

REFERENCE: 16/3/3/1/F5/16/2052/2

31 October 2024

Department of Environmental Affairs and Development Planning  
Directorate: Development Management, Region 1

**For Attention: Ms. N Bieding**

**Dear N Bieding**

**RE: COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) (“NEMA”) AND THE ENVIRONMENTAL IMPACT ASSESSMENT (“EIA”) REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED ESTABLISHMENT OF 132 KILOVOLT (KV”) OVERHEAD POWERLINE (DE HOOP 132KV OVERHEAD POWERLINE) AND LOOP-IN, LOOP-OUT FROM THE ESKOM NATIONAL ELECTRICITY GRID TO THE EXISTING DE HOOP HOUSING DEVELOPMENT SUBSTATION THAT WILL TRAVERSE THE REMAINDER OF THE FARM NO. 1113, PORTION 18 OF THE FARM NO. 766, PORTION 13 OF THE FARM NO. 766, THE REMAINDER OF PORTION 8 OF THE FARM NO. 766, PORTION 24 OF THE FARM NO. 766, THE REMAINDER OF PORTION 15 OF THE FARM NO. 766 AND ERVEN 373, 12081 AND 12496, MALMESBURY**

In response to the comments from the Department of Environmental Affairs and Development Planning (DEA&DP), outlined in their letter dated **26 September 2024** (attached as Annexure A), please find the EAP’s response in the table below.

Comment	Response
<p>1. The draft BAR and the supporting documentation, received by this Directorate via electronic mail correspondence on 3 September 2024, and this Directorate’s correspondence acknowledging receipt thereof (dated 13 September 2024), refer.</p>	<p>Noted.</p>
<p>2. Having considered the information contained in the draft BAR, this Directorate hereby provides the following comments –</p> <p>2.1. Landowner’s Consent</p> <p>2.1.1. As per this Directorate’s previous correspondence (dated 13 September 2024), please ensure that for all non-linear components, which are proposed to take place on land/property(s) not in the ownership of the Swartland Municipality, the requirements of Regulation 39(1) of the EIA Regulations, 2014 (as amended) are met.</p> <p>2.1.2. If the above is applicable, proof of having met the requirements of Regulation 39(1) of the EIA</p>	<p>Only linear components are proposed for this development proposal.</p>

Comment	Response
<p>Regulations, 2014 (as amended) must be submitted to this Directorate prior to the submission of the final BAR.</p>	
<p>2.2. Authorities' Comments</p> <p>2.2.1. Due to the nature of your proposal, please note that comments from the South African Civil Aviation Authority must be provided. The comments obtained must be adequately responded to, and proof thereof included in the final BAR.</p>	<p>An application has been submitted to the South African Civil Aviation Authority (SACAA). For proof, refer to <b>Appendix F7.2 – Application to SACAA for Comment</b> (dated 01 October 2024) in the revised draft BAR.</p> <p>CK Rumboll &amp; Partners, the town planner appointed for the development proposal, submitted the application to the SACAA. Additionally, as noted in a response letter (dated 10 October 2024 ; Ref: MAL/12474):</p> <p><i>"Several efforts, through phone calls and emails, have been made to obtain feedback from the South African Civil Aviation Authority (CAA), leading us to reasonably conclude that they have no comments on the matter..."</i></p> <p>For proof of the response letter, refer to <b>Appendix L – CK Rumboll Response on Comments on the Draft Basic Assessment Report</b> (dated 10 October 2024 ; Ref: MAL/12474) in the revised draft BAR.</p> <p>However, since the application to the SACAA, the authority has provided comments in the form of a conditional approval for the proposed development. For proof of the conditional approval letter, please refer to <b>Appendix M – CAA Conditional Approval for the Proposed Transmission Line Facility</b> (dated 29 October 2024) in the revised draft BAR.</p>
<p>2.2.2 As per this Directorate's previous this Directorate's previous correspondence (dated 13 September 2024), please ensure that comments obtained from Heritage Western Cape is submitted together with the final BAR. The comments obtained must adequately responded to, and proof thereof included in the final BAR.</p>	<p>Heritage Western Cape's response (dated 03 May 2024) to the notification of intent to develop, in terms of Section 38(8) of the NHRA, reads as follows:</p> <p><i>"You are hereby notified that, since there is no reason to believe that the proposed powerlines between Abbotsdale and Malmesbury in Swartland will impact heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. HWC chance finds procedure to be included in the environmental authorization.</i></p> <p><i>However, should any heritage resources, including evidence of graves and human burials, archaeological</i></p>

Comment	Response
	<p><i>material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay.”</i></p> <p>For proof of the comment obtained from Heritage Western Cape, please refer to <b>Appendix E1 – HWC Section 38 Response</b> (dated 03 May 2024) in the revised draft BAR.</p>
<p>2.2.3 Similarly, comments from the authorities listed in this Directorate’s previous correspondence (dated 13 September 2024) must be obtained and adequately responded to, and proof thereof included in the final BAR</p>	<p>The following authorities were notified and invited to provide comment on the draft BAR:</p> <ol style="list-style-type: none"> <li>1. Department of Agriculture</li> <li>2. Department of Water and Sanitation</li> <li>3. Department of Rural Development and Land Reform Spatial Planning</li> <li>4. Heritage Western Cape</li> <li>5. CapeNature</li> <li>6. West Coast District Municipality</li> <li>7. Swartland Local Municipality</li> <li>8. Eskom</li> <li>9. Transnet</li> <li>10. SANRAL – South African Road Agency Limited</li> <li>11. SACAA – South African Civil Aviation Authority</li> <li>12. ATNS - Air Traffic &amp; Navigation Services</li> <li>13. BirdLife SA</li> </ol> <p>If comments are not received within the prescribed timeframes, it is assumed that no feedback is forthcoming. The revised draft BAR will be circulated again to the authorities mentioned above.</p> <p>The following authorities commented on the development proposal during the 30-day commenting period (04 September to 08 October 2024):</p> <ol style="list-style-type: none"> <li>1. <b>CapeNature</b> requested shapefiles of the activity footprint, but has not provided any feedback since then.</li> <li>2. <b>The Western Cape Government's Transport Infrastructure Branch</b> reviewed the roads affected by the proposal, specifically those under their authority, including Divisional Road 1111. They stated that they have no objection to issuing the Environmental Authorisation; however, a wayleave</li> </ol>

