



**TRANS-CALEDON TUNNEL AUTHORITY**

**CONSULTING SERVICES FOR THE MOKOLO CROCODILE  
WATER AUGMENTATION PROJECT PHASE 2  
(MCWAP-2)**

**CONTRACT № TCTA 20-041**

**COMMENTS AND RESPONSES REPORT FOR THE  
PROPOSED RE-ROUTING OF THE HIGH LIFT RISING MAIN  
(HLRM) DUE TO THE PROXIMITY OF EXISTING ESKOM  
POWERLINES**

**May 2024**

**GBN JOINT VENTURE Report No:2A-R-V005-92 (Rev-A)**





# MOKOLO CROCODILE WATER AUGMENTATION PROJECT PHASE 2

(MCWAP-2)

CONTRACT № TCTA 20-041

## DOCUMENT CONTROL SHEET

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# MOKOLO CROCODILE WATER AUGMENTATION PROJECT PHASE 2

## CONTRACT № TCTA 20-041

### COMMENTS AND RESPONSES REPORT

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## **1 INTRODUCTION**

The GIBB-Bigen-Nyeleti Joint Venture (GBN-JV) on behalf of the Applicant, Department of Water and Sanitation (DWS), is applying for Environmental Authorisation (EA) in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the 2014 EIA Regulations (as amended), subject to a Basic Assessment process, for the Re-routing of the High Lift Rising Main (HLRM) due to the proximity of existing Eskom Powerlines (hereafter referred to as “Project”).

## **2 BASIC ASSESSMENT REPORTING PERIOD**

The previous comment period for the Draft Basic Assessment Report (BAR) commenced on 19 January 2024 and ended on 21 February 2024. Two registered interested and affected parties provided comments during this period, and comments were also received from the Competent Authority (DFFE) as well as a Commenting Authority (LEDET):

1. Mr. Albre Badenhorst;
2. Servitudewatch represented by Mr. Bernard Enslin,
3. Department of Forestry, Fisheries and the Environment (DFFE); and
4. Limpopo Department of Economic Development, Environment and Tourism (LEDET)

Comments received during the comment period for this Draft BAR, 20 May 2024 to 24 June 2024, will be added to this Comments and Responses (C&R) Report.

## **3 COMMENTS AND RESPONSES REPORT**

This Comments and Responses Report (CRR), which accompanies this Draft Basic Assessment Report, serves to record the comments received from authorities and Interested and Affected Parties (I&APs) during the Basic Assessment Process. This CRR also attempts to address these comments through responses and input provided by the Applicant, Project Team and EAP, including the previous environmental process.

**Table 1: Comments received during the comment period from the previous environmental process.**

NO	COMMENT	RESPONSE
<b>EMAIL RECEIVED FROM MR. ALBRE BADENHORST</b>		
1	Kindly explain to me how this is possible at this late stage of the project - surely the proximity of the pipelines should have been evident to all and sundry that did the original EIA?	Eskom provided wayleave approval for the original alignment, but recent interaction with Eskom Officials highlighted risks during the MCWAP2 construction and operational phases that are deemed too high.
<b>EMAIL RECEIVED ON 21 FEBRUARY 2024 FROM MR. BERNARD ENSLIN</b>		
2	Specialist studies p iv  The wildlife impact assessment conducted for the EIA 2019 should be part of this assessment as Mecklenburg 310 KQ P 1 and Paarl 124 KQ p 0 is game breeding, cattle farming and Hunting farms.	The Environmental Management Programme (EMPr) has captured the mitigation measures from the Wildlife Impact Assessment Report (December 2018), which is applicable to this application as well.
	Impact assessment p vi  The contention based on an insignificant to very low impact is a bit of generalisation as again the permanent servitude and service road through the middle of Paarl 124 Kq P 0 and Mecklenburg 310 KQ p 1 cannot be low to insignificant as the location of the intended route is very significant.	The impact assessment followed the Impact Assessment described in Section 7. An example of how the significance is calculated is explained in below i.e the response to <i>Page 74 of 101 Tabulation</i> .  Security, nuisance, poaching, rubble, and closing of gates are considered as important aspects for the project and therefore the EMPr has captured mitigation measures to ensure that the aspects are managed appropriately.

	<p>Security, nuisance, poaching, rubble, gates left open and the fact that both these properties have a cumulative impact due to existing powerline servitudes. This is very significant and is not properly addressed.</p>	
	<p>Point 1.2 current MCWAP2A EA  Specialist studies on page 5 of 101 does not refer to wildlife impact study which should be part of this assessment and should be taken into consideration again referring to properties Paarl 124 KQ p 0 and Mecklenburg 310 KQ p 1.</p>	<p>The EMPr has captured the mitigation measures from the Wildlife Impact Assessment Report (December 2018). The Wildlife Study was conducted as part of the 2018 environmental process conducted by Nemaï Consulting. The mitigation measures of this assessment are already captured in the EMPr.</p>
	<p>3.2.1 Pipelines Construction page 27 of 101  Please explain in a broader context what is meant by the manufacturing of the pipes will determine the start of the pipe laying activities and very important the statement that pipe laying is not foreseen to be a critical activity.  I can not agree with these 2 statements.</p>	<p>The two statements that you are referring to are as follows:  <i>“Limited Side-Boom Pipe Laying Machines are available in South Africa and it is expected that an international contractor will bring in equipment from abroad. Pipe laying is not foreseen as a critical activity and the manufacturing of pipes will determine the start of pipe laying activities.”</i>  Various activities are included in the Construction Schedule for the MCWAP2. The manufacturing of the pipeline is a so called “long lead item”, which refers to those components of the schedule that are sourced and manufactured offsite. Thus, for pipe laying to commence, steel must first be sourced, whereafter the pipes need to be manufactured and delivered to site. At this stage, grouting at the weir is on the construction programme critical path and not pipe laying.</p>
	<p>4.1.1 Constraints analysis page 30 and 31  The risk is less but what about the impact and risks to the landowners.  This should form part of the risk analysis as the proposed least risk route has a</p>	<p>The impact and risk to all the Landowners have been incorporated into the risk analysis, specifically the following aspects (as listed in Table 12: Constraints considered in the Comparative Analysis): Public Health &amp; Safety, Large Structures/Houses, Structures within Vibration and Blast Zones, Traffic and Accessibility. These aspects take into consideration risks that could impact on landowners.  Furthermore, face to face discussions were held with the available Landowners to acquire their inputs and preferences.</p>

	<p>significant risk for the landowner, higher than the original route. Was this assessed and taken into consideration?</p> <p>If not, it should be part of the risk analysis.</p>											
	<p>Page 74 of 101 Tabulation The indication of low negative needs to be explained in a broader context and the weights applied should be explained,</p> <p>I cannot understand from the tabulation how the conclusion was reached.</p> <p>Clearing of vegetation, trees specifically is an irreplaceable resource and habitat for many species. Please explain this assessment</p> <p>The mitigation measures are funny to say the least.</p>	<p>The Impact Assessment table that you are referring to is <i>Impact of Floral Destruction and Fauna Displacement as a result of vegetation clearance and resultant habitat destruction</i>.</p> <p>The Table below provides guidance on how the significance was calculated which is in line with Section 7 of Basic Assessment Report (BAR). The methodology in Section 7 was done in accordance with the Environmental Impact Assessment (EIA) Regulations, promulgated in terms of Section 24 of the National environmental management Act (NEMA) and the criteria drawn from the Integrated Environmental Management (IEM) Guidelines Series, Guideline 5: Assessment of Alternatives and Impacts, published by the Department of Environmental Affairs (April 1998).</p> <p>The findings from the Ecology Assessment (their desktop assessment and field investigation) were also taken into consideration when compiling the impact assessment table.</p> <p>As provided in the Draft BAR (Section 5.1.3), the ecology specialist (Hooten &amp; Styn, 2023) identified that most of the study area (and the alternatives) are located in the Dwaalboom Thornveld habitat. According to the South African National Biodiversity Institute (SANBI, the Dwaalboom Thornveld habitat is considered as a “Least Concerned” vegetation type. The habitat can broadly be described as having a short-to-tall, open-to-closed thicket structure, due to variation in the landscape.</p> <p>In terms of floral Species of Conservation Concern (SCC), the specialist noted the location of species that have been recorded within the properties of the three alternatives. Refer to Figure 9 of the Basic Assessment Report (page 48 of 104), which indicates the positioning of the SCC; the SCC are not located in the re-alignment footprint but rather on the periphery of the alternative footprint. Furthermore, the specialist verified that no Red Data Listed (RDL) species are anticipated to occur in the study area and that the project area is of low sensitivity.</p> <p style="text-align: center;"><i>Table 1: Explanation of the Impact of Floral Destruction and Faunal Displacement as a result of vegetation clearance and resultant habitat destruction (pre-mitigation)</i></p> <table border="1" data-bbox="824 1241 2069 1329"> <thead> <tr> <th data-bbox="824 1241 994 1329">Criteria</th> <th data-bbox="994 1241 1391 1329">Explanation of assessment Criteria from table 20 of the BAR</th> <th data-bbox="1391 1241 1787 1329">Outcome of Criteria and Rating Scales from Table 19 of the BAR</th> <th data-bbox="1787 1241 2069 1329">Scoring assigned to the Criteria from</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>			Criteria	Explanation of assessment Criteria from table 20 of the BAR	Outcome of Criteria and Rating Scales from Table 19 of the BAR	Scoring assigned to the Criteria from				
Criteria	Explanation of assessment Criteria from table 20 of the BAR	Outcome of Criteria and Rating Scales from Table 19 of the BAR	Scoring assigned to the Criteria from									



