

# APPENDIX K

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## COMMENTS AND RESPONSES REPORT

PROPOSED 750MW COMBINED CYCLE GAS TURBINE  
POWER PLANT IN RICHARDS BAY, CITY OF UMHLATHUZE  
LOCAL MUNICIPALITY, KING CETSHWAYO DISTRICT  
MUNICIPALITY, KWAZULU-NATAL

## COMMENTS AND RESPONSES REPORT

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### SCOPING PHASE

(DFFE REFERENCE NO.: 14/12/16/3/3/2/2799)

APRIL 2026



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## 1 PROJECT BACKGROUND AND MOTIVATION

Nemai Consulting was appointed by Mabasa Energy and Fuels (Pty) Ltd (the “Applicant”), to conduct the Environmental Impact Assessment (EIA) for the proposed 750MW Combined Cycle Gas Turbine (CCGT) Power Plant in Richards Bay, City of uMhlathuze (CoU) Local Municipality, King Cetshwayo District Municipality (KCDM), Kwazulu-Natal (KZN) (the “Project”).

Following the promulgation of the Integrated Resource Plan (IRP) in 2019, the Minister of Mineral Resources and Energy determined that the procurement of new generation capacity is required to ensure energy security and that approximately 3000 megawatts (MW) would be procured, to be generated from gas. The Gas Independent Power Producers Procurement Programme (GASIPPPP) was identified by the Department of Mineral Resources and Energy (DMRE) as the appropriate programme to procure the new generation capacity.

The Applicant intends to bid for the GASIPPPP and/or other suitable energy markets. The Project is located within Phase 1F of the Richards Bay Industrial Development Zone (RBIDZ) under a long-term lease agreement. The RBIDZ, which is a Special Economic Zone (SEZ), is a purpose-built and secured industrial estate linked to the Port of Richards Bay (PoRB) which aims to attract local and foreign direct investment.

## 2 APPLICATION FOR ENVIRONMENTAL AUTHORISATION

The process for seeking Environmental Authorisation for the Project under the National Environmental Management Act (Act No. 107 of 1998) (NEMA) is being undertaken in accordance with the EIA Regulations of 2014 (as amended). In terms of NEMA, the competent authority for this application is the Department of Forestry, Fisheries and the Environment (DFFE).

Based on the listed activities triggered, the requisite environmental assessment for the Project is a Scoping and Environmental Impact Reporting (S&EIR) Process.

## 3 COMMENTS AND RESPONSES REPORT

The draft Scoping Report was lodged for public review from 6 March until 8 April 2026. This **Comments and Responses Report** (CRR) serves to record the comments received from authorities and Interested and Affected Parties (I&APs) during the review of the draft Scoping Report. The CRR also attempts to address comments received through responses and input

provided by the Applicant, technical team, Environmental Assessment Practitioner (EAP) and environmental specialists (as relevant). The CRR will be expanded on as the EIA process progresses, and more comments are received related to the Project.

The following is noted:

- ❑ All written comments received are included verbatim in the CRR.
- ❑ In terms of the Protection of Personal Information Act (Act No. 4 of 2013), all contact details of persons provided in the comments received by the I&APs have been redacted.

## 4 COMMENTS AND RESPONSES

### 4.1 Scoping Phase

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                           | RAISED BY                                                                 | SOURCE & DATE     | RESPONSE                                                                                                                               | RESPONSE BY |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------|-------------|
| 1.  | Reference is made to the below notification, kindly provide us with a kmz file of the site.                                                                                                                                                                                                                                                                                                      | L. Sibanyoni – South African National Roads Agency SOC Ltd (SANRAL)       | Email (05/03/26)  | Spatial data for the site was provided to SANRAL, as requested.                                                                        | EAP         |
| 2.  | Trust you are well and good can you please kindly provide us with a kmz file of the site.                                                                                                                                                                                                                                                                                                        | S. Lamula – SANRAL                                                        | Email (05/03/26)  | Spatial data for the site was provided to SANRAL, as requested.                                                                        | EAP         |
| 3.  | Please place me on your email list so that I also receive the emails and notices such as the one in the email below. Many thanks. Including emails for meeting notices.                                                                                                                                                                                                                          | N. Padayachee – uMngeni-uThukela Water (UUW)                              | Email (05/03/26)  | The database of I&APs was updated accordingly.                                                                                         | EAP         |
| 4.  | Please note that the development is located within KZN and not below the Maritime High Water Mark, therefore comments in terms of section 38 of the NHRA must be sought from Amafa KZN Heritage Institute.                                                                                                                                                                                       | N. Khumalo – South African Heritage Resources Agency (SAHRA)              | Email (06/03/26)  | The Amafa and Research Institute was notified of the Project and the review of the draft SR.                                           | EAP         |
| 5.  | This serves as a notice of receipt and also confirms that your application has been captured in our electronic Land Use Database<br><br>Details of your application as captured<br>Type: DEVELOPMENT<br>Your reference number:<br>Property description: RICHARDS BAY POWER PLANT<br><br>Please quote this reference number in all queries:<br>Land Use Management Reference Number: 2028/10/4649 | S.B. Thabede – KZN Department of Agriculture and Rural Development (DARD) | Letter (10/03/26) | It is noted that the application was captured on KZN DARD's database. The specified reference number will be used for related queries. | EAP         |
| 6.  | Kindly review the attached ESKOM Application requirements.<br><br>Please send thorough the layout plan in one of the stipulated file formats i.e. KMZ/KML, DXF or DGN .                                                                                                                                                                                                                          | S. Naicker – Eskom                                                        | Email (11/03/26)  | The Applicant is to adhere to all Eskom's requirements.                                                                                | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | RAISED BY                                                | SOURCE & DATE        | RESPONSE                                                                                                                                                                                                                                                                                                                                                       | RESPONSE BY |
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|     | Note. We are unable to overlay PDF files on our system hence we kindly request the above formats.<br><br>[Attachments – (1) Eskom LR Application Requirements; (2) ESKOM REQUIREMENTS]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                          |                      |                                                                                                                                                                                                                                                                                                                                                                |             |
| 7.  | Can you kindly register me as an I&AP for the above-mentioned project?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | D. Nunez                                                 | Email<br>(11/03/26)  | The database of I&APs was updated with Mr Nunez's details.                                                                                                                                                                                                                                                                                                     | EAP         |
| 8.  | With reference to your application and accompanying plans received by Eskom on the 05 <sup>th</sup> of March 2026, we confirm that an investigation has been carried out with regard to the supply of electricity, as well as any encroachment into Eskom's servitudes, in respect to the application as set out above.<br><br>Eskom's GIS system does not indicate any presence of Eskom Distribution infrastructure (132-kV, 88-kV, 33-kV, 22-kV and 11-kV overhead lines/underground cables) traversing the areas depicted on the KMZ application file "Layout export".<br><br>The application area is located within the Municipality's area of supply. Whilst on the ground, should you detect that there are overhead lines/underground cables located on the application area, kindly inform the Municipality and you will be advised accordingly. | S. Naicker – Eskom                                       | Letter<br>(12/03/26) | It is noted that Eskom's GIS system does not indicate any presence of Eskom Distribution infrastructure traversing the project area.                                                                                                                                                                                                                           | EAP         |
| 9.  | The RBCAA kindly requests an online Focus Group meeting for the presentation of the DSR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | S. Camminga – Richards Bay Clean Air Association (RBCAA) | Email<br>(15/03/26)  | A Focus Group Meeting was held with the RBCAA on 23 March 2023 and the minutes are included in the final SR.                                                                                                                                                                                                                                                   | EAP         |
| 10. | Please note that SANRAL is not affected by the proposed development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | L. Sibanyoni – SANRAL                                    | Email<br>(15/03/26)  | It is noted that SANRAL is not affected by the Project.                                                                                                                                                                                                                                                                                                        | EAP         |
| 11. | My name is Nokwazi, I stay here in Richards Bay and I work with the South Durban Community Environmental Alliance (SDCEA). I'm writing about the public participation for the newly announced proposed 750mw combined cycle gas turbine power plant in Richards bay, City of Umhlathuze local municipality, King Cetshwayo District Municipality, KwaZulu-Natal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N. Magubane – SDCEA                                      | Email<br>(18/03/26)  | Thank you for your constructive engagement and for raising these matters.<br><br>Personal information provided for purposes of the EIA process is processed in accordance with the Protection of Personal Information Act. We have updated our database of I&APs with the community members included in your list. Their information will only be used for the | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | RESPONSE BY |
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|     | <p>We want to register the following community members as Interested and Affected Parties (I&amp;APs). See the list of names attached. I have heard that a person's information needs to be kept safe in terms of the POPIA Act. Please confirm. They are all from communities that are about 30km away from the proposed developments: Nseleni, KwaMbonambi, Nhlabane. (These are the communities and areas SDCEA work with.)</p> <p>We also see that there is public meeting on 25 March at 17:30 am. We know many people would love to join and learn about the projects, but it's not easy for them to attend at these times. Some of the reasons we hear from community people include:</p> <ul style="list-style-type: none"> <li>• The distance to the venues is far and transport money is a big problem,</li> <li>• 17:30 in the afternoon is also not ideal as this is the time when parents are busy with children, cooking, preparing for school,</li> <li>• Many families depend on one person's income and they can't take time off work to travel at these times,</li> <li>• Safety concerns travelling in the evening,</li> <li>• In general, people in poor communities often struggle to join meetings scheduled far from where they live.</li> </ul> <p>Because of all this, we kindly ask if you can please arrange separate or alternative meetings that are more convenient for the communities who live further out before the end of the commenting period for the scoping report so that community members have a chance to make comments. SDCEA can help with identifying suitable venues closer to them. But we would really appreciate your support in organising this with us, so that more people can participate and understand what these projects are about.</p> <p>We also want to ask: what else can your team do to help inform more community members about the developments? Many of them want to understand gas-to-power, the potential impacts, and what it means for their lives. If there are flyers, radio announcements,</p> |           |               | <p>purposes of the EIA process for this project, and will not be shared. We will exclude the contact information of all parties where our database needs to be appended to a report that is lodged in the public domain.</p> <p>We note and understand the points raised regarding communities living further from Richards Bay. We welcome SDCEA's offer to assist in identifying suitable venues or practical approaches and propose that this be explored further. In this regard, can SDCEA please advise on suitable venues closer to these communities.</p> <p>Certain measures employed to inform community members included providing notifications in English, isiZulu and Afrikaans; advertising through the Zululand Observer and Isolezwe newspapers; and the translation of the Executive Summary of the draft SR into isiZulu. Note that the public participation tasks undertaken for the Scoping Phase are further presented in Section 12.3 of the draft SR. We remain open to discussing additional practical and constructive ways of sharing information.</p> |             |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                    | RAISED BY           | SOURCE & DATE    | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RESPONSE BY |
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|     | <p>translated summaries, extra workshops, or any other ways we can spread the info together, that will help a lot.</p> <p>We look forward to working with you so that everyone gets real chance to participate in these processes.</p>                                                                                                                                                                                                                                    |                     |                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |             |
| 12. | <p>I trust you are well, and thank you.</p> <p>Nseleni Community Hall – Contact person: Ms H.N. Mthembu<br/>Office landline: [REDACTED]<br/>Email: [REDACTED]<br/>Nhlabane Hall – I will share the contact details tomorrow, as we are using the hall then.</p> <p>Kindly confirm a suitable date for this engagement to be during the week, preferably for a morning session (09:00–12:00). Please also notify the guests using the spreadsheet I previously shared.</p> | N. Magubane – SDCEA | Email (18/03/26) | <p>Thank you for the information provided regarding potential community venues.</p> <p>We are in the process of securing with the Nseleni Community Hall with the City of uMhlathuze. The hall has been tentatively booked for next week Thursday, 26 March 2026, from 9:00 to 11:00. This is pending the final approval by the municipality. Ms Mthembu is on leave, and we have been engaging with Bonginkosi.</p> <p>This engagement is intended to supplement the public meeting already scheduled in Richards Bay and to provide an accessible opportunity for communities located further from the project site to engage with the project and provide input. We do not therefore intend to arrange a further separate engagement at the Nhlabane Hall at this stage.</p> <p><i>The meeting with the Nseleni Community was held on 26 March 2026 from 9:00 – 11:30 at the Community Hall.</i></p> <p><i>The Plan of Study (Section 14.5.3 of the SR) was also updated to cater for dedicated meetings with local communities during the EIA phase.</i></p> | EAP         |
| 13. | <p>I would like to inform you that we have gas supply available to support your development in RCB. We believe this could align well with your current and future energy requirements.</p> <p>In addition, we would appreciate it if you could kindly connect us with the developer for the GtP Mabasa project.</p>                                                                                                                                                       | S. Nkosi – SLG      | Email (20/03/26) | <p>This correspondence was forwarded to the Applicant for further consideration.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | RAISED BY                          | SOURCE & DATE                          | RESPONSE                                                                                                                                                                                                                                                                                                      | RESPONSE BY    |
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|     | We are keen to explore potential collaboration and assess how our gas supply can support that development as well.                                                                                                                                                                                                                                                                                                                                                                                                    |                                    |                                        |                                                                                                                                                                                                                                                                                                               |                |
| 14. | <p>Please register me as an I&amp;AP on the above-mentioned project's database.</p> <p>We are conducting a BA for a grid connection in close proximity to your development site and it will be appreciated if you can send me a KMZ file of the location of the 750MW CCGY Power Plant.</p>                                                                                                                                                                                                                           | N. Venter – Savannah Environmental | Email (19/03/26)                       | <p>The database of I&amp;APs was updated accordingly.</p> <p>The spatial data for the site was shared with Savannah Environmental.</p>                                                                                                                                                                        | EAP            |
| 15. | F. Schmidt questioned the choice of 275 kV for power evacuation given the local 132 kV infrastructure.                                                                                                                                                                                                                                                                                                                                                                                                                | F. Schmidt                         | Focus Group Meeting - RBCAA (23/03/26) | G. du Plessis clarified that the scope of the Project excludes the power lines that will feed into the grid. He noted that the final voltage will be determined by the grid export study.                                                                                                                     | Technical Team |
| 16. | F. Schmidt raised a concern about the municipality's ability to supply the required water volumes.                                                                                                                                                                                                                                                                                                                                                                                                                    | F. Schmidt                         | Focus Group Meeting - RBCAA (23/03/26) | G. du Plessis confirmed that only a small portion of the water required for the plant would be potable, with the majority being raw or slightly treated water. He indicated that provision is made for on-site treatment for process needs.                                                                   | Technical Team |
| 17. | F. Schmidt noted that, for the dry cooling option, the current layout indicates that the dry cooling fans would be positioned adjacent to Bronze Bar Road, which is subject to significant dust loads from nearby transfer facilities. He highlighted that this could potentially affect the efficiency of the dry cooling systems.                                                                                                                                                                                   | F. Schmidt                         | Focus Group Meeting - RBCAA (23/03/26) | G. du Plessis indicated that the plant layout is still at a preliminary stage and consideration would still need to be given to dust loads.                                                                                                                                                                   | Technical Team |
| 18. | F. Schmidt enquired about the disposal of blowdown water.                                                                                                                                                                                                                                                                                                                                                                                                                                                             | F. Schmidt                         | Focus Group Meeting - RBCAA (23/03/26) | G. du Plessis stated that the final approach depends on the cooling configuration and water quality, with options including discharge to stormwater or other sinks, subject to assessment. He noted that the option of the evaporative cooling has significantly more wastewater than the dry-cooling option. | Technical Team |
| 19. | F. Schmidt noted that he is aware of the separate EIA for the LNG infrastructure to supply the Richards Bay Industrial Development Zone (RBIDZ). He stated that the location of the LNG supply point in relation to the project site needs to be taken into consideration. He asked whether, in the absence of a direct pipeline connection, alternative supply options—such as tanker-delivered gas—would be considered, or whether the lack of pipeline infrastructure would preclude the use of gas for the plant. | F. Schmidt                         | Focus Group Meeting - RBCAA (23/03/26) | G. du Plessis noted that the volume of gas required for this type of installation would be significant. As such, a gas pipeline would form an integral component of the project and is likely necessary to ensure its feasibility.                                                                            | Technical Team |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | RAISED BY   | SOURCE & DATE                          | RESPONSE                                                                                                                                                                                                                                                                                                                     | RESPONSE BY |
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| 20. | S. Camminga expressed concern regarding the separation of the EIA applications for the LNG pipeline and the power plant, noting that this may complicate the assessment of cumulative impacts. She further requested clarity on the proposed pipeline route from the Port of Richards Bay to the project site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | S. Camminga | Focus Group Meeting - RBCAA (23/03/26) | B. Skhosana indicated that a Memorandum of Understanding (MoU) has been signed between the RBIDZ and Vopak for the development of a pipeline extending to the proposed facility. This forms part of the broader gas hub development in Richards Bay.                                                                         | Applicant   |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |             |                                        | D. Henning stated that further details of the proposed LNG infrastructure will be provided in the EIA Report.                                                                                                                                                                                                                | EAP         |
| 21. | C. Webb stated that from Mondi's perspective, as one of the largest consumers of natural gas in the Richards Bay area, there has been growing concern in recent years regarding the security of gas supply. It was noted that this has led to the consideration of alternative fuel sources. She also indicated that the area is already over-allocated in terms of water resources and periodically experiences significant drought conditions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | C. Webb     | Focus Group Meeting - RBCAA (23/03/26) | D. Henning indicated that the Applicant has been in discussions with uMngeni-uThukela Water to supply water for the proposed facility. He further noted that the engineers are also considering options to lower water consumption, such as dry-cooling. He mentioned that this will be explained further in the EIA Report. | EAP         |
| 22. | S. Camminga noted that the Site Sensitivity Verification Report for Air Quality makes references to air quality monitoring undertaken by both the City of uMhlathuze and the RBCAA and this report also presents some data. She stated that all the data was sourced from the RBCAA, as the municipality has extensive challenges around keeping their monitoring network running and their data does not meet the required standards for statistical analysis. She requested that this distinction be clearly and consistently stated throughout the report wherever air quality data is discussed. She also noted issues with some of the data and the graphs presented, which will be detailed in her written comments. She mentioned that it appears that the specialist sourced data from the South African Air Quality Information System (SAAQIS). She noted that SAAQIS automatically invalidates SO <sub>2</sub> data above certain thresholds. In doing so, it has been incorrectly invalidating valid data from the RBCAA, as their stations only submit validated data to SAAQIS. Therefore, she recommended that the specialist request the data directly from the RBCAA rather than relying on downloads from SAAQIS. | S. Camminga | Focus Group Meeting - RBCAA (23/03/26) | D. Henning indicated that the written comments from the RBCAA will be forwarded to the Air Quality Specialist for his consideration and feedback.                                                                                                                                                                            | EAP         |
| 23. | Z. Malibiji asked whether the relevant water uses under the National Water Act (Act No. 36 of 1998) *NWA) had been                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Z. Malibiji | Focus Group                            | D. Henning noted that the Scoping Report includes a section on the NWA and its relevance to the project. He indicated that the                                                                                                                                                                                               | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                            | RAISED BY                               | SOURCE & DATE                          | RESPONSE                                                                                                                                                                                                                                     | RESPONSE BY    |
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|     | identified and whether the Water Use Licence Application (WULA) process had commenced.                                                                                                                                            |                                         | Meeting - RBCAA (23/03/26)             | water uses triggered by the project still need to be confirmed and the WULA process needs to be initiated with the Department of Water and Sanitation (DWS).                                                                                 |                |
| 24. | F. Schmidt noted that there are corrosion risks in the project area that could pose a potential threat to project infrastructure.                                                                                                 | F. Schmidt                              | Focus Group Meeting - RBCAA (23/03/26) | G. du Plessis indicated that they are cognisant of Richards Bay's harsh and corrosive atmospheric conditions and confirmed that these factors will be taken into account during the selection of materials.                                  | Technical Team |
| 25. | S. Camminga emphasised the need for the Noise Impact Assessment to consider nighttime impacts on nearby residential areas due to local wind patterns.                                                                             | S. Camminga                             | Focus Group Meeting - RBCAA (23/03/26) | D. Henning indicated that this would need to be considered as part of the Noise Impact Assessment.                                                                                                                                           | EAP            |
| 26. | S. Camminga raised concerns about the direct benefits to the local community given that power is exported to the national grid while local residents bear potential negative impacts.                                             | S. Camminga                             | Focus Group Meeting - RBCAA (23/03/26) | D. Henning indicated that this would need to be considered as part of the Socio-Economic Impact Assessment and Social Impact Assessment.                                                                                                     | EAP            |
| 27. | S. Camminga requested inclusion of a Major Hazardous Installation (MHI) risk assessment and robust emergency response planning, considering local disaster management limitations and cumulative risks from other MHI facilities. | S. Camminga                             | Focus Group Meeting - RBCAA (23/03/26) | D. Henning confirmed that a Quantitative Risk Assessment would be undertaken for the project and that the Environmental Management Programme (EMPr) would include measures for managing emergencies.                                         | EAP            |
| 28. | S. Camminga enquired about emissions during bypass (simple cycle) mode and worst-case scenarios.                                                                                                                                  | S. Camminga                             | Focus Group Meeting - RBCAA (23/03/26) | G. du Plessis clarified that in bypass mode, the exhaust gas does not pass through the Heat Recovery Steam Generators (HRSGs), resulting in higher temperature but no change in exhaust constituents, and no additional chemicals are added. | Technical Team |
|     |                                                                                                                                                                                                                                   |                                         |                                        | D. Henning indicated that the Air Quality Specialist will assess worst-case scenarios.                                                                                                                                                       | EAP            |
| 29. | Please note that the proposed development require approval from KZN Amafa.<br><br>You are required to submit the application on Sahriss.                                                                                          | K. Zondi – Amafa and Research Institute | Email (23/03/26)                       | The Amafa and Research Institute was notified of the Project and the review of the draft SR. The relevant information was uploaded to the South African Heritage Resources Information System (SAHRIS).                                      | EAP            |
| 30. | K. Robbette asked which cooling technology will be selected.                                                                                                                                                                      | K. Robbette                             | Public Meeting (25/03/26)              | G. du Plessis indicated that this still needs to be confirmed.                                                                                                                                                                               | Technical Team |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                         | RAISED BY    | SOURCE & DATE             | RESPONSE                                                                                                                                                                                                                                                                                                                                                  | RESPONSE BY    |
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| 31. | D. Mkhwanazi enquired about the location of the site.                                                                                                                                                                                                                                                                                          | D. Mkhwanazi | Public Meeting (25/03/26) | D. Henning indicated that his presentation includes a slide with a locality map. He stated that the site is located within Phase 1F of the Richards Bay Industrial Development Zone (RBIDZ).                                                                                                                                                              | EAP            |
| 32. | D. Mkhwanazi asked how wastewater will be managed.                                                                                                                                                                                                                                                                                             | D. Mkhwanazi | Public Meeting (25/03/26) | G. du Plessis indicated that all liquid effluent produced by the plant will be treated on site and discharged to the municipal sewer network. He noted that the dry-cooling option will produce less water.                                                                                                                                               | Technical Team |
| 33. | D. Mkhwanazi enquired as to where the electricity generated by the plant would be supplied.                                                                                                                                                                                                                                                    | D. Mkhwanazi | Public Meeting (25/03/26) | G. du Plessis responded that the electricity would be fed into Eskom's grid.                                                                                                                                                                                                                                                                              | Technical Team |
| 34. | P. Madibana noted that the presentation addressed Particulate Matter (PM) levels during the operational phase and recommended that information on PM levels during the construction phase also be provided.                                                                                                                                    | P. Madibana  | Public Meeting (25/03/26) | D. Henning responded that PM levels for both the construction and operational phases would be assessed as part of the Air Quality Impact Assessment.                                                                                                                                                                                                      | EAP            |
| 35. | N. Magubane noted that the Site Sensitivity Verification (SSV) Report, which is appended to the draft Scoping Report, indicated that the relative Civil Aviation Theme sensitivity is high according to the National Web-Based Environmental Screening Tool. She asked why a Civil Aviation Study will not be undertaken.                      | N. Magubane  | Public Meeting (25/03/26) | D. Henning explained that there are already a number of existing high buildings and structures located between the project site and Richards Bay Airport. On this basis, the undertaking of a dedicated Civil Aviation Study was not deemed necessary. He further indicated that the South African Civil Aviation                                         | EAP            |
| 36. | P. Madibana emphasised the importance of effective stakeholder engagement and requested that community workshops be held with local communities during the EIA phase. She further noted that there were certain constraints affecting the ability of some community members to attend the public meeting, including the timing of the meeting. | P. Madibana  | Public Meeting (25/03/26) | D. Henning indicated that a separate meeting has been scheduled for 26 March 2026, from 09:00 to 11:00, at the Nseleni Community Hall to enable engagement with the local community during the daytime. He noted that provision will also be made for a similar meeting during the EIA phase.                                                             | EAP            |
| 37. | P. Madibana noted the employment opportunities associated with the construction and operational phases of the project, as presented by B. Skhosana. She enquired about the potential health risks to workers associated with working at the facility.                                                                                          | P. Madibana  | Public Meeting (25/03/26) | D. Henning indicated that an Occupational Health and Safety (OHS) system will be implemented for the facility. He further noted that a number of specialist studies forming part of the EIA will assess potential risks to human health, and that the Environmental Management Programme (EMPr) will include appropriate OHS-related mitigation measures. | EAP            |
| 38. | P. Madibana emphasised the need for the specialists undertaking the Air Quality Impact Assessment and the                                                                                                                                                                                                                                      | P. Madibana  | Public Meeting            | D. Henning indicated that the Health Impact Assessment will take into consideration all                                                                                                                                                                                                                                                                   | EAP            |

