

**THE PROPOSED DEVELOPMENT OF A LIQUIFIED PETROLEUM GAS (LPG)-TO-POWER FACILITY, OVERHEAD ELECTRICITY TRANSMISSION LINES AND ASSOCIATED PIPELINE INFRASTRUCTURE ACROSS VARIOUS FARM PORTIONS, SALDANHA**

**VENUE: Microsoft Teams**  
**DATE: 5 October 2020**  
**TIME: 13h00-14h30**

**1. ATTENDEES**

FULL NAME	ORGANISATION	EMAIL ADDRESS
Sadia Chand	Chand Environmental Consultants	<a href="mailto:sadia@chand.co.za">sadia@chand.co.za</a>
Claudette Muller	Chand Environmental Consultants	<a href="mailto:claudette@chand.co.za">claudette@chand.co.za</a>
Olivia Letlalo	Department of Environment, Forestry & Fisheries (DEFF)	<a href="mailto:oletlato@environment.co.za">oletlato@environment.co.za</a>
Mpho Monyai	Department of Environment, Forestry & Fisheries (DEFF)	<a href="mailto:mmonyai@environment.co.za">mmonyai@environment.co.za</a>
Makhosi Yeni	Department of Environment, Forestry & Fisheries (DEFF)	<a href="mailto:myeni@environement.co.za">myeni@environement.co.za</a>
Edward Mahosi	Department of Environment, Forestry & Fisheries (DEFF): Air Quality Directorate	<a href="mailto:emahosi@environment.co.za">emahosi@environment.co.za</a>
Mmatlala Rabothata	Department of Environment, Forestry & Fisheries (DEFF): Biodiversity Directorate	<a href="mailto:mrabothata@environment.co.za">mrabothata@environment.co.za</a>
Thando Booi	Department of Environment, Forestry & Fisheries (DEFF): Biodiversity Directorate	<a href="mailto:tbooi@environment.co.za">tbooi@environment.co.za</a>

**2. AGENDA**

- 2.1 Introductions
- 2.2 Previous EIA and Environmental Authorisation
- 2.3 Project Proposal
- 2.4 Listed Activities
- 2.5 Specialist Studies: Scoping vs. EIA
- 2.6 Project Programme
- 2.7 DEFF Comment on Scoping Report
- 2.8 Air Emissions Licence (AEL)
- 2.9 Conclusion

**2.1 INTRODUCTIONS**

**Sadia Chand (Chand)** welcomed all attendees to the meeting and thanked the Department of Environment, Forestry & Fisheries (DEFF) for accommodating Chand at short notice. All attendees introduced themselves (see table above).

She explained that **Chand** would be embarking on a Scoping and EIR process for the applicant (Assegai Power) who is bidding to be considered as an Independent Power Producer (IPP) under the recently advertised Risk Mitigation IPP Procurement Programme for new generation capacity, by the Department of Mineral Resources and Energy (DMRE). The development site is located in Saldanha on the west coast of the country some 130 km from Cape Town.

## 2.2 PREVIOUS EIA AND ENVIRONMENTAL AUTHORISATION

**Chand** explained that they had previously undertaken an environmental application process (Basic Assessment) for the applicant for the transportation and handling of Liquefied Petroleum Gas (LPG) on the site that would serve as the main site for power generation under this application. Chand thus already have an understanding of the site and the environmental and socio-economic context of the area. Furthermore, the same specialists have been appointed for this application given their existing knowledge of the site.

Chand continued, explaining that the previous project was authorised in January 2014 and the authorised LPG terminal constructed shortly after. Construction of the authorised inbound gas pipeline commenced in 2018 but has not been completed. The pipeline will again be included as associated infrastructure under the new application.

