planning has looked at limiting a spaghetti of services been installed across the property to rather dedicated service corridors, in which all required services are run to service both gas to power sites.
Commentator: Viwe Biyana (CDC)	Requested that CDCs Planning Unit provides an input into the query raised, to be discussed later in the meeting.	
Comments relating to specialist studies		
Commentator: Lyndon Mardon (DEDEAT)	In terms of the ambient noise levels, there is a standard, called the 7-decibel law, contained in the Noise Control Regulations ito S25 of ECA, which defines disturbing noise which is when the noise level exceeds the ambient sound level at the same measuring point by 7 dBA or more. This law and Regulations are applicable to this project.	The noise specialist has made reference to and included the relevant laws and standards in his report.
Commentator: Lyndon Mardon (DEDEAT)	It was stated in the presentation that the noise study concluded that the SANS 10103:2008 rating limits will not be exceeded for terrestrial receptors; however, 70 dB(A) will be exceeded at the Damara Tern Colony during the operational phase of the Zone 10 power stations. The noise specialist is saying that 70 dB(A) is not a significant amount of noise. At 60 dB(A), 1m apart, one cannot have a conversation, because you cannot hear each other. This is a logarithmic scale, so 70 dB(A) is far higher than what one anticipates. The rating of 70 dB(A) must not be trivialised and considered not to have a significant impact on animals.	With respect to the noise limits and regulations, the noise assessment was based on the limits for the various types of areas. The SEZ and Port are industrial areas, hence why the specialist used that particular limit. We will enquire from the specialist about the 7 decibel law. The specialist has flagged the noise levels at the Damara tern colony as a concern.
Commentator: Lyndon Mardon (DEDEAT)	In terms of the GHG emissions, the studies only make a comparison with gas and coal; however, we have been led to believe that diesel is also an option for up to 2 years. We see this as a signification emissions source and significant variation. How will impact on the GHG emissions?	The option of initial interim operation using HFO / diesel has been removed from the development proposal as described in the FEIR. Liquid fuels will only be used as backup fuel supply.
Commentator: Lyndon Mardon (DEDEAT)	In terms of the Vulnerability Assessment, Port Elizabeth is facing a significant drought. The Assessment concludes that there are no significant	The drought situation is considered in the DEIR. In terms of water supply, apart from for Phase 1 (200 MW) of the zone 13 site, for which the NMBM has

Commentator	Comments raised	Response (SRK, unless specified otherwise)
	vulnerabilities, yet the drought is significant. This must be considered.	confirmed water provision, it is expected that process water will be supplied from the authorised but yet to be developed desalination plant in Zone 10.
Commentator: Andries Struwig (DEDEAT)	Echoed the sentiments of Mr Mardon regarding the cumulative impact of noise.	Cumulative assessment of noise impacts is included in the DEIRs.
Commentator: Lyndon Mardon (DEDEAT)	If I recall correctly, the CDC's Air Dispersion Model (ADM) indicates that there is already an issue with elevated NOx levels from the Dedisa Power Station. The proposal is for two additional power stations adjacent to the existing Dedisa Power Station and the consultant is saying that there will be no NOx issues. I have doubts about the air quality studies. These issues must be clarified.	The air quality specialist indicated that in terms of NO2, that there are already some exceedances in the baseline, so the issue is recognised. The additional contribution of the gas plants is relatively low compared to what is already there and would not contribute in a meaningful way to the airshed. It was specified that it would be low sulphur and low sulphur HFO that would be used for a maximum of 2 years for the initial development and start-ups or unexpected circumstances; hence for short-term use. This does not include Mulilo.
Commentator: Lyndon Mardon (DEDEAT)	Where the noise circles overlap, the noise will increase by 6 dB(A). This is a well-known scientific fact and must be reflected in the studies. There will be other impacts where you have overlapping of that energy.	Slide 10/19 in the presentation shows the overlapping/cumulative noise circles and the noise radii, so it does consider the overlapping of the noise contours and therefore the cumulative effect of potential noise generated by the power stations.
Format: Meeting Commentator: Lyndon Mardon (DEDEAT)	Looking at the map with the noise zones, I do not see the cumulative impact of the noise from roads, neither the impact of the Cerebos salt plant or any other noise-generating infrastructure. Is this a true / fair reflection of the cumulative noise impact?	The noise map only includes the cumulative noise impacts of the 3 power stations and gas infrastructure. However, we have requested that the noise specialist update the study and the map to include the other similar power project developments in the area, as this was also requested by DEFF. Unsure whether the specialist will also include other existing noise generating sources in the area. SRK will enquire from the noise specialist whether the noise generated by the existing operations in the SEZ would make a significant difference.
Commentator: Lyndon Mardon (DEDEAT)	There is currently a process underway that is reviewing the National Ambient Air Quality Standards. It has not been released into the public domain yet; however, there are significant implications for some of the emission standards. For example, the PM10 standard – there will be a significant reduction (30%) in the standard. This must be factored into planning for the projects that require AELs. The bottom line is, will developers be able to meet the National Ambient Air Quality Standards? If not, there will be cost implications insofar as compliance to the Standards is concerned. There are other pollutants of concern; e.g., sulphur dioxide will also have a decrease in the	The relevant legal requirements with regard to air emissions will have to be complied with by developers at the time of development, which apart from Phase 1 of the zone 13 site, is not yet known.

