

APPENDIX F

COMMENTS AND RESPONSES REPORT (CRR)



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

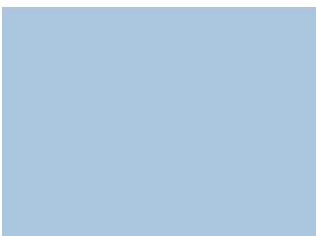
REPORT NO:
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PROPOSED MOKOLO AND CROCODILE RIVER (WEST) WATER AUGMENTATION PROJECT (PHASE 2A) (MCWAP-2A): BORROW PITS

SCOPING REPORT (FINAL)

COMMENTS AND RESPONSES REPORT

November 2018



1 INTRODUCTION

Water requirements will increase in the Lephalale area due to various planned and anticipated developments associated with the Waterberg coalfields. The Department of Water and Sanitation (DWS) commissioned the Mokolo and Crocodile River (West) Water Augmentation Project (MCWAP) Feasibility Study to investigate the options for meeting the aforementioned water requirements.

Nemai Consulting was appointed by the DWS (The Applicant) and the Trans-Caledon Tunnel Authority (TCTA) (Implementing Agent) to conduct the Environmental Impact Assessment (EIA) for MCWAP Phase 2A (MCWAP-2A) in terms of Government Notice (GN) No. R. 982 of 4 December 2014, as amended. This document serves as the “Comments and Responses Report” which accompanies the Final Scoping Report for the proposed **MCWAP-2A Borrow Pits (BP)**.

This Comments and Responses Report summarises the issues and queries raised, as well as statements made, by authorities, stakeholders as well as Interested and Affected Parties (IAPs) through correspondence received (including completed Reply Forms and Comments Sheets, letters, faxes and emails) and discussions at meetings during the Announcement and Scoping phases of the EIA process. This report also aims to address the comments through responses and input provided by the relevant members of the project team (including DWS, TCTA, Nemai Consulting, stakeholders, consulting engineers and specialists).

When reviewing the Comments and Response Report, please take cognisance of the following:

1. The two primary sources of comments that were received to date (November 2018) are (1) correspondence and (2) meetings.
2. Where necessary, additional information from the project team was included in certain responses that were provided to comments raised during meetings with IAPs and feedback from focus groups. This was done to allow for these comments to be addressed in greater detail. All these responses are recorded in *italics* font type.
3. A number of key issues were echoed by various IAPs. In these instances where related issues were raised multiple times, a reference is provided to the comment number where the associated response is recorded. See table to follow:

Comment No.	Theme of Response
3	Scoping and EIA Process
10	Compensation
14	Land matters
15	Specialist Studies
17	Wildlife Impact Assessment
20	Ecotourism

Comment No.	Theme of Response
20	Fauna and Flora

- This CRR does not necessarily provide verbatim comments from public and focus group meetings but rather reflects the essence of the discussions held with IAPs.
- The following project team members responded to the comments received during meetings (refer to relevant minutes of meetings appended to the Draft Scoping Report):

Name	Affiliation	Role
J. Enslin	DWS	Applicant
R. Gillmer	DWS	Applicant
O. v. d. Berg	DWS	Applicant
A. Nelwamondo	TCTA	Implementing Agent
S. Kelefetswe	TCTA	Implementing Agent
P. le Roux	MCC	Technical Team
J. Kroon	MCC	Technical Team
R. Botha	DWS	Presentation of Validation and Verification of water use in the Crocodile (West)-Marico catchment
S. Ndwandwe	Limpopo-North West Proto CMA	
P. van Rooyen	WRP Consulting Engineers	Water Resources Specialist
F. Vogel	-	Chairman of selected Meetings
S. Pienaar	Nemai Consulting	Environmental Assessment Practitioner (EAP)
C. van der Hoven	Nemai Consulting	EAP
D. Henning	Nemai Consulting	EAP

- A large portion of the comments received were translated from Afrikaans.
- Various references are made to legislation. Note that in all circumstances the gazetted laws take preference should a conflict arise.

2 COMMENTS AND RESPONSES – PROJECT ACCOUNCEMENT PHASE

Note that the Announcement Phase of the EIA process refers to the period prior to the submission of the Application Form to the Department of Mineral Resources (DMR) on 27 September 2018.

