

## Draft Decommissioning Plan

1. As stated above, one of the NAQO's conditions for granting Eskom's application in relation to Hendrina; Arnot; Camden; Grootvlei; and Kriel was that it submit a decommissioning plan. While the NAQO was not prescriptive about what must be contained in a decommissioning plan, it is clear that the decommissioning schedule submitted by Eskom, as well as the Atmospheric Impact Report ("**AIR**"); a summary of the AIR; a cost benefit analysis focused mainly on health; and the public participation report attached to its application were insufficient to satisfy that requirement.
2. In the light of the above and the fact that there is no legislation or framework setting out what a decommissioning plan ought to contain, the Forum proposes below what, at a minimum, the decommissioning plan must address. The plan must address:
  - 2.1. General information about the power plant;
  - 2.2. Engineering/activity plan;
  - 2.3. Cost of decommissioning and fully funded financing plan;
  - 2.4. Public consultation and stakeholder engagement strategy / plan; A part of this needs to be specific to directly affected parties (employees, contractors, suppliers, service providers, etc). Somewhere and somehow organised labour needs to be engaged noting that Eskom is not alone in ending the life of projects and dealing with the consequences, workforce downscaling, etc. There are lessons to be learned from other sectors and operations, two of which are (i) how to avoid genuine efforts at finding resolutions being hijacked by special interest groups (ii) how to moderate expectations, especially because Eskom is an SOE, with many citizens viewing SOEs as having an infinite pool of resources (money) to meet every need, demand, etc. The point is that this is not 'ordinary'/'run-of-the-mill' stakeholder engagement (it is tailored, specific, focussed, and extremely complex because there will be many competing needs and desires.
  - 2.5. A socio-economic conditions and impact assessment report (Local economic development; employment; health; diversification plan;
  - 2.6. Health and safety risk assessment;

2.7. Air Quality Impact Assessment

2.8. Geotechnical Assessment (restoration of the land; water waste);

2.9. Local economic development and diversification plan; and

2.10. Rehabilitation and / or repurposing plan.

**Wastes for several waste streams, including hazardous wastes.**

**Investigation of alternatives, e.g. it may be better to leave structures in situ to avoid having to deal with mega tons of different wastes that require disposal.**

**Recycling and reuse.**

### **General information on the power plant**

3. The purpose of this section of the decommissioning plan is to address all the information regarding the power station. The information that must detail:

3.1. Historical context;

3.2. Location of the plant;

3.3. Details of the property, layout and boundary lines;

3.4. Current operations;

3.5. Technical profile of the plant; and

3.6. The reason for the decommissioning the plant.

### **Planning**

4. A detailed schedule for and detailed description of each phase of the decommissioning process such as:

4.1. the decommissioning planning;

4.2. remediation and reclaiming planning;

- 4.3. decommissioning of the power plan; and
- 4.4. remediation and reclamation – project closure.

### **Cost of decommissioning and financing plan**

#### **5. The finance section must address:**

- 5.1. Projected cost for decommissioning of the plant;
- 5.2. Cost of retraining and reskilling of employees;
- 5.3. Retrenchment packages;
- 5.4. Providing training to members of the community;
- 5.5. Rehabilitation of the land;
- 5.6. Asset and infrastructure management;
- 5.7. Supporting communities to mitigate impact of decommissioning the plant; and
- 5.8. Supporting local SMMEs which directly or indirectly service the plant.

### **Public consultation and engagement strategy**

#### **6. In the public engagement strategy, Eskom should endeavour to address the conditions contemplated in the Public Participation Guideline in terms of National Environmental Management Act, 1998 Environmental Impact Assessment Regulations. The public engagement strategy should, amongst other things,**

- 6.1. Identify relevant stakeholders that must be consulted regarding the decommissioning process. At a minimum, the following stakeholders must be consulted:
  - 6.1.1. communities affected by the power plant;
  - 6.1.2. employees and organised labour;
  - 6.1.3. SMMEs and other business in the area;
  - 6.1.4. local, provincial and national government; and
  - 6.1.5. civil society organisations.

- 6.2. Contain a preliminary schedule for the public engagements and the schedule should provide for at least one consultation before the commencement of each phase of the decommissioning process.
- 6.3. Identify the most effective and efficient methods of disseminating information in the area the plant is situated in order to ensure that information reaches the relevant stakeholders. Eskom must produce educational pamphlets setting out the key information regarding the decommissioning process.
- 6.4. Timelines for the decommissioning process. It must be clear when the plant will be completely shut down and there must be key milestones that can be used to determine the progress of the decommissioning process.

