

Comments-Responses Report

Application phase		
Nicholas Smith Attorneys (on behalf of Triple D Farms) Triple D Farms (17/10/2025)	2. We act for Messrs. Triple D Farms, a registered interested and affected party ("I&AP") in the statutory environmental assessment process pertaining to and regulating the proposed municipal infrastructure project described in the title to this letter. 3. Our client also has a substantial interest in commenting on the application for a water use licence ("WULA") that forms part of the proposed project. Background facts 4. Our instructions are that on 17 September 2025, an email was circulated by EnviroAfrica to all registered I&APs, stating <i>inter alia</i> the following: <i>"The Draft Basic Assessment Report (BAR) and associated appendices for the EIA application are available for public comment until 21 October 2025, and until 21 November 2025 for the [WULA]."</i> 5. We note that in subsequent correspondence addressed to our client's duly authorised representative by email on 10 October 2025, Enviro-Africa's environmental assessment practitioner ("EAP") stated the following: 2 <i>"The information that you requested on 7 October 2025 concerning the application for environmental authorisation is hereby extended from 21 October 2025 to 31 October 2025."</i> The substance of this correspondence 6. Against the backdrop of what is set out above, it is objectively unreasonable to suggest that you can	2. Please note that EnviroAfrica provided Triple D Farms and other Interested and Affected Parties ("I&APs") with a copy of the Draft Basic Assessment Report ("BAR") and its associated appendices on 17 September 2025. Triple D Farms then requested additional information from EnviroAfrica on 07 October 2025 and 08 October 2025 and the requested additional information was supplied to Triple D Farms within three days, i.e., on 10 October 2025. It is on these grounds that EnviroAfrica extended the original commenting period of 32 days on the application by 10 days for Triple D Farms. EnviroAfrica

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	expect registered I&APs to deliver their comments on the BAR by 31 October 2025, in a situation where as recently as 7 and 8 October 2025, you were still providing documents of substantive relevance to the BAR, including the feasibility study, and accompanying files in KMZ format. 7. The minimum regulated period for the provision of comments as obliged in terms of the Environmental Impact Assessment (“EIA”) Regulations published under the National Environmental Management Act 107 of 1998 (“NEMA”) is 30 days. See in this regard Regulation 19(1)(a) which refers to the relevant basic assessment report having “... <i>been subjected to a public participation process of at least 30 days...</i>”. 8. We suggest that in the circumstances, and in order to avoid any suggestion of procedural impropriety regarding the pre-application basic assessment report (“BAR”) that you have seen fit to circulate for public comment, the same stipulation should be observed (and the 30-day period should be extended to 60 days, on the basis of what is set out directly below). 9. There can be no suggestion by you that our client is in a position to comment on the substance of the WULA when it is common cause that the documentation pertaining to that application has not yet been made available by you. As you are no doubt well aware, section 41((4)(a)(ii) of the National Water Act 36 of 1998 stipulates that an applicant for a WUL must provide suitable notice in newspapers and other media “... <i>stating that written objections may be lodged against the application before a specified date, which must be not less than 60 days after the last</i>	8. EnviroAfrica hereby agrees to give Triple D Farms 34 days beyond the original 32 days to comment on the application. The provided commenting period exceeds the minimum 30 days required in terms the EIA Regulations of 2014 (as amended) The closing date for commenting on the Amended Draft BAR is 25 November 2025 and this closing date will be given to all other I&APs as well. Please further note that EnviroAfrica clarified to Triple D Farms on 10 October 2025 that a water use licence application is still pending for the proposed wastewater treatment works and that the only available information relating to the pending water use licence application thus far is the freshwater impact study	
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	<i>publication of the notice.” (My underlining.)</i> 10. In the circumstances, we suggest that in order for the process that you are following in respect of your pre-application BAR to meet the relevant procedural stipulations of the applicable legislation, that you should afford all registered I&APs a period of 60 days to comment, calculated from the future date on which you first advertise (and notify the I&APs who have already registered their interest in your client’s applications) that the WULA documentation is available for public comment. 11. The 60-day period for comment should apply both to comments on the pre-application BAR and on the documents delivered and circulated in support of the WULA. 12. We look forward to your favourable response to this letter at your earliest convenience	report that also informs the application for environmental authorisation and accompanies the Draft BAR as Appendix D2. The 60 day commenting period provided for in the Draft BAR notification for the pending WULA, is the opportunity to provide any initial comments or concerns that may be addressed in the WULA. In view of this, any comment made on the pending water use licence application will be noted for the time being and then responded to appropriately when the water use licence application for the proposed wastewater treatment works has been lodged with the licensing authority. Please rest assured that Triple D Farms is included among the I&APs who will be invited to participate in the public consultation process for the water use licence application when the water use licence application has been lodged with the licensing authority. Please also note that EnviroAfrica has not been appointed to conduct the WULA, but any initial comment received will be forwarded to the consultants that will be conducting the WULA. An additional PPP period will be provided when the WULA is lodged.	
Triple D Farms (09/10/2025)	I’m just following up with regards to the emails that I sent on the 7th and 8th October requesting the following: KMZ files of the proposed development, including the pipelines, Engineering Design and Report	Dear R. Erasmus, The trailing electronic mail correspondence below, the kmz file that EnviroAfrica forwarded to you on 09 October 2025 and the attached correspondence that BVI Engineering forwarded	EnviroAfrica