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE
1.	Requested that a CD with the application for the borrow pits be delivered to the regional offices of the Department of Mineral Resources (DMR). He also confirmed that all borrow pits can be included in a single application.	T Kolani (DMR)	Authorities Meeting (25/05/2016)	The Application Form and Draft Scoping Report was submitted to the DMR Limpopo Regional Offices on 27/09/2018
2.	What are the locations of the borrow pits?	B Enslin	Public Meeting (26/05/2016)	Refer to Appendix B of the Final Scoping Report for locality maps of the 23 proposed borrow pits.
3.	Borrow pits.	J. L. Pretorius	Reply Form (22/06/2016)	Construction material will need to be sourced from approximately 30 borrow pits that will be located at about 5 km intervals along the project footprint. A consolidated application was submitted to DMR on 27/09/2018. A Scoping and EIA Process is ensued, in order to seek environmental approval for the proposed borrow pits. <i>the Final Scoping Report was submitted to DMR on 08/11/2018</i>
4.	<i>Linked to No. 92.</i> Specific EIA process requirements include: <ul style="list-style-type: none"> The damage of borrow pits and their exact locations must be indicated. 	Dr L. F. Fouche	Reply Form (24/06/2016)	Refer to Appendix B of the Final Scoping Report for locality maps of the 23 proposed borrow pits.
5.	Thanks for the conversation today regarding the attached documents. I would like to request that we arrange a meeting on the farm as soon as possible. I would like to discuss the following: <ul style="list-style-type: none"> Timing of the project; Impact of the burrow; Impact on farming activity high value game; and Access on and of the Farm. 	G du Preez	Email (05/03/2018)	A landowner consultation meeting was held with Mr. du Preez on 05 May 2018. The purpose of the meeting was to provide: <ul style="list-style-type: none"> More information regarding the project and its background; More information on the current state of the Environmental Impact Assessment Process; An opportunity to submit further concerns and objections; An opportunity to deliver inputs; An opportunity to directly consult the project team to

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	Your assistance in this matter will be appreciated.			<p>what extent they will be affected, e.g. Construction process, servitudes, etc.</p> <p><i>The potential impacts associated with the borrow pits will be identified and assessed as part of the EIA Phase. Suitable mitigation measures will also be identified.</i></p>
6.	My farm is just south of the planned pipeline on the farm Vlakplaas. There is an existing digging where they took gravel for the construction of the railway line. Please consult me when you start with the planned location of the borrow pits.	A Venter	Email (13/03/2018)	Spoil material may be used to rehabilitate old borrow pits, which will need to be confirmed during the EIA phase.
7.	Topsoil must be stripped and correctly stored. Large pertinent trees must be protected. Borrow pit must be shaped afterwards with 1:3 or flatter side slopes, free drained, topsoil must be re- distributed, erosion protection measures must be put in place, ripped and scarified and re- vegetated with same kind of natural indigenous vegetation.	P Ackerman	Email (13/03/2018)	<i>To be incorporated in the EMPr in the EIA phase.</i>
8.	<p>Just a few questions:</p> <ol style="list-style-type: none"> 1. How big is the borrow pit? 2. What is the compensation? 3. Can I oppose it? 	H Hills	Email (16/03/2018)	<p>There are 2 proposed borrow pits that directly affects Mr. Hills' properties, namely Vergulde Helm 321 LQ which contains the proposed BP 14 (12.6 ha); and Pontes Estates 744 LQ, which contains the proposed BP 13 (7.7 ha).</p> <ol style="list-style-type: none"> 1. The determination of compensation will be undertaken by an independent valuer in accordance with the principle set out in Section 25 of the Constitution concurrent with Section 12 of the Expropriation Act. TCTA shall endeavour to compensate the affected parties' fair and equitable amount. 2. The EIA process undertaken to seek Environmental Authorisation for the proposed borrow pits makes provision for public participation, which includes the opportunity for Interested and Affected Parties (IAPs) to raise their concerns. If authorisation is received for the borrow pit the will be an opportunity to appeal the decision.
9.	Water use authorisation will be required if the borrow areas (I call them mining areas) are within the regulated areas of	P Ackerman	Email (20/03/2018)	To be determined as part of specialist studies for the delineation of watercourses.

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	watercourses and if they pose a quantum of risk to the characteristics of the watercourses. If there are sand mining areas there also need to be a sand buffer kept at the bottom and sides to still ensure as natural as possible movement of water through the landscape.			<i>Measures provided to be incorporated in the EMP.</i>
10.	<p>Here are a few points:</p> <p>Firstly in TCTA's meeting it was acknowledged that an industrial corridor was created and that all future expansions would take place there.</p> <p>Secondly is that when TCTA is done, I cannot farm economically anymore and the farm just gets smaller every time and even where there is a servitude, I also have to share it and the road of the servitude has to be kept clear.</p> <p>Thirdly the dam which will be built is and stays a problem due to there been no plan made with the effluent and this portion will be expropriated.</p> <p>Fourthly is the borrow pit which will remove even more ground that cannot be used to farm.</p> <p>Fifthly every time someone is finished, the farms value becomes less. From the first time till now, has the farms value decreased by more than R4 million, so when TCTA is done will it be even less.</p> <p>There is already 4 huge powerlines which move through the heart of the farm plus a small powerline which moves over the ground. The road cuts the farm into two plus I have already lost land with the Lephale road. The railway line also cuts a piece off of the farm. And also heard of is the expansion of the railway line. So the farm is now split into three sections.</p> <p>I am a Brahman stud farmer and the buyers don't like to see all the development taking place on the farm as they think that I am an untidy farmer that can't qualify as a stud farmer, so my sales decline.</p>	J. Erasmus	Email (03/04/2018)	<p>The determination of compensation will be undertaken by an independent valuer in accordance with the principle set out in Section 25 of the Constitution concurrent with Section 12 of the Expropriation Act. TCTA shall endeavour to compensate the affected parties' fair and equitable amount.</p> <p><i>The impacts related to the borrow pits will be assessed in the EIA phase.</i></p>