Commentator	Comments raised	Response (SRK, unless specified otherwise)
	emissions standards. The standards are getting stricter and this will have an impact on what is being planned.	

Table 4: IAP Comments and Responses on the Draft Environmental Impact Report for CDC Gas to Power Project

Date of comment, format of comment, Commentator	Comment	Response
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Please explain for the benefit of the layman how this project will facilitate an increased uptake of renewable energy to the grid.	This explanation is provided in section 7.7 of the FEIR and in the Climate Change specialist report.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Appendix H of all projects refers. In a letter received from DEFF (the competent authority) on 6 January 2021 it is requested that comments from all relevant stakeholders are submitted to the department including those of the Endangered Wildlife Trust and BirdLife South Africa (Birdlife SA). Although representatives of both organisations are included in the updated IAP database it appears that neither have been notified or registered. Given the Critically Endangered status of the Damara Tern comment from these two organisations is of considerable importance. Comment should therefore be obtained before completion of the final EIA report and the comment period should be extended if necessary.	Representatives of these organisations have been notified, automatically registered, and provided with the DEIRs on which to comment. The IAP database has been updated to reflect this. No comments have however been received from either organisation.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Appendix I of all reports refers. The legend on .png files is too small to	The DEIR and appendices are provided as downloadable pdfs, which can be zoomed in if necessary and which are legible.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Reference list. Branch 1988 and Branch 1988a are one and the same. Change "Taylor et al." to "Taylor, M.R, Peacock, F. & Wanless, R.M.	This has been corrected in the FEIR.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Page 73, section 4.2.2, paragraph 4, line 9: no red list status for Knysna Woodpecker is provided. It is however provided in the next paragraph so this species can be omitted from paragraph 4	This has been corrected in the FEIR.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Figure 6-8. The colours used in the figure do not all match those given in the legend, e.g. there is no orange line in the figure and no blue line in the legend.	This has been corrected in the FEIR.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Section 6.8.7. While essential and desirable, monitoring of the Damara Tern population cannot be described as a mitigation measure. It may allow the effects of the cumulative impacts	Agreed. This is one of the measures proposed in the FEIR, however other mitigation measures are also proposed.

Date of comment, format of comment, Commentator	Comment	Response
	on the population to be documented but it will not mitigate them.	
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Appendix H. The second point made by South African National Parks Refers. If this proposal is in contravention of the Record of Decision for Zone 10 then this cannot be conveniently "swept under the carpet" by stating that selection of site locations is "outside of the scope of this EIA". It would obviously be a critical factor in whether or not DEFF grants an EA for the Zone 10 proposals or not. However, my understanding is that authorisation for rezoning of the SEZ east of the Coega River for land uses including mariculture, aquaculture and power production was received from DEAT in 2007. Please confirm whether or not this is the case.	SRK is not aware of any contravention of the RoD for Rezoning of the SEZ in relation to this proposal. As mentioned previously, site selection is outside the scope of this EIA and the sites have been identified by CDC as part of their development strategy for the area.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Section 6.3.4. To provide a balanced view it should also be stated that the negative impacts of the proposed development would also not be realised under the No-Go Alternative.	The positive impacts referred to relate specifically to socio-economic impacts. It is agreed that the negative impacts (relating to other aspects) also would not be realised.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Appendix L: Table 4.2 has been copied from other reports. Some information, e.g. references to the wetland, is not relevant to this EIA.	This specific table could not be found in Appendix L.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	The following comments refer to Appendix K6 and the same corrections may also be necessary in section 6.7.5 of the draft EIA relating to Impacts on the Marine Environment. Page numbers and section numbers refer to those used in Appendix K6. Page 17, paragraph 1, line 3 and page 83, under the heading Sensitivity of Receptors, paragraph 2, lines 3 & 4: Bank Cormorant does not occur in Algoa Bay. The nearest populations are around Cape Agulhas. White Pelican is a vagrant to Algoa Bay from breeding populations off the west coast or iSimangaliso Wetland Park, KwaZulu-Natal. These species should therefore be omitted.	These changes have been made to the Marine Ecology specialist report.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Under the heading Sensitivity of Receptors on page 47, paragraph 2, line 6 and under the same heading on page 72, line 7 and page 74, paragraph 2, line 6: Crowned Cormorant is a rare vagrant to Algoa Bay (it has occurred once to the best of my knowledge). The nearest populations are just east of Cape Agulhas, although 4 pairs bred in one	These changes have been made to the Marine Ecology specialist report.

