



Corner Belmont Terrace / Castle Hill Central Port Elizabeth 6001
Private Bag X5001 Greenacres 6057 | Republic of South Africa
Ref: 14/12/116/3/3/1/??? | Contact Person: Alan Southwood
Tel: 041 508 5813 | Fax: 041 508 5865 | E-mail: Alan.Southwood@dedea.gov.za | www.dedea.gov.za

| | | | |
|-----------------|--|-------------|----------------------|
| Attention: | Ms Donn  du Toit | Enquiries | : Alan Southwood |
| Organisation: | SRK Consulting Stakeholder Engagement Office | DEA Ref Nos | : 14/12/16/3/3/1/??? |
| Postal address: | P O Box 35290? Menlo Park, 0102 Pretoria | | |
| Fax: | 012 361 9821 | | |
| Tel: | 011 361 9912 | | |
| E-mail: | ddutoit@srk.co.za | | |

Dear Ms du Toit,

COMMENT ON THE BASIC ASSESSMENT REPORT FOR THE REHABILITATION OF THE SKOENMAKERS RIVER: BLUE CRANE LOCAL MUNICIPALITY: EASTERN CAPE: REF NO DEA 14/12/16/3/3/1/???

Your e-mail dated 4th December refers.

No DEA Reference Number was provided with the Notification included in this e-mail.

Please refer to the comments provided in Appendix 1.



DAYALAN GOVENDER

REGIONAL MANAGER: ENVIRONMENTAL AFFAIRS: CACADU REGION

DATE: 27/01/2016

"Innovation for Sustainable Development"

Appendix 1: Comment on the Draft Basic Assessment Report for the rehabilitation of the Skoenmakers River: Blue Crane Local Municipality: Eastern Cape.

| Page Numbers | Section | Paragraph / Bullet | Comment |
|--------------|--|----------------------------------|--|
| Page 3 | | | <ul style="list-style-type: none"> • A title page and Executive Summary would be appropriate as there could be confusion between this DBAR and the various applications for the upgrading of the ten river crossings. • No DEA Reference Number is provided for the BAR. |
| Page 3 | a) Describe the project associated with the listed activities applied for | Last Paragraph: Last Sentence | It is now called the Mzimvubu to Tsitsikamma Water Management Area. |
| Page 17 | 5. Surface Water | Box: Third Line | |
| Page 3 | b) Provide a detailed description of the listed activities associated with the project | | Mention that the application is in terms of the 2014 Regulations. |
| Page 9 | 10. Activity Motivation | (e) EMF | No explanation is provided. |
| Page 11 | 11. Applicable Legislation, Policies and / or guidelines | | This list is superficial. There are other pieces of legislation that are applicable, such as, NEMBA (AIS, ToPS and Protected Ecosystem Regulations), NEM: PAA, National Heritage Resource Act, Nature and Environmental Conservation Ordinance. |
| Page 12 | 12. Waste, Effluent, Emission and Noise Management | a) Solid waste management: Boxes | Waste manifests to be obtained from the Municipality to prove legal disposal. |
| Page 13 | 12. Waste, Effluent, Emission and Noise Management | e) Generation of noise | Working hours to be restricted from 06:00 to 18:00 on workdays, 06:00 to 13:00 on Saturdays and not on Sundays and public holidays. |
| Page 13 | Property Description / physical address | District Municipality | It is now the Sarah Baartman District Municipality. |
| Page 26 | 2. Determination of Appropriate | 54 (2) (b) (v): Third | |

| | Measures | Column: Last Paragraph | |
|---------|--|--|---|
| Page 23 | d) Description of vegetation types | First Paragraph: Last Line | Provide the Government Gazette and Regulation Numbers. A URL would also be appropriate. |
| Page 25 | 2. Determination of Appropriate Measures | 54 (2) (e): Third Column: Last Paragraph. | These dates must be incorrect. |
| Page 26 | 2. Determination of Appropriate Measures | 54 (7): Third Column | |
| Page 30 | 2. Determination of Appropriate Measures | 54 (2) (b) (vi): Third Column: Second and Third Paragraphs | There is only one Department and its correct name is the latter. |
| Page 31 | 5. Authority Participation | | <ul style="list-style-type: none"> When was this list last updated? Mr Bogani Gxilise now works for this Department. A number of Departments, such as ECHRA and DMR, were not included. |
| Page 33 | 2. Methodology for the Assessment of Impacts | Last Paragraph: Second Last Line | 'Error!Reference source not found'? |
| Page 36 | Table 3 | Surface Water: Fourth Cell | Delete 'preferably'. |
| Page 36 | Table 3 | Surface Water: Fifth Cell | Park vehicles and operate plant over drip trays. |
| Page 36 | Table 3 | Surface Water: Last Cell | No vehicle maintenance on site: only at a service provider in the nearest town. |
| Page 36 | Table 3 | Noise | Working hours to be restricted from 06:00 to 18:00 on workdays, 06:00 to 13:00 on Saturdays and not on Sundays and public holidays. |
| Page 36 | Table 3 | Waste Management: First Cell | Waste manifests to be obtained from the Municipality to prove legal disposal. |
| Page 36 | Table 3 | Waste Management: Second Cell | Storage in water-tight containers on plastic-lined bunds (for example empty or full bags of cement). |

