



# GA Environment

**PUBLIC PARTICIPATION PLAN (PPP) FOR THE BASIC ASSESSMENT PROCESS FOR THE PROPOSED ESKOM AZAADVILLE 4KM 400KV DEVIATION POWERLINE, ESKOM WESTRAND STRENGTHENING PHASE I, MOGALE CITY AND RAND WEST CITY LOCAL MUNICIPALITY, GAUTENG PROVINCE**

**September 2021**

This plan has been submitted as per the requirements of the Directions regarding the measures to address, prevent and combat the spread of the COVID-19 relating to the National Environmental Management Permits and Licences issued by the Minister of Environment, Forestry and Fisheries on 05 June 2020 and 09 September 2020.

Prepared by:	Submitted to
<b>GA Environment (Pty) Ltd</b> P.O. Box 6723 Halfway House, Midrand 1685 Tel. No.: (011) 312 2537 Fax. No.: 011 805 1950 Contact: Nyaladzi Nleya e-mail: <a href="mailto:environment@gaenvironment.com/">environment@gaenvironment.com/</a> <a href="mailto:nyaladzin@gaenvironment.com">nyaladzin@gaenvironment.com</a>	<b>Department of Environment, Forestry and Fisheries</b>

## TABLE OF CONTENTS

<b>1. INTRODUCTION .....</b>	<b>3</b>
<b>2. LEGISLATIVE REQUIREMENTS .....</b>	<b>4</b>
<b>3. PUBLIC PARTICIPATION PLAN .....</b>	<b>6</b>
<b>3 CONCLUSION .....</b>	<b>13</b>

## 1. INTRODUCTION

GA Environment (Pty) Ltd has been appointed by Eskom Holdings SOC Ltd as independent Environmental Assessment Practitioners to undertake an Environmental Authorisation and Water Use Authorisation process for the proposed Eskom Azaadville 4km 400kV Deviation Powerline, Eskom Westrand Strengthening Phase I, Mogale City and Rand West City Local Municipality, Gauteng Province. Eskom Holdings SOC Ltd, (hereafter Eskom) intends to construct a 4km 400kV deviation route from the existing and authorised Hera - Westgate 400kV transmission powerline.

The proposed deviation line is located across Ward 3 and 6 of Mogale City and Ward 8 of Rand West City Local Municipality. The proposed deviation line will affect the Remainder of portions 0, 52, 53, 70 of the Farm Rietvalei 241 IQ and Erf 210,213 and 214 Azaadville Gardens. Land negotiations and acquisition of affected property for this deviation are currently underway. The deviation line starts at the existing Westgate substation with approximate starting point coordinates of 26°08'58.43"S; 27°45'17.40"E and turns to the South Westerly direction for 4km to end coordinates of 26°11' 05.37"S; 27°44'08.58"E.

The proposed development which is located outside the urban edge will require the clearance of indigenous vegetation within the identified Critical Biodiversity Areas (CBA) and triggers Activity 9 of Listing Notice 2. According to the NEMA EIA Regulations 2014, as amended, a Scoping and EIA process is required for the project. Since the deviation line is located within a Strategic Transmission Corridor (Central corridor) it will not trigger the need to undertake a Scoping/EIA Process. A Basic Assessment (BA) process is therefore contemplated in terms of Government Notice No. 113 (Government Gazette No. 41445) which prescribes the procedure to be followed when applying for environmental authorisation for electricity transmission and distribution expansion occurring in the identified central corridor.

The deviation corridor is also located within the regulated area of identified wetlands and a Water Use Authorization (WUA) may be triggered in terms of Section 21 (c) and (i) of the National Water Act (NWA), 1998 (Act No. 36 of 1998). These activities (c) impeding or diverting the flow of water in a watercourse; (i) altering the bed, banks, course or characteristic of a watercourse will be confirmed with the Department of Human Settlements, Water and Sanitation.

On the 5<sup>th</sup> of June and the 9<sup>th</sup> of September 2020, the Minister issued directions regarding the measures to address, prevent and combat the spread of the COVID-19 relating to the National Environmental Management Permits and Licences. One of the requirements provided in the directions is that a Public Participation Plan (PP Plan) shall be submitted to the Department of Forestry, Fisheries and the Environment (DFFE), in instances where a case officer has been assigned to the project then the Public Participation Plan shall be submitted to the case officer.