Date of comment, format of comment, Commentator	Comment	Response
	year at Nature's Valley. This species should therefore be omitted.	
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Page 78, last sentence under the heading Sensitivity of Receptors: cut and paste error – this section is dealing with hypochlorite spills not LNG!	These changes have been made to the Marine Ecology specialist report.
Date Received: 18 April 2021 Format: Letter Commentator: Phillip Whittington	Page 89: footnotes 5 and 6 cited in the text should be footnotes 7 and 8 as provided at the bottom of the page.	These changes have been made to the Marine Ecology specialist report.
Date Received: 17 March 2021 Format: Email Commentator: Babalwa Layini (DAFF)	Thank you for copying forestry however Coega IDZ is covered by thicket within the thicket there are protected species milkwood and cheesewood a license under section 15 will be required.	CDC already has blanket permits for protected trees in the SEZ.
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys)	We understand that the overall project involves 3 gas-to-power plants, each with up to 1000MW generation capacity, and gas pipelines for the transmission, distribution and reticulation of natural gas within the CDC SEZ and Port of Ngqura. There is thus a separate EIA for each aspect of the project. Four Environmental Authorisations ("EAs") are thus being applied for. This document focuses on the Draft Gas EIA Report, which deals with the gas infrastructure components of the project, facilitating the supply of gas to the power plants, and gas and LNG to third-party off-takers.	The commentators understanding is correct.
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	Page 25 of the Draft Gas EIA Report notes that "The assessment of cumulative risks reported in the QRA is limited to an assessment of the vessels in their moored positions and excludes risks associated with ship movements, which would typically be assessed in a marine transportation study. No claims are made in the QRA regarding the level of risk, and the acceptability of the risk, associated with ship movements within and outside of the Port." It is submitted that these issues must be dealt with and must form part of the EIA Report.	Ship movements within and outside the port fall outside the scope of the EIA.
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	The quantitative risk assessment also excludes an assessment of road transportation outside of the facility, natural events (earthquakes, floods and so forth), ecological risk assessment and an emergency plan. The question arises as to why these aspects, as well as those in paragraph 2.1 above, were excluded. We submit that these are fundamental aspects of	These aspects are not generally dealt with as part of a QRA and / or are not required at EIA stage of development planning (e.g. emergency plan), and where relevant are dealt with via other specialist studies or by the EAP.