Comment	Response
	<p>application will be necessary. This requirement has been communicated to CK Rumboll &amp; Partners, who are responsible for managing such applications for the Swartland Municipality concerning this development proposal. Refer to <b>Appendix E6 - 2024 09 11_AN 2024-09-0028 Letter</b>.</p> <p>The following authority commented on the development proposal <i>outside</i> the 30-day commenting period (04 September to 08 October 2024), but still within the overall 90-day Basic Assessment period:</p> <ol style="list-style-type: none"> <li>1. <b>SACAA</b> provided comments in the form of a conditional approval for the proposed development. For proof of the conditional approval letter, please refer to <b>Appendix M—CAA Conditional Approval for the Proposed Transmission Line Facility</b></li> </ol>
<p>2.3 Associated Impacts</p> <p>2.3.1 Based on the two (2) images below, it appears that the current proposed powerline, as extracted from figure 1 of the draft BAR (figure 1 below) is not the same as the powerline route as the dark blue line in figure 2 below (extracted from the correspondence of Westerlike Provinsie Oesbespuiting Maatskappy (Pty) Ltd (“WPO”) (dated 22 November 2023):</p>	<p>For all comments related to the aerodrome, Westerlike Provinsie Oesbespuiting Maatskappy (Pty) Ltd (WPO), and the SACAA, please refer to the response letter drafted by CK Rumboll &amp; Partners specifically addressing these matters. This letter is attached as <b>Appendix L – CK Rumboll Response on Comments on the Draft Basic Assessment Report</b> (dated 10 October 2024 ; Ref: MAL/12474) in the revised draft BAR.</p> <p>However, since the draft BAR was made available for comment, a consultation was held with WPO to discuss their concerns and comments. Following the representations made in the letter referenced in Appendix L and the subsequent meeting between CK Rumboll &amp; Partners and WPO, WPO decided to withdraw their objection. For proof of the withdrawal, please refer to the letter from WPO attached as <b>Appendix N—2024-10-28_Withdrawal_Signed</b> in the revised draft BAR.</p>

Comment	Response
<p>2.3.2 Therefore, please ensure that comments from the WPO is obtained on the latest powerline route, as depicted in figure 1 above. The comments obtained must be adequately responded to, and proof thereof included in the Comments and Responses Report.</p>	<p>See response above.</p> <p>For all comments related to the aerodrome, Westerlike Provinsie Oesbespuiting Maatskappy (Pty) Ltd (WPO), and the SACAA, please refer to the response letter drafted by CK Rumboll &amp; Partners specifically addressing these matters. This letter is attached as <b>Appendix L – CK Rumboll Response on Comments on the Draft Basic Assessment Report</b> (dated 10 October 2024 ; Ref: MAL/12474) in the revised draft BAR.</p> <p>However, since the draft BAR was made available for comment, a consultation was held with WPO to discuss their concerns and comments. Following the representations made in the letter referenced in Appendix L and the subsequent meeting between CK Rumboll &amp; Partners and WPO, WPO decided to withdraw their objection. For proof of the withdrawal, please refer to the letter from WPO attached as <b>Appendix N—2024-10-28_Withdrawal_Signed</b> in the revised draft BAR.</p>
<p>2.3.3 Furthermore, whilst not being based on the latest proposed powerline depicted in figure 1 above, the Directorate notes with concern the objections raised in the correspondences from WPO (dated 12 December 2022 and 22 November 2023, respectively). The said correspondences highlighted that the proposal’s impacts and matters of concern are, as follows:</p> <p>2.3.3.1Its location having a direct impact on the health and safety of the aircraft, pilots and other personnel at the aerodrome, including:</p> <p>2.3.3.1.1. potential catastrophic events caused by pilots have more limited options of evading danger;</p> <p>2.3.3.1.2. negative risks to the aircraft, pilots as well as the surrounding environment;</p> <p>2.3.3.1.3. noise from the powerline with such a high voltage or the magnetic field emitted from the powerline, may have an effect on radio communication; and</p> <p>2.3.3.1.4. effect on aircraft instrumentation, which if not properly functioning, can lead to aircraft collisions, incorrect readings.</p> <p>2.3.3.2 If approved, it will severely affect the ability of WPO to adhere to the Civil Aviation Regulations;</p>	<p>See response above.</p> <p>For all comments related to the aerodrome, Westerlike Provinsie Oesbespuiting Maatskappy (Pty) Ltd (WPO), and the SACAA, please refer to the response letter drafted by CK Rumboll &amp; Partners specifically addressing these matters. This letter is attached as <b>Appendix L – CK Rumboll Response on Comments on the Draft Basic Assessment Report</b> (dated 10 October 2024 ; Ref: MAL/12474) in the revised draft BAR.</p> <p>However, since the draft BAR was made available for comment, a consultation was held with WPO to discuss their concerns and comments. Following the representations made in the letter referenced in Appendix L and the subsequent meeting between CK Rumboll &amp; Partners and WPO, WPO decided to withdraw their objection. For proof of the withdrawal, please refer to the letter from WPO attached as <b>Appendix N—2024-10-28_Withdrawal_Signed</b> in the revised draft BAR.</p>