According to Section (2)(4)(f) of the National Environmental Management Act, the participation of all Interested and Affected parties (I&APs) must be promoted and all potential I&AP's must be informed early and in an informative and proactive way regarding applications that may affect their lives or livelihood. In order to give effect to the above sections, it is essential to ensure that there

is adequate and appropriate opportunity for Public Participation (PP) in decisions that may affect the environment.

The purpose of this document is to provide the competent authority with direction on the public participation processes to be fulfilled while ensuring that the Environmental Assessment Practitioner's actions limit the threat posed by the Covid-19 pandemic and to alleviate, contain and minimise the effects of the national state of disaster. It is the intention of GA Environment to ensure that reasonable opportunity is provided for public participation and that all administrative actions are reasonable. While the challenges posed by COVID-19 pandemic are drastic, the specific measures recommended have been carefully considered to ensure that the process is clear and participatory to all I&APs.

The NEMA EIA Regulations 2014 (as amended) prescribe the minimum requirements for public participation as summarised in **Table 1**. Due to the COVID-19 pandemic and in line with the Section 27(2) of the Disaster Management Act, additional measures have been proposed in this PP Plan. The level of public participation required for the proposed development has been informed by:

- the scale of anticipated impacts of the proposed project;
- the sensitivity of the affected environment and the community interest in the matters related to the project; and
- the characteristics of the potentially affected parties.

## 2. LEGISLATIVE REQUIREMENTS

Chapter 6 of the NEMA EIA Regulations 2014, as amended (Government Notice R. 982 in Government Gazette No. 40772 of 07 April 2017) prescribes the minimum requirements for Public Participation through which all role players including potential I&APs, state departments, organs of state, and the competent authority (CA) to obtain clear, accurate and understandable information about the environmental impacts of the proposed activity or implications of a decision. These requirements and the sections of the report in which they have been addressed is provided in **Table 1**.

*Table 1: Minimum requirements for Public Participation*

GN 982, Reference	Content	Reference in Table 2
<b>41 (2) (a)</b>	Fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of (i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and (ii) any alternative site;	1.9
<b>41 (2) (b)</b>	Giving written notice, in any of the manners provided for in section 47D of the Act, to—	
(i)	the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site	1.3
(ii)	owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken	1.4

<b>GN 982, Reference</b>	<b>Content</b>	<b>Reference in Table 2</b>
(iii)	the municipal councillor of the ward in which the site and alternative site is situated and any organisation of ratepayers that represent the community in the area;	1.5
(iv)	the municipality which has jurisdiction in the area;	1.6
(v)	any organ of state having jurisdiction in respect of any aspect of the activity; and	1.7
(vi)	any other party as required by the competent authority;	1.2, 1.4 & 1.7
<b>41 (2) (c)</b>	placing an advertisement in—	
(i)	one local newspaper;	1.8
(ii)	any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	N/A
<b>42 (a)</b>	A proponent or applicant must ensure the opening and maintenance of a register of interested and affected parties and submit such a register to the competent authority	1.2
<b>43 (1)</b>	A registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application	2.1
<b>43 (1)</b>	In order to give effect to section 240 of the Act, any State department that administers a law relating to a matter affecting the environment must be requested, subject to regulation 7(2), to comment within 30 days.	2.2

### 3. PUBLIC PARTICIPATION PLAN

The provision of public participation tasks has been outlined in **Table 2**. In addition to the public participation requirements, mechanisms for the undertaking of Public Participation, is subjected to all the applicable health and safety and other restrictions, directions and requirements determined in terms of section 27(2) of the Disaster Management Act.

Table 2: Public Participation Procedure to be followed

No.	PUBLIC PARTICIPATION TASK TO BE PERFORMED	MECHANISM FOR THE UNDERTAKING OF THE PUBLIC PARTICIPATION TASK	Date & Status
<b>Section 1. Initial Public Participation Phase</b>			
1.1	Pre-application meeting	This task will not be undertaken as all aspects of the proposed activity and processes are understood.	The Pre-Application form will be submitted <b>only</b> for purposes of the approval of the PP Plan.
1.2	Identifying and approaching specific I&AP's	A register of all I&APs will be opened and maintained throughout the project. Consultation will be mainly through telephone and e-mails to minimise the risk of the spread of the Covid-19 virus. The collection and processing of personal information collected from the I&APs will be undertaken in accordance with the requirements of the Protection of Personal Information Act as amended in 2021.	Ongoing. Evidence will be included in the Draft Basic Assessment Report (DBAR).
1.3	Written Notification of the owner or person in control of the site	Each landowner will be contacted telephonically/emailed and informed of the project and written notification will be provided to all potentially affected landowners. A land acquisition process is currently being undertaken by Eskom.	Ongoing. This task will be undertaken upon approval of the public participation plan in September 2021. Evidence will be included in the DBAR.
1.4	Written Notification of occupiers of land adjacent to the site	Written notification will be provided to adjacent landowners during the initial public participation phase. The distribution of electronic notification letters will be undertaken. The ward councillor and ward committee members will be contacted regarding the adjacent businesses, as well as community forums that shall be informed of the proposed development.	Ongoing. This task will be undertaken upon approval of the public participation plan during September 2021. Evidence will be included