Date of comment, format of comment, Commentator	Comment	Response
	the quantitative risk assessment and must be dealt with.	
<p>Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)</p>	<p>The Draft Gas EIA Report notes that the Climate Change Impact Assessment (“CCIA”) was assessed through an analysis of available datasets. This includes that no new data was collected and the project lifetime is assumed to be 30 years. The CCIA was limited to a desktop study, no modelling was done, and the impact of a changing economy and changing legislation was not considered. It also states that “The limited availability of data results in increased uncertainties regarding the full extent and accuracy of the possible climate change impacts affecting the Gas Distribution Infrastructure’s operations, its supply chain, the surrounding communities, and the surrounding environment.” Please advise on why no new data was considered or endeavoured to be obtained, without which DEFF would not be able to conduct a comprehensive and wholistic assessment of the application.</p>	<p>The reference to new data in this comment refers, it is assumed, to ‘primary data’, i.e. data obtained specifically for this development on this site.</p> <p>This being the case it is important to understand that the proposed plant is not operational and it is therefore impossible to obtain primary data of emissions. The specialist’s task is therefore to predict, making conservative (i.e. reasonable worst case) assumptions regarding the likely emissions and impacts.</p> <p>The assumptions and limitations listed are typical for a study of this nature and it is clearly stated that a worst case scenario approach has been taken.</p>
<p>Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)</p>	<p>We note that the specialists, Promethium Carbon, deemed certain sources of emissions “immaterial” towards the GHG footprint of the gas distribution infrastructure. These exclusions are:</p> <ul style="list-style-type: none"> • Mobile combustion associated with the use of vehicles on the project site; • Stationary combustion from backup generators; • Employee commuting; • Quantity of construction and municipal waste generated, including the distance transported to landfill; • Emissions associated to nitrogen and LPG use as blending agents. 	<p>Text included here for context of the points that follow. No response required</p>
<p>Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)</p>	<p>We submit that the above must be considered in the CCIA. Each exclusion, when read in isolation, may be deemed to produce emissions insignificant when viewed in the context of the totality of the project. However, all exclusions must be cumulatively assessed and included in the CCIA, as they are likely to have an impact on the project’s overall climate change impacts.</p>	<p>Given the volumes of GHG emissions predicted (in terms of the worst case scenario on which the impact assessment is based), these are already considered to be very high, and the addition of the emissions listed will not materially change the impact significance rating or mitigation measures.</p>
<p>Date Received: 19 April 2021 Format: Letter</p>	<p>Further limitations are noted in the Draft Gas EIA Report, including that “detailed design documents for the Gas Distribution Infrastructure were not available.” It is not understood</p>	<p>Detailed design detail is often not available at EIA stage. The assessment (including the CCIA) has therefore been based on the worst case scenario approach whereby the</p>

Date of comment, format of comment, Commentator	Comment	Response
Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	how an accurate CCIA could be conducted when the designs for the infrastructure are not available. Clarity is thus sought in this regard.	predicted emissions are based on the technology option that is expected to result in the highest emission levels. The rationale for this is that the final technology used would result in the same or (more likely) lower emission levels than those on which the impact assessment was based.
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	The following is taken from page 115 of the Draft Gas EIA Report: <i>“The project, with its direct and indirect emissions, will emit in the order of 28 million tons of CO2e per year. Overall, 855 million tonnes CO2e of emissions are emitted across the lifetime of the project. This is equivalent to around 19% of the South African carbon budget...”</i> <i>“According to the methodology used for the CCIA, emissions over 10 million tons CO2e over the lifetime of the project, or greater than 0.227% of SA’s carbon budget would be rated as very high impact intensity rating.”</i> <i>“Due to the global nature of the impact, high intensity, long term duration and definite probability, the impact significance rating comes out as very high (negative), both with and without mitigation in place.”</i>	Text included here for context of the points that follow. No response required
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	It is clear that, even with mitigation measures in place, the climate change impacts of the proposed project are unavoidable and constitute a fatal flaw.	That climate change impacts are not mitigatable is correct – this would be the case for any project of this nature. Neither the EAP nor the specialist are of the view that this constitutes a fatal flaw. The specialist has commented on the potential benefits of the addition of natural gas fired power as part of the national energy mix, in terms of allowing for increased uptake of power from renewable energy sources.
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	Page 116 further highlights the risks the project will present regarding climate change: <i>“The health and safety of employees as well as their performance could also be significantly impacted, mostly due to increasing average temperatures and reducing water security. The climate change impacts that are likely to have severe impacts are associated with the increased frequency and severity of severe weather events, such as severe storms and severe rainfall events.”</i> The above confirms that the climate change impacts of the proposed project constitute a fatal flaw,	The statement provided relates to risks resulting from climate change that could potentially affect the project, and not direct impacts of the project on climate change (by way of GHG emissions), and should be treated as such (i.e. as risks as opposed to impacts).