| | | | |
|---------|--|-------------------------------|---|
| Page 36 | Table 3 | Waste Management: Third Cell | No waste to be buried or burned. |
| Page 36 | Table 3 | Waste Management: Fourth Cell | Sanitary bins for women; water to wash hands. |
| Page 36 | Table 3 | Waste Management: First Cell | Bins to have lids that are inaccessible to animals. |
| Page 36 | Table 3 | Soil and Land Use: First Cell | Vehicles to park over drip trays. |
| Page 36 | Table 3 | Biodiversity: First Cell | Plants listed in Schedules 3 and 4 of the Nature and Environmental Conservation Ordinance must be protected. |
| Page 36 | Table 3 | Biodiversity: Last Cell | The Compliance and Enforcement Section of this Department will investigate the contravention of any legislation it has the mandate to enforce. |
| Page 38 | 3. Environmental Impact Statement | First and Last Paragraphs | This Department agrees with these statements. |
| Page 38 | 3. Environmental Impact Statement | Biodiversity | The site should be monitored annually post-construction to see if any AIS germinated. Any seedlings should be removed. |
| Page 39 | No-go Alternative | Last Sentence | What 'river crossing'? This BAR only deals with remediation and rehabilitation of the banks and floodplain of the river (refer to 1 a) on Page 3. |
| Page 40 | Section E: Recommendations of the Practitioner | Box: Last Four Paragraphs | This Department agrees with these recommendations. |

Appendix D: Palaeontological Assessment

| Page Numbers | Section | Paragraph / Bullet | Comment |
|--------------|--------------------|--------------------|---------------------|
| Page 11 | J. Recommendations | Bullets a. to d. | They are supported. |

Appendix D: Cultural Heritage Assessment

| Page Numbers | Section | Paragraph / Bullet | Comment |
|--------------|---------------------------------|---------------------------------------|---------------------|
| Page 3 | Conclusions and Recommendations | Second and Last Paragraphs | They are supported. |
| Page 19 | 5. Legal Framework | Mitigation guidelines: Last Paragraph | |
| Page 28 | Conclusions and Recommendations | First Paragraph | |

DAYALAN GOVENDER
REGIONAL MANAGER: ENVIRONMENTAL AFFAIRS: CACADU REGION

DATE: 27/01/2016.



09 February 2016
472748

Mr Alan Southwood
Department: Economic Development Environmental Affairs & Tourism
Private Bag X447
Pretoria
0001

Attention: Mr Alan Southwood

Dear Sir

RESPONSE TO COMMENTS ON THE OF DRAFT THE BASIC ASSESSMENT REPORTS (DBARs) FOR THE REHABILITATION OF THE SKOENMAKERS RIVER WITHIN BLUE CRANE LOCAL MUNICIPALITY IN THE EASTERN CAPE PROVINCE

DEA Reference: 14/12/16/3/3/1/1508

SRK Consulting was appointed by BVI Consulting Engineers on behalf of the Department of Water and Sanitation (DWS) as the independent Environmental Assessment Practitioner to undertake the necessary Environmental Authorisation processes and associated stakeholder engagement for the proposed project.

We refer to the comments received from the Department Economic Development, Environmental Affairs and Tourism: Eastern Cape on 27 January 2016. Please see below our response to these comments received on the above mentioned date:

Appendix 1: Comment on the Draft Basic Assessment Report for the rehabilitation of the Skoenmakers River: Blue Crane Local Municipality: Eastern Cape

| Page number | Section | Paragraph/ Bullet | Comment | Response |
|-------------|---------|-------------------|--|--|
| Page 3 | | | <ul style="list-style-type: none"> A title page and Executive Summary would be appropriate as there could be confusion between this DBAR and the various applications for the upgrading of the ten river crossings. | All mention of the EA applications for the 10 river crossings have been removed from the FBAR for the rehabilitation after receiving feedback from the DEA to this effect. |