			Table 21 of the BAR			
		Duration	The lifespan of the impact is indicated as temporary, short, medium and long term.	The duration of the activity associated with the impact will last 6-18 months. The duration is therefore considered "Short term".	Short term	2
		Extent	This refers to the spatial scale at which the impact will occur. Extent of the impact is described as: footprint (affecting only the footprint of the development), site (limited to the site) and regional (limited to the immediate surroundings and closest towns to the site). Extent or scale refers to the actual physical footprint of the impact, not to the spatial significance. It is acknowledged that some impacts, even though they may be of small extent, are of very high importance, e.g. impacts on species of very restricted range. In order to avoid "double counting, specialists have been requested to indicate spatial significance under "intensity" or "impact on irreplaceable resources" but not under "extent" as well.	The impact will affect only the development area. The extent is therefore considered to impact the "Site".	Site	2
		Severity	This is a relative evaluation within the context of all the activities and the other impacts within the framework of the project. Does the activity destroy the impacted environment, alter its functioning, or render it slightly altered?	The severity of the impact is rated as Moderate negative as the affected environment is altered but natural, cultural and social functions and processes continue albeit in a modified way; and valued, important, sensitive or vulnerable systems or communities are negatively affected	Moderative negative	-2
		Impact On Irreplaceable Resources	This refers to the potential for an environmental resource to be replaced, should it be impacted. A resource could possibly be replaced by natural processes (e.g. by natural colonisation from surrounding areas), through artificial means (e.g. by reseeding disturbed areas or replanting rescued species) or by providing a substitute resource, in certain cases. In natural	Protected plants and trees would be removed to another location. The relevant permit must be obtained before moving, cutting or removal of protected trees and or plants. The regrowth of vegetation within the affected area can be implemented. The mitigation measures and recommendations will guide this process.	No	0

			<p>systems, providing substitute resources is usually not possible, but in social systems substitutes are often possible (e.g. by constructing new social facilities for those that are lost). Should it not be possible to replace a resource, the resource is essentially irreplaceable e.g. red data species that are restricted to a particular site or habitat of very limited extent.</p>	<p>The ecology specialist confirmed that there a no Red Data species within the study area.</p> <p>The affected site was therefore assigned a value of "0" which corresponds to No, as vegetation can be replaced or relocated.</p>		
		<b>Consequence</b>	<p>The consequence of the potential impacts is a summation of above criteria, namely the extent, duration, intensity and impact on irreplaceable resources.</p>	<p>The consequence of the potential impacts is a summation of above criteria, namely the extent, duration, intensity and impact on irreplaceable resources.</p> <p>The consequence is calculated using the above-mentioned criteria i.e                      Consequence = [(Duration + Extent + Impact Irreplaceable Resources)] x Severity                       Consequence = [(Short term) + (Site) + (No)] x (Moderative -negative)                       Consequence = [(2)+(2)+(0)] x (-2)                      Consequence = (4) x (-2)                      Consequence = -8</p> <p>Therefore, the score assigned for Consequence is -8. According to Table 21, the value of -8 is in a range of values that are regarded as Slightly Detrimental (-7 to -12).</p>	Slightly detrimental	-8
		<b>Likelihood</b>	<p>The probability of the impact actually occurring based on professional experience of the specialist with environments of a similar nature to the site and/or with similar projects. It is important to distinguish between probability of the impact occurring and</p>	<p>In order to calculate Significance, the Probability which is the Likelihood of the impact occurring, is determined.                      Based on the breakdown of the criteria on Table 19, the impact is more than 75% certain that the impact will occur;</p>	3	Definite

			<p>probability that the activity causing a potential impact will occur. Probability is defined as the probability of the impact occurring, not as the probability of the activities that may result in the impact.</p>	<p>the vegetation will be cleared for the alignment. The Likelihood is therefore "Definite". According to Table 21, the score assigned to "Definite" is 3.</p>		
<p><b>Calculation of Significance</b></p>						
		<p>Significance</p>	<p>Impact significance is defined to be a combination of the consequence and probability of the impact occurring. The relationship between consequence and probability highlights that the risk (or impact significance) must be evaluated in terms of the seriousness (consequence) of the impact, weighted by the probability of the impact actually occurring.  For instance, if the consequence and probability of an impact is high, then the impact will have a high significance.  The significance defines the level to which the impact will influence the proposed development and/or environment. It determines whether mitigation measures need to be identified and implemented and whether the impact is important for decision-making.</p>	<p>Significance is a function of Consequence and Probability  Significance if therefore calculated as followings: Significance = Consequence x Probability Significance = (-8) x (3) Significance = -24  According to Table 21, the value of -24 is in a range of values that are regarded as Low Negative (-19 to -36).</p>	<p>-24</p>	<p>Low negative</p>
<p>As noted in Table 20, mitigation measures are designed to reduce the consequence or probability of an impact, or to reduce both consequence and probability. The significance rating of Low Negative (-24) is rating without mitigation measures.</p> <p>The Draft BAR presented the current MCWAP2A Environmental Authorisation in Section 1 which highlights that there have been various environmental studies regarding ecology for the MCWAP2. The mitigation measures from the various ecology reports have been captured in the Environmental Management Programme that was authorised by the Department of Forestry, Fisheries and the Environment (DFFE) (Reference No. 14/12/16/3/3/2/1100). For this Draft BAR, the same EMP was updated with any additional mitigation measures provided by specialists. Due to the alternatives</p>						

		<p>being placed a 100 metres away from the originally approved pipeline corridor, the mitigation measures are similar. Hence, the mitigation measures presented for <i>Floral Destruction and Faunal Displacement as a result of vegetation clearance and resultant habitat destruction</i> are specific mitigation measures.</p>
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Post mitigation page 75 of 101 tabulation. An indication of very low negative after vegetation clearing cannot be very low negative as large trees takes many years to be replaced in nature and species using this habitat will not return, if at all for many years to come.

Address the impact as it is.

When considering the Post Mitigation significance for *Floral Destruction and Faunal Displacement as a result of vegetation clearance and resultant habitat destruction*, the mitigation measures presented for ecology were considered. These mitigation measures includes but not limited to:

- Search, rescue and relocation of red data, protected and endangered flora species affected by construction. Seasonality must conform to activity period of animal with reference to herpetofauna.
- A suitable specialist is to identify protected plants and trees. Any protected plants or trees in proximity to the construction domain that will remain, should be marked clearly (danger tape, fencing, etc.) and must not be disturbed, defaced, destroyed or removed, unless otherwise specified by the Engineer. Acquire the necessary permits under the National Forestry Act if avoidance of protected trees is not possible.
- A compensation ratio of 1:3 should apply for every conservation-worthy indigenous tree removed. Suitable sites for the planting of the trees will need to be identified. This may include planting within the edge of the construction servitude or outside of the permanent servitude.
- Comply with the requirements of NEM:BA, NFA, National Veld and Forest Fire Act (No. 101 of 1998) and LEMA. Include mitigation measures identified as part of environmental sensitivity walk down survey.

Refer to the Environmental Management Programme for all mitigation measures.

