



The Southern African Institute for Environmental Assessment

**EXTERNAL REVIEW OF THE
SCOPING REPORT FOR THE HOUHOEK
TRANSMISSION SUBSTATION, WESTERN CAPE**

Name of the project	Houhoek Transmission Substation
Country where the project is to be located	Western Cape, RSA
Name of proponent	Eskom Holdings SOC Ltd
Name of company which compiled the Scoping Report	BKS
Date that the Scoping Report was completed	November 2012
Name of reviewer	B Walmsley
Date of review	8-10 January 2013

EXTERNAL REVIEW OF THE SCOPING REPORT THE HOUHOEK TRANSMISSION SUBSTATION, WESTERN CAPE

PREAMBLE AND GUIDE TO REVIEW DOCUMENT

1 STRUCTURE OF REVIEW FORM

This standard review form allows the reviewer to assess the Scoping Report in a systematic and structured way both in terms of process and content. An explanation of the grading system used in the review is provided in section 2 below and a summary of the findings of the review is presented in section 3. This is followed by the detailed review form, which is divided into the following sections:

- | | |
|--|-------------------------------|
| 1. Scoping process | 7. Description of environment |
| 2. Scoping methodology | 8. Description of impacts |
| 3. Public consultation and disclosure | 9. Mitigation |
| 4. Legal, policy and planning requirements | 10. Non-technical summary |
| 5. Description of project | 11. General approach |
| 6. Identification of alternatives | |

2 EXPLANATION OF REVIEW NOTATION

1. For each question posed in the Review Form, the reviewer considers whether the information is relevant to the project and it is marked Y (yes) or N (no).
2. If the information is relevant, the reviewer reads the relevant sections of the EIA report and specialist studies and establishes whether the information provided is:
 - **Complete or comprehensive (C):** all information required for decision-making is available. No additional information is required even though more information might exist.
 - **Acceptable or adequate (A):** the information presented is incomplete, but the omissions do not prevent the decision-making process from proceeding.
 - **Inadequate (I):** the information presented contains major omissions. Additional information is necessary before the decision-making process can proceed.

3 SUMMARY OF REVIEW PROCESS AND FINDINGS

3.1 Introduction

Eskom Holdings SOC Ltd has applied for an environmental authorisation from the National Department of Environmental Affairs to construct a new substation, adjacent to an existing substation near Botrivier at the foot of the Houhoek Pass in the Western Cape. The project, known as the Houhoek Transmission Substation project, will comprise the construction of a 400/132kV transmission substation linked to the existing 132kV distribution substation and loop-in, loop-out (LILO) powerlines. The existing distribution substation site is 4.5 ha in extent and the new substation will be approximately 11 ha in size. Additional land will also be required for the LILO servitudes.

The project triggers a full EIA in terms of the EIA Regulations (R545 and 546) and, therefore, Eskom commissioned BKS to undertake the EIA. As required by the regulations, a draft scoping report has been compiled to identify the key issues and to determine the scope and extent of the specialist studies required to inform the EIA. It is this report which is the subject of this review.

3.2 Methodology for the review

The Southern African Institute for Environmental Assessment (SAIEA) has standard Review Forms which are used for all Scoping, EIA and EMP reviews, irrespective of the sector or the location of the project. This scoping report review form acts as a checklist so that the reviewer can make sure that all pertinent aspects have been covered in the report.

The review of the scoping report was conducted by Ms Bryony Walmsley of SAIEA, a not-for-profit organisation with headquarters in Windhoek. SAIEA does not undertake EIAs and thus can act as a wholly independent review body without any conflicts of interest. Ms Walmsley has over 32 years' experience as an environmental consultant with specific experience in bulk infrastructure development, especially transmission lines and related infrastructure.

The site visit was not inspected on foot, but the reviewer was able to observe the site from various viewpoints along the N2 highway on several occasions during December 2012.

3.3 Summary appraisal of the Scoping report

	Judgement (C/A/I)	Comments
1. Scoping Process	C	A sound and legally compliant process has been followed.
2. Public consultation process	C	A comprehensive and legally compliant public participation process has been followed. The draft scoping report needs to be updated to include the comments received during the public comment period.
3. Description of the project	A/I	The motivation and description of the basic project components is adequate for scoping, but the report lacks information on the following: land ownership, waste and emissions and project inputs (see detailed review form for details).
4. Assessment of alternatives	A/I	The identification of alternatives is sound, but the process to be followed in the EIA to evaluate and compare these alternatives has not been provided. The scoping report should include a description of the methodology to be used, including a list of evaluation criteria (economic, technical and environmental), the weightings to be applied and who will be involved in the evaluation process.
5. Description of the environment	A	Generally adequate for scoping, but care needs to be taken to keep the discussion focussed on the site and the project. Some gaps have been noted e.g. baseline water quality, baseline aquatic ecology, (see the detailed comments in the review form).
6. Identification of key issues of concern	A/I	The list of issues provided in Chapter 7 is incomplete or the issues have not been explicitly mentioned. Some of the missing issues include: <ul style="list-style-type: none"> • Climate risks; • Erosion potential; • Terrestrial fauna (spp not necessarily of conservation concern); • Aquatic ecology; • Health issues; • Traffic impacts; • Macro-economics.

	Judgement (C/A/I)	Comments
		These need to be included in Chapter 7 and in the Executive Summary. There are some issues where it is unclear whether they are of concern or not, for example, groundwater, seismics, which needs to be clarified in the report.
7. Terms of Reference for EIA and scope of specialist studies	A/I	The ToRs for the specialist studies are adequate as far as they go, but need to be amended to include the issues listed above. See also detailed comments in the review form.
8. Non-technical summary	A/I	It strikes the right note and is informative, but needs to include a short overview of the environment, a complete list of the potential positive and negative impacts and a full list of specialist studies.
9. General approach and presentation	A	The approach is generally good. The report is well written and illustrated with maps and diagrams. The appendices need to include the studies done to inform the scoping report and the consultants' ToR for the scoping work. The consultants need to ensure that the final scoping report focuses on the site and project-related impacts.