| No. | VERBATIM COMMENT/QUERY                                                                                                                            | RAISED BY     | SOURCE & DATE             | RESPONSE                                                                                                                                                                                                                                                                                                                                                   | RESPONSE BY    |
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|     | Health Impact Assessment to work closely together in order to adequately assess the plant's potential human health risks.                         |               | (25/03/26)                | relevant specialist studies, including the Air Quality Impact Assessment.                                                                                                                                                                                                                                                                                  |                |
| 39. | P. Madibana stated that the assessment of cumulative impacts needs to include the supply of gas to the facility.                                  | P. Madibana   | Public Meeting (25/03/26) | D. Henning noted that potential cumulative impacts were identified in the Scoping Report, which will be assessed during the EIA phase.                                                                                                                                                                                                                     | EAP            |
| 40. | An unknown attendee asked whether separate EIAs are being undertaken for the LNG infrastructure and the CCGT Power Plant.                         | -             | Public Meeting (25/03/26) | D. Henning confirmed that this is the case, as these projects have different proponents.                                                                                                                                                                                                                                                                   | EAP            |
| 41. | An unknown attendee enquired whether approval would be required from the South African National Defence Force (SANDF) for the proposed project.   | -             | Public Meeting (25/03/26) | D. Henning responded that the site's sensitivity in relation to the Defence Theme, as determined using the National Web-Based Environmental Screening Tool, has been assessed and is documented in the SSV Report appended to the draft Scoping Report. He also noted that it will be confirmed whether the SANDF is included in the stakeholder database. | EAP            |
| 42. | D. Mkhwanazi enquired whether the project remains feasible in light of the increase in gas prices.                                                | D. Mkhwanazi  | Public Meeting (25/03/26) | B. Skhosana responded that this form part of the project's commercial considerations and confirmed that mitigation measures are being assessed to manage this risk.                                                                                                                                                                                        | Applicant      |
| 43. | D. Mkhwanazi asked whether gas would be stored on site and, if so, whether municipal approval would be obtained and a risk assessment undertaken. | D. Mkhwanazi  | Public Meeting (25/03/26) | G. du Plessis clarified that gas will not be stored on site. He further noted that a Quantitative Risk Assessment will be undertaken for the overall project.                                                                                                                                                                                              | Technical Team |
| 44. | Hi I was unable to attend, farm issue with cattle. Pls can you give me the just of what went on.                                                  | S. Aspden     | Email (25/03/26)          | Sorry you couldn't join us. We will be having more meetings when the draft EIA Report is lodged for public review, including physical and virtual meetings. I will provide further details in the future.<br><br>Copies of the presentations from the meeting were shared with Mr Aspden.                                                                  | EAP            |
| 45. | No electronic links? Would like to participate                                                                                                    | T. van Tonder | Email (25/03/26)          | We will be having more meetings when the draft EIA Report is lodged for public review, including physical and virtual meetings. I will provide further details in the future.<br><br>Copies of the presentations from the meeting were shared with Mr van Tonder.                                                                                          | EAP            |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                | RAISED BY           | SOURCE & DATE                        | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                     | RESPONSE BY |
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| 46. | Kindly confirm whether there will be a virtual session held, if so, kindly provide a link.                                                                                                                                                            | L. Perumal – RBIDZ  | Email (25/03/26)                     | The public meeting was a face-to-face session. We will cater for a virtual meeting when the draft EIA Report is lodged for public review.<br><br>Copies of the presentations from the meeting were shared with Mrs Perumal.                                                                                                                                                                                  | EAP         |
| 47. | I am based in Pietermaritzburg, so I can't attend the meeting tonight. Will there be a MTeams meeting soon?                                                                                                                                           | N. Padayachee – UUW | Email (25/03/26)                     | We will cater for a virtual meeting when the draft EIA Report is lodged for public review.<br><br>Copies of the presentations from the meeting were shared with Mr Padayachee.                                                                                                                                                                                                                               | EAP         |
| 48. | An unknown attendee enquired about the status of the Scoping Phase.                                                                                                                                                                                   | -                   | Nseleni Community Meeting (26/03/26) | D. Henning explained that the draft Scoping Report is currently out for public review and all comments are due by 8 April 2026.                                                                                                                                                                                                                                                                              | EAP         |
| 49. | An unknown attendee asked where the gas will be obtained from. She also enquired about the route of the gas pipeline.                                                                                                                                 | -                   | Nseleni Community Meeting (26/03/26) | D. Henning indicated that the Applicant would source the natural gas from the planned terminal development at the Port of Richards Bay (PoRB). He noted that the Liquefied Natural Gas (LNG) is expected to be supplied through a pipeline from the Transnet natural gas terminal to the proposed plant. He further stated that separate regulatory processes will be undertaken for the LNG infrastructure. | EAP         |
| 50. | An unknown attendee expressed concern about air pollution that may be caused by the plant.                                                                                                                                                            | -                   | Nseleni Community Meeting (26/03/26) | D. Henning indicated that an Air Quality Impact Assessment will be undertaken for the project and that the findings from this study will be included in the EIA Report, during the next phase of the process. He noted that this study will also assess cumulative air quality impacts.                                                                                                                      | EAP         |
| 51. | An unknown attendee asked if the plant will alleviate load shedding.                                                                                                                                                                                  | -                   | Nseleni Community Meeting (26/03/26) | B. Skhosana indicated that the plant would contribute to reducing load shedding.                                                                                                                                                                                                                                                                                                                             | Applicant   |
| 52. | An unknown attendee asked how it would be possible to create 500 jobs during the construction phase, and only 50 permanent jobs once the plant is operational. He also asked about the qualifications necessary to apply for employment at the plant. | -                   | Nseleni Community Meeting (26/03/26) | B. Skhosana explained that many more employment opportunities are available during the construction phase due to the large number of activities that will be taking place on site. Specific skills will be required during the operational phase. He noted that the qualifications required still need to be                                                                                                 | Applicant   |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                        | RAISED BY   | SOURCE & DATE                        | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RESPONSE BY         |
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|     |                                                                                                                                                                                                                                                                                                               |             |                                      | determined, and this this will be published in consultation with the Richards Bay Industrial Development Zone (RBIDZ). He stated that preference will be given to local people. He also mentioned that training will be provided to employees.                                                                                                                                                                                                                                                                                                                                                                      |                     |
| 53. | An unknown attendee enquired if the project relates to any mining activities.                                                                                                                                                                                                                                 | -           | Nseleni Community Meeting (26/03/26) | N. Ncube confirmed that the project relates to a proposed Gas-to-Power Plant, and that it is not linked to mining.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Meeting Facilitator |
| 54. | An unknown attendee asked why Richards Bay was identified as a location for the project.                                                                                                                                                                                                                      | -           | Nseleni Community Meeting (26/03/26) | B. Skhosana indicated that government undertook a study to identify suitable locations for gas-to-power projects, which lead to the identification of Richards Bay, Coega and Saldanha Bay. He noted that Richards Bay is near Mozambique, from where natural gas is sourced from. He also mentioned that the site is near the PoRB and that there is spare capacity in the electrical grid. He further noted that gas-to-power will stabilise the grid. He indicated that government intends adding gas power of 15,000MW to the grid, and that the total generation capacity of the proposed plant will be 750MW. | Applicant           |
| 55. | An unknown attendee asked when the project would start.                                                                                                                                                                                                                                                       | -           | Nseleni Community Meeting (26/03/26) | B. Skhosana indicated that government wants construction to commence in 2029/2030.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicant           |
| 56. | An unknown attendee asked if employment opportunities will only be offered to males, or if females will also be employed.                                                                                                                                                                                     | -           | Nseleni Community Meeting (26/03/26) | B. Skhosana stated that males and females would be employed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Applicant           |
| 57. | N. Magubane expressed concerns regarding traffic-related impacts that may be caused by the project. She enquired whether there will be more trucks on the roads as a result of the project. She also asked if LNG would be transported by trucks to the plant and, if so, what the associated risks would be. | N. Magubane | Nseleni Community Meeting (26/03/26) | D. Henning indicated that there would be more traffic during construction, however, mitigation measures would be identified based on the Traffic Impact Assessment. He noted that the gas would be conveyed by a pipeline to the plant.                                                                                                                                                                                                                                                                                                                                                                             | EAP                 |
| 58. | N. Magubane noted that, while gas is cleaner than coal, its use as a fossil fuel energy source appears to be                                                                                                                                                                                                  | N. Magubane | Nseleni Community Meeting            | D. Henning indicated that a Climate Change Impact Assessment will be undertaken for the project and that the findings from this study will                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | EAP                 |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                    | RAISED BY                | SOURCE & DATE                        | RESPONSE                                                                                                                                                                                                                                                                                  | RESPONSE BY |
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|     | inconsistent with the country's commitments under the Paris Agreement.                                                                                                                                                                                                                                                    |                          | (26/03/26)                           | be included in the EIA Report. He further noted that this study will also assess cumulative climate change impacts.                                                                                                                                                                       |             |
| 59. | N. Magubane asked if the minutes of the meeting and presentations would be shared with the meeting attendees.                                                                                                                                                                                                             | N. Magubane              | Nseleni Community Meeting (26/03/26) | D. Henning confirmed that the minutes and copies of presentations would be shared.                                                                                                                                                                                                        | EAP         |
| 60. | S. Williams enquired about the extent of noise and vibration impacts from the plant, and whether surrounding game reserves and residential areas would be affected.                                                                                                                                                       | S. Williams              | Nseleni Community Meeting (26/03/26) | D. Henning indicated that a Noise Impact Assessment would be undertaken for the project, which will consider sensitive receptors in relation to the site.                                                                                                                                 | EAP         |
| 61. | S. Williams stated that, with regard to employment opportunities, the Applicant needs to look at the database and employ people that have participated in the process.                                                                                                                                                    | S. Williams              | Nseleni Community Meeting (26/03/26) | B. Skhosana indicated that meeting attendees may submit their CVs for consideration.                                                                                                                                                                                                      | Applicant   |
| 62. | S. Williams noted that the draft Scoping Report was only placed at two libraries. She requested that the EIA-related reports be distributed wider.                                                                                                                                                                        | S. Williams              | Nseleni Community Meeting (26/03/26) | D. Henning indicated that the EIA Report would be placed at additional areas that are accessible to the local communities.                                                                                                                                                                | EAP         |
| 63. | An unknown attendee indicated that some people may be too old when the project starts to be employed for the project.                                                                                                                                                                                                     | -                        | Nseleni Community Meeting (26/03/26) | B. Skhosana mentioned that the people that attended the meeting would be considered.                                                                                                                                                                                                      | Applicant   |
| 64. | An unknown attendee expressed concern regarding the cost of electricity, which impacts local communities.                                                                                                                                                                                                                 | -                        | Nseleni Community Meeting (26/03/26) | B. Skhosana noted that the cost of electricity is determined by the municipality and is outside the control of the Applicant.                                                                                                                                                             | Applicant   |
| 65. | Apologies I could not attend, I had an online on Tuesday but there were technical issue on Unisa IT side, and yesterday at 13h00, received notification that it will happen at 17h00.<br><br>When I received reminder for the meeting I was already in class.<br><br>Trust that I will be added on the distribution list. | P. Thango                | Email (26/03/26)                     | Sorry you couldn't join us. We will be having more meetings when the draft EIA Report is lodged for public review, including physical and virtual meetings. I will provide further details in the future.<br><br>Copies of the presentations from the meeting were shared with Mr Thango. | EAP         |
| 66. | This is Khaya, we spoke earlier. Please kindly see my company profile.                                                                                                                                                                                                                                                    | ICAYA HOLDINGS (PTY) LTD | Email (26/03/26)                     | This information was forwarded to the Applicant for further consideration.                                                                                                                                                                                                                | EAP         |
| 67. | Please note that all development applications are processed via our online portal, the South African Heritage                                                                                                                                                                                                             | N. Khumalo – SAHRA       | Email (27/03/26)                     | The Amafa and Research Institute was notified of the Project and the review of the draft SR.                                                                                                                                                                                              | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RAISED BY                   | SOURCE & DATE    | RESPONSE                                                                                     | RESPONSE BY |
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|     | <p>Resources Information System (SAHRIS) found at the following link: <a href="http://sahra.org.za/sahris/">http://sahra.org.za/sahris/</a>. We do not accept emailed, posted, hardcopy, faxed, website links or DropBox links as official submissions.</p> <p>The SAHRA will provide comment on any portions of the development located below the Maritime High Water Mark.</p> <p>Please create an application on SAHRIS for each EA application and upload all documents pertaining to the Environmental Authorisation Application Process. As per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), an assessment of heritage resources must form part of the process and the assessment must comply with section 38(3) of the NHRA. If a case already exists on SAHRIS regarding the development, please upload the documents to that case using the "Make an additional submission to an existing case" in the application selector wizard <a href="https://sahris.org.za/form/application-selector">https://sahris.org.za/form/application-selector</a>. Please ensure that all documents produced as part of the EA process are submitted as part of the application.</p> <p><b>**PLEASE NOTE**</b></p> <p>An application fee is now required for all section 38 applications. Please ensure that the SAHRIS application contains a proof of payment as per the notice at the following link: <a href="https://www.sahris.org.za/node/383817">https://www.sahris.org.za/node/383817</a>. Please make separate payments with the specific reference numbers. Applications that do not include a proof of payment will be considered incomplete and will not be processed until proof of payment is provided. Please make use of the auto generated payment reference that can be found within the application form. Please upload the PoP using the "Make an additional submission to an existing case" in the application selector wizard <a href="https://sahris.org.za/form/application-selector">https://sahris.org.za/form/application-selector</a>. The case officer assigned to your case will approve the submission and begin to process the case.</p> |                             |                  | The relevant information was uploaded to SAHRIS.                                             |             |
| 68. | The following below project and link to the scoping report refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | R. Moraka – Natural Justice | Email (01/04/26) | Written comments on the draft Scoping Report need to be forwarded by 8 April 2026 - refer to | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RAISED BY          | SOURCE & DATE     | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | RESPONSE BY |
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|     | <ul style="list-style-type: none"> <li>Proposed 750MW Combined Cycle Gas Turbine Power Plant in Richards Bay, City of uMhlathuze Local Municipality, King Cetshwayo District Municipality, Kwazulu-Nata</li> <li><a href="https://nemai.co.za/documents/10784richardsbay2/01%20DRAFT%20SCOPING%20REPORT.pdf">https://nemai.co.za/documents/10784richardsbay2/01%20DRAFT%20SCOPING%20REPORT.pdf</a></li> </ul> <p>Please could you advice (or provide a reference document) on when the deadline for comments on the scoping are due?</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                    |                   | the attached notification. The deadline for comments is also provided in Section 12.3.1 of the draft Scoping Report, which can be downloaded via <a href="https://nemai.co.za/10784-richardsbay/">https://nemai.co.za/10784-richardsbay/</a> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |             |
| 69. | The Application for Environmental Authorisation and Draft Scoping Report (SR) dated March 2026 and received by the Department on 05 March 2026, refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | M. Mogorosi - DFFE | Letter (02/04/26) | It is confirmed that the application and the draft Scoping Report (SR) were submitted to DFFE on 5 March 2026.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | EAP         |
| 70. | This letter serves to inform you that the following information must be included in the Final Scoping Report:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                    |                   | It is noted that, in some instances, the information requested by the DFFE will only be provided in the EIA Report. The relevant responses are provided below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | EAP         |
| 71. | <p>(a) Listed Activities</p> <p>(i) Please ensure that all relevant listed activities are applied for, are specific, and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.</p> <p>(ii) The description of the project to which the listed activities are related must be expanded to include thresholds, footprints and capacities of the associated infrastructure, particularly those that trigger a listed activity.</p> <p>(iii) The relevant authorities must be continuously involved throughout the assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 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.</p> |                    |                   | <p>(i) The listed activities triggered by the Project are captured in the Application Form as well as in Table 3 of the draft SR.</p> <p>All listed activities applied for have been reviewed to ensure that they are relevant, specific, and directly linked to the proposed development activities and associated infrastructure, including applicable thresholds, as described in the draft SR.</p> <p>(ii) The Project Description will be expanded in the EIA Report (as necessary) to clearly define the thresholds, physical footprints and capacities of all proposed development components and associated infrastructure that trigger listed activities.</p> <p>(iii) Various authorities were notified of the review of the draft SR, including the KZN Department of Economic Development, Tourism &amp; Environmental Affairs (DEDTEA), Ezemvelo KZN Wildlife (EKZNW), Department of Water and Sanitation (DWS), Department of</p> | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | RESPONSE BY |
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|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |           |               | <p>Mineral and Petroleum Resources (DMPR), South African Heritage Resources Agency (SAHRA), Amafa and Research Institute, KZN Department of Agriculture and Rural Development (DARD), KZN DFFE, and CoU (amongst others). Refer further to the database contained in Appendix E of the SR for a list of the authorities that were informed of the review of the draft SR.</p> <p>The relevant sensitive geographical areas linked to Listing Notice 3 that are directly affected by the development footprint are listed in Table 3 of the SR. Refer to the corresponding maps contained in Section 11 of the SR, such as Figure 47 that shows Critical Biodiversity Areas (CBA) Irreplaceable areas in relation to the project area.</p>                                                       |             |
| 72. | <p>(b) Specialist Assessments</p> <p>(i) Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of the development footprint, and all other associated infrastructures that they have assessed and are recommending for authorisations.</p> <p>(ii) The specialist studies must also provide a detailed description of all limitations of their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p> <p>(iii) Please note that the Department considers a 'no-go' area as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.</p> <p>(iv) Should the specialist definition of 'no-go' area differ from the Department's definition; this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.</p> |           |               | <p>(i) The Specialist Studies will be included in the EIA Report. The specialists' reports will comply with these requirements.</p> <p>(ii) The specialists' reports will include the limitations, as relevant.</p> <p>From an ecological perspective, it is noted that the site was previously cleared under the Environmental Authorisation for RBIDZ Phase 1F that was granted in Sept 2016 (reference no.: 14/12/16/3/3/2/665). The site is currently undeveloped/vacant and is mowed and maintained by the RBIDZ. The site is also located within a controlled area and the RBIDZ Phase 1F is fenced.</p> <p>(iii) This definition of a 'no-go' area will be applied in the EIA Report, based on the findings of the specialists.</p> <p>(iv) This will be included in the EIA Report.</p> | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | RESPONSE BY |
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|     | <p>(v) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.</p> <p>(vi) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expert advice.</p> <p>(vii) It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols. Please indicate whether the protocols were applied.</p> <p>(viii) Please note that the protocols require certain specialist's to be SACNASP registered. As such, the Specialist Declaration of Interest forms must also indicate the scientific organisation registration/member number and status of registration/membership for each specialist.</p> <p>(ix) Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation for such must be provided in the report, inclusive of the necessary site sensitivity verification reports and specialist compliance statements.</p> <p>(x) The terms of reference for the Climate Change Impact Assessment must assess the impacts of the development on climate change and vice versa and accordingly must</p> |           |               | <p>(v) The Specialist Studies will be included in the EIA Report. The specialists' reports will comply with these requirements.</p> <p>(vi) This will be considered further in the EIA Report if specialists provide contradicting recommendations.</p> <p>(vii) The specialist studies will be undertaken in accordance with these Protocols, as relevant.</p> <p>(viii) The specialists' Declarations will include this information, which will be appended to the EIA Report.</p> <p>(ix) The Screening Report for the Project was compiled by means of the Screening Tool, which was appended to the Application Form. Table 20 in the SR lists the specialist studies that were identified in the Screening Report and notes the relevance of these studies to the Project following Site Sensitivity Verification (SSV). The SSV Report is contained in Appendix D of the SR.</p> <p>(x) The terms of reference for the Climate Change Impact Assessment, which are contained in Section 14.4.5.2 of the SR, cater for these requirements.</p> |             |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RESPONSE BY |
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|     | consider both mitigation and adaptation measures to climate change.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |           |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |             |
| 73. | <p>(c) Layout &amp; Sensitivity Maps</p> <p>(i) Please provide a layout map that indicates the following:</p> <ul style="list-style-type: none"> <li>• Positions of the proposed facility as well as all associated infrastructure;</li> <li>• Permanent and temporary laydown area footprints;</li> <li>• All supporting onsite infrastructure e.g. roads (existing and proposed); and</li> <li>• All existing infrastructure on the site.</li> </ul> <p>(ii) The above map must be overlain with a sensitivity map that indicates the following:</p> <ul style="list-style-type: none"> <li>• The location of sensitive environmental features on site e.g., CBAs, NPEAS focus areas, heritage sites, wetlands, drainage lines etc. that will be affected;</li> <li>• Buffer areas; and,</li> <li>• All “no-go” areas.</li> </ul> <p>(iii) Provide a map of the Combined Cycle Gas Turbine Power Plant in relation to the proposed electrical grid and gas pipeline infrastructure (the potential connection points and distances), to support the feasibility of the facility.</p> <p>(iv) A cumulative map showing the development in relation to similar neighbouring industrial/energy developments and air pollutant emitters must also be provided. Google maps will not be accepted.</p> |           |               | <p>(i) Layout drawings, aerial views and schematic plans are provided in Figures 11 and 12 of the SR, as well as in Appendix A. The resolution of the layouts in Figures 11 and 12 were increased in the final SR to enable a clearer and more legible presentation of the proposed plant components.</p> <p>These plans indicate the spatial arrangement of the CCGT Power Plant and ancillary infrastructure. Further information will be provided in the EIA Report.</p> <p>(ii) Various maps reflecting the location of the site in relation to sensitive areas and environmental features (such as CBA Irreplaceable, NPAES, rivers, wetlands, groundwater level depths, air quality sensitivity, noise-sensitive receptors, etc.) are provided in Section 11 of the SR.</p> <p>A composite sensitivity map will be included in the EIA Report, which will also show buffer areas and ‘no-go’ areas based on the findings of the specialist studies.</p> <p>(iii) An indicative map of the CCGT Power Plant in relation to the proposed gas infrastructure is included in Section 9.3 of the final SR.</p> <p>A map of the electrical grid infrastructure will be included in the EIA Report, based on engagement with Eskom.</p> <p>(iv) The known existing industrial facilities or projects within a 10 km radius of the site are provided in Section 13.4.2.2 of the SR. Cumulative impacts will be assessed as part of the specialist studies, and the findings</p> | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | RESPONSE BY |
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|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |           |               | (including associated mapping) will be included in the EIA Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |
| 74. | <p>(d) Public Participation Process</p> <p>(i) Please ensure that all issues raised, and comments received during the circulation of the SR from registered I&amp;APs and organs of state which have jurisdiction (including this Department's Biodiversity Section: BCAdmin@dffe.gov.za ) in respect of the proposed activity are adequately addressed in the Final SR.</p> <p>(ii) Proof of correspondence with the various stakeholders must be included in the Final SR. Should you be unable to obtain comments, proof must be submitted to the Department of the attempts that were made to obtain comments.</p> <p>(iii) The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development and SR, particularly, this Department's Climate Change; Air Quality, and Protected Areas Directorates; the KwaZulu-Natal Department of Economic Development, Tourism and Environmental Affairs; the relevant Atmospheric Emissions Licence (AEL) Authority, the KwaZulu-Natal Department of Agriculture and Rural Development; Department of Water and Sanitation; the Department of Mineral and Petroleum Resources; Ezemvelo KZN Wildlife, AMAFA, SAHRA, SANRAL and the District and Local Municipalities.</p> <p>(iv) The Public Participation Process must be conducted in terms of the approved public participation plan and Regulation 39, 40 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</p> <p>(v) A comments and response trail report (C&amp;R) must be submitted with the final SR. The C&amp;R report must incorporate all comments received (pre and post submission of draft SR) for this development. The C&amp;R report must be a separate document from the main report,</p> |           |               | <p>(i) The issues raised and comments received during the public review of the draft SR have been reviewed and addressed in the preparation of the final SR. Responses to all comments are provided in this CRR, and where applicable, the final SR has been revised to address the comments.</p> <p>DFFE's Biodiversity Section was notified of the review of the draft SR.</p> <p>(ii) Proof of notification of the review of the draft SR is provided in Appendix I of the final SR. Comments received on the draft Scoping Report are contained in Appendix J of the final SR.</p> <p>(iii) Proof of notification of the review of the draft SR is provided in Appendix I of the final SR. Comments received on the draft Scoping Report are contained in Appendix J of the final SR.</p> <p>All the authorities listed in this comment were notified of the review of the draft SR.</p> <p>Refer further to the database contained in Appendix E of the SR for the overall list of the authorities and I&amp;APs that were informed of the review of the draft SR.</p> <p>(iv) The Public Participation Process was undertaken in accordance with the regulated requirements.</p> <p>Section 12 of the SR explains the following public participation tasks:</p> <ul style="list-style-type: none"> <li>• Compiling the database of I&amp;APs.</li> <li>• Review of draft Scoping Report –</li> </ul> | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RESPONSE BY |
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|     | <p>and the format must be in the table format which reflects the details of the I&amp;APs and date of comments received, actual comments received, and response provided. Please ensure that comments made by I&amp;APs are comprehensively captured (copy verbatim if required) and responded to clearly and fully. Please note that a response such as "Noted" is not regarded as an adequate response to I&amp;AP's comments.</p> <p>(vi) Please include the period for when the public participation period occurred i.e. when was the draft Scoping Report circulated for comment for the current application.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |           |               | <ul style="list-style-type: none"> <li>Period to review the draft Scoping Report;</li> <li>Notification of review of the draft Scoping Report;</li> <li>Accessing the draft Scoping Report;</li> <li>Commenting on the draft Scoping Report; and</li> <li>Public meeting to present the draft Scoping Report.</li> </ul> <p>(v) This CRR, which will be appended to the final SR, serves to capture all the comments received and the related responses.</p> <p>(vi) As indicated in Section 12.3.1 of the SR, the draft SR was lodged for public review from 6 March until 8 April 2026.</p> |             |
| 75. | <p>(e) Cumulative Assessment</p> <p>(i) Should there be any other similar Gas to Power plants proposed within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</li> <li>A cumulative impact environmental statement on whether the proposed development must proceed.</li> </ul> |           |               | <p>(i) Cumulative impacts that were identified during the Scoping Phase are presented in Section 13.4 of the Scoping Report.</p> <p>The EIA Report will include a detailed qualitative and quantitative assessment of direct, indirect and cumulative impacts associated with the Project, which will cover the requirements listed in this comment. The assessment will incorporate the findings of the specialist studies and technical investigations.</p>                                                                                                                                 | EAP         |