Table 2: Explanation of the Impact of Floral Destruction and Faunal Displacement as a result of vegetation clearance and resultant habitat destruction (post-mitigation)

Criteria	Explanation of assessment Criteria from table 20 of the BAR	Outcome of Criteria and Rating Scales from Table 19 of the BAR	Scoring assigned to the Criteria from Table 21 of the BAR	
Duration	The lifespan of the impact is indicated as temporary, short, medium and long term.	The duration of the activity associated with the impact will last 6-18 months. The duration is therefore considered "Short term".	Short term	2
Extent	This refers to the spatial scale at which the impact will occur. Extent of the impact is described as: footprint (affecting only the footprint of the development), site (limited to the site)	The mitigation measures presented by the ecology specialist and those captured in the Environmental Management Programme, will be implemented to the impacted area i.e	Footprint	1

			and regional (limited to the immediate surroundings and closest towns to the site). Extent or scale refers to the actual physical footprint of the impact, not to the spatial significance. It is acknowledged that some impacts, even though they may be of small extent, are of very high importance, e.g. impacts on species of very restricted range. In order to avoid "double counting, specialists have been requested to indicate spatial significance under "intensity" or "impact on irreplaceable resources" but not under "extent" as well.	the footprint. According to Table 19, the scoring assigned to "Footprint" is 1		
		Severity	This is a relative evaluation within the context of all the activities and the other impacts within the framework of the project. Does the activity destroy the impacted environment, alter its functioning, or render it slightly altered?	<p>The severity of the impact is rated as Low negative as the impact affects the environment in such a way that natural, cultural and social functions and processes are minimally affected.</p> <p>The implementation of the mitigation measures reduces the impact of the activity. In other words, even through vegetation will be removed or cleared, there are processes that are in place to prevent the destruction and careless damage of this activity. For instance, the walkdown by an ecologist will provide coordinates of the plants or trees that would need to be removed, only once the relevant permits are in place..</p>	Low negative	-1
		Impact On Irreplaceable Resources	This refers to the potential for an environmental resource to be replaced, should it be impacted. A resource could possibly be replaced by natural processes (e.g. by natural colonisation from surrounding areas), through artificial means (e.g. by reseeding disturbed areas or replanting rescued species) or by providing a substitute resource, in certain cases. In natural	<p>Protected plants and trees can be removed to another location.</p> <p>The regrowth of vegetation within the affected area can be implemented. The mitigation measures and recommendations will guide this process.</p>	No	0

			<p>systems, providing substitute resources is usually not possible, but in social systems substitutes are often possible (e.g. by constructing new social facilities for those that are lost). Should it not be possible to replace a resource, the resource is essentially irreplaceable e.g. red data species that are restricted to a particular site or habitat of very limited extent.</p>	<p>The ecology specialist confirmed that there a no Red Data species within the study area.</p> <p>The affected site was therefore assigned a value of "0" which corresponds to No, as vegetation can be replaced or relocated.</p>		
		Consequence	<p>The consequence of the potential impacts is a summation of above criteria, namely the extent, duration, intensity and impact on irreplaceable resources.</p>	<p>The consequence of the potential impacts is a summation of above criteria, namely the extent, duration, intensity and impact on irreplaceable resources.</p> <p>The consequence is calculated using the above-mentioned criteria i.e                      Consequence = [(Duration + Extent + Impact Irreplaceable Resources)] x Severity</p> <p>Consequence = [(Short term) + (Site) + (No)] x (Moderative -negative)</p> <p>Consequence = [(2)+(1)+(0)] x (-1)                      Consequence = (3) x (-1)                      Consequence = -3</p> <p>Therefore, the score assigned for Consequence is -3. According to Table 21, the value of -3 is in a range of values that are regarded as Slightly Detrimental (0 to -6).</p>	-3	Negligible
		Likelihood	<p>The probability of the impact actually occurring based on professional experience of the specialist with environments of a similar nature to the site and/or with similar projects. It is important to distinguish between probability of the impact occurring and</p>	<p>In order to calculate Significance, the Probability which is the Likelihood of the impact occurring, is determined.</p> <p>Based on the breakdown of the criteria on Table 19, the impact is between 50</p>	2	Likely

			<p>probability that the activity causing a potential impact will occur. Probability is defined as the probability of the impact occurring, not as the probability of the activities that may result in the impact.</p>	<p>and 75 % certain that the impact will occur. The Likelihood is therefore "Likely". According to Table 21, the score assigned to "Likely" is 2.</p>		
		<p>Significance</p>	<p>Impact significance is defined to be a combination of the consequence and probability of the impact occurring. The relationship between consequence and probability highlights that the risk (or impact significance) must be evaluated in terms of the seriousness (consequence) of the impact, weighted by the probability of the impact actually occurring.  For instance, if the consequence and probability of an impact is high, then the impact will have a high significance.  The significance defines the level to which the impact will influence the proposed development and/or environment. It determines whether mitigation measures need to be identified and implemented and whether the impact is important for decision-making.</p>	<p>Significance is a function of Consequence and Probability Significance = Consequence x Probability Significance = (-3) x (2) Significance = -6  According to Table 21, the value of -6 is in a range of values that are regarded as Very Low Negative (0 to -6).</p>	<p>-6</p>	<p>Very Low negative</p>



<p>Page 86 of 101 tabulation social environment livelihoods Does this section deal with livelihoods then why only address resettlement. The livelihoods should address activities on the properties and how this impacts the livelihoods of property owners. This address lacks the broader concept of impacts on livelihoods during construction.</p>	<p>The impact on the livelihood of landowners predominately relates to the generation of dust, noise, and access control. The mitigation measures for these impacts have been captured in the Environmental Management Programme.</p>
<p>Page 90 tabulation Traffic and Noise( Disturbance) Low negative? Duration is not short term as the construction is around and adjacent to these properties. Borrow pits in the vicinity will entail construction vehicles passing through these properties and construction vehicles can only pass on this service road. There is no way around or through as there is no road connecting the next property namely Karoobult. The contention that it is short term and low negative impact cannot be true and this should be reassessed based on the facts.</p>	<p>The laying of the pipeline for the MCWAP2A will be done in different fronts which will follow a Construction Programme. The time allocated for pipe laying in this area is estimated to be approximately 18 months. Short term as per the impact assessment methodology is 6 to 18 months.</p> <p>A separate Basic Assessment Process was conducted for Borrow D, which is located on Paarl 124 KQ Portion 7. The Environmental Authorisation for Borrow Pit D was issued on 5 September 2024. The impacts relating to traffic and noise were addressed in that Basic Assessment process.</p> <p>The servitude road will be used to access the site.</p>
<p>Page 93 of 101 operational phase tabulation Maintenance of project infrastructure Low Positive, High positive? The service road with the contention that appointed personal will use this route for routine inspections causes all kinds of issues for landowners like nuisance, disturbance, security, rubble in veld, leaving gates open to mention a few.</p>	<p>Maintenance during the operational phase is directly related to the number of times the line will be inspected. It is expected that inspections will be carried out every 6 months This depends whether there are air valves, valve chambers, scours, etc on this alignment. Ensuring that the pipeline is operational without any defects and issues.</p> <p>In terms of property access and the impact to the landowners, the maintenance team will be informed by the Access Protocol and access the properties from the established maintenance roads. The positive outcome is based on the fact that maintenance will be a controlled activity.</p>

<p>There cannot be anything positive about a servitude inspection road through your property. Please reassess thos contention or explain broader how the positive outcome was reached.</p>	<p>The inspection of the pipeline will be conducted in terms of the Operational Environmental Management Programme (OEMPr) which will take into account the matters raised.</p>
<p>7.7 Cumulative impacts page 95 of 100 If one reads the first paragraph it clearly states that the impact of an activity that in itself may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area. In the bullets below 1of the significant impacts that may occur is discussed or mentioned. The clearance of vegetation includes large trees and no mitigation can replace a big tree. The inclusion in the EMPr does not soften this blow. Very large areas have already been stripped by Eskom and now even a larger area will be stripped of big trees. This is a very significant cumulative impact.</p>	<p>Specialists have provided the required mitigation measures which have been captured in the EMPr. Some of these mitigation measures include:</p> <ul style="list-style-type: none"> <li>• A suitable specialist is to identify protected plants and trees. Any protected plants or trees in proximity to the construction domain that will remain, should be marked clearly (danger tape, fencing, etc.) and must not be disturbed, defaced, destroyed or removed, unless otherwise specified by the Engineer. Acquire the necessary permits under the National Forestry Act if avoidance of protected trees is not possible.</li> <li>• A compensation ratio of 1:3 should apply for every conservation-worthy indigenous tree removed. Suitable sites for the planting of the trees will need to be identified. This may include planting within the edge of the construction servitude or outside of the permanent servitude.</li> </ul> <p>As discussed in the Table 2 above, the significance rating, post mitigation, for the impact on Floral Destruction and Faunal Displacement as a result of vegetation clearance and resultant habitat destruction is Very Low Significance.</p>
<p>8.1.3 Summary of Impact A mere tabulation consisting of ratings or weights for the impacts in the summary is not explaining how it was arrived at. Several hundreds of trees will be lost and cannot be replaced in the next 20 plus years, habitats for insects and related food chains are destroyed and to indicate a very low negative cannot be acceptable views. Again, the maintenance that entails appointed personal poses many impacting factors due to related issues as</p>	<p>Section 7 of the Draft BAR provides impact assessment tables which demonstrate how the impacts were rated. In order to meet the EIA Regulation (2014) for the content for Basic Assessments, a summary was added to Section 8.</p> <p>As discussed under Table 1: <i>Explanation of the Impact of Floral Destruction and Faunal Displacement as a result of vegetation clearance and resultant habitat destruction (pre-mitigation)</i>, mitigation measures are designed to reduce the consequence or probability of an impact, or to reduce both consequence and probability. The EMPr has captured the necessary mitigations measures for the trees and vegetation.</p>