3.4 Conclusion

The overall grading of the Scoping Report is as follows:

Excellent: The Scoping Report contains everything required for decision-making on the project. There are no gaps.

Good: The Scoping Report contains most of the information required as far as it is relevant in the particular circumstances of the project; any gaps are relatively minor.

Satisfactory: The information presented is not complete; there are significant omissions but in the context of the proposed project, these are not so great as to prevent a decision being made on whether the project should be allowed to proceed or not.

Inadequate: Some of the information has been provided, but there are major omissions; in the context of the proposed project these must be addressed before a decision on whether the project should be allowed to proceed can be taken.

Poor: The information required has not been provided or is far from complete and, in the context of the proposed project, the omissions must be addressed before a decision on whether the project should be allowed to proceed can be taken.

Rectification of the deficiencies noted in this review and updating the report to include comments received from the stakeholders could result in the finding being upgraded to 'good'.

Key questions	Yes	No	Partially	Don't know
Does the Scoping Report comply with the Terms of Reference?				Don't know
Does the Scoping Report comply with the legal requirements for EIA in the country and/or international best practice?	Yes			
Did the scoping process include genuine public participation?	Yes			
Does the Scoping Report provide a balanced, accurate and objective assessment appropriate to the nature of the project?	Yes			
Did the Scoping Report highlight the most important issues?			Partially	
Is the Scoping Report of acceptable quality?	Yes			
Has the scope of the project changed as a result of the scoping process?	No			
Will the Scoping Report help to make a more informed decision about the project?			Partially	

3.5 Recommendations

In addition to the detailed comments in the review form, the following points need to be attended to in the final scoping report:

- On p 81 (s. 7.5) reference is made to 'medics' in relation to crop types. This appears to be a typo.
- What is the likelihood of Eskom preferring the 320-720m (23.04 ha) layout? If this is not likely, it should be removed from s. 3.3.1 as it leads to confusion.
- The consultants should take note of the comments in this review report relating to which aspects need to be elaborated upon further in the EIA. Note also that the reviewer will be looking for **quantification** and **relevance** in all the environmental descriptions in the EIA.
- Much more information is required on the construction phase – particularly with respect to wastes, project inputs and staffing.
- The final scoping report must include greater analysis of the policy and planning framework, with a critical review of how this project 'fits'.

DETAILED REVIEW

		Relevant? Yes/No	Judgement (C/A/I)	Comments
1. SCOPING PROCESS				
1.1	Has the screening, scoping and EIA process been described?	Y	C	Yes the scoping and EIA process has been described.
1.2	Is the scoping process compliant with the minimum legal requirements for scoping, if such legal requirements exist, or where none exist, does the scoping process conform with relevant national policies or guidelines etc, or where none exist, other accepted guidelines for scoping e.g. World Bank, IFC, EU?	Y	C	Yes, it complies with the EIA regulations.
1.3	Have all the relevant communications with the Authorities regarding the screening and scoping process been included in the appendices (including for example the approval of the consulting team, notification of the authorities and their acknowledgement, any conditions for the study received from the authorities etc.)?	Y	C	Yes, the letter from DEA confirming the project application is included in the Appendices.
1.4	Is the level of appraisal (scoping) in sync with the project development phase i.e. scoping should occur at the project pre-feasibility stage?	Y	C	Yes – various route and design options are still being considered by Eskom.
2. SCOPING METHODOLOGY (excluding the public consultation process – see section 3)				
2.1	Does the report set out the assumptions, limitations and constraints of the study?	Y	A	Yes, they are included in s 8.6, but it would be more helpful to the reader to have these listed earlier in the document e.g. Chapter 1.
2.2	Does the report clearly explain the methodology used in the scoping process e.g. literature reviews, baseline monitoring, initial field work and data collection?	Y	A	Yes.
2.3	Has the project scope been clearly defined in terms of the geographic extent, sphere of influence, all associated project components, trans-boundary impacts and time frame?	Y	A	Yes, but some of the baseline environmental descriptions are misleading, e.g. the avian description talks about seashore birds (African Oystercatcher, Cape Cormorant, etc) none of which are likely to occur on site. It will be important in the EIA to focus on the site itself and what is likely to occur there, rather than what may never occur there even though it may occur within the same quarter degree 1:50,000 map.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			The other aspect which is unclear is how the EIA will address the broader issue of long-term electricity transmission development and power generation and the cumulative impacts thereof. It is mentioned in the Issues and Response report that this issue will be looked at in the EIA, but more clarity is required on the scope of this work.
2.4 Does the Scoping Report identify the key issues relevant to the project?	Y	I	A list is provided in the conclusion, but it needs far greater elaboration. For example, “air quality” is listed but earlier in the report it states that diesel fumes will not be a significant issue. So do you actually only mean “dust”? But there is no specialist study for dust, so if this is a major issue, how will it be addressed in the EIA? If it is not an issue, then leave it out of the list. Expand on “Construction related impacts”. How will you have a geotechnical impact? Do you not mean “erosion”? I do not see “health” listed as an impact; health impacts will manifest in a number of possible ways: road safety issues associated with construction traffic; electromagnetic frequency-related health issues – how far is the nearest residential dwelling? And social health issues such as HIV, STIs and substance abuse.
2.5 Does the Scoping Report identify major gaps and data deficiencies and have specialist studies been recommended to address these gaps or data deficiencies?	Y	A	Gaps are listed on p.96 and the specialist studies required to address these gaps are described in Chapter 9 (see comment for question 2.6 below)
2.6 Does the Scoping Report include the Terms of Reference (ToR) for the EIA including detailed scopes of work for the specialist studies?	Y	A/I	Geotechnical investigation: the aim of this study is less for the EIA and more for engineering design. Nevertheless, in addition to what is listed on p100, the study needs to provide information on the following: <ul style="list-style-type: none"> • Determination of quantities of cut and fill and mass balance – if there will be excess spoil, where and how will it be dumped? • Erodibility factors; • Need for blasting. Soil and agricultural potential assessment: I assume that the study will include the collection and analysis of soil samples, but this is not mentioned. What level of investigation is proposed?