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	<p>I also allow hunting by a professional hunter that brings tourists and shoot pigs right where the pipeline will come. So that income falls away completely.</p> <p>I ask that TCTA buys my land at market value plus solatium costs as well as costs involved in clearing everything (moving costs)</p>			
11.	<p>The property Buffelsvley 127 KQ Ptn O is an extensive buffalo and exotic game breeding facility. 2 X Buffalo bulls alone on this 170 strong herd of buffalo are ranging from R60 million to R187 million. This excludes numerous other expensive Buffalo and other exotic game species.</p> <p>The buffalo camps host arguably 2 of the most expensive sought after Buffalo breeding herds in the country and as a specialist study on these herds and other game is of utmost and critical importance w.r.t the fact that this breeding herds are next to and close to the intended water pipeline servitude.</p> <p>On the farm Karoobult 126 KQ Ptn 0 directly next to the breeding camps on Buffelsvley the borrow pit creates another huge concern. The intended borrow pit with all its infrastructure, offices and activities will most certainly have to be investigated w.r.t the buffalo and other game on the farm Buffelsvley 127 KQ Ptn.</p> <p>The servitude road between Buffelsvley 127 KQ P 0 and Karoobult 126 KQ P 0 must be investigated.</p>	J. L. Pretorius (K P Trust)	Comment Sheet (07/04/2018)	A Wildlife Impact Assessment will be conducted during the EIA phase. Further details in terms of the approach to dealing with sensitive game and the related mitigation measures will be included in the EIA Report.
12.	<p>This property is an international hunting outfitter with top class lodge facilities and eco-tourism. The property has several breeding camps for exotic game next to or close to the intended servitude and construction area. This property must be properly investigated as there are several activities that may be impacted on during and after construction. As hunting and eco-tourism occurs year round, a just and equitable solution must be investigated and all impacts must be investigated.</p>	P. G. Bothma (C G N B Boerdersy Beleggings PTY Ltd.)	Comment Sheet (07/04/2018)	<p>Impacts on property to be assessed in Socio-Economic Impact Assessment and Wildlife Impact Assessment, which will be conducted during the EIA phase.</p> <p>Further details in terms of the approach to dealing with sensitive game and the related mitigation measures will be included in the EIA Report and EMPr.</p>

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE
	<p>THE IMPACT ON GAME IN CAMPS NEEDS PROPER INVESTIGATION AND MITIGATION. THE IMPACT ON HUNTING AND ECO-TOURISM NEEDS PROPER INVESTIGATION AND MITIGATION.</p> <p>This property has several Eskom servitudes that already cause havoc for the owner and the cumulative impact of the intended servitude must be investigated. Specialist studies on all factors must be conducted on this property (unit).</p> <p>THE IMPACT OF BORROW PITS CLOSE TO THIS PROPERTY NEEDS PROPER INVESTIGATION AND MITIGATION.</p>			
13.	<p>The property is a hunting farm with lodge facilities boasting numerous species of game. The use of this property will be severely impacted on during and after construction and must be thoroughly investigated w.r.t all factors that may impact on the use and the market value of this property. A servitude road between the farms Karoobult 126 KQ P 0 and Buffelsvley 127 P 0 must also be investigated with the final route of the intended pipeline servitude. The big concern with this property is the game breeding program that is situated near or close to the intended construction area, both water transfer pipeline and the intended borrow pit. The owner breeds with numerous species of exotic game and a specialist study covering all aspects mentioned must be conducted on this property.</p> <p>My biggest concern with the proposed project is as follows:</p> <p>1. The game steel camp is approximately 100 m away from the border fence.</p> <p>I have a golden wildebeest breeding project; A king wildebeest breeding project; A black impala breeding project; A copper springbuck breeding project; An Inyala breeding project; A trophy impala breeding project; and A kudu trophy breeding project.</p>	P. Visser	Comment Sheet (07/04/2018)	<p>Provision will be made in the EMPr to manage impacts with regards to the following matters raised (amongst others):</p> <ul style="list-style-type: none"> • Access control; • Fencing arrangements; and • Wildlife. <p><i>Positioning of borrow pit to be assessed in the EIA phase.</i></p>