<p>mentioned earlier and this is rated as High Positive.                  A lot of damage, permanent and temporary will occur to the receiving environment and this is not properly assessed.                  The term MITIGATION is always used to greenlight environmental damage and is from experience and as a fact a pie in the sky.</p>	
<p>Page 71 Of 101 Ascribing significance in decision making and                  Page 71 of 101 Consequence and then the tabulation on page 72 of 101 table 21 Ranking of consequences                  Second row Material reductions in Faunal populations, loss of livelihoods, individual economic loss is not reflected if one assess the location and the rights TCTA and/or DWS acquires and the right to remove vegetation that will impact on said factors and                  Third row Loss of habitat indicated as moderate high to moderate.                  This is not reflected in the assessment of very low negative and low positive.                   MAYBE I look at it different, but the conclusion is not taking the long lasting or construction activities and impact under the broader scope adequately into consideration in the assessment.</p>	<p>As explained in Tabel 1 and Table 2, the mitigation measures presented are to reduce the impacts that may occur.                   During the construction and operational phases, the applicant will be monitored and will be responsible for the Implementation of the mitigation measures contained in the EMPr.</p>
<p>I will not submit more than this but please take my inputs on the most crucial matters into consideration.                  This is not requested to stop or try to nullify the report but merely to be heard and that all impact factors and on all</p>	<p>Your intention not to stop or nullify the report is noted.</p>

	<p>activities on the properties be addressed, not only the risk factor for the approval of the BA.</p>	
	<p>ANNEXURE F 5 Socio Economic Baseline report June 2021 I am not sure whether this report is part of an authorised Environmental Assessment but will address as it is attached as an annexure to the Draft Basic Assessment.</p>	<p>The Socio Economic Baseline report was compiled in 2021 for the overall MCWAP2A. The baseline study was therefore considered to provide an understanding of the entire MCWAP2A area.</p>
	<p>Point 2 Background to the study  Emphasis is placed on the statement that challenges anticipated as a result of the project can have far reaching negative impacts peoples lives, time delays, landowners safety and then 7 bullets indicateing issues anticipated.  These have not been addressed in the BA and as in my comments on the BA it should have.  The factors mentioned here must be taken into consideration on individual land owners and not only the risk to the route for TCTA.</p>	<p>The negative impacts noted in the Socio Economic Baseline was undertaken for the entire MCWAP2A. The outcome of the Socio Economic Baseline has been included in the Final BAR. Page 88 of the Final BAR has been updated with the key findings of the Socio Economic Baseline.</p>
	<p>POINT 3. Methodology  It is evident that landowners did not form part of these interviews. If I am wrong please advise and provide interview notes.</p>	<p>As noted in the Executive Summary, Section 3. Methodology of the Socio Economic Baseline:  Those interviewed included people who and institutions which are likely to be directly or indirectly affected by the project implementation as well as those who are knowledgeable of the area and/ or interested in the project. Stakeholders interviewed included community forums, business forums, landowners, private</p>

		<p>entities, parastatals, local politicians and local and traditional authorities. A total of 141 interviews were conducted. These 141 individuals interviewed were from 119 institutions across 23 stakeholder groups.</p> <p>Annexure A of the Socio Economic Baseline Report notes the list the interviewees, amongst the interviewees are sixteen landowners.</p>
	<p>Point 5. Key findings</p> <p>Page iv and v</p> <p>This study still talks about Covid 19 as an issue which indicates this study is not relevant anymore.</p> <p>Maybe it should be re-assessed.</p> <p>Perceived positive impacts</p> <p>Bullet 1- improved water availability- really</p> <p>Bullet 13- secure electricity supply</p> <p>Really this is who's perceived positive impact that this project will foster secure electricity supply for the whole country- this is so misleading as no water in the world will achieve this.</p> <p>Perceived negative impacts are noted.</p>	<p>If there is a need for a new Socio Economic Baseline Report, comments regarding COVID 19 will be considered, if and when the Socio Economic Baseline Report will be updated.</p> <p>Your comments regarding perceived positive impacts are noted. The positive comments were noted during interviews within the Thabazimbi and Lephalale areas.</p>
	<p>Point 6 Socio Economic response plan page ix</p> <p>May we have a copy of this plan</p>	<p>The Socio-Economic Response Plan is under Section 7 of the Socio-Economic Baseline Report. Refer to Table 28: Socio-economic Response Plan.</p>
	<p>Point D Managing security concerns page xiii and xiv</p> <p>Managing security concerns</p> <p>This had been discussed but currently we are not aware of a PLAN. There had</p>	<p>It is the responsibility of the appointed contractor to compile the Security Management Plan. This plan is not available as the plan has not been compiled as yet.</p>

	<p>been much talk but when will an official document outlining this plan be available Page 1. Project description The project details had been adjusted for instance the new study on hydro-cyclone pumps and the change of the silt dams. This may alter the description and should be adjusted if applicable.</p> <p>The study is 3 years old and should be reassessed or at least updated. Some assessments are always consistent, but a new assessment may alter some aspects as the political climate has changed drastically in the past 3 years and will even more so change after the May elections. The project has not yet finalised a RMS which is and will be a major factor to an updated report.</p>	<p>The description of the Socia Economic Baseline Study will be updated.</p> <p>Various environmental themes have to be assessed during a, environmental impact assessment, such as terrestrial biodiversity, and if these were assessed already for areas where no changes are expected, then previous specialist work may be used, as defined in legislation, specialist studies up to five (5) years old can be utilised.</p>
	<p>Annexure F 6 Can still be viable as the landscape did not change much-2021 REPORT</p>	<p>Agree, the landscape has not changed much. This report is still applicable.</p>
	<p>Annexure F 7 – PAGE 2 Water transfer infrastructure Pipe diameter 2400mm. This is incorrect and emphasise the need for updated reports. All the annexures are old reports and the risks and analysis are based on outdated reports. This report is also not on the deviation but in general.</p>	<p>The pipeline diameter does not impact on the area affected for the development.</p> <p>Annexure F7 is the Biodiversity and Invertebrate Specialist Detailed Site Sensitivity Analyses and Design Report that was conducted in March 2021, for the entire MCWAP2A. The assessment was conducted by Scientific Terrestrial Services CC (Authors C, Hooten, C, Styn and D. van der Merwe and P.Ezzey).</p> <p>The GBN-JV approached Scientific Terrestrial Services CC to conducted the Annexure F 2 Ecology Rerouting of Pipeline Desktop Assessment, as they have knowledge of the site and are familiar with the project and study area.</p> <p>Annexure F7 was included in this Draft BAR to provide an understanding of the entire MCWAP2A and refer to the mitigation measures that are already part of the EMPr.</p>

	<p>Annexure F 8 Agricultural study This report is in general and not done on the deviation. Old report from 2018 and information and facts have changed since. Why is old reports not relevant to the deviation used? We have waited a long time for this BAR on the deviation and the annexures are outdated and may not be relevant to the proposed route. None of the activities on the newly affected properties are addressed or assessed but a broad generalisation. I do not see the relevance of old outdated studies to be used for a new route, not previously assessed or addressed. This is my opinion and the time it took too complete the draft BAR without updating studies indicates issues to the landowners detriment. The question remains, why were these studies not updated and why was specialist studies not conducted specifically for the new route?</p>	<p>The proposed pipeline deviation was identified in July 2023, through engagements with Eskom. Since then, the GBN-JV has identified the possible alternatives, considered the risk assessment, conducted specialist studies, engaged with the GBN-JV technical team to present the findings of the specialist studies, engaged with Eskom and the other landowners to obtain their input regarding the three alternatives and thereafter compile the Draft Basic Assessment Report.</p>
3.	<p><b>EMAIL RECEIVED 18 JANUARY 2024 FROM THE DEPARTMENT OF FORESTRY, FISHERIES AND THE ENVIRONMENT: THE DRAFT BASIC ASSESSMENT REPORT (BAR) DATED JANUARY 2024 AND RECEIVED BY THIS DEPARTMENT ON 18 JANUARY 2024, REFER.</b></p>	
	<p>This letter serves to inform you that the following information must be included to the final BAR:</p>	
	<p>(a) Listed Activities • Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project</p>	<p>The Listed activities noted in <i>Table 8: Listed Activities in terms of EIA Regulations</i> and the Application Form remains the same.  The Final BAR and the Application Form reflect the same listed activities.</p>