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			<p>Wetland delineation and assessment: the emphasis of this specialist study appears to be on mapping and verifying the presence of wetlands, using all sorts of remote tools. While wetlands are a critical landscape component, would it not be more relevant in the context of this project to simply undertake a site visit to confirm the presence of wetlands and to ascertain their importance in the environment in terms of ecosystem services and as aquatic habitat. I cannot find any explicit references to the need for an aquatic ecological study in this scoping report, unless the statement “Collection of sufficient information/data to determine the present ecological condition and conservation importance of potentially affected freshwater ecosystems” means that such a study will be undertaken. If so, what methods will be used? The presence or absence of prey in the dam will be a key informant for the avian study to determine how valuable this water body is for birds. This whole study needs to be focussed on providing relevant information to other specialists and the overall EIA.</p> <p>Ecological assessment: The focus of this study appears to be on plants, whereas it needs to encompass all other aspects of biodiversity with the exception of aquatic ecology, (which should be done by the wetlands specialist) and avifauna (to be covered by the avian expert). A more holistic ecosystem approach is recommended.</p> <p>I would also like to see the responsibility for formulating an indigenous rehabilitation plan being given to Mr Helme, with inputs from the soil specialist.</p> <p>Avifauna: this needs to be much more site specific and tightly focussed than proposed (QDGC level). This study needs to be closely integrated with the botanical study and the wetlands assessment.</p>

		Relevant? Yes/No	Judgement (C/A/I)	Comments
				<p>Social impact assessment: This needs to include the following:</p> <ul style="list-style-type: none"> • Identification of skills levels in the local community; • Current noise and dust levels (qualitative) ; • Health baseline relating to: electromagnetic frequency-related health issues (cumulative effects of several high voltage transmission lines in a small area); HIV and STIs; • Macro-economic assessment relating to current and future power demand in the Western Cape and how this substation is a key link (project motivation). <p>Visual impact assessment: OK, but it must look at the additive and cumulative impacts.</p> <p>Traffic impact assessment: this has not been identified in the scoping report, but the reviewer understands that this study has been requested by DEADP and a traffic impact assessment is in the process of being commissioned.</p> <p>Sustainability assessment: DEA (in their letter of approval) requested BKS to undertake a sustainability assessment. This needs to be added.</p> <p>Cumulative effects assessment: The cumulative impacts of all the transmission lines in this area and the impacts on visual, health, birds, fire risk etc need to be considered, as well as the macro effects of ongoing power infrastructure development in the Western Cape – i.e. will this project induce the routing of future powerlines through Botrivier?</p> <p>EMP: The DEA provides a specific list of elements that needs to be included in the EMP – perhaps these should be listed in s 9.7.</p>
2.7	Does the Scoping Report provide a list of the proposed EIA team members, including the specialists, and their credentials?	Y	A	The team members are listed, but not their credentials.
2.8	Does the Scoping report include a description of the impact assessment methodology which will be used in the EIA and is it appropriate to the activity being assessed?	Y	C	Yes.
2.9	Has the Scoping Report been submitted for independent peer review and will the review report be attached as an appendix to the final document?	Y	C	This report will be added to the final scoping report.

		Relevant? Yes/No	Judgement (C/A/I)	Comments
3 PUBLIC CONSULTATION AND DISCLOSURE				
<i>Legal compliance</i>				
3.1	Did the public consultation and disclosure (PCD) process follow the legally required process, or where no such process is prescribed in legislation, does the PCD process conform with relevant national policies or guidelines etc., or where none exist, other accepted guidelines for PCD e.g. World Bank, IFC, EU?	Y	C	Yes, it complies with the regulations.
3.2	Were the I&APs informed of the relevant legislation, their environmental rights and the modalities of their engagement?	Y	C	Yes in the BID, site notices, letters and newspaper notices.
<i>Identification of Interested and Affected Parties</i>				
3.3	Is there a register for I&APs?	Y	C	
3.4	Were/are I&APs allowed to register throughout the process?	Y	C	
3.5	Are the procedures for registering as an I&AP open, transparent and appropriate for the affected communities?	Y	C	
3.6	Have all relevant government authorities at national, regional and local level been identified, including traditional authorities and other governance systems?	Y	C	Yes, DEA (competent authority) as well as the following commenting authorities and agencies were contacted: DEADP, DWA, DoA, SAHRA, SANRAL, WC Dept of Roads and Transport, Theewaterskloof Local Municipality, Cape Nature.
3.7	Have representatives from all relevant NGOs, CBOs, rate payers associations, Chambers of Commerce, agricultural cooperatives, faith groups and other representatives of civil society been identified?	Y	I	No, but may not be very relevant in the context of this project.
3.8	Have all the parties whose lives and livelihoods may be directly affected by the project been identified?	Y	A	Landowners and occupiers of land affected by all 3 site alternatives were identified and local residents were notified through a number of methods (see below).
3.9	Have the representatives of relevant labour unions and company employees been identified?	N	-	
3.10	Have members of the media been identified?	N	-	

