

MENCO

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Date: 21 November 2017
Ref: 16/2/7/A400/C279/3

Chief Director: Limpopo Region
Department of Water and Sanitation
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By email: *KhozaZ2@dws.gov.za*

Attention: **Mr Zipho Khoza**

Dear Sir

APPLICATION IN TERMS OF REGULATION 3 FOR EXEMPTION IN TERMS OF GN 704 OF JUNE 1999: THABAMETSI POWER COMPANY (PTY) LTD

1. BACKGROUND

Thabametsi Power Company (Pty) Ltd is engaged in an Integrated Water Use License Application process for their proposed 630 MW coal fired power plant near Lephalale, Limpopo Province. The proposed power plant has already obtained an environmental authorisation in terms of the National Environmental Management Act, 1998 (Act 107 of 1998). Environmental Authorisation 14/12/16/3/3/3/40 dated 25 February 2015 also makes provision for NEMWA Listed Activities with regards to the establishment of an ash dump on the farm Onbelyk 257 LQ (EA). The EA has been suspended pending the consideration and decision by the Minister of Environmental Affairs, of, inter alia, the Thabametsi Power Plant's climate change impacts.

2. INTRODUCTION

In terms of GN267 promulgated on 24 March 2017 all water containing waste related applications are subject to a GN 704 motivation that is aimed at the protection of water resources. The GN 704 Regulations are more applicable for mining related activities but the principles contained in the Regulations that are aimed at the protection of water resources could also be applied to related activities such as power generation. Various section 21(g) water uses are applicable to the power



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plant and in this instance the Regulations on restriction of locality, restrictions on the use of material, capacity requirements as well as protection of water resources need to be addressed.

Notwithstanding the fact that GN 704 could be argued not to legally apply to the proposed activities at Thabametsi Power Plant the applicant has taken a proactive decision to assess their activities as if GN 704 were applicable and has now prepared an amended WULA in accordance with the stipulations as depicted in GNR 267 as well as supportive set of management plans aimed at securing compliance to the requirements of GN 704 and the National Water Act, 1998 (Act 36 of 1998) in general.

Activities were identified and grouped as (a) compliant; (b) non-compliant (but could reasonably and practicably be addressed); (c) not compliant (but unreasonable and/or impracticable to comply with) given the power generation and associated activities. Thabametsi Power Plant will therefore implement systems and processes to ensure that activities which would be noncompliant with GN 704 do comply with GN 704.

As per the departmental requirement related to the application for exemption in terms of GN704, the Applicant has to submit the following information:

- a) Motivation and reason for exemption;
- b) Alternative proposal to the specific requirements of GN704;
- c) Impact assessment of alternative proposal;
- d) Management plan associated with alternative proposal; and
- e) Proposed performance assessment and monitoring techniques

Notwithstanding that GN 704 may not be applicable to the Thabametsi Power Project, the applicant hereby submits the following report in the event that the Department should find that it is applicable.

3. GN 704 MOTIVATION

As stated earlier the departmental requirement as depicted in GN 267 (promulgated on 24 March 2017) stipulates that all waste related water uses are subject to a GN 704 motivation.

As illustrated in **Table 1:** below it is evident that the design principles applied on all waste related water uses adhere to the requirements as contained in the Regulations. It is however unavoidable that waste related activities as associated with power generation will ultimately contribute towards environmental degradation.

Table 1: Compliance with GN 704 Regulations

Reg No	Description	Compliant	Non-Compliant	Motivation
Regulation 1: Definitions				
	All definitions as contained	X		Refer to Thabametsi

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Reg No	Description	Compliant	Non-Compliant	Motivation
	in the National Water Act, 1998 are applicable			Power Plant Environmental Management System
Regulation 2: Information and notification				
(1)	<i>Any person intending to operate a new mine or conduct any new activity must notify the Department of such intention not less than 14 days before the start of such operation or activity.</i>	X		New operation
(2)	<i>Any person in control of an existing mine or activity must-</i>			
(a)	<i>submit a copy of all amendments of their environmental management programme to the Department;</i>	X		Applicant in the process of applying for the required authorisations. In terms of the NWA the stipulations as contained in GN 267 of March 2017 are followed
(b)	<i>notify the Department in writing 14 days before the temporary or permanent cessation of the operation of a mine or the conducting of an activity, or the resumption of such operation or activity;</i>			Not applicable as this is a proposed power plant still in the process of obtaining authorisations
(c)	<i>notify the Department by the fastest possible means of any emergency incident or potential emergency incident involving a water resource at or incidental to the operation of a mine or the conducting of any activity, furnishing information regarding-</i>			Not applicable as the power plant is still in an authorisation phase
	<i>(i) the date and time of the incident;</i>			N/A
	<i>(ii) a description of the incident; remedial action taken or to be taken by the person in control of the mine or activity to remedy the effects of the incident; and</i>			N/A
	<i>(iii) the source of the pollution or potential pollution;</i>			N/A
	<i>(iv) the impact or potential impact on the water resource and the relevant water users;</i>			N/A
(d)	<i>within 14 days after the date</i>			N/A