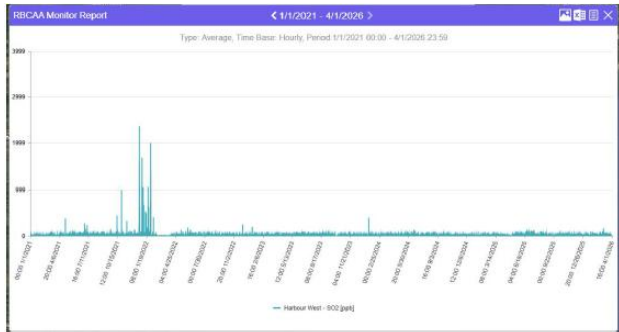
| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RESPONSE BY |
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| 76. | <p>(f) Specific Comments</p> <p>(i) The EAP must provide details of what the proposed facility will entail, including the associated infrastructure.</p> <p>(ii) The EAP must provide details of the specific locations in the final SR and not provide vague locations of the proposed developments. All associated infrastructure must be clearly indicated in the final SR and its associated layout plans.</p> <p>(iii) Please provide evidence that the application for an air emissions licence has been submitted to the relevant AEL authority and that consultation with that authority has taken place, since the AEL process is to be run parallel to the EIA process. The AEL authority must have been given the opportunity to comment on the SR, including the terms of reference for the Air Quality Impact Assessment.</p> <p>(iv) Please provide an indication of what activities have already been authorised on the proposed Combined Cycle Gas Turbine Power Plant site in terms of the Environmental Authorisation (EA) for the IDZ Phase 1F dated 27 September 2016 (DFFE Ref No.: 14/12/16/3/3/2/665), versus those being applied for in this application. Please confirm that the EA is still valid.</p> <p>(v) Please ensure that landowner consent is provided with the final SR.</p> <p>(vi) Ensure that the final SR includes confirmation of the availability of services from the relevant authorities.</p> <p>(vii) Under the legislation and policy section of the SR, which discusses the National Environmental Management: Waste Act No 59 of 2008, please indicate whether the proposed development will require a Waste Management License.</p> <p>(viii) It is noted that the electrical grid infrastructure and gas pipeline for the facility are to be applied for separately.</p> |           |               | <p>(i) The SR provides a description of the proposed facility and its associated infrastructure, including <i>inter alia</i> the CCGT Power Plant configuration, generating capacity, site extent, layout, operational processes and associated infrastructure such as water storage, cooling systems, electrical infrastructure, access, bulk services and ancillary facilities. These details are presented primarily in Sections 9 (Project Description), 9.5 (Overview of the Proposed Plant) and related subsections of the SR.</p> <p>Notwithstanding the above, the Project Description will be refined in the EIA Report.</p> <p>(ii) The cadastral extent of the site, property boundaries and coordinates are provided in Section 4 (Project Location), supported by Table 2 (Coordinates of the Property Boundary) and Figures 1 to 4, which illustrate the regional context, local setting and site-specific layout.</p> <p>In addition, the location and extent of the proposed facility and associated infrastructure are described in Section 9 (Project Description) and Section 9.5 (Overview of the Proposed Plant), with supporting layout drawings, aerial views and schematic plans (Figures 11 and 12, as well as maps contained in Appendix A). These plans indicate the spatial arrangement of the CCGT Power Plant and ancillary infrastructure.</p> <p>(iii) As noted in Section 6.5.2 of the SR, a Pre-Application Meeting was previously convened with DFFE on 8 February 2024. One of the actions that emanated from this meeting was to set up a meeting with DFFE's Air Quality and Climate Change Units in order to:</p> | EAP         |

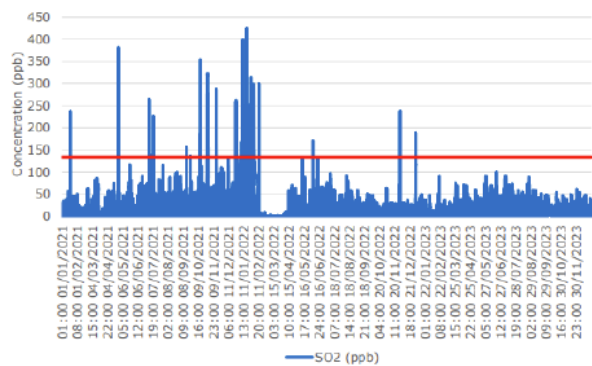
| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | RESPONSE BY |
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|     | These components should ideally be assessed holistically together with the gas power plant. The gas power plant, if approved, would therefore not be allowed to commence, without these other authorisations also being in place. The applicant is advised to take this into consideration in the planning and timing of the project. |           |               | <ul style="list-style-type: none"> <li>Determine DFFE's requirements from the Air Quality Impact Assessment and Climate Change Impact Assessment; and</li> <li>Determine DFFE's requirements for the Atmospheric Emission Licence (AEL) in terms of the National Environmental Management: Air Quality Act (Act No. 39 of 2004) (NEM:AQA) and how it needs to align with the S&amp;EIR Process.</li> </ul> <p>Accordingly, a meeting was held with DFFE's Air Quality and Climate Change Units on 1 March 2024 (refer to Appendix H of the final SR for the notes from this meeting). During this meeting, the representative from DFFE's Air Quality Unit confirmed that the AEL process will only be initiated if Environmental Authorisation is received for the Project. Hence, the application for the AEL has not been submitted yet, as per DFFE's guidance.</p> <p>(iv) An Environmental Authorisation was granted by the former Department of Environmental Affairs (DEA), now known as DFFE, for the RBIDZ Phase 1F in Sept 2016 (reference no.: 14/12/16/3/3/2/665). The following components of the development were catered for in the Environmental Authorisation (shown in Figure 5 in the SR):</p> <ul style="list-style-type: none"> <li>Water infrastructure;</li> <li>Sewer infrastructure;</li> <li>Stormwater infrastructure;</li> <li>Roads;</li> <li>Electrical services; and</li> <li>Infilling of wetlands (to enable the development of the site for industrial purposes).</li> </ul> |             |

| No. | VERBATIM COMMENT/QUERY | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | RESPONSE BY |
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|     |                        |           |               | <p>The access road and services required for the proposed Project are thus covered in the existing Environmental Authorisation for the RBIDZ Phase 1F and are not being applied for again. The infilling of the wetland on the site is also excluded from the Project's application.</p> <p>The Environmental Authorisation was activated when the above activities were commenced with by the Richards Bay Industrial Development Zone Company SOC Ltd.</p> <p>(v) As noted in Section 6.5.3 of the SR, the Project is located within Phase 1F of the RBIDZ under a long-term lease agreement. Due to its designated Strategic Integrated Project (SIP) status, landowner consent is not required for the Project. Landowner consent was previously provided by the RBIDZ for the development, prior to the project obtaining SIP status, which is contained in Appendix G of the SR.</p> <p>(vi) Confirmation of services to be included in EIA Report.</p> <p>(vii) As indicated in Section 5.1.5.2 of the SR, a Waste Management Licence will not be required in terms of NEM:WA, as the Project will not include any listed waste management activities.</p> <p>(viii) While the electrical grid infrastructure and gas supply pipeline are not included in the scope of this application and will be assessed through separate EIA processes, their functional interdependence with the proposed CCGT Power Plant is recognised. It is acknowledged that the commencement of the power plant will be contingent on the authorisation of these separate components.</p> |             |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | RAISED BY           | SOURCE & DATE     | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                      | RESPONSE BY            |
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|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                     |                   | This interdependency will be taken into account in the overall project planning.                                                                                                                                                                                                                                                                                                                                              |                        |
| 77. | <p>General</p> <p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:<br/>           “If S&amp;EIR must be applied to an application, the applicant must, within 44 days of receipt of the application by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”.</p> <p>You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.</p> <p>Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations unless an extension has been granted in terms of Regulation 3(7).</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p> |                     |                   | <p>The final SR will be submitted to DFFE within 44 days of receipt of the application by the Department.</p> <p>As a minimum, the SR aims to satisfy the requirements stipulated in Appendix 2 of the EIA Regulations. Table 1 in the SR presents the document's composition in terms of these regulatory requirements.</p> <p>The Applicant, EAP and project team will endeavour to adhere to the regulated timeframes.</p> | EAP                    |
| 78. | The Richards Bay Clean Air Association (RBCAA) has reviewed the Draft Scoping Report (DSR) prepared by NEMAI Consulting, dated March 2026 and make submission as follows;                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | S. Camminga – RBCAA | Letter (02/04/26) | Introductory part of letter – no response required.                                                                                                                                                                                                                                                                                                                                                                           | -                      |
| 79. | <p><b>AIR QUALITY</b></p> <p>The Atmospheric Impact Report should include;</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                     |                   | The Atmospheric Impact Report (AIR) will be incorporated into the EIA Report.                                                                                                                                                                                                                                                                                                                                                 | Air Quality Specialist |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RESPONSE BY            |
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|     | <ul style="list-style-type: none"> <li>Dispersion modelling of cumulative impacts, inclusive of existing and future developments that currently hold an authorisation.</li> <li>Assessment of fugitive emissions, including the potential for mercaptan odours.</li> </ul>                                                                                                                                                                                                                                                              |           |               | <p>Scenario 3 of the AIR addresses the assessment of the ambient concentration resulting from emissions from the Mabasa CCPP operating in combined-cycle mode with stack emissions of SO<sub>2</sub>, NO<sub>x</sub> and PM from six major industrial sources in Richards Bay.</p> <p>Scenario 4 concerns the assessment of six approve applications for the establishment and operation of industrial facilities in Richards Bay.</p> <p>There will be no handling and transfer of LNG at the Mabasa CCPP. Therefore, fugitive emissions are not expected to arise and are excluded from the assessment. Further the Mabasa CCPP is a negligible source of mercaptan odours, hence their exclusion in the AIR.</p> |                        |
| 80. | <p><b>Site Sensitivity Verification (SSV)</b></p> <p>The SSV sets the foundation for the air quality specialist study. The accurate representation and analysis of information and data is therefore essential.</p> <p>1. Reference is made to “dust from mining activities” as a contributor to ambient concentration within Richards Bay.</p> <p>Please can we have clarification as to what mining activities these would be ?</p>                                                                                                   |           |               | <p>Noted. This should rather refer to dust from ore storage and handling and will be corrected in the finalising the AIR.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Air Quality Specialist |
| 81. | <p><b>2. Monitoring Networks:</b> The report states that air quality monitoring in Richards Bay is being undertaken by the CoU and the RBCAA. It does not distinguish between the two monitoring networks, but simply states that the sensitivity analysis used “the available data from air quality monitoring stations in the area.”</p> <p>It is common knowledge that the CoU experiences challenges with their network. This results in data capture percentages that do not meet SANAS requirements for statistical purposes.</p> |           |               | <p>Noted, the distinction will be made in finalising the AIR.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Air Quality Specialist |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                              | RESPONSE BY            |
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|     | <p>It is imperative that the report clearly and consistently define which network's data is being analysed and presented, and to whom the stations belong.</p> <p>Please correct the references to "Habour AQMS" to read "Harbour West AQMS"..</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |           |               |                                                                                                                       |                        |
| 82. | <p>3. <b>SAAQIS SO2 Data:</b> The report states that hourly data was downloaded from SAAQIS. This has resulted in a misrepresentation of concentrations. The RBCAA is aware that SAAQIS invalidates SO2 concentrations above a certain threshold. It is important to note that the RBCAA data is validated before being uploaded to SAAQIS and should therefore not be invalidated on SAAQIS.</p> <p>RBCAA SO2 data should therefore be sourced directly from the RBCAA.</p> <p>Below is a comparison graph using data downloaded from the RBCAA database, which when compared to the graph in the SSV report highlights the significant discrepancies arising from the use of data downloaded from SAAQIS.</p> <p>The RBCAA data shows a number of hourly averages above 1000 ppb with the highest hourly average of 2537 ppb recorded at Harbour West, compared to 425 ppb in Figure 4-1 of the SSV report.</p> <p><b>RBCAA Hourly SO2 data recorded at Harbour West 2021-2023</b></p>  |           |               | <p>The discrepancy is noted, SO<sub>2</sub> data will be requested directly from the RBCAA in finalising the AIR.</p> | Air Quality Specialist |