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<p>2.3.3.3 will have a severe financial impact on the business of WPO, its clients and the economy, including:</p> <p>2.3.3.3.1. paying hefty fines which can harm the liquidity of WPO, thereby affecting the livelihood of its employees and the ability to service its clients;</p> <p>2.3.3.3.2. in extreme circumstances, the executive staff of WPO can be held personally liable in the case of severe injury or loss of life; and</p> <p>2.3.3.3.3. temporary and/or permanent suspension of operating certificate/licenses held, would be detrimental to the organisation and community.</p>	
<p>2.3.3.4 The adjusted location of the proposed powerline:</p> <p>2.3.3.4.1. still intersects directly with the two main flight paths; and</p> <p>2.3.3.4.2. can drastically affect the business of the WPO.</p>	
<p>2.3.4 Should the pending comments to be obtained from the WPO on the latest powerline route be maintained, then the abovementioned impacts and/or should any other/new matters/concern be raised, then it will require you to:</p> <p>2.3.4.1. update the BAR to display evidence of having addressed and assessed the impacts raised by the WPO;</p> <p>2.3.4.2. update Appendix J2 of the BAR to display evidence of having addressed and assessed the impacts raised by the WPO;</p> <p>2.3.4.3. provide the comments that were obtained from the South African Civil Aviation Authority during the last Public Participation Process (“PPP”) undertaken as well as the responses thereto/manner it was addressed; and</p> <p>2.3.4.4. provide a Comments and Response Report of all comments obtained, including that which were obtained from the South African Civil Aviation Authority as well as the responses thereto.</p>	<p>See response above.</p> <p>For all comments related to the aerodrome, Westerlike Provinsie Oesbespuiting Maatskappy (Pty) Ltd (WPO), and the SACAA, please refer to the response letter drafted by CK Rumboll &amp; Partners specifically addressing these matters. This letter is attached as <b>Appendix L – CK Rumboll Response on Comments on the Draft Basic Assessment Report</b> (dated 10 October 2024 ; Ref: MAL/12474) in the revised draft BAR.</p> <p>However, since the draft BAR was made available for comment, a consultation was held with WPO to discuss their concerns and comments. Following the representations made in the letter referenced in Appendix L and the subsequent meeting between CK Rumboll &amp; Partners and WPO, WPO decided to withdraw their objection. For proof of the withdrawal, please refer to the letter from WPO attached as <b>Appendix N—2024-10-28_Withdrawal_Signed</b> in the revised draft BAR.</p>

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<p>2.3.5 With regards to the abovementioned requirements, please note that if the BAR undergoes several updates and changes, depending on (i) the comments to be obtained from the WPO, the South African Civil Aviation Authority and/or any other registered I&amp;AP and commenting authority(s) and (ii) the need to provide the information, as per 2.3.4.1. to 2.3.4.2. above), then a revised draft BAR and supporting information, which incorporates all of the changes must be circulated to all registered I&amp;APs as well as commenting authorities for an additional minimum commenting period of thirty (30) days. Your attention is therefore drawn to Regulation 19(1)(b) of the EIA Regulations, 2014 (as amended) that is applicable in this regard.</p>	<p>A revised draft BAR, along with supporting documentation will be circulated to all registered I&amp;APs and commenting authorities for an additional minimum commenting period of thirty (30) days.</p>
<p>2.4. Associated Applications and Information  2.4.1. As per this Directorate’s previous correspondence (dated 13 September 2024), please ensure that proof of having submitted the necessary application (s) in terms of the National Water Act, 1998 (Act No. 36 of 1998) to the National Department of Water and Sanitation is provided.</p>	<p>The necessary application in terms of the National Water Act, 1998 (Act No. 36 of 1998) to the National Department of Water and Sanitation has been made. The application / e-WULAA’s reference is WU 34816.</p>
<p>2.4.2. According to the information contained in the Freshwater Report (dated October 2023), CK Rumboll and Partners in Malmesbury were appointed to deal with the required servitudes over private land. This information was, however, not made available, as part of the abovementioned draft BAR.</p>	<p>The following passage was included in the revised draft BAR under Section E: Planning Context and Need and Desirability: <i>“The town planner, CK Rumboll and Partners were appointed by Swartland Municipality to deal with the required servitudes over private land”</i>.</p>
<p>2.5. Specialist Report and Input 2.5.1. Based on the review of the Freshwater Report (dated October 2023), it is evident that the report was compiled to meet the requirements, as per National Water Act, 1998 (Act No. 36 of 1998), as opposed to Appendix 6 of EIA Regulations, 2014 (as amended), as originally confirmed in this Directorate’s correspondence (dated 13 September 2024). However, in view of the proposed development and the EIA Listed Activities it triggers (most notably in this case Listed Activity 19 of Listing Notice 1 of the EIA Regulations, 2014 (as amended)), it is recommended that the Freshwater Report (dated October 2023) be updated to meet the requirements of Appendix 6 of EIA Regulations, 2014 (as amended).</p>	<p>It is acknowledged that the Freshwater Report was prepared to meet the requirements of the National Water Act, 1998, specifically for the Water Use Authorisation process. However, the content of the report is sufficient for the Environmental Impact Assessment (EIA) process, and there is no need to update or restructure it to align with the requirements of Appendix 6 of the EIA Regulations, 2014. Nevertheless, for ease of reference, please see <b>Annexure A of the updated Freshwater Report</b>. Annexure A outlines where the requirements from Appendix 6 of the EIA Regulations, 2014, can be found in the Freshwater Report.</p>



Comment	Response
<p>2.5.2. Please ensure that page ii of the Terrestrial Biodiversity Assessment Report (dated 11 January 2024), which refers to the specialist being appointed for the proposed Helios tower cellular site is amended to include the appointment for the correct proposed development, which forms part of this application.</p>	<p>The specialist who conducted the Terrestrial Biodiversity Assessment, since completing the draft report, has immigrated to Australia and is no longer practicing in South Africa.</p> <p>Despite EnviroAfrica’s efforts to contact the specialist for the requested updates as per the specified comments, the specialist has been unable to respond and assist.</p>
<p>2.5.3. The abovementioned study must be updated to provide the following information in terms of the requirements of the “<i>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</i>” (“the Protocols”) –</p>	<p>Nevertheless, EnviroAfrica is of the opinion that that the content of the report remains sound and adequately addresses the relevant environmental considerations in context of the proposed development and the associated impacts. Although the previously assessed route differs somewhat from the new proposed route, the environmental attributes of the immediate area have still been identified. Given the low-impact nature of the construction and operation of the power line on the terrestrial environment, it is unlikely to result in significant changes, provided that mitigating measures are followed.</p>
<p>2.5.3.1. The contact details of the specialist, their SACNASP registration number, their field of expertise and a curriculum vitae; and</p> <p>2.5.3.2. A statement on the duration, date and season of the site inspection and the relevance of the season to the outcome of the assessment.</p>	<p>Therefore, under the circumstances, EnviroAfrica recommends that the report be noted as is. However, should the Competent Authority deem the requested updates significant for decision-making, then other options for addressing the required updates in consultation with another qualified specialist will be explored.</p>
<p>2.5.4. The Visual Assessment Report (dated 29 July 2024), must be updated to provide the following information in terms of the requirements of the Appendix 6 of the EIA Regulations, 2014 (as amended)</p> <p>2.5.4.1. Section 1 (a)(ii) - the expertise of that specialist to compile a specialist report including a curriculum vitae;</p> <p>2.5.4.2. Section 1 (c)(cA) - an indication of the quality and age of base data used for the specialist report; and</p> <p>2.5.4.3. Section 1 (d) - the duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment.</p>	<p>Noted. The Visual Assessment Report has been updated to include the required information from Appendix 6 of the EIA Regulations, 2014 (as amended), covering the specialist's expertise and CV, the quality and age of base data, and details on the duration, date, and season of the site investigation. Refer to the appended section in the Visual Assessment Report (<b>Appendix G3 - Visual Assessment</b>).</p>