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	<p>2. The proposed sand mining projects must be approximately 200 m from the border fence and 200 m from my access road to the house to make it as unsightly as possible if applicable to me.</p> <p>3. The pipeline must be situated in the servitude road between the two farms Karoobult and Buffelsvley, since the servitude has fallen into disuse and consequently will cover the least space.</p> <p>4. Lockable gates have to be erected on farm boundaries;</p> <p>5. Planned operational sites have to be fenced off with game fencing before operation begins.</p>			
14.	<p>This farm receives a balancing dam, water line infrastructure and a borrow pit. This property is already severely impacted by several servitudes and the cumulative impact of any additional servitudes and infrastructure will render this property useless to the owner. Mr. Erasmus is a stud Brahman breeder and cannot continue in this state. The construction period, infrastructure and the already heavily burdened property if they purchase this property as a whole and would be just to the receiving owner. Proper facts and impact factors and the cumulative impact must be addressed in this situation.</p>	J. Erasmus	Comment Sheet (07/04/2018)	<p>A Socio-Economic Impact Assessment (SEIA) earmarked for the EIA phase will need to consider these impacts further. The valuer will perform valuations in terms of the prevailing legislation.</p>
15.	<p>This property is a game breeding farm with game camps close to or next to the intended servitude and construction of the water pipeline. There are 2 small koppies in the way of the servitude that needs investigation and properly a deviation around it. This property has international investors and the game breeding program must be investigated and all factors that may impact on this property must be investigated. Specialist studies must be conducted on all factors that may impact on this property. Any activities due to the borrow pits close to or next to this property needs investigation.</p>	D. van Niekerk	Comment Sheet (07/04/2018)	<p>Requisite specialist studies 'triggered' by the findings of the Scoping process, are:</p> <ol style="list-style-type: none"> 1. Aquatic and Wetland Delineation Impact Assessment; 2. Terrestrial Ecological Impact Assessment; 3. Heritage Impact Assessment; 4. Agricultural Impact Assessment; 5. Social Impact Assessment; 6. Socio-Economic Impact Assessment; and 7. Wildlife Impact Assessment. <p><i>All impacts to be investigated in the EIA phase.</i></p>
16.	<p>This property is a cattle and game breeding property. The huge construction of balancing dam and water line infrastructure and the fact that most of this area is rock and</p>	J. Coetzee	Comment Sheet (08/04/2018)	<p>Provision will be made in the EMP to manage impacts with regards to the following matters raised (amongst others):</p>

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	<p>koppies may have a huge impact during and after construction.</p> <p>A proper study must be conducted on this property as the rock in this area will entail massive construction noise and dust.</p> <p>As part of this property is rented with the option to purchase and it is directly where the borrow pit is situated. We need a proper study here as well as this could have massive implications for this agreement.</p> <p>The person Mr. Marais, who rents with the option to buy is a game breeder and infrastructure in this regard has been erected. The construction of the water line infrastructure and the borrow pit on the property must be investigated.</p>			<ul style="list-style-type: none"> • Existing infrastructure; • Noise and dust; and • Wildlife.
17.	<p>This property with local and international investors is a game breeding farm with very expensive Sable and Buffalo and various other exotic game.</p> <p>2 of the sable camps borders the road which will cause a direct impact on the animals in the camps. This whole operation will be in harm's way and the intended water line infrastructure construction and the balancing dam and borrow pit will have a huge impact on this operation.</p> <p>Specialist studies on all factors that may impact on the use and value during and after construction must be conducted. The game in camps next to, on or close to the construction is a huge issue of huge importance and how this will be mitigated. Again valuers needs a report with specialist studies to refer to when impact and financial loss is addressed in a "before-and-after" valuation report.</p>	D. Smith	Comment Sheet (08/04/2018)	<p>Refer to the following:</p> <ul style="list-style-type: none"> • No. 10 for the response to compensation; • No. 15 lists the various specialist studies identified. <p>A Wildlife Impact Assessment will be undertaken as part of the EIA taking into consideration the types of game kept on the farms and the requisite mitigation measures. The Wildlife Impact Assessment will be appended to the EIA Report for review by IAPs.</p> <p><i>To be assessed as part of the EIA phase.</i></p>
18.	<p>HUNTING AND GAME BREEDING NEAR OR AT BORROW PITS-SPECIALIST STUDIES</p> <p>The following properties will be impacted by borrow pits.</p> <p>Mecklenburg 310 KQ P 1-Game breeding and Hunting; Karoobult 126 KQ P 0-Game breeding and hunting;</p>	B. Enslin	Comment Sheet (08/04/2018)	<p>Refer to the following:</p> <ul style="list-style-type: none"> • No. 10 for the response to compensation; • No. 14 for response to land matters; • No. 17 above for response in terms of the Wildlife Impact Assessment; • No. 15 lists the various specialist studies identified.