	<p>description. Only activities applicable to the development must be applied for and assessed.</p> <ul style="list-style-type: none"> <li>• If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link  <a href="https://www.environment.gov.za/documents/forms">https://www.environment.gov.za/documents/forms</a>.</li> </ul> <p>It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department.</p>	<p>The Limpopo Department of Economic Development, Environment and Tourism (LEDET) provided comment on the Draft BAR.</p>
	<p>(b) Layout &amp; Sensitivity Maps</p> <ul style="list-style-type: none"> <li>• Please provide a layout map which indicates the following: <ul style="list-style-type: none"> <li>• The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;</li> <li>• Buffer areas; and, all "no-go" areas.</li> </ul> </li> </ul>	<p>The sensitive environmental features for the Project includes the following:</p> <ul style="list-style-type: none"> <li>• All three (3) alternatives impact on CBA and ESA (as per the Limpopo 2018 CBA dataset);</li> <li>• The Eastern Alternative and Sub Alternative to the Eastern Alternative traverses Farm Dam or wildlife watering hole (anthropogenic in origin). Non avoidance of this feature is not deemed a 'fatal flaw'; and</li> <li>• The Eastern Alternative has a potential historic farmhouse and related infrastructure.</li> </ul> <p>Refer to Figure 16 which presents the environmental features.</p>



	<p>Google maps will not be accepted.</p>	<p>Specialists did not prescribe any buffers.</p>
	<p>(c) Specialist Assessments It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols.</p>	<p>Refer to Section 6.5 Specialist Studies, Table 17: Rationale for Inclusion/Exclusion of Specialist Studies.  It is important to note that the proposed pipeline deviation is 100 meters from the previously authorised pipeline corridor. In addition, the MCWAP2A conducted specialist studies for the initial environmental process (2018) and further specialist studies (2021) were conducted to meet conditions of the Environmental Authorisation issued for the initial environmental process.</p>
	<p>(d) Alternatives • Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content: (a) details of all the alternatives considered; (b) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</p>	<p>(a) Three pipeline alternatives were assessed in the Draft BAR. The Draft BAR contains details for all three pipelines alternatives. (b) Details of the public participation is contained in Section 6.6 to 6.10 with proof of public participation in Appendix C. (c) Summary of comments raised have been noted in Section 6.10. (d) Refer to Section 8.12 Summary of the Specialist Studies. (e) –(m) Section 7 for the impact assessment methodology and the outcome of the assessment and Section 8 for the recommendations. Table 28 presents a summary of all impacts (including the negative and positive ratings). (n) Refer to Section 8.2 for the EAPs Recommendations.</p>

	<p>(c) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;</p> <p>(d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> <p>(e) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts—</p> <p>(f) (aa) can be reversed;</p> <p>(g) (bb) may cause irreplaceable loss of resources; and</p> <p>(h) (cc) can be avoided, managed or mitigated;</p> <p>(i) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;</p> <p>(j) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social,</p>	
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	<p>economic, heritage and cultural aspects;                  (k) the possible mitigation measures that could be applied and level of residual risk;                  (l) the outcome of the site selection matrix;                  (m) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and                  (n) a concluding statement indicating the preferred alternatives, including preferred location of the activity.</p> <p>Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.</p>	
	<p>(e) Environmental Management Programme</p> <p>(i) The EMPr must also include the following:                  (a) Please be informed that the following content must be incorporated within the EMPr's as indicated in Appendix 4 of the EIA Regulations 2014, as amended:                  (i) Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including a curriculum vitae.                  (ii) A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the</p>	<p>Refer to Appendix E for a copy of the EMPr, that addresses all requirements as defined in Environmental Impact Assessment Regulation R.982 of 4 December 2014 (as amended) as set out in Appendix 4.</p>

<p>preferred site, indicating any areas that should be avoided, including buffers.</p> <p>(iii) A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including —</p> <ul style="list-style-type: none"> <li>(a) Planning and design;</li> <li>(b) Pre-construction activities;</li> <li>(c) Construction activities;</li> <li>(d) Rehabilitation of the environment after construction and where applicable post closure; and</li> <li>(e) Where relevant, operation activities.</li> </ul> <p>(iv) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) of Appendix 4 of the EIA Regulations 2014, as amended, will be achieved, and must, where applicable, include actions to —</p> <ul style="list-style-type: none"> <li>(v) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;</li> <li>(vi) Comply with any prescribed environmental management standards or practices;</li> <li>(vii) Comply with any applicable provisions of the Act regarding closure, where applicable; and</li> <li>(viii) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.</li> </ul>	
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<p>(ix)The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.</p> <p>(x)The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.</p> <p>(xi)An indication of the persons who will be responsible for the implementation of the impact management actions.</p> <p>(xii)The time periods within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.</p> <p>(xiii)The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.</p> <p>(xiv) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.</p>	
<p>(f) Public Participation Process</p> <ul style="list-style-type: none"> <li>• The following information must be submitted with the BAR:             <ol style="list-style-type: none"> <li>a) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;</li> </ol> </li> </ul>	<p>Refer to Section 6.6 to 6.10 of the Final BAR.</p> <p>Proof of public participation has been captured in Appendix C.</p>

	<p>b) Copies of all comments received during the Draft BAR comment period; and</p> <p>c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the Draft BAR. Please note that comments received from this Department must also form part of the comment and response report.</p> <ul style="list-style-type: none"> <li>• Please ensure that all issues raised and comments received during the circulation of the Draft BAR from registered I&amp;APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.</li> <li>• Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation</li> </ul>	
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	<p>39, 40, 41, 42, 43 &amp; 44 of the EIA Regulations 2014, as amended.</p>	
	<p>Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.</p>	<p>The period for which the Environmental Authorisation is required and the date on which the activity will be concluded have been added to the Final BAR in Section 3.3.</p>
	<p>You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: “Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (a) a basic assessment report, inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”.</p> <p>Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation</p>	<p>The Draft BAR and Application Form were submitted to the DFFE on 18 January 2024.</p>

	<p>19(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: “the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the documents contemplated in subregulation 1(a) will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days.”</p> <p>Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.</p>	
<p><b>Email received on 23 February 2024 Limpopo Department of Economic Development, Environment and Tourism (LEDET)</b></p>		
<p>4</p>	<p>1. The Basic Assessment Report (BAR)with regards to the above,</p>	<p>No comment to address.</p>



	<p>submitted to the Department on 05 February 2024 has reference.</p> <p>2. The Department has no comment to make,</p>	
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**ANNEXURE A**  
**ALBRE BADENHORST**

**From:** [Albrè Badenhorst](#)  
**To:** [Umeshree Naicker](#); [Robert Radebe](#)  
**Cc:** [Bernard Enslin](#)  
**Subject:** Re: MCWAP2A: Proposed Rerouting of the High Lift Rising Main (HLRM) - Notification of Review of draft Basic Assessment Report  
**Date:** Monday, 22 January 2024 08:43:43

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Umeshree and Robert,

Kindly explain to me how this is possible at this late stage of the project - surely the proximity of the pipelines should have been evident to all and sundry that did the original EIA?

Kind regards

**Albré**  
**083 263 5489**

On Fri, 19 Jan 2024 at 18:26, Umeshree Naicker <[UNaicker@gibbenvironmental.co.za](mailto:UNaicker@gibbenvironmental.co.za)> wrote:

**Proposed Rerouting of the High Lift Rising Main (HLRM) due to the proximity of existing Eskom Powerlines, within the Thabazimbi Local Municipality located in the Waterberg District Municipality, Limpopo Province.**

## **NOTICE OF REVIEW OF THE DRAFT BASIC ASSESSMENT REPORT**

Dear Sir/Madam

Notice is hereby given in terms of the Environmental Impact Assessment (EIA) Regulations (Government Notice No. R. 982 of 4 December 2014, as amended) (EIA Regulations) in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA).

### **A. Project Overview**

The GIBB-Bigen-Nyeleti Joint Venture (GBN-JV) on behalf of the Applicant, Department of Water and Sanitation (DWS), is applying for Environmental Authorisation (EA), in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the 2014 Environmental Impact Assessment Regulations (as amended) for the re-routing of the High Lift Rising Main (HLRM) due to the proximity of existing Eskom Powerlines.

The Mokolo Crocodile River (West) Water Augmentation Project Phase 2A (MCWAP-2A) is within the Thabazimbi and Lephalale Local Municipalities, in the Waterberg District Municipality, Limpopo Province. The project has an existing Environmental Authorisation (14/12/16/3/3/2/1100) and approved Construction Environmental Management Programme (CEMP) which included maintenance mitigation measures for the current pipeline route within the authorized corridor along four (4) properties i.e. on Farms Mecklenburg 310 KQ Portion 1, Paarl 124 KQ REM, Paarl 124 KQ Portion 6 and Paarl 124 KQ Portion 7.