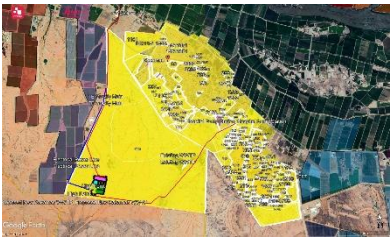
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	Water Use License Application accompanied by the appendices.	to Triple D Farms earlier today, refer. Please be informed that the water use licence application is still pending. The only documentation available thus far that will inform the pending water use licence application is a freshwater impact study report that has been compiled by WATSAN Africa. The same freshwater impact study report informs the application for environmental authorisation lodged for the above-mentioned wastewater treatment works and has been available since 17 September 2025 to Triple D Farms and other Interested and Affected Parties as Appendix D2 of the Draft Basic Assessment Report. The information that you requested on 07 October 2025 concerning the application for environmental authorisation is therefore all available to Triple D Farms as of today, 10 October 2025. In light of this, the closing date for Triple D Farms to provide comment on the application for environmental authorisation is hereby extended from 21 October 2025 to 31 October 2025.	
	I'm just following up with regards to the emails that I sent on the 7th and 8th October requesting the following: KMZ files of the proposed development, including the pipelines, Engineering Design and Report Water Use License Application accompanied by the appendices.	Goeiemôre Piet Ons telefoniese gesprek van gistermiddag aangaande bogenoemde verwys. Vind asb aangeheg 'n afskrif van die uitvoerbaarheidstudie soos versoek. Soos ek gister verduidelik het, is daar op hierdie stadium geen detail ontwerpe of	BVI Engineers