| No.               | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RAISED BY  | SOURCE & DATE    | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                     | RESPONSE BY     |    |         |                   |    |     |                   |    |            |  |  |                                                                  |                               |
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|                   | <div></div> <p><b>Figure 4-1: Hourly average SO<sub>2</sub> concentrations (ppb) measured at the Harbour AQMS</b></p> <p>The same applies to the representation of daily average SO<sub>2</sub> in the SSV report, with the highest daily average represented as being just below 350 ppb, while the highest daily average recorded by the RBCAA Harbour West station was in fact 805.80 ppb</p> |            |                  |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                 |    |         |                   |    |     |                   |    |            |  |  |                                                                  |                               |
| 83.               | <p>4. Table 4-1: The table must indicate to whom the monitoring stations belong.</p> <p><b>Table 4-1: Data Capture for data obtained from respective monitoring stations between 2021-2023</b></p> <table><tr><th>Pollutant</th><th>Data Capture (%)</th><th>Station</th></tr><tr><td>SO<sub>2</sub></td><td>96</td><td>Harbour</td></tr><tr><td>PM<sub>1.0</sub></td><td>92</td><td>CBD</td></tr><tr><td>PM<sub>2.5</sub></td><td>84</td><td>Brackenham</td></tr></table>        | Pollutant  | Data Capture (%) | Station                                                                                                                                                                                                                                                                                                                                                                                                                                      | SO <sub>2</sub> | 96 | Harbour | PM <sub>1.0</sub> | 92 | CBD | PM <sub>2.5</sub> | 84 | Brackenham |  |  | <p>Noted, the distinction will be made in finalising the AIR</p> | <p>Air Quality Specialist</p> |
| Pollutant         | Data Capture (%)                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Station    |                  |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                 |    |         |                   |    |     |                   |    |            |  |  |                                                                  |                               |
| SO <sub>2</sub>   | 96                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Harbour    |                  |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                 |    |         |                   |    |     |                   |    |            |  |  |                                                                  |                               |
| PM <sub>1.0</sub> | 92                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | CBD        |                  |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                 |    |         |                   |    |     |                   |    |            |  |  |                                                                  |                               |
| PM <sub>2.5</sub> | 84                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Brackenham |                  |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                 |    |         |                   |    |     |                   |    |            |  |  |                                                                  |                               |
| 84.               | <p><b>PIPELINE</b></p> <p>The exclusion of the pipeline as part of this EIA is not supported as it dilutes the cumulative impacts of the proposed facility.</p>                                                                                                                                                                                                                                                                                                                   |            |                  | <p>While the gas supply pipeline is not included in the scope of this application and will be assessed through a separate EIA process, its functional interdependence with the proposed CCGT Power Plant is recognised. It is acknowledged that the commencement of the power plant will be contingent on the authorisation of this separate component. This interdependency will be taken into account in the overall project planning.</p> | <p>EAP</p>      |    |         |                   |    |     |                   |    |            |  |  |                                                                  |                               |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | RESPONSE BY |
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| 85. | <p><b>MHI RISK ASSESSMENT</b></p> <p>The Risk Assessment must consider existing and proposed MHI facilities. There are now three (3) proposed gas to power facilities proposed on IDZ 1F, with one having received Authorisation.</p> <p>The establishment of multiple MHIs on IDZ 1F will increase the risk to communities. In addition, the suitability of establishing the proposed Mabasa Energy gas to power plant adjacent to a major road and small businesses needs to be assessed.</p> <p>Both the local and district municipalities have capacity challenges when it comes to Fire &amp; Rescue and Disaster Management. These risks should be assessed.</p> |           |               | As mentioned in the SR, provision is made for a Quantitative Risk Assessment to be undertaken for the Project. The findings from this assessment will be incorporated into the EIA Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | EAP         |
| 86. | <p><b>SITE IDZ 1F</b></p> <p>The RBCAA is of the opinion that the proposed site is not suitable for the establishment of multiple gas to power plants.</p> <p>The cumulative impacts due to the proximity of IDZ 1F to the residential areas of Aquadene, Brackenham and Wildenweide, and the prevailing winds, will place these communities at risk, as well as neighbouring small businesses.</p> <p>IDZ status does not automatically designate acceptability.</p> <p>An alternative site should be considered as part of the Environmental Impact Assessment.</p>                                                                                                  |           |               | <p>The SR does not assume that the IDZ status of the site equates to automatic environmental acceptability. Instead, it recognises that site suitability must be demonstrated through a detailed assessment of impacts. Accordingly, specialist studies including Air Quality Impact Assessment, Health Impact Assessment, Noise Impact Assessment, Climate Change Impact Assessment, Socio-Economic Assessment, Social Impact Assessment and Quantitative Risk Assessment have been identified for the EIA Phase to evaluate potential impacts on surrounding communities and neighbouring businesses, including cumulative effects.</p> <p>With regard to alternatives, the SR explains that no reasonable location alternatives were identified, as the project site was allocated by the RBIDZ within an established industrial precinct with appropriate zoning, services and strategic proximity to the Port of Richards Bay (PoRB). Nevertheless, the No-Go Alternative is included and will be assessed during the EIA Phase, and design-, layout- and</p> | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                             | RESPONSE BY            |
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|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |           |               | technology-related alternatives form part of the EIA assessment.<br><br>The suitability of the proposed site for the gas-to-power facility will therefore be conclusively determined through the EIA Phase, based on the outcomes of the specialist studies and the application of appropriate mitigation measures.                                                                                                  |                        |
| 87. | <b>WATER USAGE</b><br><br>The area is over-allocated in terms of water resources and has in the past been subjected to severe drought conditions. Options to lower water consumption much be considered.                                                                                                                                                                                                                                                                                                                                     |           |               | The technical team has identified the use of an air cooled / dry cooled condenser as an alternative to forced-draft cooling towers. Using a dry cooled condenser will reduce the proposed plant's water usage as well as wastewater. Further information pertaining to the dry cooled condenser will be included in the EIA Report. A comparative analysis of these options will also be included in the EIA Report. | EAP                    |
| 88. | <b>SOCIO-ECONOMIC</b><br><br>The assessment of socio-economic benefits needs to extend beyond job creation and skills development.<br><br>There need to be benefits for the greater community within uMhlathuze given that the potential negative impacts will directly affect the local residents.<br><br>The reliability of electrical, water and wastewater services should be assessed. The City's infrastructure is under extreme pressure due to lack of maintenance and upgrades, with failures and extended outages well documented. |           |               | These aspects will be considered in the EIA Report.                                                                                                                                                                                                                                                                                                                                                                  | EAP                    |
| 89. | <b>NOISE IMPACT ASSESSMENT</b><br><br>The assessment should consider nighttime impacts on nearby residential areas.                                                                                                                                                                                                                                                                                                                                                                                                                          |           |               | Night-time impacts will be assessed as part of the Noise Impact Assessment. The findings will be included in the EIA Report.                                                                                                                                                                                                                                                                                         | EAP                    |
| 90. | <b>EMISSION DATA (AELS)</b><br><br>The RBCAA has assisted with providing emission data in the form of member's AELS for the purposes of undertaking cumulative modelling.                                                                                                                                                                                                                                                                                                                                                                    |           |               | Confidentiality is understood and appreciated. Hence the exclusion of information from the respective AELs in the AIR. The point is made the AIR.                                                                                                                                                                                                                                                                    | Air Quality Specialist |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                              | RAISED BY               | SOURCE & DATE     | RESPONSE                                                                                                                                     | RESPONSE BY |
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|     | <p>We would like to reiterate that this information was provided for the sole purpose of undertaking the air quality assessment for the proposed Mabasa Energy gas to power plant.</p> <p>The information contained in the AELS may not be reproduced, extracted, republished, analysed or distributed for any other purposes without the prior written consent of the RBCAA.</p> <p>Thank you for affording the RBCAA the opportunity to comment.</p>              |                         |                   |                                                                                                                                              |             |
| 91. | 1. groundWork is a non-profit environmental justice organisation that supports communities in South and Southern Africa on issues relating to coal, climate, energy, waste and environmental health, and is a registered interested and affected party (I&AP) in this matter.                                                                                                                                                                                       | Y. Moodley – groundWork | Letter (08/04/26) | It is confirmed that groundWork is a registered I&AP for the proposed Project's EIA.                                                         | EAP         |
| 92. | 2. We submit these comments on the Draft Scoping Report (DSR) for the proposed 750MW Combined Cycle Gas Turbine (CCGT) Power Plant in Richards Bay (the "Project"), prepared by Nema Consulting on behalf of Mabasa Energy and Fuels (Pty) Ltd. We have read and support comments prepared by the South Durban Community Environmental Alliance (SDCEA). Our comments should be read together with their documentation, as they corroborate each other's arguments. |                         |                   | The comments from groundWork have been read together with the comments received from the SDCEA, as requested.                                | EAP         |
| 93. | 3. We re-affirm our registration as an interested and affected parties (I&APs) in terms of the EIA Regulations and wish to participate in all subsequent stages of this environmental assessment process.                                                                                                                                                                                                                                                           |                         |                   | It is confirmed that groundWork is a registered I&AP for the proposed Project's EIA. groundWork will be notified as the EIA process unfolds. | EAP         |
| 94. | 4. We have identified concerns with the Draft Scoping Report (DSR) relating to the scope of the Climate Change Impact Assessment (CCIA), the Needs and Desirability Assessment, and compliance with South Africa's Nationally Determined Contribution (NDC) that we address more fully below.                                                                                                                                                                       |                         |                   | The related comments are responded to below.                                                                                                 | EAP         |
| 95. | 5. We object, in principle, to the development of new long-lived fossil fuel generation capacity in circumstances where South Africa is already off-track to meet its Paris                                                                                                                                                                                                                                                                                         |                         |                   | These concerns are recognised and have been identified as key issues for assessment during the EIA Phase. The Project will be assessed       | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | RESPONSE BY                                 |
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|     | Agreement and NDC commitments, and where additional gas-fired capacity in an already heavily industrialised airshed will impose further climate, air quality, health and environmental justice burdens on surrounding communities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |           |               | within the context of South Africa's climate commitments and the existing industrial nature of the Richards Bay airshed through specialist studies, including Climate Change, Air Quality and Health Impact Assessments.                                                                                                                                                                                                                                                                                                  |                                             |
| 96. | <p><b>Climate Change Impact Assessment (CCIA) requires revision in scope</b></p> <p>6. In Earthlife Africa Johannesburg v Minister of Environmental Affairs (Case number: 65662/16) ("Earthlife case"), the court found that "the legislative and policy scheme and framework overwhelmingly support the conclusion that an assessment of climate change impacts and mitigating measures will be relevant factors in the environmental authorisation process, and that consideration of such will best be accomplished by means of a professionally researched climate change impact report."</p> <p>7. This requirement applies with equal force to gas-fired power stations. In South Durban Community Environmental Alliance v Minister of Forestry, Fisheries and the Environment (Case no. 479/2023) (September 2025) ("SDCEA case"), the Supreme Court of Appeal set aside an environmental authorisation for a 3000MW gas power plant at Richards Bay, finding that climate change impacts were not adequately considered.</p> <p>8. The CCIA proposed in the Plan of Study for EIA is inadequate in the following respects:</p> <p>9. The proposed scope of the CCIA is limited to the projects lifecycle emissions during construction and operation. The Earthlife court endorsed an assessment that "would comprise an assessment of (i) the extent to which a proposed [power station] will contribute to climate change over its lifetime, by quantifying its GHG emissions during construction, operation and decommissioning."</p> |           |               | <p>The Climate Change Impact Assessment will include emissions associated with the construction, operation and decommissioning phases of the Project, including Scope 1, Scope 2 and relevant Scope 3 emissions.</p> <p>The Climate Change Impact Assessment will address consistency with South Africa's NDC and Paris Agreement obligations.</p> <p>The Climate Change Impact Assessment will consider the Project's resilience to the impacts of climate change.</p> <p>The Plan of Study was updated accordingly.</p> | <p>Climate Change Specialist</p> <p>EAP</p> |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                    | RESPONSE BY |
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|     | <p>10. The DSR should require a detailed study of whether the Project emissions would be consistent with South Africa's GHG emissions commitments.</p> <p>11. We therefore request that the Plan of Study for EIA be amended to require a comprehensive Climate Change Impact Assessment that includes:</p> <ul style="list-style-type: none"> <li>• Full life-cycle GHG analysis (Scope 1, 2 and 3 emissions);</li> <li>• Assessment of consistency with South Africa's NDC and Paris Agreement obligations; and</li> <li>• Assessment of climate change risks to the project (adaptation and resilience).</li> </ul> |           |               |                                                                                                                                                                                                                                                                                                                                                                                                                                             |             |
| 97. | <p><b>Deficiencies in the scope of the Needs and Desirability Assessment</b></p> <p>12. Appendix 2 of the EIA Regulations requires motivation of "the need and desirability of the proposed activity." The DEA Guideline on Need and Desirability (2017) provides comprehensive guidance on this assessment. Section 24(4)(b)(i) of NEMA requires investigation of alternatives, including the option of not implementing the activity.</p>                                                                                                                                                                            |           |               | The SR explains the Needs and Desirability of the Project, as required in Appendix 2 of the EIA Regulations. This assessment was informed by the DEA Guideline on Need and Desirability (2017). Further refinement of the assessment will be undertaken in the EIA Phase as additional specialist information becomes available.                                                                                                            | EAP         |
| 98. | <p>13. The DSR's treatment of the "no-go" alternative is one-sided, emphasising foregone macro-economic benefits but failing to describe the environmental, climate, health and socio-economic harms that would be avoided if the Project does not proceed. The EIA must fairly assess both negative and positive implications of the no-go option, including avoided GHG emissions, avoided local air-pollution and health burdens in an already over-polluted airshed, and the preservation of opportunities for lower-carbon, lower-impact energy pathways.</p>                                                     |           |               | The no-go alternative is included in the Scoping Report as a baseline scenario, consistent with scoping-level requirements. The EIA Phase will provide a detailed and balanced assessment of the no-go option, including consideration of environmental, climate, air quality and health impacts, alongside foregone socio-economic opportunities, informed by the findings of the specialist studies and the cumulative impact assessment. | EAP         |
| 99. | <p>14. Furthermore, the Plan of Study should expressly recognise that, if the EIA-phase specialist studies demonstrate that cumulative climate, air quality, health or water impacts in the Richards Bay airshed and catchment are high or very high (particularly in light of existing non-compliance with more health-protective guideline values) the EIA must consider and motivate the no-go</p>                                                                                                                                                                                                                  |           |               | The Plan of Study for EIA recognises that the outcomes of the EIA-phase specialist studies will inform the overall acceptability of the Project.                                                                                                                                                                                                                                                                                            | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RESPONSE BY |
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|      | alternative as the environmentally preferable option, rather than treating it as a purely formal baseline.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |           |               | <p>Specific attention is drawn to the following item included in the Terms of Reference for the specialist studies in Section 14.4.4 of the SR:</p> <p><i>"The provision of a statement of impact significance for each issue, which specifies whether or not a pre-determined threshold of significance (i.e., changes in effects to the environment which would change a significance rating) has been exceeded, and whether or not the impact presents a potential fatal flaw or not. This statement of significance should be provided for anticipated project impacts both before and after application of impact management actions."</i></p> <p>Should the specialist studies indicate that impacts cannot be mitigated to acceptable levels, the implications of the no-go alternative will be reconsidered and motivated accordingly as part of the EIA findings.</p> |             |
| 100. | 15. In addition, the Needs and Desirability Assessment must be broadened to include a robust energy system analysis that considers recent system-level modelling of the South African electricity sector. Independent analyses by Meridian Economics and others indicate that forcing large-scale gas into the power generation portfolio, beyond a limited peaking role to support renewables, materially increases overall system costs relative to a least-cost pathway dominated by renewable energy and storage, and that peaking requirements can be met by existing liquid-fuel peakers for at least the next decade. |           |               | The Applicant notes the comment. The Needs and Desirability Assessment is strictly grounded in promulgated national policy, specifically the Integrated Resource Plan (IRP), which legally mandates new-build gas-to-power capacity for grid stability. The Environmental Impact Assessment (EIA) evaluates the project against these statutory frameworks rather than independent macro-economic models. The proposed facility is designed to provide the synchronous generation and firm dispatchable capacity required to ensure security of supply and complement the integration of Variable Renewable Energy (VRE).                                                                                                                                                                                                                                                      | Applicant   |
| 101. | 16. The Plan of Study for EIA must therefore require that the Energy System Analysis: <ul style="list-style-type: none"> <li>Assesses whether the same reliability, flexibility and capacity services that the Project is claimed to provide could instead be delivered by portfolios of</li> </ul>                                                                                                                                                                                                                                                                                                                          |           |               | Under the NEMA EIA Regulations, the EIA must assess reasonable and feasible alternatives that meet the project's specific purpose and need. National macro-economic energy modelling is governed by the IRP and falls outside the purview of a project-level EIA. The                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Applicant   |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RESPONSE BY |
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|      | <p>renewable energy, battery storage, demand-side management and grid reinforcements; and</p> <ul style="list-style-type: none"> <li>Evaluates the risk that continued cost declines in such technologies will render this gas capacity a stranded asset within its planned operating life, including under tightening climate policy and carbon-border-adjustment regimes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                            |           |               | <p>facility's engineered modularity, including a bypass stack, enables a transition from baseload to load-following profiles. This flexibility mitigates stranded asset risk by allowing the plant to adapt to evolving grid requirements as renewable energy penetration increases. A dedicated Climate Change Impact Assessment (CCIA) will evaluate the project's emissions trajectory.</p>                                                                                                                                                                                                                                                 |             |
| 102. | 17. In addition, the Needs and Desirability Assessment must be broadened to include a full cost-benefit analysis that internalises external costs, including the social cost of carbon, public-health impacts of additional air pollution, and losses of ecosystem services to affected communities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |           |               | <p>A monetised macro-economic Cost-Benefit Analysis is not a statutory requirement for a project-level EIA under NEMA. The referenced externalities will be rigorously evaluated through legally prescribed specialist studies, including an Air Quality Impact Assessment (AQIA), a CCIA, Biodiversity Assessments, and a Socio-Economic Impact Assessment. The AQIA assesses modelled emissions against statutory National Ambient Air Quality Standards (NAAQS). Findings and mitigations will be synthesised in the Needs and Desirability section to inform the Competent Authority's decision-making.</p>                                | Applicant   |
|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |           |               | <p>The EIA Phase will evaluate environmental and socio-economic impacts through specialist studies and will identify concomitant mitigation measures.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | EAP         |
| 103. | 18. As part of the need to consider a full cost-benefit analysis, scope for the consideration of natural capital accounting should be included. Natural Capital Accounting (NCA) provides a common framework for measuring and tracking over time the contribution of ecosystems and natural resources to social and economic goals, such as water security, food security and job creation, and provides a wealth of information that can improve planning and decision-making related to the management of natural resources. The underlying premise for NCA is that since the environment is important to society and the economy, it should be recognized as an asset that must be maintained and managed, and its contributions better integrated into decision making. Ecosystem accounting |           |               | <p>The Applicant notes the reference to Natural Capital Accounting (NCA) and frameworks such as the UN SEEA. Conducting a formal, monetised NCA is a macroeconomic exercise and not a statutory requirement for a site-specific EIA under NEMA. The assessment of the project's impact on critical environmental assets (water, air, biodiversity, and livelihoods) is comprehensively fulfilled through the prescribed NEMA specialist studies. The legally binding NEMA mitigation hierarchy ensures that environmental impacts are explicitly quantified, managed, and weighed without necessitating a macroeconomic accounting ledger.</p> | Applicant   |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RESPONSE BY |
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|      | incorporates a wider range of benefits to people than those captured in standard economic accounts and provides a structured approach to assessing the dependence and impacts of economic and human activity on the environment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |           |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |             |
| 104. | 19. As recognised in the natural capital accounting literature, including the UN's System of Environmental-Economic Accounting and Statistics South Africa's work on NCA, ecosystems and environmental assets that support water security, air quality, climate regulation and livelihoods constitute critical economic infrastructure and their degradation must be explicitly accounted for in project-level decision-making.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |               | The Applicant notes the reference to Natural Capital Accounting (NCA) and frameworks such as the UN SEEA. Conducting a formal, monetised NCA is a macroeconomic exercise and not a statutory requirement for a site-specific EIA under NEMA. The assessment of the project's impact on critical environmental assets (water, air, biodiversity, and livelihoods) is comprehensively fulfilled through the prescribed NEMA specialist studies. The legally binding NEMA mitigation hierarchy ensures that environmental impacts are explicitly quantified, managed, and weighed without necessitating a macroeconomic accounting ledger                                                                                                                                                                                                                                                                                                         | Applicant   |
| 105. | <p><b>Limited Cumulative Impact Assessment</b></p> <p>20. Further, the DSR defines the "Project" narrowly as the 750 MW CCGT plant and certain associated onsite infrastructure within the port, while repeatedly treating other essential components, including the LNG import and storage facilities, gas pipeline(s) to the plant, grid connection infrastructure, water supply and discharge pipelines, construction laydown areas and access routes, as separate processes or as outside the scope of the Project's Environmental Impact Assessment (EIA). In the SDCEA case, the Supreme Court of Appeal held that "if other components of the development also include listed activities, the environmental authorisation application must include all listed activities forming part of the overall development proposal", and that the comprehensive development context is essential for a complete assessment of combined impacts.</p> <p>21. The EIA should identify all listed activities triggered by the overall gas-to-power development in Richards Bay (including LNG import, gas transmission, transmission</p> |           |               | <p>The Project has been defined in the draft Scoping Report as the 750 MW CCGT Power Plant and its associated on-site infrastructure within Phase 1F of the RBIDZ. This is based on the fact that certain infrastructure components referred to in the comment (specifically the LNG import and storage facilities, gas transmission pipelines and electrical grid connection infrastructure) are being planned and applied for separately by different proponents and through separate regulatory processes.</p> <p>The Scoping Report does not disregard the broader development context. It explicitly acknowledges that the proposed gas-to-power facility is functionally linked to off-site gas supply and grid infrastructure, and it clearly records that these components fall outside the scope of the current EIA application. Their exclusion is not intended to avoid assessment, but rather reflects the legal and practical</p> | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RESPONSE BY            |
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|      | lines, water infrastructure and other gas-to-power plants); and either include those activities in this application, or, at a minimum, require a cumulative impact assessment which treats them as reasonably foreseeable parts of a single development, in line with the SDCEA case, and other judicial precedent. The cumulative assessment must specifically evaluate cumulative air quality and health impacts.                                                                                                                                                                                                                                              |           |               | <p>separation of projects undertaken by different entities.</p> <p>While the electrical grid infrastructure and gas supply pipeline are not included in the scope of this application and will be assessed through separate EIA processes, their functional interdependence with the proposed CCGT Power Plant is recognised. It is acknowledged that the commencement of the power plant will be contingent on the authorisation of these separate components. This interdependency will be taken into account in the overall project planning.</p> <p>The combined environmental effects of existing and reasonably foreseeable developments in the area, including LNG and electrical grid infrastructure, will be assessed during the EIA Phase.</p> |                        |
| 106. | <p><b>Socio-economic Impact Assessment</b></p> <p>22. The socio-economic and environmental-justice assessments must also specifically consider impacts on livelihoods and food security, including small-scale and subsistence fishers in and around the Port of Richards Bay, workers whose health may be affected by increased pollution, and households already experiencing energy poverty. Climate change and environmental degradation operate as “threat multipliers” that can undermine food availability, affordability and nutritional outcomes in coastal communities; these intersections must be explicitly incorporated in the Scoping Report.</p> |           |               | <p>22. The EIA Phase will evaluate the combined socio-economic, health and environmental effects of the Project, informed by cumulative impact considerations.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | EAP                    |
| 107. | <p><b>Air Quality Impact Assessment</b></p> <p>23. The DSR recognises that air quality in Richards Bay is already compromised by emissions from multiple industrial and port-related sources, and that there are numerous highly sensitive receptors (including schools, clinics and residential areas) within 5 km of the Project site, yet the Plan of Study provides only generic terms of reference for</p>                                                                                                                                                                                                                                                  |           |               | <p>The Atmospheric Impact Report (AIR) will be incorporated into the EIA Report.</p> <p>Monitoring data in Richards Bay will be reassessed and where possible parameters that were not included such as PM<sub>2.5</sub> and ozone will be included in finalising the AIR. NAAQA</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Air Quality Specialist |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | RESPONSE BY            |
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|      | <p>the Air Quality Impact Assessment. Given the documented non-compliance with more health-protective guideline values for PM<sub>2.5</sub> and the significant burden of respiratory and other pollution-related disease in the area, the Air Quality Impact Assessment must be scoped far more explicitly. The Plan of Study must require that:</p> <ul style="list-style-type: none"> <li>Recent municipal and RBCAA monitoring data for NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> and ozone be used to characterise baseline conditions, explicitly acknowledging where concentrations already meet or exceed the World Health Organization (WHO) 2021 Air Quality Guidelines;</li> <li>Dispersion modelling quantify the Project's incremental contribution to ambient concentrations of these pollutants at identified sensitive receptors under representative meteorological conditions; and</li> <li>The results be presented as both receptor-based tables and contour maps for Project-only and Project-plus-background scenarios.</li> </ul> |           |               | <p>and WHO 2021 guidelines will also be brought in.</p> <p>The dispersion modelling in the AIR assessed the project independently, with existing sources and with approved future sources. In so doing, the incremental contribution of the project was indeed assessed throughout the domain and explicitly at the sensitive receptors.</p> <p>Sensitive receptors are displayed explicitly on the isopleth maps where the respective concentrations can be obtained. We don't see that the inclusion of receptor based tables will add any further value.</p>                                                                                                                                                                                                                                                            |                        |
| 108. | <p>24. In addition, the Air Quality Impact Assessment must not treat compliance with the South African National Ambient Air Quality Standards (NAAQS) as a sufficient indicator of acceptability. The Plan of Study should expressly require that modelled concentrations and increments be compared to both NAAQS and the WHO 2021 guideline values, and that the associated Health Impact Assessment quantify the additional health risks attributable to the Project's emissions (including mortality and morbidity from cardio-respiratory and other pollution-related outcomes) with particular attention to vulnerable groups such as children, the elderly and people with pre-existing illness.</p>                                                                                                                                                                                                                                                                                                                                                                      |           |               | <p>The NAAQS are health-based and are the regulated standards against which compliance is assessed and against which decisions are made. WHO provides valuable ambient air quality guidelines and it is agreed that comparison can add value to an assessment, but they are not legally binding.</p> <p>A Health Impact Assessment was excluded from the scope of the AIR. Rather the assessment of air quality impacts compared predicted (modelled) ambient concentrations for four operational scenarios with the NAAQS. Considering this at these sensitive receptors, vulnerable groups such as children, the elderly and people with pre existing illness were assessed. This approach indeed excluded mortality and morbidity from cardio respiratory and other pollution related outcomes from the assessment.</p> | Air Quality Specialist |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | RESPONSE BY              |
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|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |           |               | The Health Impact Assessment will cover the potential health risks associated with emissions from the project, including impacts such as cardio-respiratory outcomes and other pollution-related effects. We are also specifically looking at how these risks may affect more vulnerable groups, including children, the elderly and those with pre-existing health conditions.                                                                                                                                                                                                                                                                                                        | Health Impact Specialist |
| 109. | <p><b>Noise and Avifaunal Impact Assessments</b></p> <p>25. The terms of reference for the Noise Impact Assessment and Avifauna Assessment must likewise be expanded. For noise, the EIA must assess not only compliance with SANS 10103 and “community response” categories, but also the health implications of elevated noise levels (including sleep disturbance, stress and cognitive impacts) at nearby sensitive receptors such as schools, clinics and high-sensitivity residential areas identified in the DSR. For avifauna, the EIA must consider how both construction and long-term operational noise and lighting may affect the behaviour, breeding success and habitat use of threatened and near-threatened bird species occurring in and around the Project area.</p>                                                                                                              |           |               | <p>In South Africa the document that addresses the issues specifically concerning environmental noise is SANS 10103:2008. It has been thoroughly revised in 2008 and brought in line with the guidelines of the World Health Organisation. The potential health effects from noise will be considered in the Noise Impact Assessment.</p> <p>Based on the findings of the Site Sensitivity Verification, the need for a dedicated Avifaunal Impact Assessment was not identified. Impacts to avifauna will be assessed as part of the Terrestrial Biodiversity Impact Assessment.</p>                                                                                                  | EAP                      |
| 110. | <p><b>Hydrological Impact Assessment</b></p> <p>26. The DSR acknowledges that the Project is located within the uMhlathuze catchment, in proximity to wetlands, drainage lines and the Richards Bay/uMhlathuze estuarine system, and that a Hydrological Assessment will be undertaken in the EIA phase. However, it does not specify how that assessment will address the Project’s significant water-use and pollution risks in a manner consistent with NEMA’s risk-averse and cautious approach and the National Water Act’s requirements regarding the water resource Reserve. The Plan of Study must therefore be strengthened to require that the hydrology and geohydrology specialist work:</p> <ul style="list-style-type: none"> <li>Quantifies the Project’s construction- and operational-phase water demand (by source and quality) and assesses this against the available</li> </ul> |           |               | <p>The Plant’s water requirements are discussed in Section 9.5.6.18 of the SR. The Applicant and the RBIDZ have been in discussions with uMngeni-uThukela Water (UW) regarding the water requirements of the Plant and how these requirements will be satisfied. The water requirements of the Project will be further explained in the EIA Report.</p> <p>The technical team has identified the use of an air cooled / dry cooled condenser as an alternative to forced-draft cooling towers. Using a dry cooled condenser will reduce the proposed plant’s water usage as well as wastewater. Further information pertaining to the dry cooled condenser will be included in the</p> | EAP                      |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | RESPONSE BY                                      |
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|      | <p>yield and Reserve of the relevant surface and groundwater resources;</p> <ul style="list-style-type: none"> <li>Identifies and assesses potential impacts on nearby wetlands, drainage lines, aquifers and any strategic surface or groundwater source areas feeding the Richards Bay estuary and associated systems; and</li> <li>Includes an assessment of the Project's implications for water security of surrounding communities, including whether existing and future basic human needs and ecological requirements can still be met if this additional demand and pollution load are authorised.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                |           |               | <p>EIA Report. A comparative analysis of these options will also be included in the EIA Report.</p> <p>The impacts to aquatic biodiversity will be evaluated as part of an Aquatic Biodiversity Impact Assessment during the EIA phase. The findings of this study will be included in the EIA Report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                  |
| 111. | <p>27. In addition, given the City of uMhlathuze's own climate-change risk assessments, the Plan of Study must require the hydrology and geohydrology assessment to consider how climate-change-induced droughts, extreme rainfall and flooding are expected to affect both the Project and local water resources over the plant's lifetime. This should include:</p> <ul style="list-style-type: none"> <li>Analysis of how increased rainfall variability and more frequent droughts may constrain surface- and groundwater availability and affect the reliability of the Project's water supply;</li> <li>Assessment of how more intense storm events and flooding could increase runoff, erosion, and the mobilisation of contaminants from the site into surrounding watercourses and wetlands; and</li> <li>A cumulative assessment of water-quantity and water-quality impacts when the Project's demands and risks are considered together with existing and authorised industrial and gas-to-power developments in Richards Bay.</li> </ul> |           |               | <p>The Climate Change Impact Assessment will determine how climate-change-induced impacts will affect the Project.</p> <p>Best environmental practices will be implemented during the operational phases to manage stormwater, which will be included in the Environmental Management Programme (EMPr).</p> <p>The technical team has identified the use of an air cooled / dry cooled condenser as an alternative to forced-draft cooling towers. Using a dry cooled condenser will reduce the proposed plant's water usage as well as wastewater. Further information pertaining to the dry cooled condenser will be included in the EIA Report. A comparative analysis of these options will also be included in the EIA Report.</p> <p>A stormwater management plan will be developed for the project based on best practice.</p> <p>Wastewater qualities, quantities and discharge options will be considered in the EIA Report.</p> | <p>EAP</p> <p>Technical Team &amp; Applicant</p> |
| 112. | <p><b>Assurances of meaningful public participation</b></p> <p>28. Recent jurisprudence, including the Sustaining the Wild Coast case, has confirmed that public participation</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |               | <p>The Plan of Study for the EIA phase was updated to specify engagement with small-scale fishers, informal-settlement</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | EAP                                              |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | RAISED BY                                                                 | SOURCE & DATE        | RESPONSE                                                                                                                           | RESPONSE BY |
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|      | must be a genuine, good-faith, two-way process aimed at consensus as far as possible, particularly with communities who stand to bear disproportionate environmental and cultural harms. Given the existing pollution burdens in Richards Bay and the clear environmental justice dimensions of adding another large fossil-fuel project, the Plan of Study must commit to proactive, inclusive engagement with affected communities, including but not limited to: small-scale fishers, informal-settlement residents, women, youth and people with disabilities.                                                                       |                                                                           |                      | residents, women, youth and people with disabilities.                                                                              |             |
| 113. | <p><b>Conclusion</b></p> <p>29. Based on the above comments and analysis, we request that the additional scope of assessment be included in the Plan of Study for EIA.</p> <p>30. Thank you for your consideration of our comments on the scoping report for the proposed project. We look forward to further engagement.</p>                                                                                                                                                                                                                                                                                                            |                                                                           |                      | Refer to the above responses for how these comments will be attended to during the EIA phase.                                      | EAP         |
| 114. | <p>1. The South Durban Community Environmental Alliance (SDCEA) is a community-based environmental justice organisation established in 1995 in South Durban. In 2022, it expanded its footprint by opening a satellite office in Richards Bay. SDCEA represents a coalition of local organisations working to protect the environmental and health rights of affected communities.</p> <p>2. We hereby submit comments on the Draft Scoping Report for the proposed 750MW Combined Cycle Gas Turbine (CCGT) Power Plant in Richards Bay (the "Project"), prepared by Nema Consulting on behalf of Mabasa Energy and Fuels (Pty) Ltd.</p> | D. D'Sa<br>South Durban<br>Community<br>Environmental<br>Alliance (SDCEA) | Letter<br>(08/04/26) | Introductory part of letter – no response required.                                                                                | -           |
| 115. | 3. We register as Interested and Affected Parties (I&APs) in terms of the EIA Regulations and confirm our intention to participate in all subsequent stages of the environmental assessment process.                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                           |                      | It is confirmed that SDCEA is a registered I&AP for the proposed Project's EIA. SDCEA will be notified as the EIA process unfolds. | EAP         |
| 116. | 4. We have identified several concerns with the Draft Scoping Report, including the scope of the Project description, Climate Change Impact Assessment (CCIA), the Needs and Desirability Assessment, the Cumulative                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                           |                      | The specific comments from SDCEA relating to the draft SR are responded to below.                                                  | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | RESPONSE BY    |
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|      | Impact Assessment, and compliance with South Africa's Nationally Determined Contribution (NDC) and international legal obligations. These concerns are elaborated on in detail below.                                                                                                                                                                                                                                                                                                                                                                                                    |           |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                |
| 117. | <p><b>5. Project description:</b></p> <p>The project's water requirements are excessive, particularly given that the application does not include a Water Use Licence Application. This omission is especially concerning in a district that has long experienced water shortages for domestic use. The proposed level of water consumption would place additional strain on an already scarce resource if not properly authorised and regulated. We caution against this approach, as it risks exacerbating existing water insecurity and further impacting vulnerable communities.</p> |           |               | <p>The Applicant and the RBIDZ have been in discussions with UUW regarding the water requirements of the Plant and how these requirements will be satisfied. The water requirements of the Project will be further explained in the EIA Report.</p> <p>The technical team has identified the use of an air cooled / dry cooled condenser as an alternative to forced-draft cooling towers. Using a dry cooled condenser will reduce the proposed plant's water usage as well as wastewater. Further information pertaining to the dry cooled condenser will be included in the EIA Report. A comparative analysis of these options will also be included in the EIA Report.</p> <p>Section 5.1.4.2 of the SR explains the relevance of the National Water Act (Act No. 36 of 1998) (NWA) to the Project. Following the delineations of the watercourses as part of the Aquatic Biodiversity Impact Assessment, the Department of Water and Sanitation (DWS) will be engaged to determine their requirements and to apply for authorisation for the NWA Section 21(c) and (i) water uses triggered by the Project. At this stage, water use in terms of NWA Section 21(a) (taking water from a water resource) is not anticipated to be triggered.</p> | EAP            |
| 118. | 6. There is a requirement for back up diesel generator, for which quantities are not specified in the application.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |           |               | The back-up diesel generators will have a capacity of approximately 10 to 30 MWe. These generators will only be used when a complete grid brown-out or black-out is experienced and the plant is required to start without any external electricity supply. This function is typically expected to occur 1/100 years.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Technical Team |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | RESPONSE BY               |
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| 119. | 7. The applicant indicates that decommissioning is not currently being considered, on the basis that the plant is intended to operate indefinitely. This position is inconsistent with government policy, which aims to transition South Africa from a carbon-intensive economy to a low-carbon economy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |           |               | The following is indicated in Section 9.5.9 of the SR: <i>Should decommissioning be required in the future, the activity will need to comply with the appropriate and prevailing environmental legislation and best practices at that time. It is envisaged that the scheme will be used indefinitely, under suitable maintenance. Decommissioning is thus not considered applicable at this stage. However, should decommissioning be required the activity will need to comply with the appropriate and prevailing environmental legislation and best practices at that time.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | EAP                       |
| 120. | <p><b>Limited scope of the Climate Change Impact Assessment (CCIA)</b></p> <p>8. Section 24O(1)(b) of NEMA requires competent authorities to consider “all relevant factors,” including “any pollution, environmental impacts or environmental degradation likely to be caused.” The courts have unequivocally confirmed that climate change impacts constitute such relevant factors and must be considered prior to the granting of environmental authorisation.</p> <p>9. In <i>Earthlife Africa Johannesburg v Minister of Environmental Affairs</i> (Case No: 65662/16) (“Earthlife case”), the court held that “the legislative and policy scheme and framework overwhelmingly support the conclusion that an assessment of climate change impacts and mitigating measures will be relevant factors in the environmental authorisation process, and that consideration of such will best be accomplished by means of a professionally researched climate change impact report” (para 91).</p> <p>10. This requirement applies with equal force to gas-fired power stations. In <i>*South Durban Community Environmental Alliance v Minister of Forestry, Fisheries and the Environment*</i> (Case No: 479/2023) (September 2025) (“SDCEA case”), the Supreme Court of Appeal set aside the environmental authorisation for a 3000MW gas-</p> |           |               | <p>12.1) The Climate Change Impact Assessment will include emissions associated with the construction, operation and decommissioning phases of the Project, including Scope 1, Scope 2 and relevant Scope 3 emissions.</p> <p>12.2) This will be addressed through the GHG inventory, which will include fugitive methane emissions associated with the Project and relevant gas supply chain components falling within the defined assessment boundary. The Climate Change Impact Assessment Report will set out the methodology, system boundaries and assumptions applied to the assessment. The quantified methane-related emissions will be presented, with results disclosed using both 100-year and 20-year GWP values to reflect the stronger near-term warming effect of methane.</p> <p>12.3) The Climate Change Impact Assessment will address consistency with South Africa’s NDC and Paris Agreement obligations.</p> <p>12.4) This will be addressed through the alternatives and contextual analysis contained in the Climate Change Impact Assessment Report. The report will consider relevant alternatives, including renewable energy-based</p> | Climate Change Specialist |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RESPONSE BY |
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|     | <p>fired power plant in Richards Bay, on the basis that the climate change impacts had not been adequately assessed.</p> <p>11. The Climate Change Impact Assessment (CCIA) proposed in the Plan of Study for the EIA is inadequate in several key respects.</p> <p>12. First, the assessment must include a comprehensive life-cycle greenhouse gas (GHG) analysis, encompassing:</p> <p>9.1 Scope 1 emissions: Direct emissions arising from the combustion of natural gas during the operation of the facility;</p> <p>9.2 Scope 2 emissions: Indirect emissions associated with the consumption of purchased electricity and other forms of energy; and</p> <p>9.3 Scope 3 emissions: Upstream emissions related to gas extraction, processing, liquefaction, transportation (including the shipping of LNG), and regasification, as well as relevant downstream emissions.</p> <p>13. The Earthlife court endorsed an assessment that "would comprise an assessment of (i) the extent to which a proposed [power station] will contribute to climate change over its lifetime, by quantifying its GHG emissions during construction, operation and decommissioning." Currently, the proposed scope of the CCIA is limited to the project's lifecycle emissions during construction and operation. What this speaks to, is the legal and methodological adequacy of the Climate Change Impact Assessment for the project – the land mark case held that a proper climate assessment must include, an assessment of the total greenhouse gas emissions over the full lifecycle. At the following phases, construction, operational and at decommissioning stage.</p> <p><i>Evaluate how these emissions contribute to climate change impacts over time/ What are the long-term impacts of the project?</i></p> |           |               | <p>options, and the Project's emissions profile within the broader electricity generation context will also be presented. Such comparisons will be provided for contextual purposes and do not constitute an energy policy determination.</p> <p>12.5) The Climate Change Impact Assessment will consider the Project's resilience to the impacts of climate change.</p> <p>12.6) The Climate Change Impact Assessment will assess cumulative emissions on a project-level lifecycle basis. It will quantify the Project's annual and lifecycle GHG emissions, including direct, indirect and upstream emissions, across the 750 MW CCPP and its functionally linked infrastructure. Cumulative climate impacts will be assessed as the Project's incremental contribution to cumulative atmospheric GHG loading, rather than as a localised impact in Richards Bay. The report will not aggregate emissions from unrelated third-party developments, as climate impacts from GHG emissions are global and broader system-wide cumulative assessment falls within the mandate of the competent authority.</p> |             |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |           |               | The Plan of Study was updated accordingly.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | RAISED BY | SOURCE & DATE | RESPONSE | RESPONSE BY |
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|     | <p>14. Secondly, given that natural gas consists predominantly of methane— a greenhouse gas with a global warming potential approximately 80 times greater than that of carbon dioxide (CO<sub>2</sub>) over a 20-year period—the assessment must adequately account for fugitive methane emissions across the full supply chain. This includes emissions arising from extraction and processing, liquefaction facilities, transportation (including LNG tanker shipping), regasification at Richards Bay, and pipeline conveyance to the proposed facility.<br/><i>How do you anticipate to mitigate the air pollution that comes with the handling of the gas?</i></p> <p>10. Thirdly, the assessment for this project must provide clear quantification of annual GHG emissions, total lifetime emissions, and emissions intensity per megawatt-hour, as well as a comparison with alternative generation technologies, including renewables. This requirement arises from judicial criticism in the Earthlife case, where the Environmental Impact Report was found deficient for containing “no quantification of CO<sub>2</sub> emissions” and offering only “passing mention of climate change impacts, describing these as being of ‘low’ and ‘relatively small’ significance.”</p> <p>11. Fourthly, the assessment must examine whether the project aligns with South Africa’s emissions trajectory as outlined in its Nationally Determined Contribution (NDC), including adherence to the peak–plateau–decline framework.</p> <p>12. We therefore request that the Plan of Study for the EIA be revised to mandate a comprehensive Climate Change Impact Assessment, incorporating the following:<br/>12.1 A full life-cycle GHG analysis, including Scope 1, 2, and 3 emissions;<br/>12.2 A quantified assessment of methane leakage throughout the supply chain;<br/>12.3 An evaluation of the project’s alignment with South Africa’s NDC and its obligations under the Paris Agreement;</p> |           |               |          |             |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | RESPONSE BY |
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|      | 12.4 A comparison of the project's climate impacts with those of renewable energy alternatives;<br>12.5 An assessment of climate-related risks to the project, including its resilience; and<br>12.6 Consideration of cumulative climate impacts from all proposed gas infrastructure in Richards Bay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |           |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |             |
| 121. | <p><b>Deficiencies in the scope of the Needs and Desirability Assessment</b></p> <p>13. Appendix 2 of the EIA Regulations requires that the “need and desirability” of the proposed activity be clearly motivated. The DEA Guideline on Need and Desirability (2017) offers detailed guidance on conducting this assessment. Furthermore, section 24(4)(b)(i) of NEMA mandates the consideration of alternatives, including the option of not proceeding with the activity.</p> <p>14. The Scoping Report primarily justifies the project with reference to macro-level energy policy, including the Integrated Resource Plan and the Gas Independent Power Producers Procurement Programme (Gas IPPPP). However, courts have rejected this approach. In Earthlife, the court held that “an abstract, macro-level assessment of the climate change impact of additional coal-fired power could not cast any light on the specific climate change impacts and mitigation strategies of specific [power stations] located at specific sites.” This principle is equally applicable to gas-fired power stations.</p> <p>14.1 The concern lies in the need for site- and project-specific environmental assessment rather than relying solely on broad, national-level policy justifications. While macro-level energy plans, such as the Integrated Resource Plan or Gas IPPPP, provide context for energy development, they do not address the direct and localized Richards Bay environmental impacts of this specific project.</p> <p>Meaning, applying this principle to the proposed gas-fired power station means that the Scoping Report must include detailed, project-specific analysis of greenhouse gas</p> |           |               | <p>The SR explains the Needs and Desirability of the Project, as required in Appendix 2 of the EIA Regulations. This assessment was informed by the DEA Guideline on Need and Desirability (2017). Further refinement of the assessment will be undertaken in the EIA Phase as additional specialist information becomes available.</p> <p>The assessment of the impacts associated with the Project, including the specialist studies, will be site- and project-specific.</p> | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | RESPONSE BY |
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|      | emissions, climate impacts, and mitigation strategies to comply with legal requirements and ensure informed decision-making.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |           |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |             |
| 122. | <p>15. The report states that "alternatives to energy generation are not relevant to this Project" because the applicant intends to bid under GASIPPPP. This approach is legally flawed.</p> <p>16. The Supreme Court of Appeal in South Durban Community Environmental Alliance held that: "The regulations do not merely permit an assessment of the 'preferred alternative and the no-go alternative,' as suggested. They require an evaluation of all reasonable and feasible alternatives to a proposed project, including location, design, technology, and the 'no-go option.' The preferred alternative must be selected only after comparing the social, environmental, technical, and economic impacts of all options considered."</p> <p>17. The assessment must consider all reasonable and feasible alternatives, including:</p> <p>17.1 Renewable energy options, such as solar PV and wind, combined with battery storage;</p> <p>17.2 Grid expansion and enhanced interconnection;</p> <p>17.3 Demand-side management measures;</p> <p>17.4 Other low-carbon generation technologies; and</p> <p>17.5 The no-go option.</p> |           |               | <p>The site is located within Phase 1F of the RBIDZ, which is a purpose-built and secured industrial estate linked to the PoRB that aims to attract local and foreign direct investment, such as the proposed Project. The location of the project site in the industrial estate (Erf 16673) was identified by the RBIDZ, in consultation with the Applicant. The Project's siting is based on the advantages posed by the RBIDZ, including the appropriate zoning (current zoning of the site is "Noxious Industry"), availability of services and strategic location (including proximity to the PoRB). Hence, no site alternatives were considered.</p> <p>The Best Practicable Environmental Option (BPEO) will only be identified during the EIA phase, based on a comparative analysis of all options.</p> <p>The no-go alternative is included in the Scoping Report as a baseline scenario, consistent with scoping-level requirements. The EIA Phase will provide a detailed and balanced assessment of the no-go option</p> | EAP         |
|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |           |               | <p>In accordance with NEMA and relevant case law, the EIA will assess alternatives that are reasonable, feasible, and fulfil the specific purpose and need of the project.</p> <p>17.1 (Renewables + BESS): This alternative does not currently meet the project's specific mandate to provide long-duration dispatchability and physical synchronous inertia at the required scale.</p> <p>17.2 &amp; 17.3 (Grid Expansion &amp; DSM): Grid expansion and Demand-Side Management are</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicant   |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                     | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RESPONSE BY                 |
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|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |           |               | <p>national or municipal macroeconomic interventions. They are not standalone generation alternatives implementable by a private Independent Power Producer (IPP) for a site-specific generation EIA. (Note: Grid interconnection infrastructure for this facility is being advanced through the necessary parallel Eskom processes).</p> <p>17.4 (Other Low-Carbon): The EIA will summarise the technology screening process.</p> <p>17.5 (No-Go): The No-Go alternative will be comprehensively assessed as the mandatory comparative baseline in the EIA.</p>                                                                                 |                             |
| 123. | 18. The report fails to adequately demonstrate that this specific 750MW project is genuinely necessary. Considering that multiple gas-to-power projects have already been authorized in Richards Bay, coupled with the rapid expansion of renewable energy capacity in South Africa, the need for this additional gasfired capacity must be thoroughly and rigorously justified.                                                                                           |           |               | The Needs and Desirability Assessment in the EIA will provide the site-specific justification for the project. Environmental Authorisation (EA) is a statutory prerequisite for an IPP to participate in national procurement programmes. The authorisation of other independent projects in the region does not negate the Applicant's statutory right to seek an EA, nor does an EA guarantee operational capacity on the grid. The planned operational flexibility of this facility is directly designed to complement the national expansion of renewable energy.                                                                            | Applicant                   |
| 124. | 19. We therefore request that the EIA Phase include: <ol style="list-style-type: none"> <li>1. A comprehensive needs and desirability assessment that complies with the DEA Guideline;</li> <li>2. Assessment of reasonable and feasible alternatives, including renewable energy options;</li> <li>3. Analysis of whether the project is consistent with South Africa's Just Energy Transition commitments; and</li> <li>4. Assessment of stranded asset risk.</li> </ol> |           |               | <p>The Needs and Desirability section of the SR was informed by the DEA Guideline on Need and Desirability (2017). Further refinement of the assessment will be undertaken in the EIA Phase as additional specialist information becomes available.</p> <p>The Applicant notes the requests. In strict compliance with NEMA, the EIA will assess all reasonable and feasible alternatives for the specific purpose of providing 750MW of highly reliable, dispatchable generation. Alignment with South Africa's Just Energy Transition (JET) will be integrated into the Needs and Desirability Assessment and CCIA. Stranded asset risk is</p> | <p>EAP</p> <p>Applicant</p> |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | RESPONSE BY |
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|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |           |               | inherently mitigated through the facility's engineered operational flexibility.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |             |
| 125. | 20. The applicant does not properly assess project alternatives but only takes the position that because there is government project for the GASIPPP then it was only in that way that they could bid for an electricity generation programme. This overlooks the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) which focused on renewable energy sources such as solar, wind and other renewable sources and was aligned with our international agreements. The same amount of generation (750MW) would've been achieved through renewable energy sources. |           |               | Generating 750MW of installed capacity from VRE is not technically equivalent to 750MW of firm, dispatchable capacity. The specific purpose of this project is to provide reliable dispatchable generation, synchronous inertia, and continuous availability that VRE and current storage technologies cannot currently fulfil at this scale. Substituting this facility entirely with a renewable energy alternative alters the fundamental nature of the project and does not meet the "reasonable and feasible" threshold for the project's purpose under NEMA. | Applicant   |
| 126. | 21. Locational alternative is also barely considered as the entire application is built on the Zululand Energy Terminal being given authorisation, which it currently does not have and may not even have LNG supply agreements in place.                                                                                                                                                                                                                                                                                                                                                 |           |               | Richards Bay is designated by national spatial and energy planning frameworks as a strategic hub for gas-to-power generation and LNG importation. Locational alternatives will be addressed in the EIA. The proposed generation facility and the required fuel-supply infrastructure are advancing through parallel but independent Environmental Authorisation processes. Commercial interdependence does not preclude the Applicant from advancing the site-specific EIA for the generation facility.                                                            | Applicant   |
|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |           |               | It is acknowledged that the commencement of the CCGT Power Plant will be contingent on the authorisation of the LNG infrastructure. This interdependency will be taken into account in the overall project planning.                                                                                                                                                                                                                                                                                                                                               | EAP         |
| 127. | 22. The No-Go Option is also barely assessed. The country is currently not load-shedding and has a higher Electricity Availability Factor, which means the generation is enough not to load shed. This negates the need for such fossil fuel developments that are regressive.                                                                                                                                                                                                                                                                                                            |           |               | The no-go alternative is included in the Scoping Report as a baseline scenario, consistent with scoping-level requirements. The EIA Phase will provide a detailed and balanced assessment of the no-go option, which will be informed by the findings of the specialist studies and the cumulative impact assessment.                                                                                                                                                                                                                                              | EAP         |
| 128. | 23. The applicant brands LNG as a cleaner fuel, which is false as LNG is a fossil fuel with large carbon footprint from point of extraction to transporting to generation, emitting methane which is more potent than carbon dioxide then                                                                                                                                                                                                                                                                                                                                                 |           |               | The Applicant acknowledges that LNG is a fossil fuel; the term "cleaner" is utilised as a comparative metric against South Africa's highly carbon-intensive, coal-dominated macro-                                                                                                                                                                                                                                                                                                                                                                                 | Applicant   |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RESPONSE BY            |
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|      | you have emissions such as NOx and CO during electricity generation. The downplaying of these impacts should not be treated lightly.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |               | energy baseline and diesel-burning peaking plants. Displacing coal with highly efficient natural gas represents a significant reduction in national emission intensity while maintaining grid stability. A dedicated CCIA will calculate a comprehensive GHG inventory, including upstream Scope 3 emissions. Localised pollutants (NOx and CO) will be strictly assessed through the AQIA.                                                                                                                                                                    |                        |
|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |           |               | Although the Climate Change Impact Assessment will focus on the lifecycle of the Project, it will also consider cumulative impacts of existing and reasonably foreseeable developments in the area, including the proposed LNG infrastructure.                                                                                                                                                                                                                                                                                                                 | EAP                    |
| 129. | <b>Impact Assessments shortfalls:</b><br><br>24. According to the statistics provided, only 14.6% of the population in the city of uMhlatuze holds higher education qualifications. This raises concerns regarding the extent to which local communities will benefit from the proposed project, as Combined Cycle Gas Turbine (CCGT) power plants typically require specialised technical skills that are scarce, particularly in smaller towns such as Richards Bay. The Socio-Economic Impact Assessment should therefore include a comprehensive Cost-Benefit Analysis that accurately weighs the project's anticipated benefits against its social and economic costs. Furthermore, the reference to 50 employment opportunities is vague and lacks clarity on whether these include unskilled positions or are predominantly highly technical roles, as is often the case with such developments. |           |               | A monetised macroeconomic Cost-Benefit Analysis is not a statutory requirement under NEMA. The Socio-Economic Impact Assessment will objectively evaluate anticipated socio-economic benefits against potential localised costs. The 50 permanent operational roles require specialised technical skills, whereas the construction phase will generate hundreds of temporary jobs. A substantial percentage of these construction roles will be semi-skilled and unskilled, directly matching the local labour profile and offering immediate economic relief. | Applicant              |
|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |           |               | The Socio-Economic Impact Assessment will consider the adverse and positive impacts of the Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                            | EAP                    |
| 130. | 25. The Air Quality data relied upon in the application is dated (2021–2023) and is therefore at least three years old. This is concerning given the significant increase in trucking activity within Richards Bay, particularly associated with operations at the port, which has likely contributed to a deterioration in air quality. This is further compounded by existing industrial emissions in the area. The applicant has not provided any justification for relying                                                                                                                                                                                                                                                                                                                                                                                                                          |           |               | The draft final version of the Atmospheric Impact Report (AIR) was completed in August 2024. At the time the data for 2021 to 2023 was the most recent data a full 3-year period. Using this data was relevant at the time. Changes in emission sources since and their effects on ambient air quality is acknowledged.                                                                                                                                                                                                                                        | Air Quality Specialist |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RESPONSE BY |
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|      | on outdated data, which raises concerns about the accuracy and reliability of the assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |           |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |             |
| 131. | 26. The applicant indicates that a fire protection system, including water storage, will be in place. However, this is inadequate, as liquefied gas fires and explosions cannot be effectively extinguished using water alone and typically require specialised chemical suppression systems. Gas-related incidents pose significant risks and require highly trained emergency responders. This presents a potential danger not only to nearby residential communities but also to surrounding industries in Richards Bay that handle flammable or hazardous materials. The application does not demonstrate that the local fire department has the capacity to respond to such incidents, nor does it include a comprehensive emergency response plan, which is a critical omission. |           |               | <p>As mentioned in the SR, provision is made for a Quantitative Risk Assessment to be undertaken for the Project. The findings from this assessment will be incorporated into the EIA Report.</p> <p>The EMP, which will accompany the EIA Report, will include an Emergency Response Plan for the proposed Plant.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | EAP         |
| 132. | <p><b>Limited Cumulative Impact Assessment</b></p> <p>27. The EIA Regulations define “cumulative impact” as “the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity.” Appendix 3 further requires an evaluation of how the impacts of a project, when combined with those of similar existing and anticipated developments, may result in significant environmental changes.</p>                                                                                                                                                                                                                                                                                                   |           |               | <p>The potential negative cumulative impacts associated with the Project were identified during the Scoping Phase and are discussed in Section 13.4 of the SR. These impacts were identified based on the current understanding of the Project, its receiving environment, and existing developments and third-party projects.</p> <p>The EIA Report will contain a detailed assessment of cumulative impacts, which will incorporate the findings of the specialist studies and technical investigations. This will include an assessment of cumulative air quality impacts, taking into consideration sensitive receptors.</p> <p>Furthermore, the EIA Report will contain all information set out in Appendix 3 of the EIA Regulations, including the assessment of cumulative impacts.</p> | EAP         |
| 133. | 28. The CCIA proposes to assess “emission of GHGs during operational phase, including cumulative impacts considering incremental effects of past, present, or future activities combined with the effects of the proposed Project’s area of influence (AOI).” What is the long-term impacts of this project?                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |           |               | The Climate Change Impact Assessment will include emissions associated with the project life-cycle (i.e., construction, operation and decommissioning phases).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | RESPONSE BY            |
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| 134. | 29. The Scoping Report identifies at least 6 authorized gas-to-power projects within a 10 km radius. The cumulative climate, air quality, and health impacts of these multiple projects must be comprehensively assessed.                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |               | The known existing industrial facilities or projects within a 10 km radius of the site are provided in Section 13.4.2.2 of the SR. Cumulative impacts will be assessed as part of the specialist studies, and the findings (including associated mapping) will be included in the EIA Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | EAP                    |
| 135. | 30. What will that mean for the surrounding communities in terms of Air Quality, as Richards Bay is known as an industrial hub. When it comes to the cumulative impacts, even if a single gas plant meets emissions standards, the combined emissions from multiple industrial sources, "Cluster of industrial activities" this will lead to worse air quality overall. Cumulative air pollution (particulate matter) will exceed health-based thresholds when added to existing industrial emissions. In figure 6.1, Brackenham and Veld En Vlei are not placed in the sensitivity map for air quality, which are closer to the project site than Aquadene. |           |               | This importance of this point is acknowledged. Hence Scenario 4 in the AIR concerns the Mabasa CCPP together with six approved applications including four gas to power project in Richards Bay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Air Quality Specialist |
|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |           |               | All sensitive receptors, including Brackenham and Veld-en-Vlei, will be included in the AIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | EAP                    |
| 136. | 31. The report noted that the power plant will use water cooling and steam systems. Our concern is that with a combination of the existing industrial water use demand and regional water scarcity pressures, the cumulative draw on freshwater resources, will have an impact and create stress to the Richards Bay water supplies and impact the ecosystem in the long run. How will this be guarded against? How will the waste water be disposed off and will it also be treated before sending it back to the ocean, where communal fisherfolks will be affected by the hot waste water/ change in temperature, which will affect the marine life.      |           |               | <p>The Applicant and the RBIDZ have been in discussions with UUW regarding the water requirements of the Plant and how these requirements will be satisfied. The water requirements of the Project will be further explained in the EIA Report.</p> <p>The technical team has identified the use of an air cooled / dry cooled condenser as an alternative to forced-draft cooling towers. Using a dry cooled condenser will reduce the proposed plant's water usage as well as wastewater. Further information pertaining to the dry cooled condenser will be included in the EIA Report. A comparative analysis of these options will also be included in the EIA Report.</p> <p>Liquid wastes produced during the operational phase will include wastewater (including water used in cooling processes and domestic sewage), condensate water as well as lubricants, oils and spent chemicals from</p> | EAP                    |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | RESPONSE BY                |
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|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |           |               | operation and maintenance activities. Mitigation measures to manage wastewater will be included in the EMP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                            |
|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |           |               | Section 9.5.6.19 of the SR provides information pertaining to sanitary sewage, water drainage and treatment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                            |
|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |           |               | The process water to be discharged from the project site comprises primarily of effluent water from the water treatment plant, heat recovery steam generator blow-down and cooling tower blow-down. Process related wastewater from the plant will be cooled, neutralised and stored on site in the process wastewater tank. Water will be tested before being discharged to the municipal sewer or the storm water system under authorisation from the relevant authority. The quality and quantities of wastewater to be discharged will be provided in the EIA Report.                                                                                                                                                                                                                                                                                                                                                                            | Technical Team & Applicant |
| 137. | <p>32. The omission of the gas pipeline, LNG terminal, and other gas-to-power plants from this assessment is a significant concern. For the assessment to effectively identify actual and potential sources of pollution, the Port of Richards Bay expansion plans must be considered cumulatively. In the (SDCEA case), the Supreme Court of Appeal found that the Minister had failed to account for the cumulative effects of gas extraction and transportation, and rejected the argument that such impacts "only become relevant at a later stage."</p> <p>33. The court stated: "...if other components of the development also include listed activities, the environmental authorisation application must include all listed activities forming part of the overall development proposal. The comprehensive development context is important for a complete assessment of the combined impacts of the listed activities in a combined development..."</p> <p>34. Meaning, when a development has multiple activities that each require environmental approval, the application</p> |           |               | <p>The Project has been defined in the draft Scoping Report as the 750 MW CCGT Power Plant and its associated on-site infrastructure within Phase 1F of the RBIDZ. This is based on the fact that certain infrastructure components referred to in the comment (specifically the gas pipeline, LNG terminal, and other gas-to-power plants) are being planned and applied for separately by different proponents and through separate regulatory processes.</p> <p>The Scoping Report does not disregard the broader development context. It explicitly acknowledges that the proposed gas-to-power facility is functionally linked to off-site gas supply and grid infrastructure, and it clearly records that these components fall outside the scope of the current EIA application. Their exclusion is not intended to avoid assessment but rather reflects the legal and practical separation of projects undertaken by different entities.</p> | EAP                        |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | RESPONSE BY |
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|      | <p>and assessment must cover everything together, because the combined impacts could be more significant than each part on its own.</p> <p>34.1“Other components of the development also include listed activities”:<br/>-Some parts of the development might themselves require environmental approval because they are “listed activities” under environmental law.</p> <p>34.2“The environmental authorisation application must include all listed activities forming part of the overall development proposal”:<br/>-When the developer applies for an environmental approval, needs to not submit one part of the development but must include all the activities that are part of the overall project. This ensures regulators see the full picture.</p> <p>34.3“The comprehensive development context is important for a complete assessment of the combined impacts of the listed activities in a combined development”:<br/>-The competent authorities need to understand how all the activities interact within the overall project. Viewing at each activity in isolation may miss how the receiving environment will be impacted.</p> <p>34.4“The assessment considers the potential impacts of all the activities, including cumulative impacts”<br/>-The report needs to view both the direct impacts and cumulative impacts.</p> <p>35. We therefore request that the EIA Phase include:</p> <ol style="list-style-type: none"> <li>1. A comprehensive cumulative impact assessment that considers all gas infrastructure components (pipeline, LNG terminal, power plant);</li> <li>2. Cumulative assessment of all proposed gas-to-power projects in Richards Bay; and</li> <li>3. Cumulative air quality and health impact assessment.</li> </ol> |           |               | <p>While the LNG infrastructure is not included in the scope of this application and will be assessed through separate EIA processes, their functional interdependence with the proposed CCGT Power Plant is recognised. It is acknowledged that the commencement of the power plant will be contingent on the authorisation of these separate components. This interdependency will be taken into account in the overall project planning.</p> <p>The combined environmental effects of existing and reasonably foreseeable developments in the area, including LNG infrastructure, will be assessed during the EIA Phase.</p> |             |
| 138. | <b>Assurances of meaningful public participation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |           |               | 37.1) The Executive Summary of the draft EIA Report will be translated into isiZulu (as was the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RESPONSE BY |
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|      | <p>36. Section 24(4)(a)(v) of NEMA requires public participation procedures that "provide all interested and affected parties... with a reasonable opportunity to participate." The courts have emphasised that public participation must be meaningful, not merely formal.</p> <p>37. We request confirmation that:</p> <p>37.1 All documentation will be available in isiZulu as well as English, including the reports;</p> <p>37.2 Hard copies will be made available at locations that are accessible and convenient for affected communities, rather than being limited to the two libraries in the Central Business District and Aquadene. Priority should be given to distribution within township communities such as Nseleni and Mzingazi, to ensure that community members do not have to travel long distances in order to participate. They could also be left at community halls and a few have "war rooms" where communal meetings are held. As most community members are unaware of projects within Richards Bay.</p> <p>37.3 Meetings will be held at times and venues accessible to affected communities;</p> <p>37.4 Adequate time will be provided for community organisations to consult with technical experts;</p> <p>37.5 All comments received will be responded to substantively.</p> |           |               | <p>case with the draft SR). Furthermore, the presentations to be shared during the meetings with the communities will be translated into isiZulu, which was also done during the Scoping Phase.</p> <p>37.2) The Plan of Study (Section 14.5.2 of the SR) was updated to read as follows: <i>Hardcopies of the document will be lodged for public review at public libraries, and will also be placed at suitable locations within Nseleni and Mzingazi.</i></p> <p>37.3) The Plan of Study (Section 14.5.3 of the SR) was updated to cater for dedicated meetings with local communities during the EIA phase.</p> <p>37.4) A 30-day period will be provided to I&amp;APs to review the draft EIA Report in accordance with the EIA Regulations.</p> <p>37.5) This Comments and Responses Report (CRR) serves to record the comments received from I&amp;APs during the review of the draft SR. The CRR also attempts to address comments received through responses and input provided by the Applicant, technical team, EAP and environmental specialists. The CRR will be expanded on as the EIA process progresses, and more comments are received related to the Project.</p> |             |
| 139. | <p><b>Inadequate public participation:</b></p> <p>38. The SDCEA is of the view that this process was not correctly followed, as it was SDCEA that approached the consultants to request a community meeting. This was necessary because the originally scheduled public meeting was inaccessible to many affected community members due to the chosen time and venue.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |           |               | <p>The public meeting was held at the Zululand Chamber of Commerce and Industry in Alton, Richards Bay on 25 March 2026. The meeting started at 17:30 to allow people coming from work to attend.</p> <p>At the request of SDCEA, an additional meeting was held on 26 March 2026 from 9:00 – 11:30 at the Community Hall in Nseleni.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | RESPONSE BY                 |
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|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |           |               | The Plan of Study (Section 14.5.3 of the SR) was updated to cater for dedicated meetings with local communities during the EIA phase.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                             |
| 140. | <p>39. While we welcomed the granting of this request (26 March – Nseleni Community Hall), we remain concerned about representations made regarding employment opportunities. It was indicated that contact details of the present community members would be collected, consolidated into an employment database, and that preference would be given to those who attended the meeting (this was done to community members that are unemployed). If this is the case, clarity is required: given that approximately 500 jobs during the construction phase which will to be temporary, and only about 50 permanent positions are expected to be skilled roles, does this imply that local community members will largely be limited to low-skilled positions such as security and cleaning?</p> <p>40. In the SDCEA case, "...Here, we are concerned with the procedural obligation on Eskom to enable public participation in environmental decision-making through meaningful and effective participation of people in an inclusive manner. Public participation is pivotal to the fulfilment of the right to an environment that is not harmful to the health and well-being. To be effective, public consultation must be conducted in good faith, through culturally appropriate measures and procedures". In this case the good faith part means the conduct and this was not the case with community meeting on the 26th of March 2026.</p> <p>41. Duty to disclose truthful, non-misleading information Regulation 13(1)(f) requires:<br/>- Disclosure of all material information that may influence decisions.</p> <p>This is a concern for us, because the promising jobs (especially if uncertain) is misleading or incomplete information. It can distort decision-making by both the public and the competent authority.</p> |           |               | <p>The Applicant explicitly confirms that no Curriculum Vitae (CVs) were requested or collected by the Environmental Assessment Practitioner (EAP), and no jobs were promised to community members as an inducement for support. The collection of community contact details fulfils the strict statutory obligation under NEMA EIA Regulations to maintain a register of Interested and Affected Parties (I&amp;APs). The Public Participation Process (PPP) was conducted in good faith as a genuine two-way engagement. The EAP has executed their duties independently and transparently, strictly within the bounds of the NEMA Regulations and EAPASA Code of Ethics.</p> <p>During the meeting with the Nseleni community on 26 March 2026, general information was provided by the Applicant regarding the potential for employment opportunities associated with the construction and operational phases of the proposed project.</p> <p>During this meeting the EAP did not support, endorse or authorise any promises of employment, nor the establishment of a project-specific employment database as part of the public participation process. Any statements made by the Applicant during the meeting regarding possible future employment opportunities were general in nature, reflective of typical large-scale infrastructure projects, and subject to procurement processes, contractor availability, skills requirements, and labour legislation.</p> <p>The purpose of the public participation process is to enable meaningful engagement on environmental issues, not to serve as a</p> | <p>Applicant</p> <p>EAP</p> |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RESPONSE BY |
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|     | <p><b>42. Participation Process (PPP)</b><br/>The Environmental Assessment Practitioner (EAP) is responsible for ensuring a fair, transparent, and ethical Public Participation Process (PPP), including maintaining a register of Interested and Affected Parties (I&amp;APs) and responding to their concerns. In terms of the Environmental Assessment Practitioners Association of South Africa Code of Ethics, the EAP must avoid conflicts of interest, provide accurate information, and uphold professional integrity.</p> <p>43. Promising jobs to community members and collecting CVs during the PPP is considered unethical, as it creates a conflict of interest and undermines the integrity of the process. It may be seen as an attempt to influence community support for the project, which violates ethical obligations— particularly those relating to independence, transparency, and impartiality.</p> <p>44. Furthermore, public participation must be meaningful, not merely procedural. In <i>Sustaining the Wild Coast NPC and Others v Minister of Mineral Resources and Energy and Others</i>, the court emphasised that meaningful consultation requires a genuine, good-faith, two-way engagement aimed at reaching consensus. The use of job promises and curriculum vitae collection may amount to misrepresentation and improper inducement, indicating that the PPP was not conducted in good faith.</p> <p>45. As a result, there are grounds to conclude that the EAP has breached the EAPASA Code of Ethics, and a formal complaint may be lodged with EAPASA, which could lead to an investigation and possible disciplinary action.</p> |           |               | <p>recruitment or employment platform. To this end, the EAP wishes to clarify that attendance at the public meeting does not confer any form of employment preference, and no representation to this effect forms part of the Project scope, application or assessment.</p> <p>The Scoping Report and Plan of Study for EIA appropriately identify socio-economic impacts, including employment creation, skills requirements and limitations, as matters to be assessed during the EIA Phase through the Socio-Economic and Social Impact Assessments.</p> <p>With regard to allegations of bad faith, misrepresentation or unethical conduct, the EAP confirms that the public participation process has been undertaken in accordance with the EIA Regulations, with the objective of ensuring transparency, inclusivity and procedural fairness. The EAP remains independent of the Applicant, has no interest in the outcome of the application, and continues to act in accordance with the EAPASA Code of Ethics.</p> <p>To avoid any potential misunderstanding going forward, the EAP will ensure that clear and consistent messaging is provided during future engagement processes, and that public meetings remain focused on environmental issues relevant to the EIA process. Should any information shared at meetings require clarification, this will be done formally through the Comments and Responses Report (CRR) and the EIA documentation.</p> <p>The comments raised have been noted and will be taken into account in refining stakeholder</p> |             |