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Reg No	Description	Compliant	Non-Compliant	Motivation
	<i>of an incident contemplated in paragraph (c) inform the Department in writing of measures taken to correct and prevent a recurrence of such incident.</i>			
Regulation 3: Exemption from requirements of regulations				
	<i>The Minister may in writing authorise an exemption from the requirements of regulations 4, 5, 6, 7, 8, 10 or 11 on his or her own initiative or on application, subject to such conditions as the Minister may determine.</i>	X		The IWWMP includes a motivation in terms of Regulation 3 of GN 704 to be exempted from Regulation 5 on the use of materials to be used in the construction phase of the project
Regulation 4: Restrictions on locality				
(a)	<i>locate or place any residue deposit, dam, reservoir, together with any associated structure or any other facility within the 1:100 year flood-line or within a horizontal distance of 100 metres from any watercourse or estuary, borehole or well, excluding boreholes or wells drilled specifically to monitor the pollution of groundwater, or on water-logged ground, or on ground likely to become water-logged, undermined, unstable or cracked;</i>	X		There is no residue deposit or waste dump in close proximity to a water resource. In the event that the footprint of the power plant intersects the 500 m protective buffer zone of a wetland or riparian zone, the appropriate section 21(c) and (i) water use application forms part of the authorisation process
(b)	<i>except in relation to a matter contemplated in regulation 10, carry on any underground or opencast mining, prospecting or any other operation or activity under or within the 1:50 year flood-line or within a horizontal distance of 100 metres from any watercourse or estuary, whichever is the greatest;</i>			Not Applicable There is no activity within the 1:50 year floodline of any watercourse as there is defined water courses within the footprint of the project site
(c)	<i>place or dispose of any residue or substance which causes or is likely to cause pollution of a water resource, in the workings of any underground or opencast mine excavation, prospecting diggings, pit or any other excavation; or</i>	X		<i>Water containing waste will be directly disposed to the ash dump.</i> This activity is subject to approval in terms of NEMWA. In addition GN 704 Regulation had been consulted in the design of the ash dump insofar it relates to storage capacities of the associated PCD's
(d)	<i>use any area or locate any</i>	X		The entire footprint of the

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Reg No	Description	Compliant	Non-Compliant	Motivation
	<i>sanitary convenience, fuel depots, reservoir or depots for any substance which causes or is likely to cause pollution of a water resource within the 1:50 year flood-line of any watercourse or estuary.</i>			proposed power plant is situated outside the 1:50 year flood line.
Regulation 5: Restrictions on use of material				
	<i>No person in control of a mine or activity may use any residue or substance which causes or is likely to cause pollution of a water resource for the construction of any dam or other impoundment or any embankment, road or railway, or for any other purpose which is likely to cause pollution of a water resource.</i>	X		There is no material on site that contains pyritic overburden that has the potential to pollute. Only inert material will be used in construction. Material has the potential to cause physical pollution (siltation/suspended solids) but the mitigatory measure of appropriate storm water management will contain any dirty runoff
Regulation 6: Capacity requirements of clean and dirty water systems				
	<i>Every person in control of a mine or activity must-</i>			
(a)	<i>confine any unpolluted water to a clean water system, away from any dirty area;</i>	X		Potential contaminated storm water from upstream activities enters the SWM and will be contained
(b)	<i>design, construct, maintain and operate any clean water system at the mine or activity so that it is not likely to spill into any dirty water system more than once in 50 years;</i>	X		Engineering design report available to validate capacity and operational requirements of dirty water systems.
(c)	<i>collect the water arising within any dirty area, including water seeping from mining operations, outcrops or any other activity, into a dirty water system;</i>	X		Separation of clean and dirty water systems will be implemented. All polluted water will be directed to dedicated containment facilities
(d)	<i>design, construct, maintain and operate any dirty water system at the mine or activity so that it is not likely to spill into any clean water system more than once in 50 years; and</i>	X		Engineering design report describes the design parameters indicative of adequate capacities to operation dirty water systems with additional 0.8 meter freeboard not to spill during the 1:50 year event.
(e)	<i>design, construct, maintain and operate any dam or tailings dam that forms part of a dirty water system to</i>	X		Engineering design report available for the ash dump