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		ontwerpverslae gedoen of beskikbaar nie. Wanneer 'n uitvoerbaarheidstudie gedoen word, doen ons 'n voorlopige ontwerp om eenheidsproses groottes te bepaal sodat dit tot om en by 85% akkuraat geprys kan word en 'n omvang van die kapitale koste bepaal kan word. Net so word daar dan ook 'n bedryfskoste en instandhoudingskoste volgens sekere industrie norme bereken. Hierdie word dan gebruik om 'n eenheidskoste vir die suiwing van diue rioolwater te bereken, waarop daar dan 'n ingeligte besluit geneem kan word. Net ter inligting, hierdie is die derde terrein waarop ons 'n voorlopige ontwerp gedoen het sedert die aanvang van hierdie projek in 2018. Die ideaal vir 'n rioolwerke is om op die laagste plek in 'n dorp geleë te wees. Op Kakamas is dit egter onmoontlik synde daar 'n breë strook landbou grond tussen die Oranjerivier en die dorp ontwikkel is wat dit verhinder. Die uiteinde daarvan is dat elke druppel riool in Kakamas gepomp moet word na 'n rioolaanleg wat heelwat hoër as die dorp geleë is, wat nie die eerste prys is nie. Die eerste terrein wat ons ondersoek het, was Restand van Erf 1181, net oorkant die riviértjie waar Charel Bruwer se werf was soos jy Kakamas verlaat, en die tweede opsie was op 'n stuk grond reg suid van jou eiendom bekend as Erf 2363, waar Mnr Bruwer 'n stuk grond wou ruil met die munisipaliteit vir Erf1181. Die transaksie het egter nooit plaasgevind nie, derhalwe is ons nou waar ons is.	
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		Die Kai !Garib Munisipaliteit het geen ander grond beskikbaar wat, eerstens groot genoeg is nie, en tweedens wat darem binne redelike afstand vanaf die dorp geleë is. Die geel gekleurde gedeeltes in die foto hieronder is die munisipale meent gronde wat tans hulle eiendom is en wat beskikbaar is vir die oprig van 'n rioolwerke.  Omdat die Kai !Garib Munisipaliteit nie in staat is om tegniese of finansiële na hoër tegnologie om te sien nie, is ons verplig om weer na Oksidasiedamme te kyk. Om dit voldoende vir Kakamas te maak, het ons om en by 10ha se damme nodig. Indien ons hoër tegnologie, soos byvoorbeeld 'n Geaktiveerde Slik suiweringproses sou kon gebruik het, het ons minder as 2 ha nodig gehad om dit net in perspektief te plaas. Ongelukkig, is 'n heelwat hoër vlak van kundigheid ook nodig om hierdie proses te bedryf, wat nie op Kakamas geredelik beskikbaar is nie. Ek gee hierdie agtergrond in goeder trou sodat julle mooi verstaan waaroor dit gaan en hoe ons op die stuk grond beland het. Dan, net die volgende asb.	
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		Dit dien geen doel om vir EnviroAfrica se personeel te dreig of om onnodige druk op hulle te plaas nie. EnviroAfrica fasiliteer net die proses, en het geen magte om besluite te neem of nie, hulle doen ook net hulle werk. Triple D Farms het die volste reg om 'n formele, deeglik gedokumenteerde beswaar in te dien teen die projek, en sal EnviroAfrica dit volgens die voorgeskrewe wetlike prosedure hanteer. Die uiteindelijke besluitneming oor hoe die beswaar hanteer word, en watter gewig dit dra, lê by die Noordkaap se Department van Omgewingsake en Natuurbewaring wat die finale beslissing sal maak. Dan net 'n laaste gedagte, daar is 'n beginsel wat lui dat die belang van 'n individu nooit swaarder kan weeg as die belang van die publiek nie. Hou dit asb in gedagte wanneer julle jul beswaar formuleer. Daar word vertrou dat hierdie vir u van waarde sal wees	
Pre-application phase			
J. H. Louw (09/05/2025)	<u>Beswaar teen oprigting- bou van riooldamme op ERF 1654 Kakamas</u> Vir wie dit mag aangaan. Die punte soos volg is nie deurdink en ondersoek nie. 1. Is daar 'n behoorlike impakstudie gedoen en deur wie, of is daar sommer besluit om die oop stuk grond in 'n gemors te omskep?	1. The public participation process that is underway is for the pre-application phase of the development proposal and does not require an impact assessment. An impact assessment that meets the legal requirements will be undertaken as part of the process of applying for an	EnviroAfrica