No.	PUBLIC PARTICIPATION TASK TO BE PERFORMED	MECHANISM FOR THE UNDERTAKING OF THE PUBLIC PARTICIPATION TASK	Date & Status
			in the DBAR.
1.5	Written Notification of the municipal councillor of the ward in which the site is located.	The ward councillors of Ward 3 and 6 of Mogale City and Ward 8 of Rand West City Local Municipality will be contacted regarding the proposed project. A notification letter will be provided electronically to the ward councillors. Each Ward Councillors will be contacted to discuss the Public Participation Plan and to obtain details of the community structure and the community forums.	Ongoing. This task will be undertaken upon approval of the public participation plan in September 2021. Evidence will be included in the DBAR.
1.6	Written Notification of the municipality which has jurisdiction in the area.	Notification letters will be sent through electronically to the following municipal departments: <ul style="list-style-type: none"> <li>• West Rand District Municipality <ul style="list-style-type: none"> <li>○ Environmental Department.</li> </ul> </li> <li>• Rand West City Local Municipality: <ul style="list-style-type: none"> <li>○ Integrated Environmental Management;</li> <li>○ Development and Planning; and</li> <li>○ Water, Sanitation and Energy.</li> </ul> </li> <li>• Mogale City Local Municipality: <ul style="list-style-type: none"> <li>○ Department of Energy: Electricity Services;</li> <li>○ Environmental Planning Coordination and Climate Change; and</li> </ul> </li> </ul> Development and Planning.	Ongoing. This task will be undertaken upon approval of the public participation plan in September 2021. Evidence will be included in the DBAR.
1.7	Written Notification of any organ of state having jurisdiction in respect of any aspect of the activity	The following Organs of State have been identified as Commentary Authorities: <ul style="list-style-type: none"> <li>• Department of Environment, Forestry and Fisheries: <ul style="list-style-type: none"> <li>○ Legal Authorisations and Compliance Inspectorate</li> <li>○ Biodiversity and Conservation</li> </ul> </li> <li>• Gauteng Department of Agriculture and Rural Development.</li> <li>• Department of Human Settlements, Water and Sanitation.</li> <li>• Provincial Heritage Resources Agency Gauteng (PHRAG); and</li> <li>• South African Heritage Resources Agency (SAHRA).</li> </ul> The above-mentioned organs of state will be informed of the proposed project. Notification letters will be submitted to them electronically.	Ongoing. This task will be undertaken upon approval of the public participation plan during September 2021. Evidence will be included in the DBAR.
1.8	Placing an advertisement	A newspaper advertisement will be placed on The Citizen Newspaper (Krugersdorp and Randfontein circulation areas), notifying the public about the project and calling on all I&APs to register with the	This task will be undertaken upon