| No.                                            | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                      | RESPONSE BY                                                                                                                          |                         |                                                                                                                              |  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
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|                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |           |               | engagement and communication during the EIA Phase.                                                                            |                                                                                                                                      |                         |                                                                                                                              |  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| 141.                                           | <p><b>Alignment with International Climate Obligations</b></p> <p>46. South Africa ratified the Paris Agreement and committed to limiting warming to 1.5°C. South Africa's NDC commits to emissions peaking by 2025, plateauing, and then declining. The EIA must assess whether authorising a new fossil fuel project with a 25-30 year operational lifespan is consistent with these commitments.</p> <p>47. Recent international developments, including advisory opinions from the International Court of Justice, emphasize states' obligations to consider climate impacts when approving new fossil fuel projects. These developments are relevant to the interpretation of NEMA in light of South Africa's international obligations.</p> <p>48. The EIA must include:</p> <ol style="list-style-type: none"><li>1. Assessment of consistency with Paris Agreement temperature goals;</li><li>2. Assessment of consistency with South Africa's NDC trajectory; and</li><li>3. Consideration of recent international climate jurisprudence.</li></ol> |           |               | <p>The Climate Change Impact Assessment will address consistency with South Africa's NDC and Paris Agreement obligations.</p> | Climate Change Specialist                                                                                                            |                         |                                                                                                                              |  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| 142.                                           | <p><b>Conclusion</b></p> <p>49. Based on the above analysis, we request that the following additional studies be included in the Plan of Study for EIA:</p> <table><tr><th>Study</th><th>Requirements</th></tr><tr><td>Comprehensive Climate Change Impact Assessment</td><td>Life-cycle GHG analysis (Scope 1, 2 and 3); methane leakage assessment; alignment with NDC; assessment of cumulative climate impacts</td></tr><tr><td>Alternatives Assessment</td><td>Comparative assessment of renewable energy alternatives; demand-side management options; assessment of the no-go alternative</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                                                           | Study     | Requirements  | Comprehensive Climate Change Impact Assessment                                                                                | Life-cycle GHG analysis (Scope 1, 2 and 3); methane leakage assessment; alignment with NDC; assessment of cumulative climate impacts | Alternatives Assessment | Comparative assessment of renewable energy alternatives; demand-side management options; assessment of the no-go alternative |  |  | <p>Provision is made in the Plan of Study for a Climate Change Impact Assessment. The Terms of Reference for this study was updated to specify the following additional requirements:</p> <ul style="list-style-type: none"><li>• Assess climate change impacts associated with the construction, operation and decommissioning phases of the Project, including Scope 1, Scope 2 and relevant Scope 3 emissions.</li><li>• Address consistency with South Africa's NDC and Paris Agreement obligations.</li></ul> <p>The assessment of cumulative climate impacts will also form part of the abovementioned study.</p> | EAP |
| Study                                          | Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |           |               |                                                                                                                               |                                                                                                                                      |                         |                                                                                                                              |  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| Comprehensive Climate Change Impact Assessment | Life-cycle GHG analysis (Scope 1, 2 and 3); methane leakage assessment; alignment with NDC; assessment of cumulative climate impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |           |               |                                                                                                                               |                                                                                                                                      |                         |                                                                                                                              |  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| Alternatives Assessment                        | Comparative assessment of renewable energy alternatives; demand-side management options; assessment of the no-go alternative                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |           |               |                                                                                                                               |                                                                                                                                      |                         |                                                                                                                              |  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |