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		environmental authorisation from the competent authority.	
	2. Voorts met die kontoere (laagte) in gedagte, wat weer later sal opeindig in die rivier.	2. It is standard practice for wastewater treatment works to discharge treated wastewater into rivers. The slope enables wastewater to gravitate through the proposed wastewater treatment works and this is an advantage.	BVi
	3. Nasionaal en internasionale geakrediteerde besighede - Groot Gariep Koelkamer, Oranje Rivier Wynkelder grens direk langs laagte wat oorloop water eventueel later sal loop rivier toe.	3. All wastewater treatment works overflow. The wastewater that is received must eventually be released. The important issue is that the wastewater treatment works must function to adequately treat the received wastewater before the wastewater is discharged. The treated wastewater will flow out of the wastewater treatment works in a closed pipe until after passing under the road. The mentioned businesses will therefore not likely even be aware of any flow passing their premises. It is noteworthy that the proposed wastewater treatment works has been designed to cater for the anticipated population growth of Kakamas until 2040.	BVi
	4. Laagte loop later teen kragpale (voedselverwekings	4. Please refer to the response in Sections 2 and 3 above.	

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	aanleg) verby, oppad rivier toe.		
	5. Verskeie boorgate vir menslike gebruik kan gekontamineer word wat laer af in die laagte is.	5. It is required in the EMP that the water from boreholes in the area be regularly sampled for laboratory testing and the laboratory test results made public. In addition, should borehole contamination be discovered, corrective measures must be implemented by the Applicant in consultation with the National Department of Water and Sanitation.	
	6. Nabygeleë woonbuurt (Suidrand) en besighede sal gedurig verswelg word met stank	6. The rising main through which raw wastewater will be pumped to the proposed WWTW will be located next to the Kakamas Hospital as has always been the case. Suidrant is beyond the watershed and is therefore unlikely to be affected. The design of the proposed wastewater treatment works incorporates measures that help prevent.	
	7. Ek was 30+ jaar betrokke by afloopwater bestuur van een van vg. besighede.	7. Noted	
	8. Ek stel voor dat daar gekyk word na bestaande stelsel naamlik a) Vergroot huidige stelsel in gebruik	8. a. The current wastewater treatment works is more than 37 years old,	

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		is in ruins and is therefore deemed better to replace with a new wastewater treatment works.	
	b) Stel kundige mense aan, lei mense op.	b. This will be done	
	c) Huidige mense is onbevoeg om werk behoorlik te doen, onvogekompakteer word en onvoldoende fondse en gebrek aan opleiding	c. Noted	
	d) Huidige stelsel loop deur woonbuurt en eindig op in die rivier	d. The existing wastewater treatment works is to be replaced with the proposed wastewater treatment works, as the capacity of the existing wastewater treatment works has over time become too small for the volumes of wastewater received and so the wastewater is no longer being treated adequately.	
	e) Walle moet gekompakteer word en panne met seil uitgevoer word.	e. The new oxidation ponds will all be constructed with compacted earth berms and will be lined with HDPE membranes to help prevent polluting leakages	
	f) Omhein- elektrifiseer bestaande panne	f. The new wastewater treatment works will be fenced off and manned 24 hours per day to help	

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	g) Tree in gesprek met gholflklub bestuur om skoon water (laaste pan) te gebruik. Kan voordele vir beide instansies hê. h) Uitbreiding van dorp (aanwas en ontvolking van platteland) noop plaaslike owerhede vir gedurige uitbreiding en verbetering. Ek as beswaarde inwoner (oprigting riooldamme erf 1654) wil graag net die vaste werkbare oplossing vir ons dorp, Kakamas hê.	prevent theft and vandalism. g. This is a good suggestion and will be considered. Re-use of treated wastewater is always positive. h. Noted and agreed Noted and agreed.	
Jacoline Mans (16/04/2025)	1. Please send me the .kml / .kmz of the proposed WWTW and the associated EIA reports.	1. Done	EnviroAfrica
Pieter Dykman	Good morning, Margeret Following our registration as an I&AP could you please provide us with a copy of the draft basic assessment report and appendices.	1. The Draft Basic Assessment Report will be made available to all Interested and Affected Parties for comment as soon as the report is ready.	EnviroAfrica
Niel van Niekerk	Dear EnviroAfrica Team, I hope this message finds you well. I am writing on behalf of the Kakamas Water Users Association, the bulk water supplier to all irrigators in the Kakamas area. Our responsibilities also include environmental stewardship, particularly monitoring for any potential spillages and	I hereby acknowledge receipt of your email and content noted. You will be added to the I&AP list as requested.	EnviroAfrica