The current pipeline alignment is within close proximity of an existing Eskom High Voltage Transmission line and will result in high induced current into the pipeline and high fault level currents, resulting in increased safety risks during construction of the pipeline and during future operation and maintenance of the pipeline.

## **B. Application for Environmental Authorisation**

GIBB-Bigen-Nyeleti Joint Venture (GBN-JV) on behalf of the Applicant, Department of Water and Sanitation (DWS), was appointed as the Environmental Assessment Practitioner (EAP) to conduct the Basic Assessment Reporting Process, as per the EIA Regulations, to seek Environmental Authorisation for the Project in terms of NEMA. The Competent Authority to decide on the application in terms of NEMA is the Department of Forestry, Fisheries and the Environment (DFFE).

## **C. Review of draft Basic Assessment Report**

The draft Basic Assessment Report will be available for public review until **20 February 2024**. The draft Basic Assessment Report can be accessed as follows:

- A hardcopy was placed at the Thabazimbi Public Library; and
- An electronic copy was uploaded to the following website, for downloading purposes: <https://bigengroup.com/who-we-are/downloads/>

Written comments on the draft Basic Assessment Report need to be forwarded to the contact person below by **20 February 2024**. The attached comment sheet can be used for this purpose.

Contact Person : Umeshree Naicker

Cell : 081 773 2625

Email : [unaicker@gibbenvironmental.co.za](mailto:unaicker@gibbenvironmental.co.za)

Kind regards,

***Ms. Umeshree Naicker***

*Tel : +27 11 781 1730*

*Mobile : +27 81 773 2625*

*Email : [unaicker@gibbenvironmental.co.za](mailto:unaicker@gibbenvironmental.co.za)*

**ANNEXURE B**  
**BERNARD ENSLIN (SERVITUDEWATCH)**



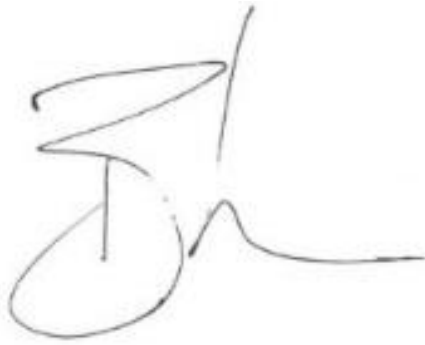
## COMMENT SHEET – Draft Basic Assessment Report

PROPOSED REROUTING OF THE HIGH LIFT RISING MAIN (HLRM) DUE TO THE PROXIMITY OF EXISTING ESKOM POWERLINES, WITHIN THE THABAZIMBI LOCAL MUNICIPALITY LOCATED IN THE WATERBERG DISTRICT MUNICIPALITY, LIMPOPO PROVINCE.

<b>Official use</b>	<b>Date received:</b>	<b>Our reference:</b>	<b>Status:</b>

### 1) GENERAL INFORMATION

<b>Name of organisation (if applicable)</b>	Servitudewatch cc
<b>Name &amp; Surname</b>	Bernard Enslin
<b>Postal Address</b>	394 Theuns v Niekerk str Wierda Park Centurion
<b>Physical Address</b> <i>(please provide full farm description, if applicable)</i>	As above
<b>Telephone No.</b>	
<b>Mobile No.</b>	0828726242
<b>Fax No.</b>	
<b>Email Address</b>	servitudewatch@gmail.com
<b>Manner in which the report was accessed (e.g. project website, library, etc.):</b>	email

A handwritten signature in black ink, consisting of a large, stylized initial 'J' followed by a horizontal line extending to the right.

*Signature*

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*Date*

20/02/2024

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## 2) COMMENTS

(Note - additional pages may be included if the space provided is insufficient)

*Draft basic assessment*

*Specialist studies p iv*

*The wildlife impact assessment conducted for the EIA 2019 should be part of this assessment as Mecklenburg 310 KQ P 1 and Paarl 124 KQ p 0 is game breeding, cattle farming and Hunting farms.*

*Impact assessment p vi*

*The contention based on an insignificant to very low impact is a bit of generalisation as again the permanent servitude and service road through the middle of Paarl 124 Kq P 0 and Mecklenburg 310 KQ p 1 cannot be low to insignificant as the location of the intended route is very significant. Security, nuisance, poaching, rubble, gates left open and the fact that both these properties have a cumulative impact due to existing powerline servitudes. This is very significant and is not properly addressed.*

*Point 1.2 current MCWAP2A EA*

*Specialist studies on page 5 of 101 does not refer to wildlife impact study which should be part of this assessment and should be taken into consideration again referring to properties Paarl 124 KQ p 0 and Mecklenburg 310 KQ p 1.*

*3.2.1 Pipelines Construction page 27 of 101*

*Please explain in a broader context what is meant by the manufacturing of the pipes will determine the start of the pipe laying activities and very important the statement that pipe laying is not foreseen to be a critical activity.*

*I can not agree with these 2 statements.*

*4.1.1 Constraints analysis page 30 and 31*

*The risk is less but what about the impact and risks to the landowners.*

*This should form part of the risk analysis as the proposed least risk route has a significant risk for the landowner, higher than the original route. Was this assessed and taken into consideration?*

*If not, it should be part of the risk analysis.*

*4.1.2 Meeting with landowners 31 of 101*

*I fail to see Paarl 124 KQ p 0 Mentioned. As I remember correctly a meeting on very short notice was communicated and I could not attend.*

*I fail to see that Paarl 124 KQ p 0 is mentioned here, even as absent*

*Page 74 of 101 Tabulation*

*The indication of low negative needs to be explained in a broader context and the weights applied should be explained,*

*I cannot understand from the tabulation how the conclusion was reached.*

*Clearing of vegetation, trees specifically is an irreplaceable resource and habitat for many species.*

*Please explain this assessment*

*The mitigation measures are funny to say the least.*

*Post mitigation page 75 of 101 tabulation.*

*An indication of very low negative after vegetation clearing cannot be very low negative as large trees takes many years to be replaced in nature and species using this habitat will not return, if at all for many years to come.*

*Address the impact as it is.*

*Page 86 of 101 tabulation social environment livelihoods*

*Does this section deal with livelihoods then why only address resettlement.*

*The livelihoods should address activities on the properties and how this impacts the livelihoods of property owners.*

*This address lacks the broader concept of impacts on livelihoods during construction.*

*Post mitigation page 87*

*Please explain hoe the outcome is very low negative if all aspects have not been taken into account*

*Adress the facts please as mitigation during construction cannot be very low negative.*

*Page 90 tabulation Traffic and Noise( Disturbance)*

*Low negative? Duration is not short term as the construction is around and adjacent to these properties.*

*Borrow pits in the vicinity will entail construction vehicles passing through these properties and construction vehicles can only pass on this service road.*

*There is no way around or through as there is no road connecting the next property namely Karoobult.*

*The contention that it is short term and low negative impact cannot be true and this should be reassessed based on the facts.*

*Page 93 of 101 operational phase tabulation*

*Maintenance of project infrastructure*

*Low Positive, High positive?*

*The service road with the contention that appointed personal will use this route for routine inspections causes all kinds of issues for landowners like nuisance, disturbance, security, rubble in veld, leaving gates open to mention a few.*

*There cannot be anything positive about a servitude inspection road through your property.*

*Please reassess thos contention or explain broader how the positive outcome was reached.*

*7.7 Cumulative impacts page 95 of 100*

*If one reads the first paragraph it clearly states that the impact of an activity that in itself may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.*

*In the bullets below 1of the significant impacts that may occur is discussed or mentioned. The clearance of vegetation includes large trees and no mitigation can replace a big tree. The inclusion in the EMPr does not soften this blow. Very large areas have already been stripped by Eskom and now even a larger area will be stripped of big trees.*

*This is a very significant cumulative impact.*

*8.1.3 Summary of Impact*

*A mere tabulation consisting of ratings or weights for the impacts in the summary is not explaining how it was arrived at.*

*Several hundreds of trees will be lost and cannot be replaced in the next 20 plus years, habitats for insects and related food chains are destroyed and to indicate a very low negative cannot be acceptable views.*

*Again, the maintenance that entails appointed personal poses many impacting factors due to related issues as mentioned earlier and this is rated as High Positive.*

*A lot of damage, permanent and temporary will occur to the receiving environment and this is not properly assessed.*

*The term MITIGATION is always used to greenlight environmental damage and is from experience and as a fact a pie in the sky.*