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	<i>have a minimum freeboard of 0.8 metres above full supply level, unless otherwise specified in terms of Chapter 12 of the Act.</i>			
Regulation 7: Protection of water resources				
	<i>Every person in control of a mine or activity must take reasonable measures to-</i>			
(a)	<i>prevent water containing waste or any substance which causes or is likely to cause pollution of a water resource from entering any water resource, either by natural flow or by seepage, and must retain or collect such substance or water containing waste for use, re-use, evaporation or for purification and disposal in terms of the Act;</i>	X		The civil engineering design report inclusive of the storm water management plan is indicative of the fact that the Zero Effluent Discharge Policy was implemented in the design of the Thabametsi Power Plant.
(b)	<i>design, modify, locate, construct and maintain all water systems, including residue deposits, in any area so as to prevent the pollution of any water resource through the operation or use thereof and to restrict the possibility of damage to the riparian or in-stream habitat through erosion or sedimentation, or the disturbance of vegetation, or the alteration of flow characteristics;</i>		X	The design of the water management system is as such that all affected stormwater from the property drains towards containment facilities. Recharge and infiltration into the aquifer may cause a slight deterioration of groundwater qualities. The pipeline construction transects riparian areas but these impacts will be rehabilitated and mitigated towards low to moderate significance ratings.
(c)	<i>cause effective measures to be taken to minimise the flow of any surface water or floodwater into mine workings, opencast workings, other workings or subterranean caverns, through cracked or fissured formations, subsided ground, sinkholes, outcrop excavations, adits, entrances or any other openings;</i>	X		Stormwater management principles to be implemented in terms of separation of clean and dirty water, minimisation of dirty water areas and maximisation of clean run-off areas
(d)	<i>design, modify, construct, maintain and use any dam or any residue deposit or stockpile used for the disposal or storage of</i>	X		The civil engineering design report addresses all regulatory requirements as depicted in GN 704 Regulations.

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Reg No	Description	Compliant	Non-Compliant	Motivation
	<i>mineral tailings, slimes, ash or other hydraulic transported substances, so that the water or waste therein, or falling therein, will not result in the failure thereof or impair the stability thereof;</i>			
(e)	<i>prevent the erosion or leaching of materials from any residue deposit or stockpile from any area and contain material or substances so eroded or leached in such area by providing suitable barrier dams, evaporation dams or any other effective measures to prevent this material or substance from entering and polluting any water resources;</i>	X		There is a dedicated designed water management system which separates clean and dirty water for the power plant. Affected storm water runoff containing suspended solids will be contained in stormwater management dam. The coal stock yard is isolated and makes provision for impermeable barrier. The ash dam is designed with appropriate liners to prevent/minimise groundwater pollution
(f)	<i>ensure that water used in any process at a mine or activity is recycled as far as practicable, and any facility, sump, pumping installation, catchment dam or other impoundment used for recycling water, is of adequate design and capacity to prevent the spillage, seepage or release of water containing waste at any time;</i>	X		Due to the scarcity of water in the area the applicant has a Water Conservation and Demand Management Strategy in place. All water to be recycled and re-used at the power plant. The power plant itself is based on dry cooled technology in order to endorse water savings in the catchment
(g)	<i>at all times keep any water system free from any matter or obstruction which may affect the efficiency thereof; and</i>			Considering the nature of the operation a low moderate risk is identified that fine silt material reduces the capacity of storm water systems and PCD's.
(h)	<i>cause all domestic waste, including wash-water, which cannot be disposed of in a municipal sewage system, to be disposed of in terms of an authorisation under the Act.</i>	X		Agreements will be in place with the local municipality in terms of by-laws to dispose waste in the sewer
Regulation 8: Security and additional measures				
	<i>Every person in control of a mine or activity must-</i>			
(a)	<i>cause any impoundment or dam containing any</i>	X		Access control, security, fencing and notice boards

