

# COMMENTS AND RESPONSE REPORT

## Breede-Olifants Catchment Management Agency via Email on Draft Part 2 Amendment Assessment Report

COMMENTS	RESPONSE
<p>The Breede-Olifants Catchment Management Agency notes the amendments on the Environmental Authorisation and confirms that the new water uses triggered by the proposed activities were identified and the applicant was advised to apply for a water use authorisation.</p>	<p>Noted.</p>
<p>Please note that BOCMA has received an application for a water use licence application from the applicant, George Local Municipality, with water use reference number WU37373 for water uses triggered by the proposed sewer alignment and is currently under assessment.</p>	<p>Noted.</p>
<p>The BOCMA has also conducted site visit inspections on the 03 September 2024 in Thembaletu to assess the proposed sites and confirm water uses applied for.</p>	<p>Noted.</p>
<p>Therefore, BOCMA will not provide further comments until the authorisation assessment is finalised.</p>	<p>Noted.</p>

## Department of Environmental Affairs and Development Planning via Email on Draft Part 2 Amendment Assessment Report

COMMENTS	RESPONSE
<p>The EA issued on 14 March did not specify a date of conclusion of the implementation of the EA. Kindly note, in terms of Regulation 26 (d) (ii) of the NEA EIA regulations, 2014 (as amended 2017). an Environmental Authorisation must include where the environmental authorisation does not include operational aspects, the period for which the environmental authorisation is granted, which period may not be extended unless the process to amend the environmental authorisation contemplated in regulation 32 is followed, and the date on which the activity is deemed to have been concluded. Please be advised that an end-date will be specified in the decision, should the application be approved.</p> <p>In light of the afore-mentioned, kindly include an implementation schedule which clearly stipulates when the installation of the pipeline, and the post construction rehabilitation and monitoring will be concluded in order for the competent authority to be in a position to comply with Regulation 26(d)(ii).</p>	<p>The implementation schedule is solely dependant on available funding of the George Municipality. It is envisaged that installation of the sewerage pipeline infrastructure is to commence during 2025 (should approval of the Part 2 Amendment be issued), with implementation continuing in phases as funding becomes available.</p> <p>The period for which the EA is required:</p> <ul style="list-style-type: none"> <li>• Ten (10) year implementation period to conclusion of development phase from the date of issue of the Amended Environmental Authorisation.</li> </ul> <p>Condition 10 of the original EA: The applicant (read Holder of EA) must compile and submit an Environmental Audit Report six months after commencement of construction and thereafter annually with the last report 12 months after completion of construction activities. Such audit report must indicate the date on which construction activities were commenced with and when it was completed and detail compliance with the mitigation / rehabilitation measures and recommendations referred to in the EMPR and conditions of the Environmental Authorisation.</p>
<p>The need and desirability motivation in the draft Impact Report is noted, however, this is more a motivation for a sewer pipeline and does not the for the need and desirability for the change.</p>	<ul style="list-style-type: none"> <li>• The existing Thembalethu bulk sewer system is overloaded, with numerous blockages and leaks resulting in raw sewage flowing into watercourse systems.</li> <li>• The proposed sewerage pipeline infrastructure has been specifically designed to rectify the constraints</li> </ul>

Please amend this section to speak to why the amendment is needed and desirable.

experienced by current sewerage systems by providing enough capacity to accommodate the informal housing developments erected in the area.

- Long sections of the original approved pipeline route, have already been constructed, however uncontrolled land invasion since the issue of the Environmental Authorisation in 2014, prevents the Municipality from completing the remaining section due to informal structures being erected over the approved sewer pipeline route.
- Implementing this last remaining section of the sewer line along the approved route, would require mass relocation of numerous informal dwellings (to allow workspace for installation) and since it is a gravity fed line, none of the informal dwellings below the original approved route would ever be able to connect to the Municipal sewer line in the future.
- Deviating this short section of sewer pipeline route has the added benefit of enabling all of the newly erected dwellings currently located on-top of, as well as downstream of the original approved route, to be able to connect to the municipal sewer system in the future as well, should the Municipality be able to do so.