<b>Comment</b>	<b>Response</b>
<p>2.5.5. The Agricultural Compliance Statement (dated October 2023), must be updated to provide the following information, as per the requirements of the Protocol –</p> <p>2.5.5.1. In the case of a linear activity, confirmation from the agricultural specialist or soil scientist, that in their opinion, based on the mitigation and remedial measures proposed, the land can be returned to the current state within two years of completion of the construction phase.</p>	<p>As part of the specialist’s conclusion the specialist stated the following: <i>“Due to the linear nature and low impact on existing agricultural activities, it is the specialist’s opinion that the development continues, provided the following conditions are met:</i></p> <ol style="list-style-type: none"> <li>1. <i>Good fencing is used during construction.</i></li> <li>2. <i>Minimal footprint inside agricultural lands.</i></li> <li>3. <i>All rehabilitation to occur immediately, to ensure that surrounding area is not impacted on 2 years after construction</i></li> </ol> <p><i>The development will not have a significant impact on agricultural activities in the area and poses no threat to food security. In terms of agricultural sensitivity, the development should thus be allowed to proceed.”</i></p> <p>Refer to <b>Appendix G4 - Agricultural Compliance Statement.</b></p>
<p>2.5.6. The Socio- Economic Impact Assessment Report (dated May 2024), must be updated to provide the following information, as per the requirements of the Appendix 6 of the EIA Regulations, 2014 (as amended)</p> <p>2.5.6.1. Section 1 (a)(ii) - the expertise of that specialist to compile a specialist report including a curriculum vitae;</p> <p>2.5.6.2. Section 1 (c)(cA) - an indication of the quality and age of base data used for the specialist report; and</p> <p>2.5.6.3. Section 1 (e) - a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used.</p>	<p>Noted. The Socio-Economic Impact Assessment Report has been updated to include the required information from Appendix 6 of the EIA Regulations, 2014 (as amended), covering the expertise of the specialist, the quality and age of base data, and the methodology used in preparing the report.</p> <p>Refer to <b>Appendix G5 - Socio Economic Impact Assessment.</b></p>

Comment	Response
<p>2.5.7. Based on proposed powerline route, as illustrated in figure 1 on page 13 of the draft BAR <i>versus</i> the visual representations of the proposed powerline route, as it appears in the various specialist studies/input (with the exception of the Visual Assessment Report (dated 29 July 2024), which has been suitably updated), it appears that the following specialist studies/inputs are based on the previous and not current proposed powerline route:</p> <p>2.5.7.1. Freshwater Report (dated October 2023);            2.5.7.2. Terrestrial Biodiversity Assessment Report (dated 11 January 2024);            2.5.7.3. Agricultural Compliance Statement (dated October 2024); and            2.5.7.4. Socio- Economic Impact Assessment Report (dated May 2024).</p> <p>In light of the above, the said specialists must suitably update their studies and inputs to focus on the current proposed powerline route.</p>	<p>The listed specialist studies have been updated to align with the current proposed powerline route.</p>
<p>2.5.8. This Directorate hereby reminds to you that all updated studies and inputs will be regarded as new information that must be circulated to all registered I&amp;APs and commenting authorities (including this Directorate) for a further minimum commenting period of thirty (30) days. It is in this regard that the new information must be made part of the abovementioned revised draft BAR and the provisions of Regulation 19 (1)(b) of the EIA Regulations, 2014 (as amended).</p>	<p>Noted. All updated studies and inputs will be circulated to registered I&amp;APs and commenting authorities for a minimum commenting period of thirty (30) days.</p>
<p>2.6. EIA Listed Activities            As per this Directorate’s previous correspondence (dated 13 September 2024), please ensure that confirmation is provided on the applicability of Listed Activity 14 of Listing Notice 3 of the EIA Regulations, 2014 (as amended). In the event that the said Listed Activity is not triggered, an updated Application Form, which excludes the said Listed Activity must be submitted to this Directorate. The updated Application Form may be included in the revised draft BAR to be circulated for the additional minimum commenting period of thirty (30) days.</p>	<p>The EAP is of the opinion that the possibility of triggering Activity 14 from Listing Notice 3 of the EIA Regulations, 2014 (as amended) is significant enough to warrant its inclusion. This is to avoid any ambiguity and to adopt a precautionary approach.</p> <p>Activity 14 is relevant in this case because the powerline pylon structures may have a cumulative physical footprint of 10 square meters or more where such pylons are placed within 32 meters of a watercourse.</p> <p>Therefore, no changes will be made to the Listing Notice Activities applicable to this development.</p>