		Relevant? Yes/No	Judgement (C/A/I)	Comments
3.11	In the case where trans-boundary impacts may occur, have representatives from government, media, land owners, communities and relevant representatives of civil society in the neighbouring country been identified?	N	-	
<i>Notification process</i>				
3.12	Have all the project notices pertaining to registration as an I&AP, public meetings, open houses etc. been advertised in local and national newspapers?	Y	C	Yes, in the Cape Times and Theewaterskloof Gazette.
3.13	Has the project been advertised on radio?	N	-	
3.14	Have special provisions been made to inform those without the necessary electronic equipment (TV, radio, computer), connectivity (phone, internet, cellular) and literacy or language skills, about the project and all relevant meetings?	Y	C	Fliers in English and Afrikaans were distributed in the study area, as well as notices and newspaper advertisements.
3.15	Have notices been posted on site and in several public places?	Y	C	Yes, at 12 strategic locations.
3.16	Have all the notices been posted or announced in the locally understood languages?	Y	A	The notices were mostly in English, but the advertisement in the Theewaterskloof Gazette was in Afrikaans. DEADP requested BKS to appoint a Xhosa translator for the EIA public process.
3.17	Was a Background Information Document (BID) or other form of information pamphlet or poster disseminated, or made easily available to all I&APs?	Y	C	A BID was sent to all identified I&APs and registered stakeholders.
3.18	Did the BID (or other notification method) include basic information about the project, its location (on a map), motivation for the project, the proponent, project timing and the scoping process?	Y	A/I	The BID and other notices contained a map, photos, a description of the scoping and EIA process, and an overview of the project, however it lacked a statement of need and desirability and failed to provide an indication of the construction timetable.
3.19	Did the BID provide I&APs with a means to submit comments and concerns to the scoping team?	Y	C	Yes.
3.20	Were any other forms of communication used such as via the web, letters, questionnaires etc.?	Y	C	106 emails were sent and letters were sent by registered mail and fax; follow-up phone calls were made.
3.21	Was the notification period for public meetings, open houses or other PCD meetings adequate?	Y	C	Yes.

	Relevant? Yes/No	Judgement (C/A/I)	Comments	
Consultation				
3.22	Were public meetings held in the main centres as well as on or near the site?	N	-	No public meetings were held.
3.23	Were focus group meetings held?	Y	C	The consultants held 3 focus group meetings with: 1) DEADP and the WC Dept of Roads and Transport; 2) the Theewaterskloof Local Municipality; and 3) members of the Wildekrans Trust.
3.24	Were any open house displays or exhibitions held?	Y	C	An open house was held in Botrivier adjacent to the site on 06/12/12 but was only attended by 2 people.
3.25	Did the project team make themselves available for one-on-one meetings with I&APs?	Y	A	The offer was made, but was not taken up.
3.26	Was special provision made to consult with marginalised groups, women, youth, unemployed, etc.?	Y	I	No.
3.27	Were capacity building programmes required to enable informed stakeholder involvement and are they described in the Scoping Report?	N	-	The project will not have a significant impact on the lives and livelihoods of any affected parties, therefore capacity building programmes were not necessary.
3.28	Did the I&APs receive sufficient information about the project and its potential impacts to enable them to make an informed and objective decision about the project?	Y	A	Yes, the draft scoping report captures most of the main issues, and the key impacts will be examined in more detail in the EIA.
3.29	Were the I&APs informed as to when and how they would have further opportunities to comment on the project?	Y	C	Yes.
3.30	Was the period allowed for I&APs to comment on the Scoping Report adequate?	Y	C	Although the comment period fell over the Christmas Holidays, the consultants extended the period to ensure sufficient time was given for comments (29/11/12 to 25/01/13).
3.31	Did the comment period avoid main holidays?	Y	A	No, but it was extended (see above).
3.32	Was there any intimidation by the Client and/or his representatives at any of the public meetings?	Y	C	None apparent.
Reporting				
3.33	Does the report clearly explain the methodology used in the PCD process?	Y	C	Yes in Appendix B.
3.34	Does the main Scoping Report provide a summary of all the issues and concerns raised?	Y	I	No, because the DSR was issued prior to the public open day and focus group meetings being held. The issues and concerns raised at these meetings need to be summarised in the Executive Summary and in the body of the final scoping report.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
3.35 Are the minutes or records of the meetings included in the Scoping Report together with the attendance registers?	Y	I	The reviewer is in receipt of the minutes of the meetings held and the attendance registers, but they are not included in the reviewed version of the scoping report for the reasons given in the point above. It is expected that the minutes and attendance registers will be included in the finals scoping report.
3.36 Are the original written submissions of the I&APs included in the report?	Y	A	Yes, all the comments received up to the date of submission of the draft scoping report have been included.
3.37 Are copies of all the notices and BID included in the report?	Y	C	
3.38 Were the I&APs given an opportunity to comment on the Scoping Report?	Y	C	Yes
3.39 Is there an issues and response table indicating where issues raised by the I&APs have been addressed, and if not addressed, providing a reason why not?	Y	A	Yes, but it needs to be updated.
4. LEGAL, POLICY AND PLANNING REQUIREMENTS			
4.1 Have the relevant international treaties, conventions and agreements been listed with reference to where and how these obligations have been met on this project?	Y	I	No. Certainly the CBD is relevant. In terms of future developments and macro-energy planning, the UNFCCC is relevant.
4.2 Have the relevant policies of the country been listed with reference to where and how the obligations have been met on this project?	Y	I	There are several policies which could be relevant e.g. the National Development Plan (2030), new growth path (2020), national strategy for sustainable development and action plan (2014), national climate change response policy, integrated energy plan, green economy accord and provincial green economy plan. These need to be listed and motivation given as to how this project fits with these policies, plans and strategies.
4.3 Have the relevant laws and regulations of the country been listed, with reference to project compliance?	Y	A	Yes.
4.4 Have other relevant permits, licences, authorisations etc. which may be required for project approval been listed?	Y	A	Yes – water and heritage. A decision as to whether the project needs to go through the LUPO process has yet to be taken depending on which site is selected.
4.5 Have the relevant standards and guidelines for compliance been listed?	Y	A/I	Yes, inasmuch as they are relevant, e.g. buffers around wetlands. Perhaps receiving water quality standards for aquatic ecosystems need to be applied as the yardstick for future water quality from site.