## 2.3 PROJECT PROPOSAL

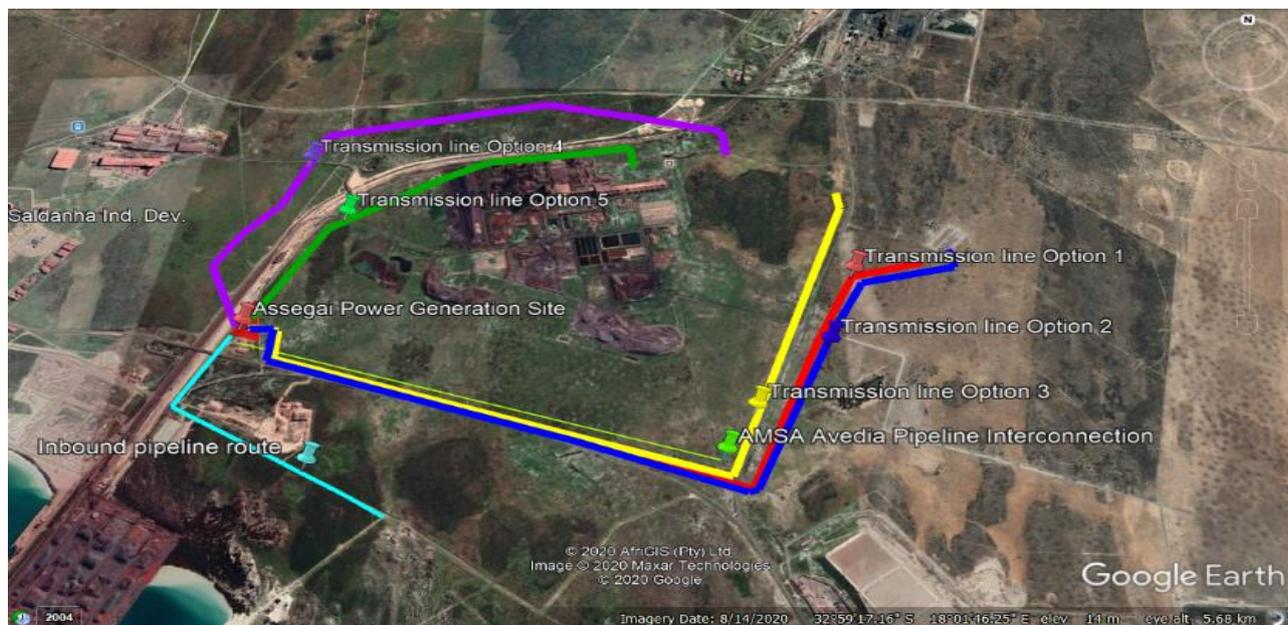
**Claudette Muller (Chand)** presented the project proposal, referring to Figure 1 below.

It was explained that the applicant is proposing to develop a gas-to-power facility for direct transmission into the ESKOM electricity grid. LPG would be supplied from a VLGC's (Very Large Gas Carrier) at the Port of Saldanha and then offloaded via a pipeline to the existing onshore LPG terminal. The applicant would make use of an existing pipeline owned by the Strategic Fuel Fund (SFF). This pipeline route extends from the SFF berth, the turns west to connect to the proposed new pipeline (refer to the light blue line in Figure 1). The new pipeline would then turn north to connect to site along the western border of the existing terminal.

The power plant of mobile gas turbines would be established in the northern corner of the terminal site. The process entails the direct fire vaporisation of gas to produce gas vapour which will be used to fuel the turbines. It is anticipated that the maximum output of the power plant would be 320 MW.

**Chand** continued, explaining that a new substation would be constructed on site from where the generated electricity would be transmitted via a new 132 kV line, either into a nearby existing power line or into the Blouwater substation. Five power line route alternatives would be considered during the Scoping Phase (referring to Option 1 - 5 in Figure 1 below).

**Chand** concluded, stating that the activity would emit NO<sub>x</sub>, SO<sub>x</sub> and Particulate Matter requiring an Air Quality Impact Assessment and an application for an Air Emissions Licence (AEL).