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE
	<p>Buffelsvley 127 KQ P 0 - Game breeding -very expensive 170 herd strong Buffalo Project; Leeuwbosch 129 KQ P1-area of pit rented with option to buy; Rietfontein 15 KQ P 4- the pit is on Ptn 0 but next to my clients breeding camps and hunting concession; Inkerman 819 KQ P 0- game breeding camps; Zandfontein 382 LQ -THIS WIL DIRECTLY IMPACT JULIUS ERASMUS ON Rooipan 357 LQ P 4; Rooipan 357 LQ P 4- CUMULATIVE IMPACT WITH PIT ON Zandfontein 382 LQ P 0;</p> <p>Please ensure studies that takes all factors in account on these properties and the fact that these borrow pits may have a massive impact over a long period of time. Game will have to be relocated and big trees will be destroyed and all hunting will seize. Future potential losses on brand building for hunting concessions must be addressed and discussed and progeny loss must be dealt with.</p>			
19.	<p>MCWAP WATER AUGMENTATION PROJECT</p> <p>To whom it may concern.</p> <p>SERVITUDEWATCH CC represents several land owners on the MCWAP water project and our participation is to inform and assist our clients w.r.t. to impacts on market values of properties and or rights, other actual financial loss and to request specialist studies on various factors of importance to refer to.</p> <p>Negotiations for the servitude rights for the pipeline infrastructure, balancing dams and borrow pits and the possible impact on market values of properties with irrigation and water use rights MUST be done with reference to a reliable independent source, namely the EIA and related specialist studies.</p> <p>The draft scoping report is in all aspects fairly complete but, an important factor which I did not see, is the discussion on market value impacts and other financial loss w.r.t the</p>	Servitude Watch (B. Enslin)	Letter (08/04/2018)	<p>Refer to the following:</p> <ul style="list-style-type: none"> • No. 10 for the response to compensation; • No. 14 for response to land matters; • No. 17 above for response in terms of the Wildlife Impact Assessment; • No. 15 lists the various specialist studies identified.

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	<p>intended construction period and servitudes and related infrastructure taking all factors into consideration.</p> <p>My reason for this input is that when Valuers conduct “before-and-after” valuations, they must analyse, compute and motivate their reports.</p> <p>This is always a matter of dispute and the fact that TCTA or Water Affairs do have expropriation rights, it is the duty of the independent EIA consultants to address these factors and points of importance to assist in fair and equitable compensation as dictated by section 25 of our Constitution.</p> <p>A Valuer must refer to credible sources when analysing and motivating an opinion on impact on market value of the whole remainder property outside the intended servitude and all other financial loss.</p> <p>In this scenario your report will be most helpful and a lot of time and effort can be saved to ensure a smooth acquisition process where all parties are treated just, equal, fair and consistent.</p> <p>Another point of importance is the following and this issue has never been answered or properly discussed, namely legal water use rights and water listings and how TCTA plans to compensate owners in this regard.</p> <p>The fact that a study on the water was conducted never addressed the fear or uncertainty that is created. As you are aware there have been many objections and the main fear is that water rights may be infringed upon.</p> <p>The study mentions that the Minister may, if necessary restrict use or legal water use rights in a situation when there is not enough water. We are also aware that this MCWAP project has priority of water use over that of for example irrigation use.</p> <p>If you put yourselves in the shoes of a potential buyer, will you</p>			

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	<p>buy a farm that may be subjected to these conditions and if yes, would you pay current market price or less?</p> <p>This fear or uncertainty regarding the water issue, it is my humble opinion that the EIA should conduct a study to address this. I have spoken to all the irrigators upstream and particularly downstream from the intended Vlieëpoort weir/wall and all of them are very very worried.</p> <p>Any situation that creates fear or uncertainty must surely impact on buyers decisions and this is what I am getting at. Buyers must be informed of this situation and most surely this information will create doubt.</p> <p>Another huge concern is the cumulative impacts on many of the properties. Game farms that are used for eco-tourism, hunting, game breeding and even cattle farming will be severely impacted and affected by this cumulative impact. At what stage does the impact on sense of place and the impact on the use of these properties and interference from servitudes and construction reach a point where agriculture and its related activities become obsolete?</p> <p>Loss of business in the future, due to land owners not being able to accommodate clients during the construction period. Hunting and eco-tourism clients will seek alternative venues and may never return- this is an important matter and must be addressed and is another factor of importance.</p> <p>The specialist study on game in camps and on game overall is welcomed and thank you for the effort. A point of concern is the time owners will have to move these game if found to be applicable. Game and game breeding programs rely on progeny and if you move or dart these animals progeny lost could have dire consequences for that farm or business.</p> <p>This must please be assessed and addressed.</p> <p>The intended rehabilitation of borrow pits and the servitude</p>			

