



3 October 2012

To: Deborah O'Connor,  
Senior Environmental Consultant,  
Sebata Group

**RE: Kusile Power Plant Ecological Draft Specialist Statement**

MDA Group received a request from the Sebata Group to provide a specialist statement concerning the potential impacts of the ash dump associated infrastructure at the Kusile Power Station. A Basic Assessment process is being conducted on behalf of Eskom for NEMA listed activities 11 and 18 of GN R544 for the construction of the Ash Dump Dirty Dam (ADDD) and ash dump embankment culvert within a wetland, a pipeline crossing a stream between the ADDD and the station Dirty Dam (SDD) and a fence-line around the perimeter of the project area and as well as around the ash dump.

Although the construction of the power station and associated infrastructure (ADD, SDD etc.) was authorised in terms of the 2006 EIA, construction within wetlands was not authorised. This was due to an administrative oversight as the specialist studies, impacts and mitigation relating to the wetlands were addressed in the Ninham Shand (Pty) Ltd. Environmental Impact Assessment Report.

The ecological (vegetation and terrestrial fauna) assessment was undertaken for the Kusile Power Station Project. This report was submitted to Ninham Shand (Pty) Ltd. and formed part of the Kusile Power Station Environmental Impact Assessment (EIA). Upon receiving this request from Sebata, the Ecological study was assessed in conjunction with the proposed revised ash dump plan and associated infrastructure layout. The initial site investigation identified a low habitat diversity due to farming and grazing pressures. The study also stated that the ecological function of the grasslands had been changed to a large extent with very few areas of natural veld remaining. Barren patches were noted. Although a few protected species were found in the wetland communities (*Cyrtanthus breviflorus* and *Crinum bulbispermum*) the proposed activities are not expected to have any additional impact on these protected species.

Based on this assessment, it can be stated that there will be no foreseeable additional impacts on the grasslands or riparian vegetation on the streams and stream banks, other than those assessed and discussed in the Ecological Report for the Proposed Coal-Fired Power Station near Kendal (Kusile).

Design Changes since the EIA & Amendment Application was undertaken:

1. The ash dump has subsequently been redesigned in order to protect a wetland depression that occurred within the original ash dump boundary. An eco-hydrological study was undertaken for this depression and it was determined that a

buffer of between 133m and 225m is maintained from the wetland boundary. Eskom decided to redesign the ash dump to protect the wetland depression.

2. The total size of the ash dump has been reduced.

In light of the reduction in the ash dump footprint to exclude the wetland, it can be stated that the impacts on the wetland will be reduced.

Kind Regards,

A handwritten signature in purple ink, appearing to read 'PJ du Preez', is centered on a light blue rectangular background.

PJ du Preez  
Machetcha Development Associates (MDA)