**Figure 1: Proposed site development showing power generation site, inbound and outbound pipelines and five transmission line options**

**DEFF** asked why so many transmission lines were being considered. They also queried which one of the routes was the preferred line at this stage.

**Chand** explained that Option 1 and Option 2 were the preferred options from a technical and environmental perspective based on initial investigations. It is suspected that Option 3 terminates in an existing rehabilitation/conservation area of ArcelorMittal so would likely be excluded as an Alternative. Option 4 and 5 are being investigated during Scoping as they offer shorter routes which are more cost-effective.

**DEFF** warned against including too many Alternatives since the public may prefer routes which are challenging from a technical perspective. They also stated that there would have to be consistency throughout the process regarding options being investigated. **Chand** stated that it is likely that only one or two options would be included in the impact assessment stage, but all five options would be assessed during Scoping.

## 2.4 LISTED ACTIVITIES

**Chand** presented the listed activities identified thus far:

Activity No(s):	Basic Assessment Activity(ies) as set out in Listing Notice 1 of the EIA Regulations, 2014 as amended.	Description of the portion of the proposed project to which the applicable listed activity relates.
11	The development of facilities or infrastructure for the transmission and distribution of electricity— (i) outside urban areas or industrial complexes with a capacity of more than 33 but less than 275 kilovolts; or (ii) (ii) inside urban areas or industrial complexes with a capacity of 275 kilovolts or more;	Transmission lines for the distribution of electricity of 132 kilovolts is proposed and would be located outside an urban area. The site is also located beyond the Saldanha Industrial Development Zone (IDZ). It is understood that <b>this activity is triggered.</b>
27	The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	Th construction of the <i>outbound</i> pipeline and transmission lines would traverse undeveloped vegetated areas mapped as Critical Biodiversity Areas (CBAs). The area also historically contained Endangered Saldanha Flats Strandveld.  The actual sensitivity, conservation value and size of the vegetation which may be affected would however still be confirmed by a botanical

		specialist. These activities are also linear, so it is understood that <b>this activity would likely be excluded.</b>
<b>Activity No(s):</b>	<b>Basic Assessment Activity(ies) as set out in Listing Notice 3 of the EIA Regulations, 2014 as amended.</b>	<b>Description of the portion of the proposed project to which the applicable listed activity relates.</b>
<b>12</b>	<p>The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</p> <p><b>i. Western Cape</b>  i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;  ii. Within critical biodiversity areas identified in bioregional plans...</p>	<p>The construction of the <i>outbound</i> pipeline and transmission lines will traverse undeveloped vegetated areas mapped as Critical Biodiversity Areas (CBAs). The area also historically contained Saldanha Flats Strandveld which is listed as Endangered.</p> <p>The actual sensitivity, conservation value and extent of intact vegetation which may be affected must however still be confirmed by a specialist. <b>The applicability of the activity would be confirmed during Scoping.</b></p>
<b>Activity No(s):</b>	<b>Scoping and EIR Activity(ies) as set out in Listing Notice 2 of the EIA Regulations, 2014 as amended.</b>	<b>Description of the portion of the proposed project to which the applicable listed activity relates.</b>
<b>2</b>	The development and related operation of facilities or infrastructure for the generation of electricity from a non-renewable resource where the electricity output is 20 megawatts or more.	The power plant would have a production capacity of more than 20 megawatts. <b>It is understood that this activity is triggered.</b>
<b>6</b>	The development of facilities or infrastructure for any process or activity which requires a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent, excluding...	The activity will require an Air Emissions Licence (AEL) in term of the National Environmental Management: Air Quality Act (Act No. 39 of 2004). <b>It is understood that this activity is triggered.</b>
<b>7</b>	The construction of facilities or infrastructure for the bulk transportation of dangerous goods – (i) _____ in _____ gas form, outside an industrial complex, using pipelines, exceeding 1000 metres in length, with a throughput capacity of more than 700 tons per day; contained in this Notice:	While the proposed LPG pipelines will exceed 1000 m, the throughput capacity will be less than 700 tons/day. <b>It is understood that this activity would thus not be triggered.</b>

**Chand** asked whether the **DEFF** had any comments on the listed activities presented. **DEFF** stated that it was the responsibility of the EAP to determine the relevant listed activities.