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	<p>area can only partly fix the destruction of flora. Big trees will never grow back and will permanently alter and scar the properties.</p> <p>The clients I represent are on my comment forms attached to my documents and I am more than willing to assist if needed.</p> <p>I thank you in advance and hope we can find an amicable solution that is mutually agreed upon by all involved.</p>			
20.	<p>This property is a share block registered company and the current use of this property is for country living and the eco facet, game breeding, cattle farming and hunting.</p> <p>The main income on this property is hunting and this income is detrimental for the running costs for this property and any interference in this regard may have a huge financial impact on this property. This issue here needs a proper investigation.</p> <p>The cumulative impact from MCWAP construction, existing servitudes and new water pipe infrastructure servitude on this property must be investigated. Hunters who cannot be accommodated during the construction period may seek alternative venues and may be permanently lost. This may have a huge impact on income loss and huge marketing costs to revive this business and income generating facet pleasure investigate this scenario. The borrow pit on Diepspruit 386 LQ will impact this property as well – investigate</p>	A. Badenhorst (Mabulskop Boerdery Share Block PTY ltd)	Comment Sheet (09/04/2018)	<p>Impacts of the project on habitats within the receiving environment will be assessed as part of the Terrestrial Ecological Impact Assessment, which will be undertaken as part of the EIA phase.</p> <p><i>Cumulative impacts to be assessed in the EIA phase.</i></p>
21.	<p>This is a game breeding property, eco-tourism and game hunting property with lodge facilities. The intended water line infrastructure and the construction period will have a major impact on this property. At the main entrance to this property are huge Knoppiesdoring and Apiesdoring Trees (other trees as well) that have been looked after by the owner for many years and is a huge concern to the owner. The destruction of these huge trees is non-negotiable – deviate. The game breeding program includes Sable, Red Oryx, Golden Gnu, Nyala etc. and a specialist study needs to be conducted on this breeding program and the potential impact during construction. The intended borrow pit is a disaster as it</p>	J. Prinsloo	Comment Sheet (09/04/2018)	<p>Refer to No. 20 for response to impacts to ecotourism.</p> <p>Impacts to flora to be assessed as part of the Terrestrial Ecological Impact Assessment, which will be undertaken as part of the EIA phase.</p> <p>Refer to No. 17 for response in terms of the Wildlife Impact Assessment. Further details in terms of the approach to dealing with sensitive game and the related</p> <p><i>Mitigation measures will be included in the EIA Report.</i></p>

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE
	impacts on one of the hunting camps and the cumulative impact from construction on the pipeline and the borrow pit must be properly investigated and all factors that may impact on the use and value of this property must be investigated and addressed.			
22.	<p><u>PROPOSED MOKOLO AND CROCODILE RIVER (WEST) WATER AUGMENTATION PROJECT (PHASE 2A): WATER TRANSFER INFRASTRUCTURE ("WTI") & BORROW PITS</u></p> <p>COMMENTS and OBJECTIONS – Mr. PN JORDAAN IN MY PERSONAL CAPACITY ("Jordaan") AND AS AN AUTHORISED TRUSTEE FOR AND ON BEHALF OF THE PN JORDAAN FAMILY TRUST, IT59/1998 (the "Trust") – Dated <u>10 April 2018</u></p> <p><i>Two borrow pits have also been planned</i> – to service a portion of the pipeline in this area.</p> <ol style="list-style-type: none"> 1. One on my southern neighbour's farm – directly opposite my main entrance to the Farm; 2. Second one on my northern neighbour's farm. 3. FACT: The Farm shall be neighboured by 2 (two) borrow pits with the consequential volume of traffic, increase in noise and dust. 	P. N. Jordaan on behalf of PN Jordaan Family Trust	Reply Form (10/04/2018)	<p>Refer to the following responses:</p> <ul style="list-style-type: none"> • No. 10 for the response to compensation; • No. 14 for response to land matters; • No. 15 lists the various specialist studies identified. • No. 17 above for response in terms of the Wildlife Impact Assessment; and • Refer to No. 20 for response to impacts to ecotourism.
23.	<p>We hereby act on behalf of the Trustees of KP Trust, the registered owner of the Farm Buffelsvley 127. Our client has taken note of the preliminary scoping reports of the Water Transfer Scheme and Borrow Pits that will have an impact on our client's property and we have been requested to send our client's preliminary comments to you.</p> <p>Our client operates an intensive buffalo farming operation on the property, and preliminary investigations show that the proposed works will have a significant impact on the animal's stress levels. We attach a provisional summary by our customer with maps to it, and reserve the right to supplement it with specialist reports and further information as well as obtaining more clarity about the intended work.</p>	S van der Merwe	Email (10/04/2018)	Refer to No. 17 for a response in terms of the Wildlife Impact Assessment. Further details in terms of the approach to dealing with sensitive game and the related mitigation measures will be included in the EIA Report.