Comment	Response
<p>2.7. Public Participation Particulars</p> <p>2.7.1. According to this Directorate’s records, only a Notice of Intent (“NOI”) Form was received and responded to by this Directorate on 14 February 2023 (Referenced: 16/3/3/6/7/1/F5/16/2019/23). It is, therefore, this Directorate’s understanding that all of the PPP requirements stipulated in Chapter 6 and Regulation 41 of the EIA Regulations, 2014 (as amended) will be conducted, as part of your current application, with the exception of the placing of the newspaper advert (already placed on 15 November 2022 and 17 October 2023, respectively. Proof of having met these requirements must therefore be submitted together with the final BAR.</p>	<p>All PPP requirements have been conducted as stipulated in Chapter 6 and Regulation 41 of the EIA Regulations, 2014 (as amended), the proof of having met these requirements is appended as Appendices F in the revised BAR.</p>
<p>2.7.2. All comments obtained during the PPP must be adequately responded to, and proof hereof included in the Comments and Response Report to be submitted together with the final BAR.</p>	<p>The Comments and Response Report will be submitted together with the final BAR.</p>
<p>2.8. Content Requirements of the Environmental Management Programme (“EMPr”)</p> <p>2.8.1. Please ensure that all relevant mitigation measures proposed throughout the Basic Assessment process, the specialist studies and other inputs obtained, are included in the EMPr.</p>	<p>Noted.</p>
<p>2.8.2. Your attention is drawn to Appendix 4 of the EIA Regulations, 2014 (as amended), for the requirements with respect to the ‘<i>Content of Environmental Management Programme</i>’. Please ensure that the EMPr is updated to fulfil the following requirements, as per Appendix 4 of the EIA Regulations, 2014 (as amended):</p>	<p>Noted.</p>
<p>2.8.2.1. Section 1 (a)(ii) - the expertise of that EAP to prepare an EMPr, including a curriculum vitae; and</p>	<p>The expertise of the EAP who prepared the EMPr and the EAP who reviewed it is detailed on page 2 of the revised EMPr.</p>
<p>2.8.2.2. Section 1 (c) - 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 (further refer to paragraph 2.9.3. below and ensure that the same map is provided in both instances).</p>	<p>A map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers have been included in the final BAR and EMPr as per Section 3(l)(ii) of Appendix 1 of the EIA Regulations, 2014 (as amended).</p>

Comment	Response
	Refer to <b>Appendix B2.1</b> and <b>Appendix B2.2</b> of the revised draft BAR and to <b>Section 3.10.3 “No-Go” areas in the revised EMPr.</b>
2.8.3. As per the Freshwater Report (October 2023), please ensure that the specific best management practices pertaining to, <i>inter alia</i> , awareness that the river must be kept intact to keep the impacts at bay are all included in the EMPr.	The specific best management practices related to maintaining river integrity is included in the EMPr as outlined in the Freshwater Report (October 2023).  Refer to <b>Section 3.10.31 in the revised EMPr.</b>
2.8.4. Furthermore, (i) the specific targeted restoration efforts as well as (ii) the measures to manage and control Invasive Alien Plants that must be implemented, as required in terms of the Terrestrial Biodiversity Assessment Report (dated 11 January 2024) must be further elaborated on/detailed and included in the EMPr.	Refer to page 59-60 for the operational impact management outcomes related to the manage and control of invasive alien plants.
2.9. Content Requirements of the BAR 2.9.1. Your attention is drawn to Appendix 1 of the EIA Regulations, 2014 (as amended), for the requirements with respect to the ‘ <i>Content of basic assessment reports</i> ’. Please ensure that you fulfil these requirements.	Noted.
2.9.2. It appears that the following ‘no-go’ areas, are applicable to your development proposal:  2.9.2.1. buffer areas (with reference to the development footprint in proximity to the aerodrome and associated components);	SACAA has provided comments in the form of a conditional approval for the proposed development. For proof of the conditional approval letter, please refer to <b>Appendix M – CAA Conditional Approval for the Proposed Transmission Line Facility</b> (dated 29 October 2024) in the revised draft BAR.
2.9.2.2. possible/partial avoidance of the mapped CBA I and ESA1;  2.9.2.3. possible/partial avoidance of local watercourses, the danger and other areas, as per page 27 of the Freshwater Report (October 2023); and  2.9.2.4. transmission line required to be located a 100m away from any residential property, as per page 13 of Appendix J2.	A map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers have been included in the final BAR and EMPr as per Section 3(l)(ii) of Appendix 1 of the EIA Regulations, 2014 (as amended).
2.9.3. In light of the above, the information, as per Section 3(l)(ii) of Appendix 1 of the EIA Regulations, 2014 (as amended) must be provided together with the final BAR.	Refer to <b>Appendix B2.1</b> and <b>Appendix B2.2</b> of the revised draft BAR and to <b>Section 3.10.3 “No-Go” areas in the revised EMPr.</b>

Comment	Response
<p>General</p> <p>3.1 Please be reminded that in accordance with Regulation 19(1) of the EIA Regulations, 2014 (as amended), the final BAR must be submitted within ninety (90) days of receipt of the application by the Competent Authority, calculated from <b>3 September 2024</b>.</p>	<p>Noted.</p>
<p>3.2 In terms of Regulation 45 of the EIA Regulations, 2014 (as amended), an application in terms of the EIA Regulations, 2014 (as amended) lapses and the Competent Authority will deem the application as having lapsed, if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations.</p>	<p>Noted.</p>
<p>3.3 If, however, significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Competent Authority that an additional 50 days (i.e., 140 days from receipt of the Application Form for Environmental Authorisation) will be required for the submission of the final BAR for decision-making. The additional 50 days must include a minimum commenting period of thirty (30) days to allow I&amp;APs to comment on the revised report/additional information (see paragraphs 2.3.4.1., 2.3.4.2., 2.3.5., 2.4.3. and 2.5.8. above).</p>	<p>Acknowledgment of the requirement to notify the Competent Authority of significant changes or new information in the BAR is noted.</p>
<p>3.4. This Directorate awaits the submission of the final BAR for decision-making. Please note that the final BAR must be submitted via mail correspondence to the central email address (DEADPEIAAdmin@westerncape.gov.za) and include a link to download the documents. The submission of the final BAR must contain an MS Word document/pdf (not scanned) copy of the final BAR and separate appendices.</p>	<p>Noted.</p>
<p>4. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p>	<p>Noted.</p>

Comment	Response
<p>5. It is prohibited in terms of the NEMA for a person to commence with a Listed Activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable for a fine not exceeding R10 000 000 or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.</p>	<p>Acknowledgment of the prohibition under NEMA is noted.</p>
<p>6. This Directorate reserves the right to revise or withdraw its comments and request further information from you based on any information received.</p>	<p>Noted. The right to revise or withdraw comments, as well as the request for further information, is acknowledged.</p>

Thank you for your attention to this matter.