**Chand** asked whether potential listed activities related to the removal of vegetation could be included in the application while the exact sensitivity of the site was still being determined. **DEFF** replied that this would be acceptable if I&APs were informed of the uncertainty, and if Chand confirmed their relevance once verified by the relevant specialist.

**DEFF** asked that the EAPs confirm with the Western Cape biodiversity authorities whether the Western Cape Spatial Biodiversity Plan (WCBSP) has officially been adopted given the CBAs on site. **Chand** replied that their understanding was that it had been adopted but would engage with the authorities on the matter.

## 2.5 SPECIALIST STUDIES: SCOPING VS. EIA

**Chand** listed the specialist studies that would be conducted:

- Terrestrial Biodiversity
- Aquatic Biodiversity (Compliance Statement)
- Air Quality
- Palaeontology
- Heritage Screener and NID submission to Heritage Western Cape (HWC)
- Major Hazard Installation (MHI) Assessment
- Noise Impact Assessment

**Chand** stated that a DEFF Screening Tool Report had been prepared for each component of the project and that a number of studies would be motivated against following a Site Sensitivity Verification exercise. This report would be submitted with the application. The screener furthermore did not prescribe an MHI assessment but the EAPs have identified the need for it.

**DEFF** commented that the data and conclusions presented in the botanical study completed in 2014 would be outdated for this EIA. **Chand** confirmed that while the same specialist would be undertaking the study, the study would be repeated and based on the current terrestrial biodiversity baseline.

The **DEFF** queried why an aquatic study was being conducted. **Chand** answered that the study was prescribed by the DEFF Screening Tool. Furthermore, that a desktop screener of the site showed artificial wetlands in proximity to the development site. The freshwater specialist has since been to site and confirmed no freshwater constraints. A water-use authorisation under the National Water Act would also not be required.

## 2.6 PROJECT PROGRAMME

**Chand** presented the below project programme referring to key dates and accelerated timeframes in order to meet the deadlines of the bid submission. The bid submission is due 24 November 2020 (proof of environmental application and the Final Scoping Report to be included) and financial close is end April 2021 at which time a decision on the application is required.

ASSEGAI SALDANHA PROJECT PROGRAMME	
DATE	TASK
28 Sept - 2 Oct 20	Site Sensitivity Verification
28 Sept - 16 Nov 20	Specialist Scoping
30-Sep-20	Request for Pre-App Meeting
05-Oct-20	Pre-App meeting with DEFF
05-Oct-20	NID Submission to HWC
06-Oct-20	Submission of Application & PP Plan
13-Oct-20	PPP Preparation & Notification
14-Oct-20	DEFF Acknowledge Application & Provide Ref Nr.
16 Oct- 16 Nov 20 (30 days)	Public Review of Scoping Report
26 Oct - 9 Nov 20	PPP Activities
16 Nov - 20 Nov 20	Finalisation of Scoping Report
20-Nov-20	Submission of Scoping Report
21 Nov - 25 Jan 21 (43 days)	DEFF consider Scoping Report
21 Nov - 25 Jan 21	Preparation of EIR
21 Nov - 25 Jan 21	Preparation of AEL
25-Jan-21	Feedback from DEFF on Scoping Report
26-Jan-21	Circulation of Notification for Public Review of EIR (if feedback from DEFF allows for this)
29 Jan - 1 Mar 21 (30 days)	Public Review of EIR
8 Feb - 19 Feb 21	PPP Activities

1 Mar - 4 Mar 21	Compilation of Final EIR
05-Mar-21	Submission of Final EIR
05-Mar-21	Submission of AEL Application
6 Mar - 15 Apr 21 (42 days)	DEFF consider EIR (accelerated timeframe)
15-Apr-21	DEFF issue Decision on Application
16-Apr-21	Notification of decision to I&APs