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	especially considering that the Zone 13 and Zone 10 South and North plants will also be releasing high levels of emissions into the atmosphere.	
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	The Draft Gas EIA Report states that the plant will operate for 24 hours a day, and that the client could not provide enough detailed information for the noise impact assessment as the designs of the plant were not finalised.	As is specified in the EIR, the assessment is based on the worst case scenario where specific information is not available and the impacts presented therefore reflect this.
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	The potential noise impact on nearby receptors is summarised on page 119 of the Draft Gas EIA Report, and notes that the Damara Tern colony in Zone 10 is one such ecological receptor, as well as rare butterfly habitats. Page 121 states that "With the exception of the Damara Tern Colony, for the construction phase it is unlikely that the construction noise will impact on any NSAs. It is recommended that an avifauna specialist is consulted to further assess the impacts that will arise on the Damara Tern Colony at NSA 10."	Text included here for context of the points that follow. No response required
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	The EIA Executive Summary states "The predicted impact on the nearby Damara tern colony, primarily due to disturbance, is however rated to be of high significance." The summary also states that "The fundamental decision is whether to allow the development and the operation of the Gas Infrastructure, which is consistent with development policies for the area, but which may have significant climate change impacts in terms of greenhouse gas emissions, and possibly contribute to the localised extinction of the Damara tern colony, should the level of disturbance be found to be incompatible with their continued occupation." The area is home to 85% of the 61 pairs of the critically endangered Damara Tern breeding in South Africa. This again proves the negative noise and climate change impact of the gas infrastructure on this bird colony, and we submit that this is a fatal flaw in the Draft Gas EIA Report.	It is unclear how the greenhouse gas emissions resulting from the project would specifically impact the Damara tern population – the statement referenced does not refer to GHG emissions in the context of the Damara tern population, but rather in the context of national and global emissions. The impact of disturbance on the Damara tern population is rated as of high significance, although the population is situated more than 200 m (the no-go buffer distance recommended by an avifaunal specialist for other projects in the area) from the closest component of the gas infrastructure (the LNG and gas hub). It is also noted however that the main component of the LNG and gas hub, being the onshore storage and regasification facilities, are only planned for if and when the demand for natural gas merits it, and would take some years to reach that point, if it is ever reached.
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	The potential impact on the Damara Tern colony is exacerbated if one looks at pages 105 and 106 of the Draft Gas EIA Report, which states as below: "Loss and disturbance of vegetation will occur through the clearing of	While it is agreed that impacts on surrounding habitat and vegetation would result from development of the gas infrastructure, these would be localised. Mitigation measures are provided specifically to address alien invasive vegetation, limit habitat

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	<p>areas for the construction of the power plant units (including associated infrastructure) and the spread of invasive alien vegetation may be promoted through the disturbance to land. Faunal species could be lost and habitats fragmented through vegetation clearing for the development, displacing these animals to adjacent areas. During operation, noise and other anthropogenic impacts of the development will also disturb and displace fauna in the surrounding habitat.”</p> <p>This highlights the likely displacement of the Damara Tern colony, as well as other species of avifauna (including rare butterfly species). The report also states that “Most species will be able to migrate to other areas of the SEZ further from the site, provided suitable habitat is available.” It is not clear which species may not be able to migrate to other areas, and it is also not clear whether suitable habitat is available. Specific identification of “most species” is to be provide in accordance with a specialist avifauna report that is current and not reliant on any earlier study or authorisation.</p>	<p>destruction and disturbance, and potential disturbance of the Damara tern population. These include a recommended no-go buffer area of 200 m (recommended by a specialist for the sand mining operations in the area and based on current experience with this particular tern population).</p> <p>Butterflies are not avifauna and, apart from the gas pipeline, which would not be a key source of noise, the rare butterfly habitat mentioned is over 2 km from the gas infrastructure, and therefore is not predicted to be impacted by the development. The Open space management plan for the SEZ specifically aims to preserve suitable habitat for them and other protected species within the SEZ. It is further proposed that prior to vegetation clearing a search and rescue operation is conducted whereby any protected species (fauna and flora) within the development footprint are relocated to other suitable areas.</p>
<p>Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)</p>	<p>It is also noted that underwater noise impacts have not been addressed. The Safetech Noise Impact Assessment recommends that a “long-term hydrophone system is installed in the vicinity of the FSRU and LNGC berth and the harbour entrance to determine the current underwater noise climate”, and further that “a separate marine mammal noise specialist study should be conducted to determine the noise impacts on the marine fauna.”</p>	<p>Impacts of noise on marine fauna are addressed as part of the Marine Ecology specialist report (Appendix K6).</p>
<p>Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)</p>	<p>Similarly, the Marine Ecological Assessment recommends that such a study be done. The assessment notes that “As the noise will be a stationary source with likely habituation by affected groups, the behavioural disturbance is considered possible.” It is recommended in the Marine Ecological Assessment that an acoustic consultant be engaged to undertake a site-specific underwater noise assessment. The current absence of this study is deemed to be a fatal flaw and must be addressed prior to submission of the final Gas EIA Report.</p>	<p>The significance of impacts of underwater noise from construction on marine mammals is predicted by the specialist to be very low with mitigation. A number of essential mitigation measures are listed by the specialist to address this impact. An underwater noise assessment is listed as a best practice mitigation measure, as opposed to an essential one, that therefore the absence thereof is not considered to be a fatal flaw.</p>
<p>Date Received: 19 April 2021</p>	<p>Several other issues have emerged during our review of the Draft Gas EIA</p>	<p>As these are not listed it is impossible to comment. It is SRK’s view however</p>