Partners R Armstrong, AH Bracken, MJ Braune, JM Brown, CD Dalglish, BM Engelsman, R Gardiner, GC Howell, WC Joughin, DA Kilian, JA Lake, BF Liber, V Maharaj, DJ Mahlangu, RRW McNeill, HAC Meintjes, MJ Morris, GP Nel, VS Reddy, PE Schmidt, PJ Shepherd, MJ Sim, VM Simposya, HFJ Theart, KM Uderstadt, AT van Zyl, MD Wanless, ML Wertz, A Wood

Directors AJ Barrett, GC Howell, WC Joughin, V Maharaj, DJ Mahlangu, VS Reddy, PE Schmidt, PJ Shepherd

Associate Partners N Brien, LSE Coetser, CJ Ford, E Goossens, M Hinsch, SG Jones, W Jordaan, AH Kirsten, LH Kirsten, S Kisten, I Mahomed, RD O'Brien, T Shepherd, JJ Slabbert, WI Stewart, D Visser

Consultants JAC Cowan, *PrSci/Nat, BSc(Hons)*; JH de Beer, *PrSci Nat, MSc*; JR Dixon, *PrEng*; T Hart, *MA, TTHD*; GA Jones, *PrEng, PhD*; PR Labrum, *PrEng*; PN Rosewarne, *PrSci/Nat*; AA Smithen, *PrEng*; TR Stacey, *PrEng, DSc*; OKH Steffen, *PrEng, PhD*; PJ Terbrugge, *PrSci/Nat, MSc*, DJ Venter; *PrTech*

African Offices:

Cape Town + 27 (0) 21 659 3060
Durban + 27 (0) 31 279 1200
East London + 27 (0) 43 748 6292
Johannesburg + 27 (0) 11 441 1111
Kimberley + 27 (0) 53 861 5798
Pietermaritzburg + 27 (0) 33 347 5069
Port Elizabeth + 27 (0) 41 509 4800
Pretoria + 27 (0) 12 361 9821
Rustenburg + 27 (0) 14 594 1280
Accra + 23 (3) 24 485 0928
Lubumbashi + 243 (0) 81 999 9775

Group Offices:

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Asia
Australia
Europe
North America
South America



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|---------|--|--|---|--|
| | | | • No DEA Reference Number is provided for the BAR. | The DEA reference number was not available at the time of the comment period for the Draft BAR as the application was submitted to the DEA at the same time as the report was released for public comment. The FBAR will be circulated for a further 30 day period before final submission to the DEA. |
| Page 3 | a) Describe the project associated with the listed activities applied for | Last Paragraph: Last Sentence | It is now called the Mzimvubu to Tsitsikamma Water Management Area. | Noted, and change effected in the FBAR. |
| Page 17 | 5. Surface Water | Box: Third Line | | |
| Page 3 | b) Provide a detailed description of the listed activities associated with the project | | Mention that the application is in terms of the 20154 Regulations. | The table indicates that the regulations cited are GN R 983, 984 and 985, which are the 2014 regulations. |
| Page 9 | Activity Motivation | (e) EMF | No explanation is provided. | No EMF was available during the compilation of the FBAR. |
| Page 11 | 11. Applicable Legislation, Policies and I or guidelines | | This list is superficial. There are other pieces of legislation that are applicable, such as, NEMBA (AIS, ToPS and Protected Ecosystem Regulations), NEM: PAA, National Heritage Resource Act, Nature and Environmental Conservation Ordinance. | The list of applicable legislation has been updated. |
| Page 12 | 12. Waste, Effluent, Emission and Noise Management | a) Solid waste management: Boxes | Waste manifests to be obtained from the Municipality to prove legal disposal | Included in the FBAR |
| Page 13 | 12. Waste, Effluent, Emission and Noise Management | e) Generation of noise | Working hours to be restricted from 06:00 to 18:00 on workdays, 06:00 to 13:00 on Saturdays and not on Sundays and public holidays. | Included in the FBAR |
| Page 13 | Property Description I physical address | District Municipality | It is now the Sarah Baartman District Municipality. | Noted |
| Page 26 | 2. Determination of Appropriate Measures | 54 (2) (b) (v): Third Column: Last Paragraph | | Noted |
| Page 23 | d) Description of vegetation types | First Paragraph: Last Line | Provide the Government Gazette and Regulation | Inserted |