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|      | Cumulative Impact Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                      |                   | The EIA Report will be compiled in accordance with Appendix 3 of the EIA Regulations. This will include an assessment of feasible project alternatives and cumulative impacts. Refer further to responses to related comments above.                                                                                                                                            |             |
|      | Energy System Analysis                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                      |                   | The project-specific Needs and Desirability Assessment will evaluate how the facility fulfils the statutory mandate established by the IRP. Stranded-asset risk is mitigated by the facility's modular configuration, allowing it to adapt to evolving grid requirements. Concerns regarding carbon lock-in will be evaluated in the CCIA.                                      |             |
|      | Environmental Justice Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                      |                   | The Health Impact Assessment will cover the potential health risks associated with emissions from the project, including impacts such as cardio-respiratory outcomes and other pollution-related effects. We are also specifically looking at how these risks may affect more vulnerable groups, including children, the elderly and those with pre-existing health conditions. |             |
|      | 34. We await your written response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                      |                   |                                                                                                                                                                                                                                                                                                                                                                                 |             |
| 143. | <b>1. FIRE AND SAFETY</b> <ul style="list-style-type: none"> <li>The fire layout plans must be in accordance with SANS 10400 T:2024.</li> <li>The Fire Department must approve the plans.</li> <li>Adherence to SANS 10087 and SANS 10089 is required as there will be a presence of both diesel and flammable gases.</li> <li>The services of fire engineers for the rational design of fire systems on the site are strongly encouraged.</li> <li>A Disaster Management Plan is required for approval by the City of uMhlathuze Disaster Management Chief.</li> </ul> | E. Naidoo – City of uMhlathuze (Environmental Planning Department: City Development0 | Letter (08/04/26) | <p>The Applicant needs to adhere to all these requirements related to Fire and Safety.</p> <p>Provision is made for a Quantitative Risk Assessment to be undertaken for the Project. The findings from this assessment will be incorporated into the EIA Report.</p>                                                                                                            | EAP         |
| 144. | <b>2. SPATIAL PLANNING</b> <ul style="list-style-type: none"> <li>Spatial Planning has no objections to the proposed project as the project area is located within the</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                      |                   | It is noted that CoU's Spatial Planning Unit has no objections to the proposed project.                                                                                                                                                                                                                                                                                         | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | RESPONSE BY                                      |
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|      | Richards Bay Industrial Development Zone (RBIDZ) Phase 1F.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |           |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                  |
| 145. | <b>3. LAND USE MANAGEMENT</b> <ul style="list-style-type: none"> <li>Erf 16673, Alton, is zoned as Noxious Industry and is located within Phase 1F of the RBIDZ. The proposed activity is a permitted use under this zoning.</li> <li>The applicant is requested to submit building plans to the City of uMhlathuze Municipality for approval.</li> <li>Please note that any new servitudes with a width of 15 m (or greater) constitute a change in Land Use and will require Municipal consent.</li> <li>The draft report makes reference to the Land Use Management Scheme; the applicant is informed that a revision was undertaken in 2025. You are therefore reminded to include the most recent version of the Land Use Scheme as part of the Assessment.</li> </ul>                                                                                                                                                     |           |               | <p>The zoning of the site is also captured in the SR as 'Noxious Industry'.</p> <p>The Applicant needs to adhere to all these requirements related to Land Use Management.</p> <p>The most recent version of the Land Use Scheme will be considered in the EIA Report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | EAP                                              |
| 146. | <b>4. ENVIRONMENTAL PLANNING</b> <ul style="list-style-type: none"> <li>The report briefly mentions storage of water with a capacity of 50 000 m³. The applicant is advised to consult the Department of Water and Sanitation regarding compliance with Section 21(b) of the National Water Act and the Dam Safety Regulations.</li> <li>The applicant is requested to disclose the capacity of the back-up generators in the Scoping Report.</li> <li>The Report suggests that Stormwater Management principles will be applied during construction and operation. The applicant is advised to develop a Stormwater Management Plan stipulating site-specific conditions to ensure there is controlled drainage.</li> <li>It has been noted that a Cumulative Impact Assessment will be conducted during the Scoping phase of the project. The applicant is advised to not only consider impacts emanating from the</li> </ul> |           |               | <p>Section 5.1.4.2 of the SR explains the relevance of the National Water Act (Act No. 36 of 1998) (NWA) to the Project.</p> <p>The implications of the storage of water will be considered further in the EIA Report.</p> <p>Cumulative impacts that were identified during the Scoping Phase are presented in Section 13.4 of the Scoping Report. The EIA Report will include a detailed assessment of cumulative impacts associated with the Project. This assessment will incorporate the findings of the specialist studies and technical investigations</p> <p>Potable Water will be supplied to the RBIDZ through a 90mm diameter pipeline, from uMngeni-uThukela Water, confirmed by the RBIDZ on 23 February 2026. Potable Water will be stored on site as a supply source to the water treatment plant for the production of demineralised water as required by the steam cycle. Water will also be stored for the fire</p> | <p>EAP</p> <p>Technical Team &amp; Applicant</p> |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                    | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | RESPONSE BY |
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|      | proposed project but to also consider surrounding industries.                                                                                                                                                                                                                                             |           |               | <p>protection system and for domestic use. Finalised water storage volumes and uses will be provided in the EIA Report.</p> <p>The back-up diesel generators will have a capacity of approximately 10 to 30 MWe. These generators will only be used when a complete grid brown-out or black-out is experienced and the plant is required to start without any external electricity supply. This function is typically expected to occur 1/100 years. This information was included in the final SR.</p> <p>Indicative water storage volumes (these volumes will change based on design):</p> <p><u>Wet-Cooled Option</u><br/> Raw Water: 15 000m<sup>3</sup><br/> Fire Water: 2 000m<sup>3</sup><br/> Demineralized Water: 2 000m<sup>3</sup><br/> Potable Water: 100m<sup>3</sup><br/> Neutralise Water: 300m<sup>3</sup></p> <p><u>Dry-Cooled Option</u><br/> Raw Water: 2 000m<sup>3</sup><br/> Fire Water: 2 000m<sup>3</sup><br/> Demineralized Water: 2 000m<sup>3</sup><br/> Potable Water: 100m<sup>3</sup><br/> Neutralise Water: 300m<sup>3</sup></p> <p>A Stormwater Management Plan will be compiled for the project.</p> |             |
| 147. | <b>5. AIR QUALITY MANAGEMENT</b> <ul style="list-style-type: none"> <li>Air Quality Management has no objection to the proposed project subject to compliance with the National Dust Control Regulations, 2026 and Section 28 of the National Environmental Management Act 107 of 1998 (NEMA).</li> </ul> |           |               | <p>An Air Quality Impact Assessment will be undertaken for the Project, and the findings will be included in the EIA Report. This study will identify mitigation measures to address air quality impacts.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | RAISED BY                                                                           | SOURCE & DATE      | RESPONSE                                                                                                       | RESPONSE BY |
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|      | The applicant is requested to ensure that emissions are kept at a minimum during the operational phase of the project.                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                     |                    |                                                                                                                |             |
| 148. | You are welcome to direct further queries regarding the above to Ms. Estelle Naidoo from the Office of the Deputy City Manager: City Development on Tel: [REDACTED], or email: [REDACTED].                                                                                                                                                                                                                                                                                                                                                      |                                                                                     |                    | Ms. Naidoo is included in the database of I&APs and she will be kept informed as the EIA process unfolds.      | EAP         |
| 149. | Kindly note that for the department to process any application of this nature they need to be submitted via the HODs office.<br><br>Please forward all applications to [REDACTED] to ensure that they are processed and allocated to the relevant persons.                                                                                                                                                                                                                                                                                      | A. Chiya – KZN Department of Cooperative Governance and Traditional Affairs (COGTA) | Email (10/04/26)   | Please note that this email address ([REDACTED]) was included in the distribution list.                        | EAP         |
| 150. | <b>1. GENERAL</b><br><br>1.1 The Provincial Department of Agriculture and Rural Development: Agricultural Resource Management, Land Use Regulatory Unit acknowledges the receipt of the above-mentioned application.<br><br>1.2 The main objective of the application is to request the Provincial Department of Agriculture and Rural Development to provide comments, input and make recommendations on the proposed development of a 750 MW Combined Cycle Gas Turbine (CCGT) Power Plant in Richards Bay.                                   | S.B. Thabede – KZN DARD                                                             | Letter (13/04/206) | Introductory part of letter – no response required.                                                            | -           |
| 151. | <b>2. COMMENTS</b><br><br>2.1 The Applicant intends to bid for the GASIPPPP and/or other suitable energy markets and has proposed the development of a 750 MW Combined Cycle Gas Turbine (CCGT) Power Plant in Richards Bay, which falls within the City of uMhlathuze.<br><br>2.2 The proposed project is located within Phase 1F of the Richards Bay Industrial Development Zone (RBIDZ) under a long-term lease agreement.<br><br>2.3 Thus, Nema Consulting was appointed by Mabasa Energy and Fuels (Pty) Ltd, to conduct the Environmental |                                                                                     |                    | These points are based on the content of the draft SR, and do not include any comments that require responses. | EAP         |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RAISED BY | SOURCE & DATE | RESPONSE | RESPONSE BY |
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|     | <p>Impact Assessment (EIA) for the proposed 750 MW Combined Cycle Gas Turbine (CCGT) Power Plant in Richards Bay.</p> <p>2.4 The project site is located in Alton North within Ward 2 of the City of uMhlathuze, approximately 1.5 km from the Richards Bay Central Business District (CBD). The earmarked site is located on Erf 16673 in Phase 1F of the RBIDZ, which is approximately 12.7 ha in extent.</p> <p>2.5 The proposed Project is a greenfield development however entails the clearance of indigenous vegetation, but it is noted that the site was also previously cleared under the EA for RBIDZ Phase 1F and is fenced.</p> <p>2.6 Generally, the study area is characterised as a relatively flat landscape with some gradual slopes towards the south.</p> <p>2.7 Properties to the immediate north and west of the site are also undeveloped. Richards Bay Alloys (formerly Tata Steel) is located more than 200 m to the west of the site. The erf bordering the site to the south-west contains a wetland.</p> <p>2.8 According to the CoU 2021 Land Use Scheme Viewer, the current zoning of the site is Noxious Industry. The land located to the north and west, which also falls within the RBIDZ, has the same zoning. The land to the south and east of the site is zoned as General Industry.</p> <p>2.9 Residential areas within a 5 km radius of the site include Wild en Weide, Veld en Vlei, Brackenheim, Aquadene, Birdwood, and the Richards Bay Central. The Richards Bay Cemetery is also located approximately 1.2 km to the north.</p> <p>2.10 The proposed Combined Cycle Power Plant (CCPP) Module will consist of a 750 MW Power Block. A Module consists of two (2) Gas Turbines each having capacity of 250 MW along with Electric Generators, two (2) Heat</p> |           |               |          |             |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RAISED BY | SOURCE & DATE | RESPONSE | RESPONSE BY |
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|     | <p>Recovery Steam Generators (HRSGs) and one (1) Steam Turbine Generator (STG) having capacity of 250 MW.</p> <p>2.11 The proposed CCPP is based on the latest state-of-the-art heavy-duty industrial-type Gas Turbines GE 9FA, which is suitable for base load and cyclic load operation in both simple (open) cycle and combined cycle mode.</p> <p>2.12 As per the expectations the project has to undertake Specialist Studies &amp; Compile Draft EIA Report DFFE Review &amp; Decision Submit Final EIA.</p> <p>2.13 The proposed Plant will comprise of the following key equipment:</p> <ul style="list-style-type: none"> <li>• Two (2) General Electric (GE) Frame 9 (model 9F.03) combustion turbines and generators;</li> <li>• Two (2) triple pressure, 3-drum, natural circulation HRSGs;</li> <li>• One (1) condensing steam turbine and generator;</li> <li>• One (1) de-aerating surface condenser;</li> <li>• One (1) induced draft cooling tower;</li> <li>• Balance of plant (BOP) equipment consisting of pumps, heat exchangers, transformers, power electrics, etc.;</li> <li>• One (1) integrated plant distribution control system; and</li> <li>• 275 kV switchyard comprising of three (3) × 15 kV to 275 kV step-up transformers and one (1) station auxiliary transformer (rating to be defined during detailed design).</li> </ul> <p>2.14 Then the associated infrastructure will be:</p> <ul style="list-style-type: none"> <li>• Construction camp and laydown area</li> <li>• Workshop</li> <li>• Main office</li> <li>• Control building</li> <li>• Warehouse</li> <li>• Fire water pump house</li> <li>• Maintenance facilities</li> </ul> |           |               |          |             |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | RAISED BY | SOURCE & DATE | RESPONSE | RESPONSE BY |
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|     | <ul style="list-style-type: none"> <li>Storage facilities</li> <li>Ablution facilities</li> <li>Guard house</li> <li>Fencing and gates; and</li> <li>Waste management facilities</li> </ul> <p>2.15 Moreover, the demineralized water tank will be a steel construction foundation bed of reinforced concrete.</p> <p>2.16 It is also proposed that oil and contaminated wastewater from turbine washing, floor washing and other processes be collected in reinforced oily water separator sumps positioned at suitable locations around the power proposed 750 MW Combined Cycle Gas Turbine Power Plant, Richards Bay Scoping Report (Draft) March 2026 58 station. Moreover, heavy-duty mild steel covers including ventilation pipes with suitable hoods will be provided.</p> <p>2.17 The scrap yard and schedule waste storage area will be a hard-standing area sized to allow collection of scrap and waste.</p> <p>2.18 All liquid effluent waste produced by the Plant from different sections shall be collected in an Effluent Treatment Plant and treated as required.</p> <p>2.19 All oil waste effluents will be collected into a separate network and sent to an oil separator and treated. Water shall also be collected in a Central Monitoring Basin (CMB) where it is continuously monitored for pH, Total Dissolved Solids (TDS) and other parameters, as required.</p> <p>2.20 The Effluent Treatment Plant shall also be able to handle effluent wastes from the Gas Turbine Compressor Wash Water Drain System; oily water from transformer pits; neutralised waste from the Demineralised (DM) plant; cooling tower blow down; Heat Recovery Steam Generator (HRSG) blow down; and wastewater from the plant wash area.</p> |           |               |          |             |