*Page 71 Of 101 Ascribing significance in decision making and  
Page 71 of 101 Consequence and then the tabulation on page 72 of 101 table 21 Ranking of consequences  
Second row Material reductions in Faunal populations, loss of livelihoods, individual economic loss is not  
reflected if one assess the location and the rights TCTA and/or DWS acquires and the right to remove  
vegetation that will impact on said factors and  
Third row Loss of habitat indicated as moderate high to moderate.  
This is not reflected in the assessment of very low negative and low positive.  
MAYBE I look at it different, but the conclusion is not taking the long lasting or construction activities and  
impact under the broader scope adequately into consideration in the assessment.*

*I will not submit more than this but please take my inputs on the most crucial matters into consideration.  
This is not requested to stop or try to nullify the report but merely to be heard and that all impact factors and  
on all activities on the properties be addressed, not only the risk factor for the approval of the BA.*

#### **ANNEXURE F 5**

##### **Socio Economic Baseline report June 2021**

*I am not sure whether this report is part of an authorised Environmental Assessment but will address as it is  
attached as an annexure to the Draft Basic Assessment*

##### **Point 2 Background to the study**

*Emphasis is placed on the statement that challenges anticipated as a result of the project can have far  
reaching negative impacts peoples lives, time delays, landowners safety and then 7 bullets indicateing issues  
anticipated.*

*These have not been addressed in the BA and as in my comments on the BA it should have.  
The factors mentioned here must be taken into consideration on individual land owners and not only the risk  
to the route for TCTA.*

##### **POINT 3. Methodology**

*It is evident that landowners did not form part of these interviews. If I am wrong please advise and provide  
interview notes.*

##### **Point 5. Key findings**

###### **Page iv and v**

*This study still talks about Covid 19 as an issue which indicates this study is not relevant anymore.  
Maybe it should be re-assessed.*

###### **Perceived positive impacts**

*Bullet 1- improved water availability- really*

*Bullet 13- secure electricity supply*

*Really this is who's perceived positive impact that this project will foster secure electricity supply for the whole  
country- this is so misleading as no water in the world will achieve this.*

*Perceived negative impacts are noted.*

###### **Point 6 Socio Economic response plan page ix**

*May we have a copy of this plan*

*Point D Managing security concerns page xiii and xiv  
Managing security concerns*

*This had been discussed but currently we are not aware of a PLAN. There had been much talk but when will an official document outlining this plan be available*

*Page 1. Project description*

*The project details had been adjusted for instance the new study on hydro-cyclone pumps and the change of the silt dams.*

*This may alter the description and should be adjusted if applicable.*

*The study is 3 years old and should be reassessed or at least updated.*

*Some assessments are always consistent, but a new assessment may alter some aspects as the political climate has changed drastically in the past 3 years and will even more so change after the May elections.*

*The project has not yet finalised a RMS which is and will be a major factor to an updated report.*

*Annexure F 6 Can still be viable as the landscape did not change much-2021 REPORT*

*Annexure F 7 – PAGE 2 Water transfer infrastructure*

*Pipe diameter 2400mm. This is incorrect and emphasise the need for updated reports.  
All the annexures are old reports and the risks and analysis are based on outdated reports.*

*This report is also not on the deviation but in general.*

*Annexure F 8 Agricultural study*

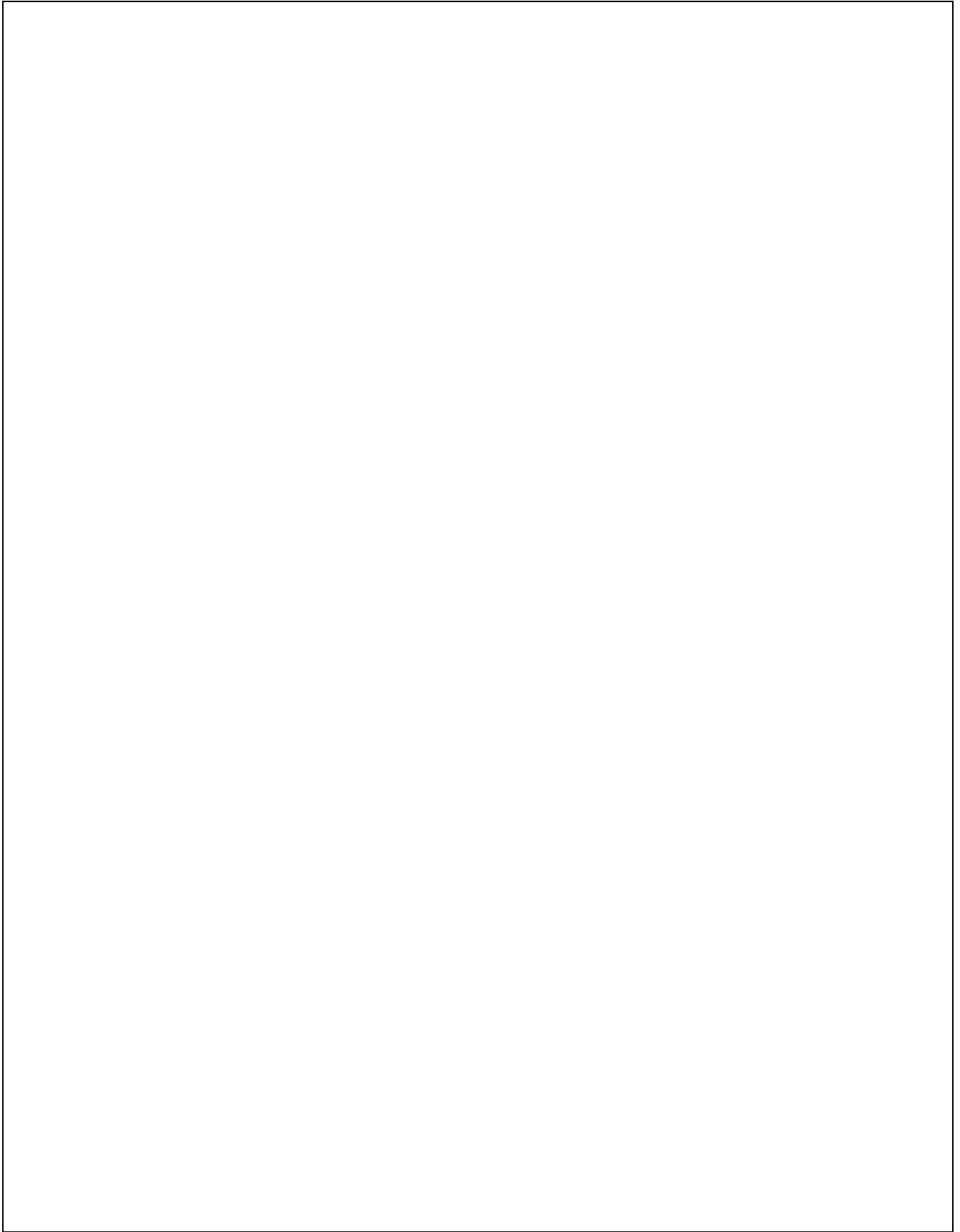
*This report is in general and not done on the deviation.  
Old report from 2018 and information and facts have changed since.  
Why is old reports not relevant to the deviation used?*

*We have waited a long time for this BAR on the deviation and the annexures are outdated and may not be relevant to the proposed route.*

*None of the activities on the newly affected properties are addressed or assessed but a broad generalisation. I do not see the relevance of old outdated studies to be used for a new route, not previously assessed or addressed.*

*This is my opinion and the time it took too complete the draft BAR without updating studies indicates issues to the landowners detriment.*

*The question remains, why were these studies not updated and why was specialist studies not conducted specifically for the new route?*



## **ANNEXURE C**

### **DEPARTMENT OF FORESTRY, FISHERIES AND THE ENVIRONMENT (DFFE)**



# forestry, fisheries & the environment

Department:  
Forestry, Fisheries and the Environment  
**REPUBLIC OF SOUTH AFRICA**

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

**DFFE Reference:** 14/12/16/3/3/1/2912

**Enquiries:** Ms Bathandwa Ncube

**Telephone:** (012) 399 9368 **E-mail:** [Bncube@dff.gov.za](mailto:Bncube@dff.gov.za)

Mr. Deon Esterhuizen  
GIBB Environmental Pty Ltd, part of the GBN Joint Venture  
P O Box 2700  
**RIVONIA**  
1240

**Telephone Number:** 0824451781  
**Email Address:** [deon@mdte.co.za](mailto:deon@mdte.co.za)

## PER MAIL / E-MAIL

Dear Mr Esterhuizen

### **COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED REROUTING OF THE HIGH LIFT RISING MAIN (HLRM) DUE TO THE PROXIMITY OF EXISTING ESKOM POWERLINES, WITHIN THE THABAZIMBI LOCAL MUNICIPALITY LOCATED IN THE WATERBERG DISTRICT MUNICIPALITY, LIMPOPO PROVINCE.**

The Draft Basic Assessment Report (BAR) dated January 2024 and received by this Department on 18 January 2024, refer.