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Reg No	Description	Compliant	Non-Compliant	Motivation
	<i>poisonous, toxic or injurious substance to be effectively fenced-off so as to restrict access thereto, and must erect warning notice boards at prominent locations so as to warn persons of the hazardous contents thereof;</i>			will be in place during the operational phase of the power plant.
(b)	<i>ensure access control in any area used for the stockpiling or disposal of any residue or substance which causes, has caused or is likely to cause pollution of a water resource so as to protect any measures taken in terms of these regulations;</i>			Not applicable at this stage of the project as this is Greenfields. The appropriate measures will be in place once operational phase commences
(c)	<i>not allow the area contemplated in paragraph (a) and (b) to be used for any other purpose, if such use causes or is likely to cause pollution of a water resource; and</i>	X		Project area only to be used for power generation activities only
(d)	<i>protect any existing pollution control measures or replace any existing pollution control measures deleteriously affected, damaged or destroyed by the removing or reclaiming of materials from any residue deposit or stockpile, and establish additional measures for the prevention of pollution of a water resource which might occur, is occurring or has occurred as a result of such operations.</i>			Not applicable at this stage as this is a new project on a Greenfields site
Regulation 9: Temporary or permanent cessation of mine or activity				
(1)	<i>Any person in control of a mine or activity must at either temporary or permanent cessation of operations ensure that all pollution control measures have been designed, modified, constructed and maintained so as to comply with these regulations.</i>			Not applicable as there is currently no activity that is subject to temporarily cessation or closure
(2)	<i>Any person in control of a mine or activity must ensure that the in-stream and riparian habitat of any water resource, which may have been affected or altered by a mine or activity, is remedied</i>	X		Rehabilitation plans for affected areas forms part of the WULAR

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Reg No	Description	Compliant	Non-Compliant	Motivation
	<i>so as to comply with these regulations.</i>			
(3)	<i>On either temporary or permanent cessation of a mine or activity the Minister may request a copy of any surface or underground plans as required in terms of the MPRDA, 1998.</i>			Not applicable to Thabametsi Power Plant
Regulation 10: Additional regulations relating to winning sand and alluvial minerals from watercourse or estuary				
(1)	<i>No person may-</i>			
(a)	<i>extract sand, alluvial minerals or other materials from the channel of a watercourse or estuary, unless reasonable precautions are taken to-</i> <i>(i) ensure that the stability of the watercourse or estuary is not affected by such operations;</i> <i>(ii) prevent scouring and erosion of the watercourse or estuary which may result from such operations or work incidental thereto;</i> <i>(iii) prevent damage to in-stream or riparian habitat through erosion, sedimentation, alteration of vegetation or structure of the watercourse or estuary, or alteration of the flow characteristics of the watercourse or estuary; or</i>			Not Applicable
(b)	<i>establish any slimes dam or settling pond within the 1:50 year flood-line or within a horizontal distance of 100 metres of any watercourse or estuary</i>			Not Applicable
(2)	<i>Every person winning sand, alluvial minerals or other materials from the bed of a watercourse or estuary must-</i>			Not Applicable
(a)	<i>construct treatment facilities to treat the water to the standard prescribed in Government Notice No. R.665 dated 6 September 2013 as amended or by any subsequent regulation under the Act before returning the water to the watercourse or</i>			Not Applicable

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Reg No	Description	Compliant	Non-Compliant	Motivation
	<i>estuary;</i>			
(b)	<i>limit stockpiles or sand dumps established on the bank of any watercourse or estuary to that realised in two days of production, and all other production must be stockpiled or dumped outside of the 1:50 year flood-line or more than a horizontal distance of 100 metres from any watercourse or estuary; and</i>			Not Applicable
(c)	<i>implement control measures that will prevent the pollution of any water resource by oil, grease, fuel or chemicals</i>			Not Applicable
Regulation 11: Additional regulations for rehabilitation of coal residue deposits				
	<i>Any person mining or establishing coal residue deposits must rehabilitate such residue deposits so that-</i>			Statement noted
(a)	<i>all residue deposits are compacted to prevent spontaneous combustion and minimise the infiltration of water; and</i>	X		Coal stock yard designed with cement liner to minimise infiltration and to reduce pollution impacts
(b)	<i>the rehabilitation of the residue deposits is implemented concurrently with the mining operation.</i>			Not applicable as there is no mining associated with the power plant
Regulation 12: Technical investigation and monitoring				
(1)	<i>The Minister may, after consultation with the Department of Mineral Resources and the Department of Environmental Affairs and Tourism, in writing require any person in control of a mine or activity to arrange for a technical investigation or inspection, which may include an independent review, to be conducted on any aspect aimed at preventing pollution of a water resource or damage to the in-stream or riparian habitat connected with or incidental to the operation or any part of the operation of a mine or activity.</i>	X		The applicant is in the process of conducting additional studies in the field of climate change, has updated the wetland study and has redone the numerical groundwater modelling as part of the hydrogeological study to be compliant with the requirements as contained in GN 267 Regulations.
(2)	<i>Such investigation must be conducted and a report</i>	X		The studies and reports are conducted in line with