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Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	Report and annexures. In addition to the above, we are of the view that report contains numerous material deficiencies.	that this is not the case and the report provides adequate information for DEFF to make a decision on the project.
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	We have noted from the Public Participation documents that the majority of Interested & Affected Parties ("I&APs") are made up of state departments, CDC tenants and other interested parties. No mention is made of either the local fishermen or Khoisan in the area, and it is doubtful whether they have been notified or consulted in any capacity. The Draft EIA Reports have thus failed to provide sufficient information to all I&APs to enable them to meaningfully comment on the applications.	The commentator is correct that the majority of IAPs are state departments. The Public participation process has provided a wide range of potential IAPs the opportunity to register as IAPs for this assessment and has fulfilled all of the legal requirements in terms of NEMA and was in accordance with the PPP plan for Covid that was submitted to and approved by DEFF prior to commencement of the EIA.
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	It is stated on page 141 that "The proposed Gas Infrastructure development may result in the direct creation of approximately 2000 temporary job opportunities (over a construction period of 3 years), of which 30% would be unskilled labour." This figure is applied to the gas infrastructure and to all 3 proposed plants, and is not substantiated by any evidence or supporting documentation/data.	This figure is an approximation, as provided by the project design team. Supporting documentation in this regard is generally not required at EIA stage.
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	No specialist avifauna study has been conducted. We submit that this is a fatal flaw, particularly considering the possible impacts on the Damara Tern colony. The project area of influence is likely to include several species of conservation concern and is within an Important Bird and Biodiversity Area. Algoa Bay is home to 85% of the 61 pairs of the critically endangered Damara Tern breeding in South Africa. The impact on avifauna due to an increase in atmospheric emissions, the disturbance to avifauna caused by the construction and operation of the plant, and the impact on avifauna due to emergency events, which would all form part of the specialist avifauna, have not been considered by the omission of this particular study.	The approach to the EIA as indicated in the approved plan of study is to address impacts on avifauna (specifically the Damara tern population in zone 10) through mitigation measures and knowledge of this population gained through specialist monitoring and assessment for other developments in the area. While it is recognised that the potential impact on this population due to disturbance is predicted to be high, it is also noted that much of the proposed gas infrastructure is located some distance from the population and the onshore storage and regasification proposed at the LNG and Gas hub would only be developed if and when demand for natural gas merits it, which is likely to take some years. It is unclear what emergency events are referred to, but it is unlikely that an avifaunal study would address these any better than the specialist studies already undertaken as part of the EIA.
Date Received: 19 April 2021 Format: Letter	We respectfully submit that the Draft Gas EIA Report, in its current form, falls short of the requirements as per the National Environmental	SRK is of the opinion that this is not the case and that the comments provided above do not merit this statement.

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Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	Management Act and the EIA regulations thereto.	
Date Received: 19 April 2021 Format: Letter Commentator: Tim van der Merwe (Gunn Attorneys on behalf of Karpowership SA)	The issues highlighted above are, in our view, material and potentially fatal if not properly dealt with prior to construction and implementation of the project. We reserve our Client's right to revise and expand on these initial comments and to request additional information as the process continues.	SRK has provided responses demonstrating that this is not the case.
Date Received: 14 April 2021 Format: Email Commentator: Mark Moodaley (Transnet)	Are you able to provide us with shape files or geo-reference CAD drawings of the project footprints and related infrastructure such pipelines, overhead cable etc.?	Data pack was provided with requested information.
Date Received: 15 April 2021 Format: Email Commentator: Ane Oosthuizen (SANPARKS)	The proposed dredge dumping site seems to be situated within the footprint of the MPA. Can you please make the shapefile for the dredge dumping site, from the Marine Specialist study, available to us urgently. Can you also include the authorisation for this proposed dumping site in terms of section 70, 71 or 72 of the Integrated Coastal Management Act.	Copy of TNPA's permit for dumping at the dredge spoil site and co-ordinates for the spoil site were provided. No further comments have been received to date.