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	reporting such incidents to the relevant authorities. We have taken note of the public participation process related to the proposed Wastewater Treatment Works (WWTW) and associated infrastructure on the remainder of ERF 1654 in Kakamas. We recently became aware of the project through information sheets posted on fences in the vicinity. Given the nature of our operations and our environmental mandate, we kindly request that my contact details be added to your stakeholder database for this project. We would also appreciate it if you could keep us informed of all relevant information, documentation, and developments related to this proposed project moving forward. Please confirm if this request can be accommodated, and do let me know if any additional information or formal steps are required.		
Marlien Theron (23/05/2025)	To whom it may concern. The 2 attached notices of the proposed wastewater treatment works refers. Please note that we would like to register as a interested and affected party, on both these notices. Full details: Kobus Van Zyl Familie Trust Telephone Nr 082 560 4031	EnviroAfrica has taken note of your request for a copy of the Draft Basic Assessment and all its associated appendices for the above-mentioned development proposal as well as your request for a public meeting. Please be assured that EnviroAfrica will include you in the public participation process to be conducted for the development proposal as required in the EIA Regulations of 2014 (as amended).	EnviroAfrica
C. P. van den Hever (23/05/2025)	I am writing to formally confirm my registration as an Interested and Affected Party (I&AP) in relation to the current application.	EnviroAfrica has taken note of your request for a copy of the Draft Basic Assessment and all its associated appendices for the above-mentioned development	EnviroAfrica

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	We are writing in connection with the proposed development of the Wastewater Treatment Works and associated infrastructure to be located on the remainder of Erf 1654 in Kakamas, approximately 1.7 km southwest of Kakamas and about 1.4 km west of the current Kakamas Wastewater Treatment Works. Chargo Trust hereby requests to be formally registered as a stakeholder in accordance with the Environmental Impact Assessment (EIA) Regulations of 2014. I respectfully request access to the following documentation as soon as it becomes available: The Draft Basic Assessment Report (DBAR), The Environmental Management Programme (EMPr), All specialist studies conducted for this project, Detailed engineering layouts and infrastructure designs, and The full public participation schedule, including key dates and periods for public comment. It is essential that these documents are made available to me immediately upon release to ensure that both I and other members of the community have the full 30-day period to review the proposed development and formulate any feedback or objections. In addition, I formally request that a public meeting be scheduled in Kakamas as a part of the public participation process. I strongly recommend that the meeting be conducted in Afrikaans to enable effective participation by local residents. This gathering is a vital opportunity for Interested and Affected Parties to raise objections and ensure that community concerns are acknowledged and thoroughly considered.	proposal as well as your request for a public meeting. Please be assured that EnviroAfrica will include you in the public participation process to be conducted for the development proposal as required in the EIA Regulations of 2014 (as amended).	
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	Please ensure that the meeting minutes are accurately recorded, and that the minutes are shared with all registered I&APs. We also request that the project team provide clear and direct responses to all questions and concerns raised during the session.		
Wilna Mayer (23/05/2025)	I am writing to formally confirm my registration as an Interested and Affected Party (I&AP) in relation to the current application. We are writing in connection with the proposed development of the Wastewater Treatment Works and associated infrastructure to be located on the remainder of Erf 1654 in Kakamas, approximately 1.7 km southwest of Kakamas and about 1.4 km west of the current Kakamas Wastewater Treatment Works. I hereby requests to be formally registered as a stakeholder in accordance with the Environmental Impact Assessment (EIA) Regulations of 2014. I respectfully request access to the following documentation as soon as it becomes available: The Draft Basic Assessment Report (DBAR), The Environmental Management Programme (EMPr), All specialist studies conducted for this project, Detailed engineering layouts and infrastructure designs, and The full public participation schedule, including key dates and periods for public comment. It is essential that these documents are made available to me immediately upon release to ensure that both I and other members of the community have the full 30-day period to review the proposed development and	EnviroAfrica has taken note of your request for a copy of the Draft Basic Assessment and all its associated appendices for the above-mentioned development proposal as well as your request for a public meeting. Please be assured that EnviroAfrica will include you in the public participation process to be conducted for the development proposal as required in the EIA Regulations of 2014 (as amended). Kind regards,	EnviroAfrica