Kind regards



**Lian Roos**  
*Environmental Assessment Practitioner*  
*SACNASP PrSciNat (151023)*  
*EAPASA Candidate EAP (2022/4550)*  
**EnviroAfrica cc**



**REFERENCE:** 16/3/3/1/F5/16/2052/24

**DATE:** 26 SEPTEMBER 2024

The Municipal Manager  
Swartland Municipality  
Private Bag X52

**MALMESBURY**

7299

**For Attention: Mr. M. J. Möller**

Tel.: (022)487 9400

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[swartlandmun@swartland.org.za](mailto:swartlandmun@swartland.org.za)

Dear Sir

**COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) (“NEMA”) AND THE ENVIRONMENTAL IMPACT ASSESSMENT (“EIA”) REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED ESTABLISHMENT OF 132 KILOVOLT (KV”) OVERHEAD POWERLINE (DE HOOP 132KV OVERHEAD POWERLINE) AND LOOP-IN, LOOP-OUT FROM THE ESKOM NATIONAL ELECTRICITY GRID TO THE EXISTING DE HOOP HOUSING DEVELOPMENT SUBSTATION THAT WILL TRAVERSE THE REMAINDER OF THE FARM NO. 1113, PORTION 18 OF THE FARM NO. 766, PORTION 13 OF THE FARM NO. 766, THE REMAINDER OF PORTION 8 OF THE FARM NO. 766, PORTION 24 OF THE FARM NO. 766, THE REMAINDER OF PORTION 15 OF THE FARM NO. 766 AND ERVEN 373, 12081 AND 12496, MALMESBURY**

1. The draft BAR and the supporting documentation, received by this Directorate via electronic mail correspondence on 3 September 2024, and this Directorate's correspondence acknowledging receipt thereof (dated 13 September 2024), refer.
2. Having considered the information contained in the draft BAR, this Directorate hereby provides the following comments –
  - 2.1. Landowner's Consent
    - 2.1.1. As per this Directorate's previous correspondence (dated 13 September 2024), please ensure that for all non-linear components, which are proposed to take place on land/property(s) not in the ownership of the Swartland Municipality, the requirements of Regulation 39(1) of the EIA Regulations, 2014 (as amended) are met.
    - 2.1.2. If the above is applicable, proof of having met the requirements of Regulation 39(1) of the EIA Regulations, 2014 (as amended) must be submitted to this Directorate prior to the submission of the final BAR.
  - 2.2. Authorities' Comments
    - 2.2.1. Due to the nature of your proposal, please note that comments from the South African Civil Aviation Authority must be provided. The comments obtained must be adequately responded to, and proof thereof included in the final BAR.

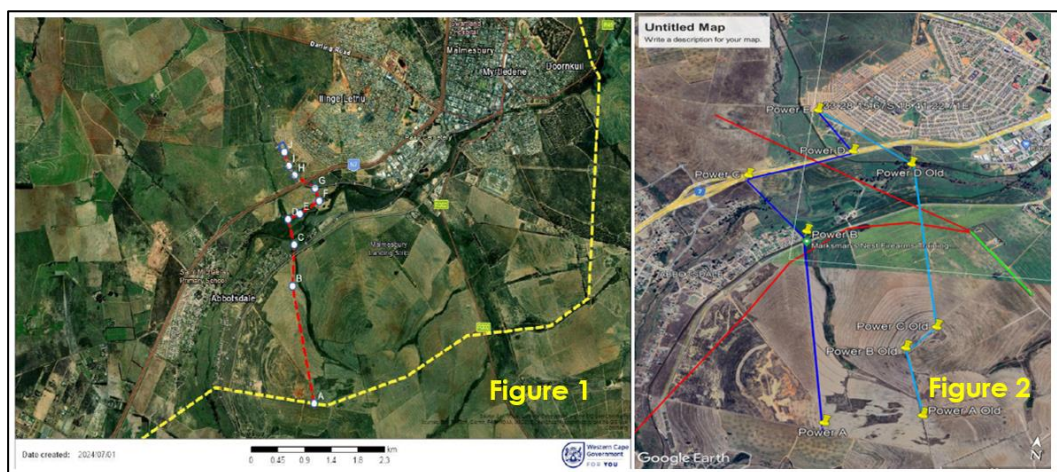


2.2.2. As per this Directorate's previous this Directorate's previous correspondence (dated 13 September 2024), please ensure that comments obtained from Heritage Western Cape is submitted together with the final BAR. The comments obtained must adequately responded to, and proof thereof included in the final BAR.

2.2.3. Similarly, comments from the authorities listed in this Directorate's previous correspondence (dated 13 September 2024) must be obtained and adequately responded to, and proof thereof included in the final BAR.

### 2.3. Associated Impacts

2.3.1. Based on the two (2) images below, it appears that the current proposed powerline, as extracted from figure 1 of the draft BAR (figure 1 below) is not the same as the powerline route as the dark blue line in figure 2 below (extracted from the correspondence of Westerlike Provinsie Oesbespuiting Maatskappy (Pty) Ltd ("WPO") (dated 22 November 2023):



2.3.2. Therefore, please ensure that comments from the WPO is obtained on the latest powerline route, as depicted in figure 1 above. The comments obtained must be adequately responded to, and proof thereof included in the Comments and Responses Report.

2.3.3. Furthermore, whilst not being based on the latest proposed powerline depicted in figure 1 above, the Directorate notes with concern the objections raised in the correspondences from WPO (dated 12 December 2022 and 22 November 2023, respectively). The said correspondences highlighted that the proposal's impacts and matters of concern are, as follows:

2.3.3.1. Its location having a direct impact on the health and safety of the aircraft, pilots and other personnel at the aerodrome, including.:

- 2.3.3.1.1. potential catastrophic events caused by pilots have more limited options of evading danger;
- 2.3.3.1.2. negative risks to the aircraft, pilots as well as the surrounding environment;
- 2.3.3.1.3. noise from the powerline with such a high voltage or the magnetic field emitted from the powerline, may have an effect on radio communication; and
- 2.3.3.1.4. effect on aircraft instrumentation, which if not properly functioning, can lead to aircraft collisions, incorrect readings.