		Relevant? Yes/No	Judgement (C/A/I)	Comments
4.6	Have local, regional and national plans e.g. SEAs, structure plans, integrated development plans, environmental management frameworks, zoning plans, biodiversity plans etc. been reviewed in order to place the project into context?	Y	A/I	Yes, a number of relevant planning documents have been listed, but they have not been analysed in terms of project fit. This needs to be addressed in the EIA.
5. DESCRIPTION OF THE PROJECT				
<i>Land requirements</i>				
5.1	Has the land ownership status been described?	Y	I	The current owners of the land have not been identified.
5.2	Has the land required for all phases of the project and any associated services, been described and clearly shown on an appropriately scaled map?	Y	A	The various site alternatives have been shown and a broad area within which the LILO lines will go has been indicated on a map.
5.3	For a linear project, has the land corridor and need for earthworks been described and shown on an appropriately scaled map?	Y	I	Not yet. The LILO route will only be finalised once the substation site alternative has been selected. This will be included in the EIA.
5.4	Have the areas which will only be temporarily affected during construction been described and shown on a map?	Y	I	Only in very broad terms. This information needs to be included in the EIA.
<i>Project description</i>				
5.5	Has the project been described (location, size, layout, design, main components etc.) at a pre-feasibility level of detail, with the aid of appropriate maps, photos and images?	Y	C	Yes, the main components have been described and the various site alternatives have been shown on a map.
5.6	Have any additional project components, which are not included in this scoping study but which will require authorisation from the relevant authority, been identified and a justification provided as to why they have been excluded (e.g. access roads, power lines, borrow pits etc.?)	Y	A	It is unclear from the scoping report (and the minutes from the focus group meetings) whether an access road will be required or not.
5.7	Has the need and desirability of the project been well motivated?	Y	A	Yes, but this needs to be strengthened in the full EIA, with a more comprehensive description of current and future electricity generation projects and transmission lines.
5.8	Have the main processes of the project been described, together with a motivation as to how they comply with BATNEEC and BEO principles?	Y	A/I	Not really. There is some hypothetical discussion around pylon design and birds, but this needs further elaboration in the EIA. In addition, project aspects such as the type of transformer oils, etc need to be described in terms of their environmental acceptability.

		Relevant? Yes/No	Judgement (C/A/I)	Comments
5.9	Have the construction phase activities and methods been described?	Y	A	The broad steps have been described together with an indication of the time each will take. More detailed information will need to be provided in the EIA once the actual site has been decided and the routes for the LILO delineated.
5.10	Has the relationship of this project to other planned or existing projects nearby been described in terms of potential cumulative, antagonistic and synergistic effects?	Y	A	Other projects such as wind farms are mentioned, but this aspect needs far greater elaboration in the EIA in terms of other energy-related projects and other developments e.g. the proposed industrial area to the south of Botrivier, the widening of the R43, the toll road, etc.
5.11	Have other activities or developments which may be required as a consequence of this project been identified e.g. upgrading of sewage plants, additional houses, schools, clinics, additional water supplies and/or power generation capacity etc.?	Y	I	No. This issue was raised in one of the focus group meetings, reminding the consultants that one of the conditions of approval set by DEA was that the proponent needs to include in the scoping report a letter confirming that the Theewaterskloof Local Municipality has sufficient capacity to provide for increased waste, stormwater, water supply, interim power, etc
5.12	Has the project timetable been clearly set out for each project phase: construction, operation, decommissioning and closure?	Y	C	Yes, the duration of each construction step has been given. The lifespan of the substation is at least 25 years and therefore closure and decommissioning timeframes are not relevant here.
5.13	Have the social issues related to the project been described e.g. estimated number of employees, percent from local community, transportation, accommodation, support services, recreation facilities, employment structures, skills breakdown, training, skills transfer etc. for each project phase?	Y	A	The approximate number of workers required for each step of construction has been provided, however the EIA needs to elaborate on this in terms of sources of labour, skills breakdown, training, skills transfer, accommodation facilities, transport of workers, etc.
<i>Waste and emissions</i>				
5.14	Have the sources and types of waste likely to be generated during different scenarios for construction and operation been identified e.g. air emissions, process effluent, runoff, noise and vibrations, odour, liquid and solid waste?	Y	I	Waste and emissions have not been addressed at all in the scoping report. Mention is made of a transmission oil pond – this needs far greater elaboration regarding its size, construction, pollution control measures, type of oil, etc. Construction always generates waste and the types and quantities need to be described in the EIA together with details concerning their handling, storage, treatment and disposal. Eskom needs to provide their recycling and waste minimisation policy.
5.15	Does the report discuss ways in which the wastes can be reduced, recycled or re-used?	Y	I	See above.
5.16	Have the ways in which wastes will be stored, handled or treated prior to disposal been explained?	Y	I	See above.

