


## COMMENT AND RESPONSE REPORT

(DENC Ref. No: NC/BA/10/ZFM/!KHE/GAR1/2020)

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager
<b>Comments Received on Initial Public Participation</b>			
1	<b>Date:</b> 17/06/2020 <b>Format:</b> Email Letter <b>I&amp;AP:</b> Gariep Watch (Chairman: Mr Ferdie Botha/ Technical Advisor: Mr Fritz Bekker)	<p>Gariep Watch is a civic society organisation that endeavours to protect the lower Orange River through effective monitoring and data collection, improved communication by role-players and the enhancement of public participation.</p> <p>We noted your abovementioned NEMA Public Participation Process (Ref. 0512) for a new township development at Topline, with much concern.</p>	<p><b>Respondent: EAP and Municipality (Appendix E3)</b></p> <p>Noted, thank you for your comment.</p> <p><b>[Gariep Watch were placed on the I&amp;AP register for all !Kheis Local Municipality Housing Projects, currently being conducted, following correspondence between the EAP and Gariep Watch – Appendix E3]</b></p>
		<p>Gariep Watch performs quarterly water quality studies and a risk assessment procedure at various localities in the lower Orange River including the river reach flowing through the !Kheis Local Municipalities jurisdiction. Our water quality results show that a number of point and diffuse sources of sewerage pollution may be affecting the surface and ground water resources in the vicinity of these townships and beyond. Furthermore, recent site visits to sewerage water infrastructure at these !Kheis townships showed that much of the sewerage water infrastructure is not being maintained or used for its intended purpose. Pump stations to the oxidation dam systems are not working, sewerage infrastructure is being vandalized, oxidation dam linings are damaged or removed and raw sewerage is being disposed into the veld or towards dry water courses.</p>	<p><b>Respondent: EAP and !Kheis Local Municipality (Appendix E3)</b></p> <p>Noted. Issues relating to the water quality and sewage infrastructure have been addressed in this Draft BAR, the Engineer's Services Report (Appendix D4) and the Freshwater Report (Appendix D2).</p> <p>As per the Engineer's Services Report, all existing households within the Gariep Settlement are currently serviced by Ventilated Improved Pit (VIP) toilets as no bulk sewer infrastructure is present. The construction of a full-borne sewerage system was recommended as per the specifications outlined in the Engineer's Services Report.</p>

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		<p>The photographs in Figure 1 show some of the oxidation dam systems encountered at !Kheis Local Municipality during 2019.</p>  <p>Figure 1: Oxidation dam systems at !Kheis Local Municipality (2019)</p> <p>The extension of existing townships that already have inadequate, unmaintained or unused sewerage infrastructure will only aggravate their pollution risk towards the downstream environment.</p> <p>We therefore object to any new township development in the !Kheis Local Municipality and request the following information:</p> <ol style="list-style-type: none"> <li>1. A list of all new proposed township developments in the !Kheis Local Municipality where EnviroAfrica CC is the appointed environmental practitioner.</li> <li>2. Details pertaining to new sewerage infrastructure that are planned for these developments.</li> </ol> <p>Please also register Gariep Watch as an I&amp;AP for these new township developments.</p>	<p>Noted.</p> <ol style="list-style-type: none"> <li>1. A list of all new proposed township developments were sent to Gariep Watch.</li> <li>2. Please see response above. As per the Engineer's Services Report, all existing households within the Gariep Settlement are currently serviced by Ventilated Improved Pit (VIP) toilets as no bulk sewer infrastructure is present. The construction of a full-borne sewerage system was recommended as per the specifications outlined in the Engineer's Services Report.</li> </ol>