#### **A socio-economic conditions and impact assessment**

7. The decommissioning plan must include a report on the socio-economic conditions in the region. The report must detail the impact on:
  - 7.1. Communities and households;
  - 7.2. Local, regional and national employment and economy;
  - 7.3. The town, settlements and possible relocation of people to other areas;
  - 7.4. Access to electricity;
  - 7.5. Access to water and sanitation;
  - 7.6. Other sources of energy generation;
  - 7.7. Housing (formal versus informal dwelling);
  - 7.8. Access to health care;
  - 7.9. Access to education;
  - 7.10. Unemployment rate in the area by age group, gender and nationality;
  - 7.11. The number of people living on social grants and to what extent this number may increase due to job losses;
  - 7.12. The other socio-economic issues in the region; and

- 7.13. Main industries and employers in the region.

## **Health and safety risk assessment**

### **Air Quality Impact Assessment**

8. The decommissioning plan must include a report on the Air Quality impacts due to the decommissioning activities. The report must detail the impact on:
- 8.1. The identification of sources of emissions and pollutants that will be released during each activity/phase of the decommissioning; and
  - 8.2. A description of the pollutants to be released and their health impacts when inhaled;
  - 8.3. A detailed dust and air quality management plan to address emissions from each source. Plan should for each identified source list the following:
    - 8.3.1. Source of emission;
    - 8.3.2. Pollutants released;
    - 8.3.3. Mitigation/management measure;
    - 8.3.4. Responsible person;
    - 8.3.5. Implementation timeframe;
    - 8.3.6. Implementation frequency;
    - 8.3.7. Verification; and
    - 8.3.8. Supporting document.
  - 8.4. Ambient air quality monitoring and data analysis on a continuous basis based on surrounding air quality monitoring stations, with data reports being submitted to the competent authority monthly, indicating any non-conformances and rectifying actions taken to address the non-conformances.

## **Geotechnical Assessment (restoration of the land; water waste)**

### **Economic development and diversification plan**

9. Eskom working together with the local and provincial spheres of government should develop an economic diversification plan for the surrounding district and region. The economic diversification plan must:
- 9.1. Be aligned with the local integrated Development Planning process.

- 9.2. Be formulated in consultation with the employees and members of the relevant communities.
- 9.3. Propose solutions to mitigate the impacts and risks of the decommissioning of the plant and indicate when, how and who should be involved in the implementation of the proposed solutions.
- 9.4. Prioritise vulnerable groups that are often excluded from participating in the local and national economy, focusing on women and youth.
- 9.5. Identify SMMEs that have the potential to contribute to the development and diversification of the local economy and must clearly set out how it will support them to ensure that their potential is realised.
- 9.6. In relation to Eskom's employees, indicate:
  - 9.6.1. the education, skill and qualification level of each employee;
  - 9.6.2. each employee's age;
  - 9.6.3. the number of employees that will be retained, retrained and / or reskilled;
  - 9.6.4. the number of employees that will be retrenched and trained for other industries or to seek employment with other employers in the region;
  - 9.6.5. the number of employees that will be retrenched without an option to be trained for the purposes of seeking employment elsewhere; and
  - 9.6.6. the selection criteria for retaining, retrenching, retraining or training employees.
- 9.7. In relation to the community members in the region, indicate plans or initiatives to address the socio-economic issues identified in the socio-economic conditions and impact report.

#### **Land, asset and infrastructure report**

10. The plan must also deal with the land and buildings owned by Eskom which are related or linked to the plant that will be decommissioned. This should include a list of buildings in the community that are used by the community for various purposes.

11. Provide an inventory of its assets and existing infrastructure and indicate whether the infrastructure and / or assets can be repurposed:

**Rehabilitation and / or repurposing plan**

12. The plan must set out if the repurposing of the plant, for any use whatsoever, is not possible. Eskom must then explain why this is the case.
13. If Eskom intends to repurpose the power plant, it must set out all the various ways of how it can be repurposed. It must address the following:
  - 13.1. The timelines for the repurposing project;
  - 13.2. Key milestones;
  - 13.3. Transitioning measures it will put in place;
  - 13.4. The number of employees that will be retained for that purpose and the selection criteria; and
  - 13.5. When it intends to commence retraining and reskilling the employees that will be retained.