		Relevant? Yes/No	Judgement (C/A/I)	Comments
5.17	Has the receiving environment where such waste will be disposed, been identified and described?	Y	I	See above.
Project inputs				
5.18	Have the resources and materials needed for construction and operation, been identified e.g. water, power, lubricants, raw materials, ore, structural components, fill, etc?	Y	I	No. This needs further elaboration in the EIA.
5.19	Have the means of transporting materials, products, workers and visitors to and from the site during construction and operation, been explained?	Y	I	No. This needs further elaboration in the EIA.
6 ALTERNATIVES				
6.1	Were strategic alternatives to the entire project considered in the Scoping Report (e.g. demand management instead of a new power station; renewable power supplies rather than fossil fuels)?	Y	A	The strategic alternatives mentioned included the no-go option and demand side management.
6.2	If strategic alternatives were considered, are evaluation criteria listed and the reasons provided for selecting the proposed alternative?	Y	A	Both these strategic options were discussed and valid reasons provided for dismissing both options.
6.3	If strategic alternatives are described, have their main environmental impacts been compared clearly and objectively with those of the proposed project?	N	-	
6.4	Has a prediction of the likely future environmental conditions in the absence of the project been developed (no go option)?	Y	A	This is addressed in the project motivation (s. 3.2), but needs greater elaboration in the EIA, including an evaluation of the macro-economic consequences of the no-go option.
6.5	Does the Scoping Report identify and assess various 'within-project' alternatives (e.g. site, route, design, technology, etc.)?	Y	C	Yes, various sites and site layouts have been identified. The option of burying the powerlines is also discussed and reasons given for not considering this option further. The reviewer believes that there is scope for further optimisation of powerline infrastructure on and around the site to minimise the footprint and the visual impacts. This needs greater consideration in the EIA.
6.6	Does the Scoping Report list the evaluation criteria used to compare the alternatives identified and have the reasons for selecting one or more alternative to study further in the EIA been provided?	Y	I	No. Indeed the whole process as to how the sites will be compared and evaluated has not been described in this scoping report. This needs to be rectified.
6.7	Does the Scoping Report indicate whether inputs from the I&APs were instrumental in identifying	Y	I	No.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
new alternatives or selecting existing alternatives?			
7 DESCRIPTION OF THE ENVIRONMENT			
7.1 Have the areas expected to be significantly affected by the various aspects of the project been indicated with the aid of suitable maps?	Y	C	Yes.
7.2 Have the land uses on the project site(s) and in the surrounding areas been described together with an indication of their sensitivity to the proposed project? Photos, maps and images should be used to show the various land uses in relation to the project.	Y	C	Yes. Currently there is no actual use of the land at any of the site options, but the consultants need to add the information obtained during the focus group meetings relating to the industrial area, the expansion of the R43 road and the tolling plans. More photographs could be used.
7.3 Have the <i>biophysical</i> components of the environment likely to be affected by the project been identified and described in sufficient detail for a Scoping Report? 7.3.1 <i>Climate (wind, precipitation, temperature, evaporation etc)</i>	Y	I	Not considered and yet issues such as fires, strong winds, heavy rain and flooding need to be considered in relation to final site selection and site management plans relating to stormwater management, wind and fire protection.
7.3.2 <i>Geology (rock type, structure, geochemistry, seismicity, etc)</i>	Y	A	The description is adequate for scoping. More site specific data must be provided in the EIA and the information needs to be interpreted in terms of its relevance to the design and operation of this project e.g. need for blasting, mass balance of cut and fill, etc.
7.3.3 <i>Soils (agricultural and rehabilitation potential)</i>	Y	A	The description is adequate for scoping. More site specific data must be provided in the EIA and the information needs to be interpreted in terms of its relevance to the design and operation of this project, e.g. soil erodibility potential, rehabilitation potential, agricultural potential.
7.3.4 <i>Topography (slopes, erosion, screening)</i>	Y	A	The description is adequate for scoping. More site specific data must be provided in the EIA and the information needs to be interpreted in terms of its relevance to the design and operation of this project, e.g. screening factors, visibility, erodibility (in conjunction with the soil study), etc.. Include the relevant section of the 1:50,000 map to provide a better indication of the topography.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
7.3.5 <i>Surface hydrology (flood lines, runoff, flows, supply, users, wetlands, dams, lakes)</i>	Y	A	The description is adequate for scoping. More site specific data must be provided in the EIA and the information needs to be interpreted in terms of its relevance to the design and operation of this project, e.g. flooding potential. Figure 5-6 needs better resolution of the image. The description of the regional drainage would be helped by including a map showing the relevant rivers and coastal wetlands (preferably the 1:50,000 sheet of the relevant area).
7.3.6 <i>Groundwater (aquifers, yields, permeability, users, gradients etc)</i>	Y	I	For most of the site, groundwater is probably not an issue, but the scoping report mentions that it may be quite shallow in the vicinity of the dam (site 3). No further work has been proposed to follow up on this, which is an omission – or does this form part of the geotechnical investigation?
7.3.7 <i>Hydrochemistry (organic, inorganic, physical)</i>	Y	I	The baseline water quality has not been described. Construction activities will result in increased turbidity and TDS, as well as other potential contaminants e.g. hydrocarbons. Therefore the baseline water quality of affected water courses and the dam needs to be determined.
7.3.8 <i>Air quality (ambient and seasonal, dust, gas and odour)</i>	N	-	The main sources of air pollution at present are from wood burning in Botrivier, veld fires (especially during summer) and from the N2 highway (vehicle fumes), but the project will not contribute to these loads. We know that the construction of the project will result in some dust, and this will need to be managed through the EMP. The scoping report concludes (correctly) that the impact of additional vehicle fumes from the construction site on ambient air quality is unlikely to be significant.
7.3.9 <i>Flora (vegetation types, diversity, endemic, endangered, alien and invasive spp)</i>	Y	C	
7.3.10 <i>Terrestrial fauna (populations, diversity, endemic, endangered, alien and invasive spp)</i>	Y	A	The scoping report concludes that that there are unlikely to be any species of conservation importance on the site due to its disturbed nature and the level of surrounding disturbance (town of Botrivier, roads, energy infrastructure). However, species which may not have any conservation value may be important for ecosystem functioning and therefore they need to be understood. Table 5.2 needs to be more site-specific; it is rather misleading to list African Oystercatcher, Cape Cormorant, African Openbill, Blue Crane and Striped Flufftail and others, when there is