| | | | | |
|---------|--|---|---|--|
| | | | Numbers. A URL would also be appropriate. | |
| Page 25 | 2. Determination of Appropriate Measures | 54 (2) (e): Third Column: Last Paragraph | These dates must be incorrect | New dates have been included to make provision for the final public participation process to be followed prior to submission of the FBAR to the DEA for decision making |
| Page 26 | 2. Determination of Appropriate Measures | 54 (7): Third Column | | |
| Page 30 | 2. Determination of Appropriate Measures | 54 (2) (b) (vi) : Third Column: Second and Third Paragraphs | There is only one Department and its correct name is the latter. | Noted |
| Page 31 | 5. Authority Participation | | <ul style="list-style-type: none"> When was this list last updated? Mr. Bogani Gxilishe now works for this Department. A number of Departments, such as ECHRA and DMR, were not included. | <ul style="list-style-type: none"> Noted. A new contact person has been identified for the Department of Public Works and Roads – Eastern Cape b) The DMR was not consulted on the proposed development as the proposed development would not require an approval / comment from them. Furthermore , no Mineral Resources would be impacted upon by the proposed development. Comments were requested from the ECHRA but no comments have been forthcoming. |
| Page 33 | 2. Methodology for the Assessment of Impacts | Last Paragraph: Second Last Line | 'Error! Reference source not found'? | Corrected in the FBAR |
| Page 36 | Table 3 | Surface Water: Fourth Cell | Delete 'preferably'. | Change effected in FBAR |
| Page 36 | Table 3 | Surface Water: Fifth Cell | Park vehicles and operate plant over drip trays. | Included |
| Page 36 | Table 3 | Surface Water: Last Cell | No vehicle maintenance on site: only at a service provider in the nearest town. | Included |
| Page 36 | Table 3 | Noise | Working hours to be restricted from 06:00 to 18:00 on workdays, 06:00 to 13:00 on Saturdays and not on Sundays and | Included |

| | | | | |
|---------|--|-------------------------------|--|-------------------------------|
| | | | public holidays. | |
| Page 36 | Table 3 | Waste Management: First Cell | Waste manifests to be obtained from the Municipality to prove legal disposal. | Included |
| Page 36 | Table 3 | Waste Management: Second Cell | Storage in water-tight containers on plastic-lined bunds (for example empty or full bags of cement) | Included |
| Page 36 | Table 3 | Waste Management: Third Cell | No waste to be buried or burned. | Has been included in the FBAR |
| Page 36 | Table 3 | Waste Management: Fourth Cell | Sanitary bins for women | Included |
| Page 36 | Table 3 | Waste Management: First Cell | Bins to have lids that are inaccessible to animals. | Included |
| Page 36 | Table 3 | Soil and Land Use: First Cell | Vehicles to park over drip trays. | Included |
| Page 36 | Table 3 | Biodiversity: First Cell | Plants listed in Schedules 3 and 4 of the Nature and Environmental Conservation Ordinance must be protected. | Included |
| Page 36 | Table 3 | Biodiversity: Last Cell | The Compliance and Enforcement Section of this Department will investigate the contravention of any legislation it has the mandate to enforce. | Noted |
| Page 38 | 3. Environmental Impact Statement | First and Last Paragraphs | This Department agrees with these statements. | Noted |
| Page 38 | 3. Environmental Impact Statement | Biodiversity | The site should be monitored annually post-construction to see if any AIS germinated. Any seedlings should be removed. | Included |
| Page 39 | No-go Alternative | Last Sentence | What river crossing'? This BAR only deals with remediation and | Amended |
| Page 40 | Section E: Recommendations of the Practitioner | Box: Last Four Paragraphs | Rehabilitation of the banks and floodplain of the river (refer to 1 a) On Page 3. | Noted |
| | | Box: Last Four Paragraphs | This Department agrees with these recommendations. | Noted |

Appendix D: Paleontological Assessment

| Page number | Section | Paragraph/ Bullet | Comment | Response |
|-------------|---------|-------------------|---------|----------|
|-------------|---------|-------------------|---------|----------|

| | | | | |
|---------|--------------------|------------------|--------------------|-------|
| Page 11 | J. Recommendations | Bullets a. to d. | They are supported | Noted |
|---------|--------------------|------------------|--------------------|-------|

Appendix D: Cultural Heritage Assessment

| Page Numbers | Section | Paragraph Bullet | Comment | Response |
|--------------|---------------------------------|---------------------------------------|---------------------|----------|
| Page 3 | Conclusions and Recommendations | Second and Last Paragraphs | They are supported. | Noted |
| Page 19 | 5. Legal Framework | Mitigation guidelines: Last Paragraph | | |
| Page 28 | Conclusions and Recommendations | First Paragraph | | |

Yours faithfully,

SRK Consulting (South Africa) (Pty) Ltd

SRK Consulting - Certified Electronic Signature

 *M. Hinsch*
 /42389/Letter
 152-8816-309-HINSA
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Ms Manda Hinsch
 Associate Partner/Principal Scientist