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	formulate any feedback or objections. In addition, I formally request that a public meeting be scheduled in Kakamas as a part of the public participation process. I strongly recommend that the meeting be conducted in Afrikaans to enable effective participation by local residents. This gathering is a vital opportunity for Interested and Affected Parties to raise objections and ensure that community concerns are acknowledged and thoroughly considered. Please ensure that the meeting minutes are accurately recorded, and that the minutes are shared with all registered I&APs. We also request that the project team provide clear and direct responses to all questions and concerns raised during the session. Kindly confirm the date, time, and location of the public meeting as soon as possible. Thank you for your attention to this matter. I look forward to your response		
Christo Jordaan (22/05/2025)	To whom it may concern. We, Christie Jordaan Boerdery Trust, hereby register as an Interested and Affected Party (I&AP) for the proposed Wastewater Treatment Works and associated infrastructure next to our premises Erf 1654, Kakamas. Kindly confirm that our registration has been received and recorded.	I trust this email finds you well. I hereby acknowledge receipt of your mail and content noted. We will add you to the I&APs list as requested.	EnviroAfrica
Lindiwe Dlamini (DFFE: Biodiversity and Conservation)	DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation on the 16 April 2025 to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and	Noted	EnviroAfrica

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	Ms Nompumelelo Lekalakala (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers. Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dfpe.gov.za for attention of Mr Seoka Lekota		
Boitshepo Motsodisa	Please note that all development applications are processed via our online portal, the South African Heritage Resources Information System (SAHRIS) found at the following link: http://sahra.org.za/sahris/. We do not accept emailed, posted, hardcopy, faxed, website links or DropBox links as official submissions. Please create an application on SAHRIS for <u>each EA application</u> and upload all documents pertaining to the Environmental Authorisation Application Process. As per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA), an assessment of heritage resources must form part of the process and the assessment must comply with section 38(3) of the NHRA. If a case already exists on SAHRIS regarding the development, please upload the documents to that case using the "Make an additional submission to an existing case" in the application selector wizard https://sahris.org.za/form/application-selector. Please ensure that all documents produced as part of the EA process are submitted as part of the application. **PLEASE NOTE**	Noted	EnviroAfrica

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	An application fee is now required for all section 38 applications. Please ensure that the SAHRIS application contains a proof of payment as per the notice at the following link: https://sahris.org.za/help. A payment of R 2 000.00 for each application is required. Please make separate payments with the specific reference numbers. <u>Applications that do not include a proof of payment will be considered incomplete and will not be processed until proof of payment is provided.</u> Please make use of the SAHRIS Case ID in the payment reference. e.g. 12345/38.8. Please upload the PoP using the "Make an additional submission to an existing case" in the application selector wizard https://sahris.org.za/form/application-selector. The case officer assigned to your case will approve the submission and begin to process the case.		
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