2.3.3.2. If approved, it will severely affect the ability of WPO to adhere to the Civil Aviation Regulations;

- 2.3.3.3. It will have a severe financial impact on the business of WPO, its clients and the economy, including:
  - 2.3.3.3.1. paying hefty fines which can harm the liquidity of WPO, thereby affecting the livelihood of its employees and the ability to service its clients;
  - 2.3.3.3.2. in extreme circumstances, the executive staff of WPO can be held personally liable in the case of severe injury or loss of life; and
  - 2.3.3.3.3. temporary and/or permanent suspension of operating certificate/licenses held, would be detrimental to the organisation and community.
- 2.3.3.4. The adjusted location of the proposed powerline:
  - 2.3.3.4.1. still intersects directly with the two main flight paths; and
  - 2.3.3.4.2. can drastically affect the business of the WPO.
- 2.3.4. Should the pending comments to be obtained from the WPO on the latest powerline route be maintained, then the abovementioned impacts and/or should any other/new matters/concern be raised, then it will require you to:
  - 2.3.4.1. update the BAR to display evidence of having addressed and assessed the impacts raised by the WPO;
  - 2.3.4.2. update Appendix J2 of the BAR to display evidence of having addressed and assessed the impacts raised by the WPO;
  - 2.3.4.3. provide the comments that were obtained from the South African Civil Aviation Authority during the last Public Participation Process ("PPP") undertaken as well as the responses thereto/manner it was addressed; and
  - 2.3.4.4. provide a Comments and Response Report of all comments obtained, including that which were obtained from the South African Civil Aviation Authority as well as the responses thereto.
- 2.3.5. With regards to the abovementioned requirements, please note that if the BAR undergoes several updates and changes, depending on (i) the comments to be obtained from the WPO, the South African Civil Aviation Authority and/or any other registered I&AP and commenting authority(s) and (ii) the need to provide the information, as per 2.3.4.1. to 2.3.4.2. above), then a revised draft BAR and supporting information, which incorporates all of the changes must be circulated to all registered I&APs as well as commenting authorities for an additional minimum commenting period of thirty (30) days. Your attention is therefore drawn to Regulation 19(1)(b) of the EIA Regulations, 2014 (as amended) that is applicable in this regard.

## 2.4. Associated Applications and Information

- 2.4.1. As per this Directorate's previous correspondence (dated 13 September 2024), please ensure that proof of having submitted the necessary application (s) in terms of the National Water Act, 1998 (Act No. 36 of 1998) to the National Department of Water and Sanitation is provided.
- 2.4.2. According to the information contained in the Freshwater Report (dated October 2023), CK Rumboll and Partners in Malmesbury were appointed to deal with the required servitudes over private land. This information was, however, not made available, as part of the abovementioned draft BAR.
- 2.4.3. The omitted information, as mentioned above, reinforces the need to circulate a revised draft BAR, which also includes the information, as per paragraph 2.5.3. above.

## 2.5. Specialist Report and Input

- 2.5.1. Based on the review of the Freshwater Report (dated October 2023), it is evident that the report was compiled to meet the requirements, as per National Water Act, 1998 (Act No. 36 of 1998), as opposed to Appendix 6 of EIA Regulations, 2014 (as amended), as originally confirmed in this Directorate's correspondence (dated 13 September 2024). However, in view of the proposed development and the EIA Listed Activities it triggers (most notably in this case Listed Activity 19 of Listing Notice 1 of the EIA Regulations, 2014 (as amended)), it is recommended that the Freshwater Report (dated October 2023) be updated to meet the requirements of Appendix 6 of EIA Regulations, 2014 (as amended).
- 2.5.2. Please ensure that page ii of the Terrestrial Biodiversity Assessment Report (dated 11 January 2024), which refers to the specialist being appointed for the proposed Helios tower cellular site is amended to include the appointment for the correct proposed development, which forms part of this application.
- 2.5.3. The abovementioned study must be updated to provide the following information in terms of the requirements of the "*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*" ("the Protocols") –
- 2.5.3.1. The contact details of the specialist, their SACNASP registration number, their field of expertise and a curriculum vitae; and
  - 2.5.3.2. A statement on the duration, date and season of the site inspection and the relevance of the season to the outcome of the assessment.
- 2.5.4. The Visual Assessment Report (dated 29 July 2024), must be updated to provide the following information in terms of the requirements of the Appendix 6 of the EIA Regulations, 2014 (as amended) –
- 2.5.4.1. Section 1 (a)(ii) - the expertise of that specialist to compile a specialist report including a curriculum vitae;
  - 2.5.4.2. Section 1 (c)(cA) - an indication of the quality and age of base data used for the specialist report; and
  - 2.5.4.3. Section 1 (d) - the duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment.
- 2.5.5. The Agricultural Compliance Statement (dated October 2023), must be updated to provide the following information, as per the requirements of the Protocol –
- 2.5.5.1. In the case of a linear activity, confirmation from the agricultural specialist or soil scientist, that in their opinion, based on the mitigation and remedial measures proposed, the land can be returned to the current state within two years of completion of the construction phase.
- 2.5.6. The Socio- Economic Impact Assessment Report (dated May 2024), must be updated to provide the following information, as per the requirements of the Appendix 6 of the EIA Regulations, 2014 (as amended) –
- 2.5.6.1. Section 1 (a)(ii) - the expertise of that specialist to compile a specialist report including a curriculum vitae;
  - 2.5.6.2. Section 1 (c)(cA) - an indication of the quality and age of base data used for the specialist report; and
  - 2.5.6.3. Section 1 (e) - a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used.

2.5.7. Based on proposed powerline route, as illustrated in figure 1 on page 13 of the draft BAR versus the visual representations of the proposed powerline route, as it appears in the various specialist studies/input (with the exception of the Visual Assessment Report (dated 29 July 2024), which has been suitably updated), it appears that the following specialist studies/inputs are based on the previous and not current proposed powerline route:

- 2.5.7.1. Freshwater Report (dated October 2023);
- 2.5.7.2. Terrestrial Biodiversity Assessment Report (dated 11 January 2024);
- 2.5.7.3. Agricultural Compliance Statement (dated October 2024); and
- 2.5.7.4. Socio- Economic Impact Assessment Report (dated May 2024).

