



Gariep Watch

P.O. Box 2536, Upington, 8801



22 September 2020

EnviroAfrica CC
P.O. Box 5367
Helderberg
7135

ATTENTION: MR. CLINTON GEYSER

COMMENTS ON THE DRAFT ENVIRONMENTAL SCOPING REPORT: TOWNSHIP DEVELOPMENT ON PLOT 1890, REMAINDER OF FARM 144 AND THE REMAINDER OF FARM 142; BOEGOEBERG: !KHEIS LOCAL MUNICIPALITY

The July 2020 EnviroAfrica draft Scoping Report and Plan of Study for the above-mentioned development has reference.

Thank you for registering Gariep Watch as an Interested and Affected Party and incorporating our correspondence of 17 June 2020 in the draft Scoping Report. This letter highlighted our concerns that pertain to the lack of wastewater infrastructure and maintenance of existing infrastructure at the !Kheis local municipality.

We agree that housing is necessary to promote socioeconomic development and to provide the basic needs of the Brandboom community. However, the process of urbanization and population growth, if not handled carefully, may result in increased surface and ground water pollution towards the Orange River. Intensive urban growth far from job opportunities can also lead to greater poverty with local governments unable to provide services for all people.

Gariep Watch takes note of the assertion in paragraph 6.2 of the draft Scoping Report that sewer availability and the capacity thereof will be investigated to determine whether new sewerage infrastructure is required. We also agree with the conclusion that an EIA will be required, including specialist biodiversity and freshwater assessments.

Our further comments pertaining to this application are as follows:

1. The proposed 550 erven on 49 hectares next to the Brandboom settlement straddles two drainage lines. Plot 1890 covers the upper 50% of a dry watercourse and Farm 142 overlays the two main branches of a dry watercourse. No alternative development sites away from drainage lines have been identified in the draft Scoping Report. Changes to the site layout should be considered.
2. These drainage lines close to a township development may be used for illegal dumping and ablutions with rainfall that washes pollutants to the nearest body of water, i.e. the Orange River. Stormwater contamination should be investigated with cognisance of the expected run-off from these catchments and new development areas. It should, however, be endeavoured to avoid any development close to watercourse.



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3. Raw sewerage is currently being disposed of in a dry watercourse next to the existing Brandboom settlement with the locality shown on Plate 1. Sewerage water mixes with stormwater run-off in an impoundment and overflows into the Orange River during rainfall events. Children also swim in this impoundment, which poses a serious risk to public health.

The existing adverse impact pertaining to sewerage disposal should be addressed before embarking on any new developments.



Plate 1: Sewerage disposal site in drainage line

4. Ground water quality down-slope from the proposed development and the existing settlement should be investigated. It is believed that, in the absence of adequate wastewater services at Brandboom, much sub-surface pollution may reach neighbouring boreholes.

These down-slope boreholes are being used for irrigation, livestock watering and potable purposes and may pose a serious risk to public health.

5. Paragraph 2.2.2 on p. 10 of the draft Scoping Report states that the proposed development will tie in with the existing services. It is put forward that the existing wastewater services are inadequate and are inefficiently maintained. New infrastructure should be designed, built and maintained to prevent any sewerage water from polluting the groundwater or Orange River.

6. River health indices as noted in Part 7.2 of the draft Scoping Report will not be feasible on the ephemeral drainage lines but could be conducted in the Orange River up-stream and down-stream from the proposed development.



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The Orange River is used for many purposes downstream from this development, including potable use by communities, often directly from the river and without treatment. All necessary measures must be put in place to prevent pollution from entering the Orange River.

Please feel free to contact Gariep Watch if there are any questions or queries.

Yours sincerely

Ferdie Botha
Chairman: Gariep Watch
084 800 6610

Fritz Bekker (Pr. Sci. Nat 2000 23/04)
Technical advisor: Gariep Watch
083 265 8145