Table 5: SAHRA Comments and Responses on the Draft Environmental Impact Report for CDC Gas to Power Project

Date of comment, format of comment, Commentator	Comment	Response
Date Received: 14/04/2021 Format: Letter Commentator: South African Heritage Resources Agency	The proposed gas infrastructure will consist of all key supporting infrastructure required for the operation of the <ul style="list-style-type: none"> • CDC's proposed gas to power plants in the Coega SEZ. The key infrastructure which falls under the remit of the Maritime and Underwater Cultural Heritage (MUCH) unit is: • Two floating storage and regasification units (FSRU), moored in the port, which will receive, store and regasify the LNG from the LNG carrier (LNGC). • A new jetty with offloading platform and berthing facilities for the FSRU and LNGC in the Port of Ngqura. 	Comment is to provide context – no response is required.

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	<ul style="list-style-type: none"> • Gas and cryogenic pipelines from the FSRU and jetty to the proposed powerplants. • Pipelines for the transmission of seawater from the abstraction point in the port to Zone 10. • Dredging within the port and a disposal area for the dredged material. 	
<p>Date Received: 14/04/2021 Format: Letter Commentator: South African Heritage Resources Agency</p>	<p>Section 6.6.5 of the DEIA addresses management and mitigation measures relating to heritage during the construction phase of the project, however these measures do not include any reference to maritime heritage.</p> <p>SAHRA insists that maritime heritage is addressed in these measures so that people working on site are aware that maritime heritage could be encountered. As maritime heritage is a national competence, should historic remains be uncovered during the project, all works must cease and may not commence until SAHRA has been contacted to advise the way forward.</p>	<p>This requirement, with specific reference to maritime heritage, has been included in the mitigation measures for heritage impacts, and EMPr.</p>
<p>Date Received: 14/04/2021 Format: Letter Commentator: South African Heritage Resources Agency</p>	<p>It is further noted that the preferred site for offshore disposal of dredged spoil falls under an existing authorisation for an earlier EIA which will also not be addressed in the comment.</p>	<p>Comment is to provide context – no response is required.</p>
<p>Date Received: 14/04/2021 Format: Letter Commentator: South African Heritage Resources Agency</p>	<p>The proposed development for the FSRUs, jetty and pipelines all take place within the port on the inside of the existing modern breakwater, this area has seen a high level of activity as the Port of Ngqura is a recent development. Localised dredging will be undertaken to accommodate the port manoeuvring area, this dredging will be with an area that has been previously dredged and therefore it is unlikely that any heritage remains will be uncovered.</p>	<p>Comment is to provide context – no response is required.</p>
<p>Date Received: 14/04/2021 Format: Letter Commentator: South African Heritage Resources Agency</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>Comment is to provide context – no response is required.</p>
<p>Date Received: 14/04/2021 Format: Letter Commentator: South African Heritage Resources Agency</p>	<p>In 2004 during the development of the port, the wreck of the County of Pembroke was uncovered. She wrecked in 1903 when she ran aground in Algoa Bay during a storm, her hulk was later moved further</p>	<p>Reference to this has been included in the baseline and impact assessment sections of the FEIR relating to heritage impacts.</p>

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	around the bay and sunk. When the remains of the wreck were discovered, she was the subject of emergency archaeological recording before being blown up and removed.	
Date Received: 14/04/2021 Format: Letter Commentator: South African Heritage Resources Agency	Despite the discovery of a shipwreck during construction of the port, subsequent further development and dredging of the area means that the MUCH unit at SAHRA considers the possibility of any impact on maritime heritage resources to be low.	Comment is to provide context – no response is required.
Date Received: 14/04/2021 Format: Letter Commentator: South African Heritage Resources Agency	SAHRA has noted in section 3.5.7 of the DEIA that the “Infrastructure for the intake and discharge of seawater for heating purposes is excluded from the scope of this EIA process and will be addressed by the CDC’s Marine Pipeline Servitude EIA process that is currently underway.” Therefore this part of the development is not addressed within this comment.	Comment is to provide context – no response is required.
Date Received: 14/04/2021 Format: Letter Commentator: South African Heritage Resources Agency	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.	The DEIR has been uploaded to SAHRIS, as well the FEIR, and any other further updates, be.