In light of the above, the said specialists must suitably update their studies and inputs to focus on the current proposed powerline route.

2.5.8. This Directorate hereby reminds to you that all updated studies and inputs will be regarded as new information that must be circulated to all registered I&APs and commenting authorities (including this Directorate) for a further minimum commenting period of thirty (30) days. It is in this regard that the new information must be made part of the abovementioned revised draft BAR and the provisions of Regulation 19 (1)(b) of the EIA Regulations, 2014 (as amended).

## 2.6. EIA Listed Activities

As per this Directorate's previous correspondence (dated 13 September 2024), please ensure that confirmation is provided on the applicability of Listed Activity 14 of Listing Notice 3 of the EIA Regulations, 2014 (as amended). In the event that the said Listed Activity is not triggered, an updated Application Form, which excludes the said Listed Activity must be submitted to this Directorate. The updated Application Form may be included in the revised draft BAR to be circulated for the additional minimum commenting period of thirty (30) days.

## 2.7. Public Participation Particulars

2.7.1. According to this Directorate's records, only a Notice of Intent ("NOI") Form was received and responded to by this Directorate on 14 February 2023 (Referenced: 16/3/3/6/7/1/F5/16/2019/23). It is, therefore, this Directorate's understanding that all of the PPP requirements stipulated in Chapter 6 and Regulation 41 of the EIA Regulations, 2014 (as amended) will be conducted, as part of your current application, with the exception of the placing of the newspaper advert (already placed on 15 November 2022 and 17 October 2023, respectively). Proof of having met these requirements must therefore be submitted together with final BAR.

2.7.2. All comments obtained during the PPP must be adequately responded to, and proof hereof included in the Comments and Response Report to be submitted together with the final BAR.

## 2.8. Content Requirements of the Environmental Management Programme ("EMPr")

2.8.1. Please ensure that all relevant mitigation measures proposed throughout the Basic Assessment process, the specialist studies and other inputs obtained, are included in the EMPr.

2.8.2. Your attention is drawn to Appendix 4 of the EIA Regulations, 2014 (as amended), for the requirements with respect to the '*Content of Environmental Management Programme*'. Please ensure that the EMPr is updated to fulfil the following requirements, as per Appendix 4 of the EIA Regulations, 2014 (as amended):

- 2.8.2.1. Section 1 (a)(ii) - the expertise of that EAP to prepare an EMPr, including a curriculum vitae; and

- 2.8.2.2. Section 1 (c) - 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 (further refer to paragraph 2.9.3. below and ensure that the same map is provided in both instances).
  - 2.8.3. As per the Freshwater Report (October 2023), please ensure that the specific best management practices pertaining to, *inter alia*, awareness that the river must be kept intact to keep the impacts at bay are all included in the EMPr.
  - 2.8.4. Furthermore, (i) the specific targeted restoration efforts as well as (ii) the measures to manage and control Invasive Alien Plants that must be implemented, as required in terms of the Terrestrial Biodiversity Assessment Report (dated 11 January 2024) must be further elaborated on/detailed and included in the EMPr.
- 2.9. Content Requirements of the BAR
- 2.9.1. Your attention is drawn to Appendix 1 of the EIA Regulations, 2014 (as amended), for the requirements with respect to the '*Content of basic assessment reports*'. Please ensure that you fulfil these requirements.
  - 2.9.2. It appears that the following 'no-go' areas, are applicable to your development proposal:
    - 2.9.2.1. buffer areas (with reference to the development footprint in proximity to the aerodrome and associated components);
    - 2.9.2.2. possible/partial avoidance of the mapped CBA I and ESA1;
    - 2.9.2.3. possible/partial avoidance of local watercourses, the danger and others areas, as per page 27 of the Freshwater Report (October 2023); and
    - 2.9.2.4. transmission line required to be located a 100m away from any residential property, as per page 13 of Appendix J2.
  - 2.9.3. In light of the above, the information, as per Section 3(l)(ii) of Appendix 1 of the EIA Regulations, 2014 (as amended) must be provided together with the final BAR.

### 3. General

- 3.1. Please be reminded that in accordance with Regulation 19(1) of the EIA Regulations, 2014 (as amended), the final BAR must be submitted within ninety (90) days of receipt of the application by the Competent Authority, calculated from **3 September 2024**.
- 3.2. In terms of Regulation 45 of the EIA Regulations, 2014 (as amended), an application in terms of the EIA Regulations, 2014 (as amended) lapses and the Competent Authority will deem the application as having lapsed, if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations.
- 3.3. **If, however, significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Competent Authority that an additional 50 days (i.e., 140 days from receipt of the Application Form for Environmental Authorisation) will be required for the submission of the final BAR for decision-making. The additional 50 days must include a minimum commenting period of thirty (30) days to allow I&APs to comment on the revised report/additional information (see paragraphs 2.3.4.1., 2.3.4.2., 2.3.5., 2.4.3. and 2.5.8. above).**
- 3.4. This Directorate awaits the submission of the final BAR for decision-making. Please note that the final BAR must be submitted via mail correspondence to the central email address ([DEADPEIAAdmin@westerncape.gov.za](mailto:DEADPEIAAdmin@westerncape.gov.za)) and include a link to download the documents. The submission of the final BAR must contain an MS Word document/pdf (not scanned) copy of the final BAR and separate appendices.



4. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
5. It is prohibited in terms of the NEMA for a person to commence with a Listed Activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable for a fine not exceeding R10 000 000 or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
6. This Directorate reserves the right to revise or withdraw its comments and request further information from you based on any information received.

Your interest in the future of the environment is greatly appreciated.

Yours faithfully

**Ayesha  
Hamdulay**

Digitally signed by Ayesha  
Hamdulay  
Date: 2024.09.26 17:39:08  
+02'00'

*pp* **MR. ZAAHIR TOEFY**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)**

Copied to:

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- (4) Mr. Alwyn Zaayman (Swartland Local Municipality)

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