**DEFF** raised their concern with the proposed accelerated process and shortened timeframes. It was re-iterated that there could be no public participation during the December shutdown period from 15 December – 5 January. The concern was raised that the programme only allows the Department 42 days to consider the EIR. The **DEFF** explained that even if the project is confirmed as a Strategic Infrastructure Project (SIP), the shortest timeframe allowed to issue a decision would be 57 days. **Chand** stated that should a response on the Final Scoping Report be received sooner from the Department, the timeline could accommodate an additional 2-3 weeks for decision-making.

The **DEFF** stated that the proposed timeframes are noted but could not assure the EAPs that these would be met by Department. The Department asked that the EAPs ensure that all submissions comply fully with the EIA Regulations to allow for easy processing.

**Chand** would aim to provide streamlined, compliant reports and stated that it was understood that the proposed expedited timeline could not be agreed upon by the **DEFF**.

The **DEFF** asked whether an appeal was lodged against the previous environmental authorisation. **Chand** confirmed that a private competitor lodged an appeal mostly due to commercial interests and not due to environmental concerns. **DEFF** warned that all I&AP comments would have to be considered no matter the nature of the comments. **Chand** assured the Department that all comments would be addressed.

The **DEFF** furthermore asked that the comments made during the previous environmental and appeal processes be considered upfront by the EAP during this application. **Chand** agreed that this would be valuable from a strategic perspective.

## 2.7 DEFF COMMENT ON SCOPING REPORT

**Chand** asked whether the Department would provide comment on the Draft Scoping Report. The Department confirmed that that they would.

**DEFF** asked that reports be submitted directly to the various directorates i.e. Biodiversity, Air Quality & Climate Change as they would need to be registered as separate Interested & Affected Parties (I&APs) and provide comment.

## 2.8 AIR EMISSIONS LICENCE (AEL)

**Chand** stated that the air quality specialist on the project, Demos Dracoulides, had already made contact with someone at the Department. It could not be confirmed which official he had been in contact with. **Chand** asked whether it would be acceptable for the emission stacks to be above the legislated thresholds should the ambient air quality be well below the acceptable airshed quota, pre-mitigation.

The **DEFF** replied that it is expected that an assessment of the baseline air quality as well as a determination of the how the project would contribute to the ambient air quality through dispersion modelling be conducted. It would further need to be determined whether minimum emission standards would be exceeded. The Department's Air Quality Directorate would comment on the Air Quality Impact Assessment Report. It was re-iterated that the Directorate must be included as an I&AP in order to receive all notifications and reports directly.

## 2.9 QUESTIONS & CONCLUSION

The **DEFF** asked for clarity on which components had been authorised before. **Chand** re-iterated that only the inbound pipeline had been authorised previously but would be included under this application given that the construction of the pipeline is not complete. **DEFF** requested that this context be clearly explained in the application and associated reports, and that the EA as well as the Appeal be included as an Appendix to the application.

The **DEFF** highlighted that a climate change study may be required given the release of air emissions. **DEFF** would engage with the Department's climate change directorate on the subject. **Chand** requested that the EAPs be directly connected with the relevant climate change officials as soon as possible for it to be established during scoping whether any additional studies are required. The officials agreed to share the relevant contact details with **Chand**.

**Chand** stated that the intention was to submit the application, the site sensitivity verification report and Public Participation Report the following day (6 October 2020). **Chand** asked whether the Department could issue a reference number for the project once the application is received in order for the EAPs to commence with the public participation process as programmed.

The **DEFF** confirmed that given that the application would be made online, a reference number would be issued on the same day.

**DEFF** requested that the Public Participation Plan be submitted prior to the submission of the application for the plan to be approved first. **Chand** would aim to send the plan the same day for approval.

**Sadia Chand** thanked everyone for their attendance.

The meeting was adjourned at 14:40.

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