



09 February 2016
472748

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

Dear Sir

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Paleontological Assessment

Page number	Section	Paragraph/ Bullet	Comment	Response
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Page 11	J. Recommendations	Bullets a. to d.	They are supported	Noted
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Appendix D: Cultural Heritage Assessment

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

Yours faithfully,

SRK Consulting (South Africa) (Pty) Ltd



Ms Manda Hinsch
Associate Partner/Principal Scientist