No.	PUBLIC PARTICIPATION TASK TO BE PERFORMED	MECHANISM FOR THE UNDERTAKING OF THE PUBLIC PARTICIPATION TASK	Date & Status
		project.	approval of the public participation plan in September 2021. Evidence will be included in the DBAR.
1.9	Fixing a notice board	On-site notices presenting the project will be erected at visible and accessible locations close to and along the Azaadville Deviation route, Azaadville Gardens and Kagiso, West Rand District Municipality.	Ongoing. This task will be undertaken upon approval of the public participation plan in September 2021. Evidence will be included in the DBAR.
<b>Section 2: Draft Basic Assessment Review Phase</b>			
2.1	Distribution of DBAR to registered I&APs and members of the public and notification of the availability of the report.	<p>The I&amp;AP database will be maintained throughout the duration of the project. The Draft Basic Assessment Reports will be made available to the public and all registered IAPs through the following measures:</p> <ul style="list-style-type: none"> <li>• GladAfrica Website;</li> <li>• Online SMS portal will be used to send bulk SMSs to IAPs where email addresses were not made available;</li> <li>• Electronic copies via a web link whereby the report can be downloaded;</li> <li>• WhatsApp social media platform; and</li> <li>• Public Libraries</li> </ul> <p>The public review period of the DBAR will commence following the expiry of the registration period and the circulation of the DBAR. Due to the national lockdown, and the restrictions on gatherings and movement within public venues, hard copy reports will be distributed to the Ward Councilors, the public libraries and other authorities and IAPs who will require it.</p> <p>All other registered IAPs will be informed that due to the COVID-19 pandemic, only electronic versions of the report will be made available. All IAPs will be provided with a link whereby the report can be easily downloaded from the website. This link will be sent via email, SMS or WhatsApp. Hard copies of the report will be made available only to IAPs upon request in order to limit the risk of any possible contamination.</p>	The process will be undertaken in line with the directions provided by the Ministry of DFFE regarding the measures to address, prevent and combat the spread of the COVID-19 relating to the National Environmental Management Permits and Licences. DFFE to approve or advice regarding the way forward.



No.	PUBLIC PARTICIPATION TASK TO BE PERFORMED	MECHANISM FOR THE UNDERTAKING OF THE PUBLIC PARTICIPATION TASK	Date & Status
		<p>This will be done through the Ward Councilors who will be contacted by GA Environment and informed of the COVID-19 directions that were issued by DFFE. Thereafter, a hard copy of the report will be provided which will be made available to IAPs who do not have means to receive the report electronically. IAPs will receive SMS notification of the availability of the report AND that it can be perused at the Ward Councillor's office.</p> <p>Very strict guidelines will be enforced by the Ward Councilors. All IAPs must wear a mask and the use of disposable gloves will be encouraged when reviewing the Draft BAR. GA Environment will engage with the Councilors thereafter, regarding additional measures to communicate the availability of the Draft Basic Assessment Report. Proof of such communication will be included in the report.</p> <p>30 days will be provided for comment which is deemed to be a sufficient period for review of the DBAR and efforts will be made by GA Environment to consult each registered IAP individually during this period where possible.</p>	
2.2	Distribution of DBAR to organs of state having jurisdiction in respect of any aspect of the activity	<p>A list of organs of state that will be informed of the Basic Assessment process is included in <b>Section 1.7</b>. Proof of submissions will be submitted to DFFE. The IAPs will be informed of the directions issued by DFFE and given a link through which the report and appendices can be downloaded. GA Environment will also undertake telephonic and email updates with the respective IAPs to confirm receipt of the report.</p> <p>30 days will be provided for comment as it is deemed to be a sufficient period for review of the DBAR and efforts</p>	The process will be undertaken in line with the directions provided by the Ministry of DFFE regarding the measures to address, prevent and combat the spread of the COVID-19 relating to the National Environmental Management Permits and Licences. DFFE to approve or advice regarding the way forward.
2.3	Public Meeting	<p>The need for a public meeting will be determined by the response received in the Initial Public Participation phase. At this stage No public open day will be held for the proposed project. The following alternative means are however available:</p> <ul style="list-style-type: none"> <li>• All I&amp;APs that provide comments will be acknowledgment by GA Environment.</li> <li>• GA Environment will set up a telephonic meeting with the I&amp;AP to discuss their comments/concerns. The option of an online meeting will also be provided to the I&amp;AP.</li> </ul>	The process will be undertaken in line with the directions provided by the Ministry of DFFE regarding the measures to address, prevent and