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE
	<p>We will appreciate it if you can take note of our client's concerns and engage with us in the matter. Preliminary indications are that our client will not be able to cover any losses incurred and alternatives will be discussed.</p> <p>We would like to hear from you for the preparation of the final report. To the extent that our client is not yet registered as an interested party, we request that you do so too.</p>			
24.	<p>All factors that may impact the use, value and income of directly and indirectly affected properties must be investigated and discussed with suitable specialist studies;</p> <p>Can a landowner request the borrow pit be put behind tree lines- specifically owners with game farms. Trees are removed and will take many years, if ever to return to current state.</p> <p>Impact will be higher during construction but a permanent impact due to tree loss;</p>	B. Enslin	Comments on Borrow Pits Draft Scoping Report (11/04/2018)	<p>The Socio-Economic Study will also take this into consideration.</p> <p>Refer to No. 20 for response on impacts to fauna and flora.</p>
25.	<p>2.11 <u>Impact of Borrow Pits on Thaba Tholo</u></p> <p>2.11.1 To the extent that it is anticipated that borrow pits will be located on or adjacent to the Thaba Tholo property, then this may impact negatively on Thaba Tholo for similar reasons as specified in paragraph 2.10 above, i.e. impacting negatively on the security of Thaba Tholo by clearing of perimeter natural bush, disturbing the double fence, presence of contractors, reduction in the size of the property and negative impact on certain species such as Black rhino.</p>	Gunn Attorneys	Letter (11/04/2018)	<p><i>Impacts to be assessed as part of the EIA phase.</i></p> <p>Refer to No. 17 for response on impacts on wildlife.</p>
26.	<p>4. <u>In Conclusion</u></p> <p>4.11 Borrow pits may impact negatively on Thaba Tholo if not placed strategically.</p>	Gunn Attorneys	Letter (11/04/2018)	<p><i>Impacts to be assessed as part of the EIA phase.</i></p>
27.	<p>4 We note that the notification refers to three separate components of MCWAP-2, namely: "Water Transfer Infrastructure - transfer of water from Crocodile River (West) to the Steenbokpan and Lephalale areas; Borrow Pits - sourcing of construction material for the water transfer infrastructure; and River Management System - manage abstractions from, and the river flow in, the Crocodile River (West) between</p>	Nicole Löser (Centre for Environmental Rights NPC)	Letter (11/04/2018)	<p>Refer to No. 3 for the response on the EIA process.</p>

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE
	Hartbeespoort Dam and Vlieëpoort Weir, the Moretele River from Klipvoor Dam to the confluence with the Crocodile River (West), the stretch of Elands River from Vaalkop Dam to Crocodile confluence, and also the required flow past Vlieëpoort”, but that the Scoping Report only deals with the first component – the water transfer infrastructure. Since these components are all intricately linked – especially the assessment of impacts on the giving and receiving water systems – we submit that they should not be separated in this manner and we reserve our clients’ rights to comment and make submissions on all the components of MCWAP-2.			
28.	Proposed alternative for the borrow pit. Will it be possible? It's an old piece of land. Your proposal includes natural bush. I would like to know what the compensation will be.	H Hills	Email (17/05/2018)	<i>Further investigation (test holes and laboratory tests) will have to be performed to confirm the suitability and quantity of the underlying material of the alternative site.</i>
29.	P. Jordaan mentioned that his farm is situated by the road and the railway, and that the route has not yet been finalised and there are still alternative routes. He explained that alternative routes and borrow pits fall on his farm, and his access road will be used during the construction period. He added that it would mean that for 5 years of construction, there would be traffic in front of the entrance to his farm. He bought the farm to retire and there will not be any peace.	P. Jordaan	Public Meeting – Thabazimbi (14/03/2018)	<i>A landowner consultation meeting was arranged and held with the IAP on 05/05/2018.</i>
30.	W. Engelbrecht mentioned that he had not received any e-mail and information about the borrow pits.	W. Engelbrecht	Public Meeting – Thabazimbi (14/03/2018)	D. Henning explained that C. van der Hoven will get his details after the meeting and send a locality map that shows exactly how the project infrastructure possibly affects his farm. <i>A locality map which shows all proposed project infrastructure in relation to the farm was provided to the IAP by email on 24/04/2018.</i>