	Relevant? Yes/No	Judgement (C/A/I)	Comments
			patently no suitable habitat for them on site.
7.3.11 <i>Freshwater and/or marine aquatic ecology (populations, diversity, endemic, endangered, alien and invasive spp)</i>	Y	I	The report does not address the issue of aquatic fauna at all. Do the streams, ephemeral water courses and the dam provide habitat suitable for fish, amphibians, invertebrates and what is their role in the overall food web?
7.4 Have the <i>social</i> components of the environment likely to be affected by the project been identified and described in sufficient detail for a Scoping Report?			
7.4.1 <i>Social structure of local community</i>	Y	A	Adequate for scoping.
7.4.2 <i>Demographics</i>	Y	A	Adequate for scoping.
7.4.3 <i>Skills</i>	Y	I	Information not provided. This needs to be addressed in the EIA.
7.4.4 <i>Employment</i>	Y	A	Basic information has been provided, but this needs greater elaboration in the EIA.
7.4.5 <i>Community facilities and services</i>	Y	A	Adequate for scoping.
7.4.6 <i>Amenities</i>	N	-	Not relevant.
7.4.7 <i>Settlement patterns</i>	Y	A	Adequate for scoping.
7.4.8 <i>Aesthetics (visual, noise, odour, sense of place, quality of life etc)</i>	Y	A/I	Only visual impact considerations have been described. The project will have an impact on noise. The sense of place has already been compromised by the presence of the town of Botrivier, alien invasive species, existing roads and powerlines.
7.4.9 <i>Health</i>	Y	I	Not addressed and yet, the project will have some direct and indirect impacts on health.
7.4.10 <i>Transportation, mobility and safety</i>	Y	A/I	The current road infrastructure has been described, but the scoping report needs to be amended to add in the additional information received during the focus group meetings regarding the future plans to widen the R43, the toll road plans (including toll plazas).
7.4.11 <i>Other (please specify)</i>	N	-	
7.5 Have the <i>cultural</i> components of the environment likely to be affected by the project been identified and described sufficiently for the prediction of impacts?			
7.5.1 <i>Sites of spiritual and/or religious significance</i>	N	-	None found.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
7.5.2 <i>Sites of cultural significance</i>	Y	?	The scoping report mentions (in s 5.9.3) that there are some historic buildings on properties “in the study area”. These are listed as Boontjieskraal and Compagnies Drift – are these actually <i>in</i> the study area? If not, is it relevant to mention them – will they be affected directly or indirectly by the project, given that there are already numerous powerlines and a substation on and adjacent to this project?
7.5.3 <i>Sites of historical significance</i>	Y	A/I	The description relates more to a much wider region than the actual study site, which has already been compromised in terms of sense of place – is this information really relevant?
7.5.4 <i>Archaeological sites</i>	Y	I	Needs to focus on the actual project site.
7.6 Have the <i>economic</i> components of the environment likely to be affected by the project been identified and described in sufficient detail for a Scoping Report?	Y	A/I	A brief overview of the economy of the Theewaterskloof Local Municipality has been provided, however the reviewer questions the current status of tourism in the town of Botrivier, as mentioned on pages 57 and 88. If tourism has been identified in regional planning as a future goal then this needs to be explicitly stated. As far as the reviewer knows, the town of Botrivier itself is not a tourist destination and does not have a tourist industry.
7.6.1 <i>Local, regional and national economic indicators</i>			
7.6.2 <i>Multiplier effect</i>			
7.6.3 <i>Forward and backward linkages</i>			
7.6.4 <i>Local spending</i>			
7.6.5 <i>Sectoral strengthening</i>			
7.6.6 <i>Import and export potential</i>			
7.6.7 <i>Tax base and revenue generation</i>			
7.6.8 <i>Resource economics</i>			
7.6.9 <i>Cost-benefit analysis</i>			
7.7 Have the authors of the Scoping Report adequately consulted the latest literature and/or unpublished reports and/or data relevant to the study and cited their sources?	Y	A	Yes.
8 DESCRIPTION OF IMPACTS			
8.1 Have the direct and indirect/ secondary effects of constructing, operating and, where relevant, after use or decommissioning of the project been clearly identified (including both positive and negative effects)?	Y	A	The report includes a chapter on the anticipated impacts, but it deals mostly with direct impacts only.