It is also noted that the proposal includes Reno-mattresses at the foot of the gabion wall as well as above the gabion wall. It is understood that this design is to prevent erosion as a result of water plunging into the stream bed. However, it is unclear

The provision of reno-mattresses above and below gabion walls to prevent under-mining and erosion of soil on either side of gabion walls at stream crossings, were included in the Technical Report for Bulk Services compiled by Aurecon in August 2013

<p>whether this design was also included in the initial assessment and approval or whether this is an additional/new component to what was authorised. Please provide clarity in the final Impact report.</p>	<p>(Page 15, Stream crossings (v)), that was included in the original Basic Assessment submission as well as Water Use Licence Application, however the specific details and designs as presented in 2024 by Lukhozi Consulting Engineers (Pty) Ltd as part of this Part 2 Amendment Application was not yet available in 2014. The Technical Report for Bulk Services (Aurecon, 2013) is appended to this Part 2 Amendment Assessment Report as Appendix C.</p> <p>It is therefore the considered opinion of the EAP, that the provision of reno-mattress above and below gabion walls were included in the initial assessment and approval Environmental Authorisation (16/3/1/1/D2/50/0060/12).</p>
<p>According to the Aquatic Impact Assessment, little to no wetland habitat remains on site. Kindly indicate any remnant wetlands will be rehabilitated as part of the implementation of the amendment.</p>	<p>Please see extract from the Aquatic Impact Assessment undertaken by Confluent Environmental (Pty) Ltd: “While some of the watercourses may have originally been characteristic of wetlands (although there is no way of knowing this), little to no wetland habitat remains, and the watercourses were assessed as drainage lines in their current state” (Page 18 under Section 3.4.1 ‘Present Ecological State’ in the Aquatic Impact Assessments).</p> <p>“No mapped wetlands occur in proximity to the realigned pipeline or emergency work area” (Page 12 under Section 2.5 ‘Mapped Watercourse’ in the Aquatic Impact Assessments).</p> <p>Specific rehabilitation measures will not be applied to remnant wetland habitats possibly located downstream and upstream of the proposed amended sewer pipeline route due to the high-</p>

	<p>level of land invasion, safety of staff, and theft of any demarcation material which cannot be monitored on a daily basis.</p> <p>The state of possible remnant wetland habitats downstream and upstream of the proposed amended sewer pipeline route will automatically increase due to the implementation of the proposed sewerage pipeline infrastructure and the connection of additional households to the municipal reticulation network which will ultimately reduce the amount of raw sewage flowing into watercourse habitats.</p>
<p>It is recommended that all the mitigation measures contained in the Aquatic Impact Assessment be included in the EMPr.</p> <p>Where an amendment of an EMPr is proposed, please consider whether such changes must be dealt with in terms of Part 4 of Chapter 5 of the EIA Regulations, 2014. Should the latter be applicable, the application must be revised or a new application submitted for such changes. The EAP must demonstrate in the Final EIR how this aspect was addressed.</p>	<p>Due to the condition of the site and scope of the activity remaining the same as was originally assessed in the Basic Assessment process in 2014, the assessment of the impacts related to the upgrades of the bulk sewerage infrastructure remain applicable to this amendment application.</p> <p>Therefore, the avoidance, mitigation, management monitoring and rehabilitation identified during the original Basic Assessment Process in 2014 remain applicable to the amended bulk sewer pipeline route and are contained in the updated Environmental Management Programme (EMPr) for implementation.</p> <p>All additional mitigation measures related to impacts on the new proposed bulk sewer pipeline route have been included in this report as well as the updated EMPr.</p> <p>Noted that it is only a short section of the approved sewer pipeline that is to be re-aligned. The remainder of the sewer line</p>

	is either implemented already, or will remain along the approved alignment.
<p>Kindly ensure that the final impact report contains Comment from The Breede-Olifants Catchment Management Agency (BOCMA) and CapeNature.</p>	<p>Breede-Olifants Catchment Management Agency: Comment was received on 20 October 2024 which is included in this Comments and Response Report (Appendix M5) as well as attached separately to the Final Part 2 Amendment Assessment Report as Appendix J.</p> <p>CapeNature was approached to provide comment on the draft Part 2 Amendment Assessment Report on 16 September 2024 (no comment received). A follow-up request for comment was sent to CapeNature on 13 November 2024, however no formal comment/input was received to date.</p>