This letter serves to inform you that the following information must be included to the final BAR:

#### **(a) Listed Activities**

- Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description. Only activities applicable to the development must be applied for and assessed.
- If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link <https://www.environment.gov.za/documents/forms>.
- It is imperative that the relevant authorities are continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department.

#### **(b) Layout & Sensitivity Maps**

- Please provide a layout map which indicates the following:
- The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected;
- Buffer areas; and, all "no-go" areas.
- Google maps will not be accepted.

**(c) Specialist Assessments**

- It is further brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. **Please note that specialist assessments must be conducted in accordance with these protocols.**

**(d) Alternatives**

- Please note that you are required to provide a full description of the process followed to reach the proposed preferred alternative within the site, in terms of Appendix 1(3)(1)(h) of the EIA Regulations 2014, as amended, including the following content:
  - (a) details of all the alternatives considered;
  - (b) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;
  - (c) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;
  - (d) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;
  - (e) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts—
    - (f) (aa) can be reversed;
    - (g) (bb) may cause irreplaceable loss of resources; and
    - (h) (cc) can be avoided, managed or mitigated;
  - (i) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;
  - (j) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;
  - (k) the possible mitigation measures that could be applied and level of residual risk;
  - (l) the outcome of the site selection matrix;
  - (m) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and
  - (n) a concluding statement indicating the preferred alternatives, including preferred location of the activity.
- Written proof of an investigation and motivation if no reasonable or feasible alternatives exist in terms of Appendix 1.

**(e) Environmental Management Programme**

- (i) The EMPr must also include the following:
  - (a) Please be informed that the following content must be incorporated within the EMPr’s as indicated in Appendix 4 of the EIA Regulations 2014, as amended:
    - (i) Details of the EAP who prepared the EMPr; and the expertise of that EAP to prepare an EMPr, including a curriculum vitae.
    - (ii) A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.
    - (iii) A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including —



- (a) Planning and design;
- (b) Pre-construction activities;
- (c) Construction activities;
- (d) Rehabilitation of the environment after construction and where applicable post closure; and
- (e) Where relevant, operation activities.
- (iv) A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) of Appendix 4 of the EIA Regulations 2014, as amended, will be achieved, and must, where applicable, include actions to —
- (v) Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;
- (vi) Comply with any prescribed environmental management standards or practices;
- (vii) Comply with any applicable provisions of the Act regarding closure, where applicable; and
- (viii) Comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable.
- (ix) The method of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- (x) The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- (xi) An indication of the persons who will be responsible for the implementation of the impact management actions.
- (xii) The time periods within which the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended, must be implemented.
- (xiii) The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f) of Appendix 4 of the EIA Regulations 2014, as amended.
- (xiv) A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations.

**(f) Public Participation Process**

- The following information must be submitted with the BAR:
  - a) A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended;
  - b) Copies of all comments received during the Draft BAR comment period; and
  - c) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the Draft BAR. Please note that comments received from this Department must also form part of the comment and response report.
- Please ensure that all issues raised and comments received during the circulation of the Draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section) in respect of the proposed activity are adequately addressed in the final BAR.
- Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public Participation Process must be conducted in terms of Regulation 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *"Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (a) a basic*


*assessment report, inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority”.*

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: *“the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the documents contemplated in subregulation 1(a) will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days.”*

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



**Mr Sabelo Malaza**  
**Chief Director: Integrated Environmental Authorisations**  
**Department of Forestry, Fisheries and the Environment**  
**Signed by: Mr Vusi Skosana**  
**Designation: Director: National Integrated Authorisation**  
**Date: 19 February 2024**

cc:	Mr Jabulani Maluleke	Department of Water and Sanitation	E-mail: <a href="mailto:Malulekej2@dws.gov.za">Malulekej2@dws.gov.za</a>
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## **ANNEXURE D**

### **LIMPOPO DEPARTMENT OF ECONOMIC DEVELOPMENT, ENVIRONMENT AND TOURISM (LEDET)**



# LIMPOPO

PROVINCIAL GOVERNMENT  
REPUBLIC OF SOUTH AFRICA

DEPARTMENT OF  
ECONOMIC DEVELOPMENT, ENVIRONMENT & TOURISM

Enq: Ms Rodgers MC    Tel: 015 293 8540 / 083 443 5749    E-mail: [rodgersmc@ledet.gov.za](mailto:rodgersmc@ledet.gov.za)    Ref: 12/1/9/CR-W307

**Your Ref/Contract No:** TCTA 20-041 **Report No:** 2A-R-VO05-92 (Rev A)  
GIBB Bigen Nyeleti Joint Venture (GBN-JV) Co Bigen Head Office  
The Innovation Hub  
PO Box 29  
PRETORIA  
0087

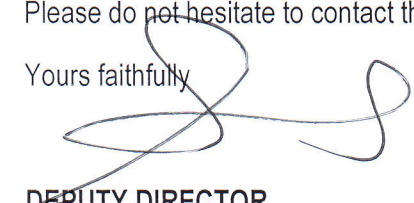
**For attention:** Umeshree Naiker    **E-mail:** [deon@mdte.co.za](mailto:deon@mdte.co.za) / [UNaicker@gibbenviromental.co.za](mailto:UNaicker@gibbenviromental.co.za)

**RE: COMMENTS ON THE RE-ROUTING OF THE HIGH LIFT RISING MAIN (HLRM) DUE TO THE PROXIMITY OF EXISTING ESKOM POWERLINES FOR THE MOKOLO CROCODILE WATER AUGMENTATION PROJECT PHASE 2 (MACWAP 2A) WITHIN THE THABAZIMBI AND LEPHALALE LOCAL MUNICIPALITIES OF WATERBERG DISTRICT**

1. The Basic Assessment Report (BAR) with regards to the above, submitted to the Department on 05 February 2024 has reference.
2. The Department has no comment to make.

Please do not hesitate to contact the Department should you have any queries in this respect.

Yours faithfully

  
**DEPUTY DIRECTOR  
ENVIRONMENTAL QUALITY MANAGEMENT**  
DATE: 23/2/2024

Cc: DFFE – Samkelisiwe Dlamini

E-mail: [SDlamini@dffe.gov.za](mailto:SDlamini@dffe.gov.za)

HEAD OFFICE

20 Hans Van Rensburg Street / 19 Biccard Street, Polokwane, 0700, Private Bag X 9484, Polokwane, 0700  
(Switchboard) Tel: +2715 293 8300 Website: [www.ledet.gov.za](http://www.ledet.gov.za)

The Mokolo Crocodile River (West) Water Augmentation Project Phase 2A (MCWAP-2A) is within the Thabazimbi and Lephalale Local Municipalities, in the Waterberg District Municipality, Limpopo Province. The project has an existing Environmental Authorisation (14/12/16/3/3/2/1100) and approved Construction Environmental Management Programme (CEMP) which included maintenance mitigation measures for the current pipeline route within the authorized corridor along four (4) properties i.e. on Farms Mecklenburg 310 KQ Portion 1, Paarl 124 KQ REM, Paarl 124 KQ Portion 6 and Paarl 124 KQ Portion 7.

The current pipeline alignment is within close proximity of an existing Eskom High Voltage Transmission line and will result in high induced current into the pipeline and high fault level currents, resulting in increased safety risks during construction of the pipeline and during future operation and maintenance of the pipeline.

## **B. Application for Environmental Authorisation**

GIBB-Bigen-Nyeleti Joint Venture (GBN-JV) on behalf of the Applicant, Department of Water and Sanitation (DWS), was appointed as the Environmental Assessment Practitioner (EAP) to conduct the Basic Assessment Reporting Process, as per the EIA Regulations, to seek Environmental Authorisation for the Project in terms of NEMA. The Competent Authority to decide on the application in terms of NEMA is the Department of Forestry, Fisheries and the Environment (DFFE).

## **C. Review of draft Basic Assessment Report**

The draft Basic Assessment Report will be available for public review until **20 February 2024**. The draft Basic Assessment Report can be accessed as follows:

- A hardcopy was placed at the Thabazimbi Public Library; and
- An electronic copy was uploaded to the following website, for downloading purposes: <https://bigengroup.com/who-we-are/downloads/>

Written comments on the draft Basic Assessment Report need to be forwarded to the contact person below by **20 February 2024**. The attached comment sheet can be used for this purpose.

Contact Person : Umeshree Naicker

Cell : 081 773 2625

Email : [unaicker@gibbenviromental.co.za](mailto:unaicker@gibbenviromental.co.za)

Kind regards,

***Ms. Umeshree Naicker***

*Tel : +27 11 781 1730*

*Mobile : +27 81 773 2625*

*Email : [unaicker@gibbenviromental.co.za](mailto:unaicker@gibbenviromental.co.za)*