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	<i>thereon compiled in the manner and within the time period that the Minister may specify.</i>			Departmental specifications: GN 267, BPG's for the mining sector as well as the Operational Guideline for the compilation of an IWWMP
(3)	<i>The person in control of the mine or activity must inform the Minister as to the expertise and qualifications of the persons who are to conduct an investigation or inspection contemplated in sub-regulation (1) before the commencement thereof.</i>	X		During the pre-feasibility meetings with the regulatory authorities the project team had been introduced stating their field of expertise
(4)	<i>The Minister may in writing require any person in control of a mine or activity to submit a programme of implementation to prevent or rectify any pollution of a water resource or damage to the in-stream or riparian habitat as recommended by the investigation contemplated in sub-regulation (1) within the time period that the Minister may specify.</i>	X		Thabametsi Power Plant in the process of compiling the required Rehabilitation Plan and Work Method Statement linked directly towards their proposed activities.
(5)	<i>The Minister may in writing direct any person in control of a mine or activity to implement a compliance monitoring network to monitor the programme of implementation contemplated in sub-regulation (4), through establishing, operating and maintaining monitoring installations of a type, at the locations and in the manner specified by the Minister and to submit the monitoring information and results to the Minister for evaluation.</i>	X		A monitoring program for the power plant had been designed for implementation in order to establish baseline conditions and any possible deviation from baseline conditions.
(6)	<i>Subject to Chapter 4 of the Act, any person in control of a mine or activity must submit plans, specifications and design reports approved by a professional engineer to the Minister, not later than 60 days prior to commencement of activities relating to-</i>	X		A civil engineer company already appointed to draft the required civil design to be used in conceptual planning and later to be replaced as "as built plans"
(a)	<i>the construction of any</i>	X		Only a raw water

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	<i>surface dam for the purpose of impounding waste, water containing waste or slurry, so as to prevent the pollution of a water resource;</i>			reservoir to be constructed that falls outside the ambit of dam safety regulations. Design criteria available for the reservoir.
(b)	<i>the implementation of any pollution control measures at any residue deposit or stockpile, so as to prevent the pollution of a water resource; and</i>	X		The Regulatory Authority requires a SWMP in accordance with BPG's. This forms part of the IWWMP and WULA
(c)	<i>the implementation of any water control measures at any residue deposit or stockpile, so as to prevent the pollution of a water resource.</i>	X		Included in the IWWMP as well as the civil engineering design report
Regulation 13: General				
	<i>The person in control of a mine or activity must provide the manager with the means and afford him or her every facility required to enable the manager to comply with the provisions of these regulations.</i>	X		Thabametsi Power Plant will be supported by a dedicated team of competent managers to operate the power plant within the restrictions as contained in any issued environmental authorisation
Regulation 14: Offences and penalties				
(1)	<i>Any person who contravenes or, subject to regulation 3, fails to comply with regulation 2, 4, 5, 6, 7, 8, 9, 10, 11, 12 or 13 is guilty of an offence and liable on conviction to a fine or to imprisonment for a period not exceeding five years.</i>			Thabametsi Power Plant management team aware of the contraventions and has committed towards a program to comply with the conditions of a WUL as well as the stipulations as contained in the IWWMP
(2)	<i>Whenever an act or omission by a manager or employee of a mine or activity-</i>			Statement noted
(a)	<i>constitutes an offence in terms of these regulations, and takes place with the express or implied permission of the person in control of a mine or activity, that person is, in addition to the manager or employee, liable to conviction for that offence; or</i>	X		Not Applicable at this stage of the project. However, contraventions of environmental legislation will be identified by means of legal audits and performance assessments. The potential contraventions and findings shall be rectified with the Power Plant Manager committed to provide the required resources
(b)	<i>would constitute an offence</i>			Not Applicable at this