		Relevant? Yes/No	Judgement (C/A/I)	Comments
8.2	Does the Scoping Report provide a brief description of how the project activities may affect the environment, including a qualitative assessment of the nature, duration, magnitude, extent and significance of the impacts on:			
8.2.1	<i>Air quality (dust, gas, odour)</i>	Y	A	Diesel fumes are not considered to be significant. Dust is considered to be a short-term temporary impact. This may be so, but will need to be managed properly during construction.
8.2.2	<i>Climate change scenarios</i>	Y	I	Indirectly, climate change and related energy policy could impact this project in a variety of ways: increased number of fires and/or heavy rainfall events, an increase in the number of windfarms and related transmission lines, construction of a nuclear power station at Bantamsklip, etc. The bigger picture needs to be addressed in the EIA.
8.2.3	<i>Topography</i>	Y	A/I	The impact of topography on visual impact has been identified as a key issue and will be addressed further in the visual impact assessment. The issue of erosion has not been identified as an impact (see also comment on soils below).
8.2.4	<i>Surface water resources</i>	Y	A	The presence of streams and other wetlands has been identified as an issue and will be addressed in the EIA.
8.2.5	<i>Ground water resources</i>	?	?	This has not been identified as an issue, and needs to be clarified.
8.2.6	<i>Water quality (surface and ground water)</i>	Y	A/I	The impact of construction on water quality has been identified as an issue, but the proposed specialist studies do not mention the need, or methodology required to determine the water quality baseline prior to construction. This needs clarification.
8.2.7	<i>Soils</i>	Y	A/I	While the impact on agricultural potential has been listed as an impact, the potential for erosion, especially on the steeper sites, has not been identified as an issue. Furthermore, these soils are usually difficult to rehabilitate successfully and some attention needs to be given to determining soil quality to inform the rehabilitation plan.
8.2.8	<i>Noise</i>	Y	A	Considered to be a short-term, temporary impact during construction. Will need to be managed through the EMP.
8.2.9	<i>Vegetation</i>	Y	C	Good discussion of potential impacts.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
8.2.10 <i>Terrestrial fauna</i>	Y	C/I	Avifauna: the report highlights key impacts. Other terrestrial fauna: The report concluded that there were unlikely to be any species of conservation importance on the site, and therefore the ecological study (and discussion of impacts) focuses on vegetation. The reviewer suggests that a more holistic ecosystem approach should be followed.
8.2.11 <i>Aquatic ecology (freshwater)</i>	Y	C	The report recognises that some wetlands may be adversely affected.
8.2.12 <i>Historic and cultural heritage</i>	Y	I	The discussion is largely theoretical at this stage and not site-informed. Further studies (and indeed, construction) will determine whether any impacts may occur.
8.2.13 <i>Land use</i>	Y	A/I	The loss of agricultural opportunity has been identified as an impact. Perhaps other land uses should be taken into consideration as well e.g. industrial use, road widening, etc. Care needs to be taken when discussing the “impacts on the tourism industry” as there is little tourism activity in Botrivier at present.
8.2.14 <i>People and communities</i>	Y	A	
8.2.15 <i>Livelihoods</i>	Y	A	
8.2.16 <i>Health</i>	Y	A	Mentioned in general terms, but perhaps this needs to specifically refer to EMF-related health impacts (especially cumulative effects), HIV and STIs.
8.2.17 <i>Sense of place (visual impact, project suitability and compatibility)</i>	Y	A	The issues of visual impact and impacts on sense of place have been identified, however, the interpretation of the study findings needs to take into account the current impact of the existing powerlines, the presence of the town of Botrivier, the existing and possible future road network, the impact of fire and alien plant invasions, etc on scenic quality and sense of place. In other words, the study needs to determine the additive impact of this project. The VIA specialist also needs to take care to determine the type and size of various project structures as the list on p 89 (s. 7.10) may not be an accurate reflection of what will actually occur on site.
8.2.18 <i>Transportation and traffic</i>	Y	I	There could be significant impacts on traffic flow near the site and on major arterial roads during the transportation of major structural components, e.g steel, transformers, conductors, etc. This issue has not been identified as a key impact.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
8.2.19 <i>Local, regional and national economic indicators</i>	Y	A/I	Some economic impacts have been identified. Far more work will be required to quantify these impacts in the EIA.
8.3 Have trans-boundary impacts been identified?	N	-	
8.4 Are cumulative impacts considered?	Y	I	This is a critical issue and needs far greater elaboration in the EIA: <ul style="list-style-type: none"> • At site-level – the cumulative effects of 2 substations and many powerlines, now and in future and the impacts on aesthetics, birds, health, etc; • At regional-level – will the presence of a new larger substation induce future powerline infrastructure, especially from windfarms and if the nuclear power station is built at Bantamsklip, and what will the cumulative impact of that be?
8.5 Have the constraints of the environment on the construction and operation of the project been considered i.e. are there any environmental constraints to development?	Y	I	The impact of fire, high winds and heavy rainfall on the construction and operation of the new substation and its associated transmission infrastructure needs to be taken into consideration and appropriate risk management plans developed in the EIA.
9 MITIGATION			
9.1 Does the Scoping Report provide any information about possible mitigation measures that might be considered to mitigate negative impacts and enhance project benefits?	Y	A/I	Some mitigation measures are mentioned e.g. putting in buffer zones, working within powerline corridors. It is expected that the EMP will provide a comprehensive set of mitigation measures.
9.2 Are the mitigation measures recommended in the report meaningful, practical and within the resources of the proponent to implement?	Y	A	Insofar as any have been mentioned, the measures could be implemented.
10. NON-TECHNICAL SUMMARY			
10.1 Is there a non-technical summary that will easily be understood by a lay-person?	Y	C	Yes.
10.2 Does the summary include a brief explanation of the overall approach to the assessment and the way forward for the EIA?	Y	C	Yes.
10.3 Does the summary contain a brief but concise description of the project and the environment?	Y	A/I	A brief description of the project is provided , but not of the receiving environment.
10.4 Does the summary clearly identify the main potential positive and negative impacts?	Y	I	The Summary does provide a partial list of negative impacts, but this is not complete and none of the positive impacts have been listed. This needs to be rectified in the final scoping report.

	Relevant? Yes/No	Judgement (C/A/I)	Comments
10.5 Does the summary provide an overview of the recommendations of the Scoping Report, including further specialist studies, baseline monitoring etc. which may be required?	Y	A/I	Yes, but the list is incomplete. The following need to be added to this list: <ul style="list-style-type: none"> • Traffic impact assessment; • Cumulative effects assessment; • Sustainability assessment; • A health impact assessment; • An economic assessment.
10.6 Does the summary provide a list of the key issues and concerns raised by the I&APs?	Y	I	No. The Executive Summary needs to be updated with a list of the issues and concerns raised during the public open house and the focus group meetings and any other comments received during the comment period.
11. GENERAL APPROACH			
<i>Organisation of the information</i>			
11.1 Is the information logically arranged in sections?	Y	C	
11.2 Is the location of the information identified in an index or table of contents?	Y	C	
11.3 When information from external sources has been introduced, has a full reference to the source been included?	Y	C	
11.4 Does the report or appendices contain the Terms of Reference for the scoping study?	Y	I	No, the ToR for the consultants to undertake the scoping study have not been included.
11.5 Are the credentials (including professional certification status if appropriate) of the scoping team presented, with a clear indication of their respective contributions?	Y	C	Yes (Chapter 2).
<i>Presentation of the information</i>			
11.6 Has information and analysis been presented so as to be comprehensible to the non-specialist, using maps, tables and graphical material as appropriate?	Y	A	

		Relevant? Yes/No	Judgement (C/A/I)	Comments
11.7	Are the maps at an appropriate scale, show co-ordinates, north sign, contours, drainage, settlement, landmarks, administrative boundaries etc in relation to the proposed project site?	Y	A	A regional map (at 1:50,000 scale) would be useful to orientate the reader. The map should include: Hermanus, Kleinmond, Hawston, the Bot River, conservation areas, main roads, Wildekrans Trust, and other points mentioned in the text. A regional power infrastructure map (current and proposed) would be useful. Some images need to be reproduced at a higher resolution e.g. Figure 5.6.
11.8	Has superfluous information (i.e. information not needed for the decision) been avoided?	Y	A/I	Some descriptions do not relate to the site at all – e.g. in the sections on avifauna and heritage discussion.
11.9	Have prominence and emphasis been given to severe adverse impacts, to substantial environmental benefits, and to controversial issues?	Y	I	A succinct summary of the issues of concern and benefits needs to be included in the main report and in the Summary.
11.10	Is the information objective?	Y	A	Yes.
11.11	Are all the supporting studies and appendices present?	Y	I	None of the specialist reports used for the scoping study have been included. This needs to be rectified in the final scoping report.