| No. | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | RAISED BY | SOURCE & DATE | RESPONSE | RESPONSE BY |
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|     | <p>2.21 To manage the stormwater, the drainage system will be designed to cope with surface water, maintenance and normal plant flows, oil contaminant and oil drainage, and will handle all drainage requirements including firefighting.</p> <p>2.22 This will be achievable through hard flooring of all enclosed buildings and cable / fuel and other trenches will be designed and graded to ensure there is no accumulation of water at any time. The oily water drainage system will be provided for all floor drains and plant areas and areas subject to oil spillage or leakage. Oily water effluent shall be passed through oil interceptors and monitored before discharge to the storm water drainage system. Moreover, the storm water drainage systems may use open ditch, underground piping or both. All open drains in areas of operation and maintenance will be covered for safety purposes.</p> <p>2.23 It will be important to note that the site is located on the Zululand coastal aquifer associated with unconsolidated sediments of the Maputaland Group; the shallow groundwater sources on site can be classified as typical marine waters with similar deeper sources inclusive of Ca-HCO<sub>3</sub> type waters associated with fresh, deeper-seated aquifers.</p> <p>2.24 There are no rivers that traverse the site. The closest non-perennial stream (Bhizolo Stream) is approximately 1.2 km east of the site and a second non-perennial stream (Ngodweni Stream) is approximately 1.5 km to the south-east. Although there are no recognised streams near the site, a stormwater canal runs parallel to the western side of the site, which conveys stormwater from the RBIDZ in a south-westerly direction to a non-perennial stream (Mhlanganabeni stream) about 3.7 km downstream of the site.</p> <p>2.25 However, the site is located within 500 m of wetlands and the proposed development thus encroaches into the regulated area of these watercourses and triggers Section 21(c) and (i) water uses in terms of the NWA.</p> |           |               |          |             |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RESPONSE BY |
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|      | <p>Authorisations for these water uses will be sought from DWS.</p> <p>2.26 It is assumed that additional investigations will include:</p> <ul style="list-style-type: none"> <li>impacts to aquatic biodiversity which will be evaluated as part of an Aquatic Biodiversity Impact Assessment during the EIA phase;</li> <li>a Hydrological Assessment will be undertaken during the EIA phase, which will investigate the project's hydrological functioning; and</li> <li>mitigation measures identified as part of the above specialist studies, as well as environmental best practices to safeguard watercourses, will be included in the EMP.</li> </ul>                                                                                                                                                                                                                             |           |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |             |
| 152. | <p><b>3. COMMENTS</b></p> <p>3.1 The site is located in an area that there is no agricultural production, and it also does not contribute to agriculture; however the impact will be mainly in natural resources of the area.</p> <p>3.2 This is a draft scoping report; thus the application has limited information to conclude.</p> <p>3.3 However Agricultural Resource Management has studied the application and request the following:</p> <ul style="list-style-type: none"> <li>Details on environmental impacts that are associated with the project and mitigation measures.</li> <li>Details on Section 21 triggers with their mitigation measures.</li> <li>Details on maintenance plan of stormwater drainage system in relation to waste water that will be produced.</li> <li>Detailed plan on management of wastewater in relation to Effluent Treatment Plant.</li> </ul> |           |               | <p>The SR confirms that the proposed development site is located within Phase 1F of the RBIDZ, an area designated for industrial development and not used for agricultural production. Accordingly, the Project does not result in the loss of agricultural land or agricultural production.</p> <p>Potential impacts on natural resources have been identified in the SR as key environmental issues. These impacts will be assessed in detail during the EIA Phase through the relevant specialist studies, and appropriate mitigation measures will be identified.</p> <p>The submitted report is a draft SR, the purpose of which is to identify the key environmental issues, define the scope of assessment, and establish a Plan of Study for EIA (amongst others). As such, it does not present final impact conclusions. The EIA Phase will provide a more detailed assessment of environmental impacts, supported by specialist studies, which will be included in the EIA Report.</p> | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                     | RAISED BY                              | SOURCE & DATE     | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RESPONSE BY |
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|      |                                                                                                                                                                                                                                                                            |                                        |                   | <p>The information requested will be addressed during the EIA Phase as follows:</p> <ul style="list-style-type: none"> <li>• Environmental impacts and mitigation measures: Potential environmental impacts have been identified at a scoping level in the draft SR. Detailed impact assessment, significance ratings and mitigation measures will be provided in the EIA Phase, informed by specialist studies.</li> <li>• Section 21 water use triggers and mitigation: The Scoping Report identifies potential Section 21(c) and (i) water uses in terms of the NWA due to proximity to wetlands and drainage features. These triggers will be confirmed and assessed in detail during the EIA Phase, supported by hydrological and aquatic specialist studies, and appropriate mitigation measures will be defined.</li> <li>• Stormwater drainage maintenance: A Stormwater Management Plan will be developed as part of the EIA Phase and reflected in the EMPr.</li> <li>• Wastewater and Effluent Treatment Plant management: The SR outlines the proposed collection and treatment of effluent through an Effluent Treatment Plant. Further information pertaining to wastewater management will be included in the EIA Report.</li> </ul> |             |
| 153. | <p><b>4. RECOMMENDATIONS</b></p> <p>Please be advised that the Provincial Department of Agriculture: Agricultural Resource Management cannot conclude on the submitted application, however will wait for a detailed application with supporting specialists' studies.</p> |                                        |                   | <p>The KZN DARD will be notified when the draft EIA Report is available for review.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | EAP         |
| 154. | The draft scoping report for the above-mentioned proposed development that was submitted to the KwaZulu-Natal Department of Economic Development,                                                                                                                          | M. Mdamba – KZN Department of Economic | Letter (15/04/26) | Introductory part of letter – no response required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | -           |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RAISED BY                                              | SOURCE & DATE | RESPONSE                                                                                                                   | RESPONSE BY |
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|      | Tourism and Environmental Affairs (hereinafter referred to as, "the Department") via email, for review and comment, in March 2026, has reference.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Development, Tourism and Environmental Affairs (EDTEA) |               |                                                                                                                            |             |
| 155. | <p><b>BACKGROUND INFO ON THE PROPOSED DEVELOPMENT:</b></p> <p>Mabasa Energy and Fuels (Pty) Ltd (the "Applicant"), proposes to construct a 750 MW Combined Cycle Gas Turbine Power Plant (CCPP) in Alton North within Ward 2 of the CoU, approximately 1.5 km from the Richards Bay Central Business District (CBD).</p> <p>The earmarked site is located on Erf 16673 in Phase 1F of the RBIDZ, which is approximately 12.7 ha in extent. The access point to the industrial complex is via Alumina Ale Road, which runs along the eastern boundary of the site. The coordinates of the approximate center point of the site are 28°44'44.2202"S and 32°15'2.938"E.</p> <p>The Applicant intends to bid for the GASIPPPP and/or other suitable energy markets.</p> <p>The proposed Plant will comprise of the following key equipment:</p> <ul style="list-style-type: none"> <li>• Two (2) General Electric (GE) Frame 9 (model 9F.03) combustion turbines and generators;</li> <li>• Two (2) triple pressure, 3 drums, natural circulation HRSGs;</li> <li>• One (1) condensing steam turbine and generator;</li> <li>• One (1) de-aerating surface condenser;</li> <li>• One (1) induced draft cooling tower;</li> <li>• Balance of plant (BOP) equipment consisting of pumps, heat exchangers, transformers, power electrics, etc.;</li> <li>• One (1) integrated plant distribution control system; and</li> <li>• 275 kV switchyard comprising of three (3) × 15 kV to 275 kV step-up transformers and one (1) station auxiliary transformer (the rating to be defined during detailed design).</li> </ul> |                                                        |               | <p>This presents the background to the Project and is based on the content of the draft SR. No responses are required.</p> | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RESPONSE BY |
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|      | The application excludes the natural gas pipeline and grid connection associated with the proposed development. The Applicant will source the supply and delivery of natural gas from the planned terminal development at the Port of Richards Bay (PoRB).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |           |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |             |
| 156. | <p><b>COMMENTS BASED ON PROPOSED DEVELOPMENT:</b></p> <p>The KwaZulu-Natal Department of Economic Development, Tourism and Environmental Affairs (the Department) has reviewed the afore-mentioned draft Scoping Report and accepts the specialist studies that have been suggested &amp; listed in the Plan of Study, and to be undertaken during the Environmental Impact Assessment phase of the development. As such, the Department believes that the suggested specialists' work will come up with the necessary mitigation measures that will minimize the level of impact of the proposed development on the receiving environment and surrounds.</p>                                                                                                                                                                                                                                                                                                                                          |           |               | It is noted that KZN EDTEA accepts the specialist studies that have been identified in the Plan of Study, which will be undertaken during the EIA phase.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | EAP         |
| 157. | <p>Furthermore, the Environmental Assessment Practitioner (EAP) is requested to take note of the following comments:</p> <p>a. The Department is concerned about the presence and likely impacts on wetlands on-site and those near the proposed developmental site. The proposed development includes activities which have a potential of contaminating ground water &amp; surface water if appropriate mitigation measures are not put in place for all phases of the proposed development. Such activities that may result to impacts include but are not limited to the following: the proposed effluent treatment plant onsite, the storage of diesel supply for back-up generators, including the storage of used oil materials on site.</p> <p>However, the Department trusts that specialist studies such as aquatic biodiversity impact assessment to be undertaken will therefore come up with necessary mitigation measures to minimize any potential negative impact on the wetlands.</p> |           |               | <p>The Plan of Study for EIA provides for specialist studies, including aquatic biodiversity and hydrological assessments, which will confirm the extent of wetlands, assess potential impacts on water resources, and inform the development of appropriate mitigation and management measures.</p> <p>Mitigation measures and operational controls will be developed during the EIA Phase and incorporated into the EMP to minimise potential impacts on wetlands and water resources.</p> <p>The location and extent of the proposed facility and associated infrastructure are described in Section 9 (Project Description) and Section 9.5 (Overview of the Proposed Plant), with supporting layout drawings, aerial views and schematic plans (Figures 11 and 12, as well as maps contained in Appendix A). These plans indicate the spatial arrangement of the CCGT Power Plant and ancillary infrastructure. Further</p> | EAP         |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | RESPONSE BY |
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|      | Further, the Department will appreciate it if a site-layout plan depicting the locations of the effluent treatment plant including storages of diesel for backup generator and used oil storages, etc. can be included in the Final Scoping Report.                                                                                                                                                                                                                                                                                                                                                              |           |               | information related to these facilities will be included in the EIA Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |             |
| 158. | b. The Department will appreciate the details regarding the development of the stormwater management plan (SWMP) of the proposed development to be included in the final scoping report.                                                                                                                                                                                                                                                                                                                                                                                                                         |           |               | A Stormwater Management Plan will be developed as part of the EIA Phase and reflected in the EMPr.                                                                                                                                                                                                                                                                                                                                                                                                                                                   | EAP         |
| 159. | c. Climate change impact assessment is emphasized for this development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |           |               | A Climate Change Impact Assessment will be undertaken for the Project, and the findings will be included in the EIA Report. The terms of reference for the Climate Change Impact Assessment are contained in Section 14.4.5.2 of the SR.                                                                                                                                                                                                                                                                                                             | EAP         |
| 160. | d. The Department appreciates the use of the Guideline for Need & Desirability (DEA, 2017) in providing the need & desirability of the proposed development. Furthermore, the draft scoping has provided a list of developments that are near the proposed 750 MW CCPP site and these include gas-to-power projects which have already been approved and awaiting implementation. The Department requests clarity regarding the desirability & need of the proposed 750 MW CCPP in the proposed location, to be included in the final scoping report.                                                            |           |               | The SR explains the Needs and Desirability of the Project, as required in Appendix 2 of the EIA Regulations. This assessment was informed by the DEA Guideline on Need and Desirability (2017). Further refinement of the assessment will be undertaken in the EIA Phase as additional specialist information becomes available.                                                                                                                                                                                                                     | EAP         |
| 161. | e. The draft scoping has indicated that the Applicant will source supply and delivery of natural gas from the planned terminal development at the PoRB to the proposed 750 MW CCPP; however the said natural gas pipeline is excluded from this current EIA application; but will later be subjected to a separate environmental authorization process. The Department would like to know if there is a plan for an on-site storage of natural gas, if yes, the Department will appreciate a layout plan & the design details of the on-site storage of natural gas, to be included in the Final scoping report. |           |               | The Applicant formally confirms there are no plans for the bulk on-site storage of natural gas at the proposed facility. The plant is engineered to operate on a continuous, direct-feed basis from a dedicated pipeline. Because the design relies on continuous feed rather than banked fuel reserves, layout plans and design details for bulk storage are not applicable and will not be included. The natural gas supply pipeline falls outside the scope of this application and is subject to a separate Environmental Authorisation process. | Applicant   |
| 162. | f. The Department has noted that Activity 13 of Listing Notice 1 (LN 1) of the EIA Regulations, 2014, as amended, has been listed as one of the triggered listed activities by the proposed development. The Department would like to                                                                                                                                                                                                                                                                                                                                                                            |           |               | The Applicant confirms that the proposed facility will not abstract river water; it will utilise existing regional bulk municipal infrastructure. Activity 13 of Listing Notice 1 was included provisionally                                                                                                                                                                                                                                                                                                                                         | Applicant   |