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Reg No	Description	Compliant	Non-Compliant	Motivation
	<i>by the person in control of a mine or activity in terms of these regulations that manager or employee is, in addition to that person, liable to conviction for that offence.</i>			stage of the project but contraventions will be noted by the ECO/SHEQ Manager for rectification

Thabametsi Power Company (Pty) Ltd hereby wishes to apply for exemption in terms of Section 3 of GN 704 of June 1999 (Regulations on use of water for mining and related activities aimed at the protection of water resources) (GN 704) for the following Regulations:

- Regulation 4: Restriction on the use of materials;
- Regulation 5: Restriction on locality.

The purpose of this application is to deal with those activities which could be deemed to be non-compliant for which Thabametsi Power Company (Pty) Ltd seeks exemption.

4. IMPACT ASSESSMENT OF PROPOSED ALTERNATIVE

The alternative proposal basically entails the alternatives for the project as contained in the Environmental Impact Assessment Report (Savannah, 2014). The following project alternatives had been considered:

- Power generation technology (wet cooled versus dry cooled systems);
- Site selection
- Route alignment for infrastructure (Pipelines and power lines) associated with the infrastructure.

The selected alternatives are considered Best Environmental Options as a dry cooled system will contribute towards water conservation in a water stressed area. The route alignment for the pipeline along the existing road will minimise the impact on the environment. The site selected (farm Onbelyk 257 LQ) was also considered most appropriate as the waste facility will not be located on an aquifer and there are also no boreholes in the vicinity that are used for domestic purposes.

The operation of the ash dump is linked to several section 21(g) water uses inclusive of a PCD, evaporation dam as well as stormwater management pond. It is clear from the IWWMP that these section 21(g) water uses are likely to have a moderate detrimental impact on the environment.

It was found that the impact of the water uses will have no significance on the water quality of the Mogol River but moderate deterioration of groundwater qualities within the footprint of the proposed power plant.

Please refer to Appendices 15 and 18 for the complete studies conducted in support of the section 21(g) water use.

5. MANAGEMENT PLAN OF PROPOSED ALTERNATIVE

The studies mentioned above details the management protocol to be followed during the construction and operational phases of the power plant. It makes provision for the implementation of appropriate barrier systems to prevent or minimise infiltration of pollutants to the aquifer. It also makes provision for a storm water system that is based on zero effluent discharge ensuring adequate capacity in all containment facilities to prevent spillages. If there is any indication that the ash disposal system is subject to unacceptable levels of environmental degradation the applicant is committed to implement a rehabilitation plan to re-instate conditions relevant for the Recommended Environmental Class for the receiving environment.

Similarly, the construction of a water supply pipeline that transgresses the protective buffer zones of delineated wetland clusters, an Environmental Risk Assessment was considered and the impacts found to be low. The impact can be mitigated as proposed resulting in an insignificant impact on the environment, which is contained within the footprint of the power plant and will remain sustainable for a long term.

It is therefore recommended that that the Thabametsi Power Plant be exempted from Regulations 4 and 5 in order to:

- To use material on site to establish the starter walls for the ash dump
- Construct a water supply line within the protective buffer zones of a wetland system;
- Operate the power plant within 500 meter of the riparian buffer of a wetland cluster;
- Implement storm water management measures to prevent pollution of the receiving watercourse (Sandloop Spruit).

The management measures will include a comprehensive monitoring program to quantify and qualify long-term impacts. The monitoring will include:

- Surface and groundwater monitoring;
- Aquatic ecological monitoring (such as SASS5, IHAS, VEGRAI, macro-invertebrates)
- Toxicology in sediments emanating from the ash dump;
- Wetland monitoring (PES, EISC).

6. CONCLUSION

The impact of the proposed Thabametsi Power Plant on the receiving environment is of moderate significance and with mitigatory measures in place, will not contribute towards any detrimental environmental degradation. It is therefore requested that the Regional Head: Limpopo Regional Office approve in terms of Regulation 3, the motivation by Thabametsi Power Company to allow it

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a Water Use License Authorization in respect of several section 21(g) water uses as well as section 21(c) and (i) in order to commence with activities needed for the operation of the Power Plant.

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M2 Environmental Connections (Pty) Ltd