No.	PUBLIC PARTICIPATION TASK TO BE PERFORMED	MECHANISM FOR THE UNDERTAKING OF THE PUBLIC PARTICIPATION TASK	Date & Status
		<ul style="list-style-type: none"> <li>• GA Environment will respond to all comments received from I&amp;APs;</li> <li>• The comments and response report will be updated and made available in the Final Basic Assessment Report; and</li> <li>• All I&amp;APs will also be provided with the link to download an electronic copy of the Final Basic Assessment Report.</li> </ul> <p>However, should the comments received on the proposed project warrant the need for a public open day, the then Disaster Management Act requirements prescribed at a time of undertaking this activity will be applicable and therefore, applied. The open day will be broken up into various sessions which will limit the number of I&amp;APs to each session, however each I&amp;AP will be afforded the opportunity to meet the project team and obtain additional information on the project and provide their comments.</p>	combat the spread of the COVID-19 relating to the National Environmental Management Permits and Licences. DFFE to approve or advice regarding the way forward.
2.4	Focus Group Meeting with representatives of organs of state having jurisdiction	Focus group meetings if required, will be undertaken based on the comments received from I&APs and the request of I&APs to have a meeting. The meeting could either be one on one sessions or online meetings via Microsoft Teams or Zoom. These meetings will be recorded and provided if requested by the competent authority.	The process will be undertaken in line with the directions provided by the Ministry of DFFE regarding the measures to address, prevent and combat the spread of the COVID-19 relating to the National Environmental Management Permits and Licences. DFFE to approve or advice regarding the way forward.
2.5	Focus Group meetings with vulnerable and marginalised groups; and	GA Environment will liaise with the Ward Councillors regarding vulnerable and marginalised communities other than those identified and then contacted by GA Environment. GA Environment will inform the Ward Councillors regarding the proposed project and the directions issued by the Minister of DFFE regarding the COVID 19 and its impact on local communication. GA Environment will provide the Ward Councillors with an electronic notification as well as a WhatsApp notification. The WhatsApp notification will be distributed to the various community groups. All responses from these groups will be consolidated and sent back to GA Environment for a response. Should there be a need, based on the comments raised and GA Environment's assessment of the comments, focus	The process will be undertaken in line directions regarding the measures to address, prevent and combat the spread of the COVID-19 relating to the National Environmental

No.	PUBLIC PARTICIPATION TASK TO BE PERFORMED	MECHANISM FOR THE UNDERTAKING OF THE PUBLIC PARTICIPATION TASK	Date & Status
		group meetings will be considered, bearing in mind COVID 19 restrictions and social distancing.	Management Permits and Licences. DFFE to approve or advice on the way forward.
2.6	CA Site Visit	A site visit will only be undertaken should it be required by DFFE. Social distancing and hygiene practices will be followed. GA Environment will provide as much photographic evidence of the site as possible in the Draft and Final BAR.	The process will be undertaken in line with the directions provided by the Ministry of DFFE regarding the measures to address, prevent and combat the spread of the COVID-19 relating to the National Environmental Management Permits and Licences. DFFE to approve or advice regarding the way forward.
<b>Section 3 Post Environmental Authorisation Notification Phase</b>			
3.1	Notification and Distribution of decision/outcome of Environmental Application to registered I&APs and organs of state.	The I&AP database will be maintained throughout the duration of the project. All IAPs on the database will receive an email or SMS notification of the decision made by DFFE including a copy of the National Appeal Regulations 2014. A copy of the decision will be circulated to registered IAPs.	This Notification will be issued as per Annexure 8 of the Directions Regarding Measures to address, prevent and combat the spread of COVID-19 relating to NEMA Permits and Licenses issued on 5 <sup>th</sup> June 2020 and 9 <sup>th</sup> September 2020.
3.2	Notification of vulnerable and marginalised groups.	GA Environment will liaise with the Ward Councillors regarding communities other than those identified and contacted by GA Environment. GA Environment will set up a telephonic/virtual meeting with the IAPs to notify them of the decision in a language they are comfortable with. SMS	The process will be undertaken in line with the directions provided by

No.	PUBLIC PARTICIPATION TASK TO BE PERFORMED	MECHANISM FOR THE UNDERTAKING OF THE PUBLIC PARTICIPATION TASK	Date & Status
		portal will be used to inform those with cell phone handsets of the decision. In the event that specific groups or individuals do not have access to telephone or cell phone handsets, communication will be arranged with these parties through the Ward Councillors.	the Ministry of DFFE regarding the measures to address, prevent and combat the spread of the COVID-19 relating to the National Environmental Management Permits and Licences. DFFE to approve or advice regarding the way forward.

### 3 CONCLUSION

The PP Plan will afford all potential and / or registered Interested and Affected Parties including the competent authority and any other stakeholder or organ of state, an opportunity to become involved in the Basic Assessment process and provide comments during the various phases of the project. GA Environment will ensure that reasonable opportunity is provided for Public Participation and that all administrative actions are reasonable. While the COVID-19 pandemic is unique, the specific measures recommended have been carefully considered and are sufficient to ensure a complete and effective Public Participation, whilst avoiding the spread of COVID-19.