| No.  | VERBATIM COMMENT/QUERY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RAISED BY | SOURCE & DATE | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                   | RESPONSE BY |
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|      | confirm if the proposed development will utilize municipal water / river water for its process plant; as Activity 13 of LN 1 of the EIA Regulations, 2014 is only applicable when there is abstraction of river water, to fill a reservoir with a capacity of 50 000 cubic meters.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |           |               | to account for necessary on-site off-stream storage infrastructure (e.g., raw and fire-water tanks). If final engineering confirms combined storage meets or exceeds the 50,000 cubic meter threshold, exact design details will be provided in the Draft EIA. If it remains below the threshold, the Applicant will formally request the removal of Activity 13 from the application.                                                     |             |
| 163. | g. As per the recent SCA judgement in the Eskom matter, public participation process (PPP) must be done in the language that is widely spoken in the area. The Department emphasizes that PPP must consider full compliance with this requirement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |           |               | <p>To ensure compliance with the requirement for the use of the local language during the EIA process, isiZulu was utilised during the Scoping Phase in the following instances:</p> <ul style="list-style-type: none"> <li>• Site notices and newspaper advertisements;</li> <li>• The Executive Summary of the Draft Scoping Report; and</li> <li>• Copies of presentations distributed during public and community meetings.</li> </ul> | EAP         |
| 164. | <p>Please note that this correspondence is not an approval to undertake any activities listed in terms of NEMA EIA Regulations, 2014, nor is it an exemption from undertaking an EIA process for listed activities. It is a comment provided as a commenting authority to the EAP and the competent authority in terms of Regulations 3(4) of the Environmental Impact Assessment Regulations, 2014.</p> <p>Please be advised that it is the proponent/developer's responsibility to continually ensure that there is legal compliance to environmental requirements, especially when there are changes in the project scope or description.</p> <p>Please ensure that all revised documents for further comments are addressed to the Control Environmental Officer: Environmental Impact Management at the King Cetshwayo District Office (Attention: Mr. Muziwandile Mdamba),<br/> <div style="background-color: black; width: 150px; height: 1.2em; display: inline-block;"></div> of this Department.</p> |           |               | <p>The EAP acknowledges that this correspondence constitutes comments provided in terms of Regulation 3(4) of the EIA Regulations, and does not represent an approval or exemption from the environmental authorisation process.</p> <p>Mr. Mdamba will be notified when the draft EIA Report has been lodged for public review.</p>                                                                                                       | EAP         |