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2	<p><b>Date:</b> 29/06/2020  <b>Format:</b> Email Letter  <b>I&amp;AP:</b> Boegoeberg Watergebruikersvereniging (Jean Lombard)</p>	<p>Boegoeberg Water Users Association is a semi-state institution with responsibilities which include: maintenance of State Infrastructure, Distribution of Water and Revenue Collection.</p> <p>Raw water distribution is mainly for human consumption, industrial use and irrigation.</p> <p>The Boegoeberg Canal System was built in the 1930's and lined with cement in the 1960's. The useable lifespan of a cement structure is in the region of 50 years. It can be seen that the canal structure has surpassed its original designed lifespan.</p> <p>After studying your proposed layout of the new development in Gariep, the following remarks need to be noted:</p> <ul style="list-style-type: none"> <li>• The Gariep Canal Structure is beyond its usable lifespan and although regular maintenance work is done, poses an extreme risk to nearby structures should an unplanned canal breakage occur. The flowrate in the Gariep Canal is around 3m<sup>3</sup>/s (3000 litres/ second), which indicates a huge amount of water outflow in the case of an unplanned canal breakage.</li> <li>• As the canal structure is constructed in cement panels of 3 meters long, water seepage through these structural joints is not uncommon, although regularly maintained. It can be seen that this water seepage would cause severe structural damage to any structure in its nearby vicinity.</li> <li>• Swimming in the canal, although properly fenced is a common practice close to human settlements although its not allowed. The drowning/ loss of life of mostly minor children occurs on a regular basis and is a big concern to this organization. Housing structures close to the canal structure would increase this practice and the risk of minor children drowning would increase in accordance.</li> <li>• A direct result of Human Settlements is the occurrence of litter and pollution, the canal raw water is distributed for human and industrial use, which will increase the risk of contaminated water.</li> </ul>	<p><b>Respondent: EAP and !Kheis Local Municipality (Appendix E3)</b></p> <p>Noted, thank you for your comment.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted, mitigation measures associated with the health and safety of community members have been included in the Impact Assessment (Appendix F, Impact No. 19) and mitigation measures, which must be implemented, have been provided.</p> <p>Noted, pollution was identified as a potential impact. Appropriate mitigation measures have been included in the EMP. This includes implementing effective waste management measures to reduce / prevent illegal dumping and/ or contaminated water entering the canal. Moreover, as per the Freshwater Assessment, a structure was present which</p>

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		<p>Recommendations: Taking the above-mentioned remarks/ risks into account, it can be seen that the new township development must be done to ensure that all risks are minimized. This can be partly accomplished by not allowing any structure in the close proximity of the canals as is currently the case. We propose that the area's in the vicinity of the canal structure not form part of the development.</p>	<p>prevented stormwater entering the irrigation tunnel (Figure 14 of Freshwater Assessment). Noted, thank you. The preferred layout has considered environmental and socially sensitive areas of the proposed site for development. Mitigation measures (see Appendix F, Impact No. 19) must be implemented to mitigate against the health and safety impact associated with the irrigation canal.</p>
<b>COMMENTS RECEIVED ON DRAFT BASIC ASSESSMENT REPORT</b>			
3	<p><b>Date:</b> 25/11/2020 <b>Format:</b> Email Letter <b>I&amp;AP:</b> SAHRA</p>	<p>Final Comment</p> <p>The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:</p> <ul style="list-style-type: none"> <li>• 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;</li> <li>• 38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to. No further specific conditions are provided for the development;</li> <li>• 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</li> <li>• 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</li> </ul>	<p>Thank you for your comment.</p> <p>It is noted that SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit have no objections to the proposed Gariep Housing Development. Noted, all mitigation measures provided by the Heritage Specialists have been incorporated into the EMPr and must be implemented accordingly.</p> <p>Noted, the SAHRA APM unit, along with the ECO, will be immediately notified should any evidence of archaeological sites or remains be discovered during construction.</p> <p>Noted, the BGG unit will be immediately contacted should unmarked human burials be uncovered or discovered.</p>

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		<ul style="list-style-type: none"> <li>• 38(4)d – See section 51(1) of the NHRA;</li> <li>• 38(4)e – The following conditions apply with regards to the appointment of specialists: <ul style="list-style-type: none"> <li>○ If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;</li> </ul> </li> <li>• The Final BAR and EMPr must be submitted to SAHRA for record purposes;</li> <li>• The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.</li> </ul>	<p>Noted, should any heritage resources be uncovered or discovered, a professional and qualified archaeologist and/or palaeontologist will be contacted. The ECO will also be immediately contacted.</p> <p>Noted. The Final BAR and Final EMPr will be submitted to SAHRA.</p> <p>Noted. I&amp;APs will be notified of the DENC's decision regarding the EA.</p>