3 COMMENTS AND RESPONSES – SCOPING PHASE (28 SEPTEMBER 2018 – 29 OCTOBER 2018)

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE
31.	Dear Donavan, do you have a map for me to see where and on or close to which farms the proposed pipeline will run?	Prof JH Meiring	Email (27/09/2018)	<i>A locality map showing the location of the proposed pipeline and borrow pit in relation to the Farm Taaiboschpan 320 LQ, was provided to the IAP.</i>
32.	We have a permit to mine sand 30 km from Steenbokpan shop in the Matlabas river. We are currently supplying Medupi Power Station of washed river sand and have been supplying them for the past six years. We can also supply from the Thabazimbi area. Please contact me if you need any further information.	M. Barkenhuizen	Email (27/09/2018)	The IAP was registered. The IAPs contact details will be passed on to the Contractor if the services will be required once construction commences.
33.	According to the map, the first borrow pit will be on the border of Hanover and Mooivalei and the rest will surely be downstream. Do I understand correctly - no borrow pits will be on or near Grootfontein?	B. Grobler	Email (28/09/2018)	No proposed borrow pits are planned on the Grootfontein farm. The borrow pits required for construction material for the MKWAP-2A pipeline start at Hanover / Mooivallei in Thabazimbi, and continue all the way to Lephalale.
34.	With reference to your correspondence received, as well as our conversation, we provide comments. 1. As you know, the official route marked the "Central Route" as indicated on the map, thus affecting the property Blaauwpan KQ 133 directly. 2. Borrow pits are required for back filling material for the pipeline, and so "Borrow Pit - BP 28" has been identified. 3. The question we have is why do not they make use of the existing pit, or is the material not suitable? 4. If they continue with BP-28, we request that the borrow pit's eastern border area be at least 25m from the boundary fence between Tarentaalpan and Blaauwpan. According to the coordinates it is +/- 10m from the boundary fence and can cause problems in the long term. 5. If they cannot use the existing borrow pit, excess material that gets excavated during construction of the pipeline may be placed into the existing borrow pit so that it can be rehabilitated. Keep us informed of changes.	D. Smit	Email (01/10/2018)	The existing borrow pit will be used as a spoil site for excess material from the pipe trench. The option to move the boundary of BP-28 a distance of 25 m away from Tarentaalpan is noted and will be investigated as a mitigating measure in the EIA phase.
35.	1. Substantial physical irreversible change in the aesthetic	L. F. Fouche	Reply Form	<i>1. All impacts of borrow pits to be assessed in the EIA</i>

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	<p>view of the proposed borrow pit on Farm Leeuwbosch cannot be restored with rehabilitation and has a definitive negative influence on the pristine wilderness tourism experience at Farm Leeuwbosch, borrow pits in this area are not accepted.</p> <p>2. Breakwater reservoir on Farm Leeuwbosch's design and layout will be provided in detail in order to limit the visibility and noise from the reservoir. Again, the aesthetic influence of this pipeline development on the farm Leeuwbosch in the Waterberg Biosphere Reserve a materially detrimental role play in the pristine wilderness tourism experience of this environment.</p>		(08/10/2018)	<p><i>phase.</i></p> <p>2. Details of the break pressure reservoir are provided in Section 9.5 of the Water Transfer Infrastructure Draft EIA Report. A general layout is provided in Figure 53 and a drawing is contained in Appendix H. From a visibility perspective, the break pressure reservoir will be formed by shallow excavation and surrounding earthfill embankments.</p>
36.	<p>Borrow Pits – Should this project go ahead those pits could be utilised and prepared as water storage facilities, coffer dams, which would be beneficial to the coal mining projects as well as for the agricultural sector to alleviate water shortages in the winter time.</p>	E. R. Schuette	Email (11/10/2018)	<i>To be assessed in the EIA phase.</i>
37.	<p>As per the attached acknowledgement at receipt we give herewith reasons why the establishment of borrow pit should not be located as proposed by yourselves.</p> <ol style="list-style-type: none"> 1. The present borrow pit location is situated within 200m of a dwelling and the access road proposed is the existing access to that dwelling and passes within 30m of the dwelling and associated outbuildings. 2. Haarlem Oost is conducting business in hunting and Eco Tourism and has paying clients making use of these facilities on a regular basis. The dust and disruption to this business will mean we would have to shut down operations during construction period resulting in large losses of income and potential future bookings. 3. The proposed borrow pit is situated within 200m of the existing skinning, cold room and carcass preparation area which are part of the income generated by the business. As you would be aware the dust and disruption generated by traffic carting fill material to the site would not be conducive to this type of activity. 4. The access to this proposed borrow pit area would also have a negative effect on our ability to carry out our day to day business activities; especially hunting. This would 	K. Myles	Reply Form (15/10/2018)	<ol style="list-style-type: none"> 1. Impacts on existing infrastructure to be assessed in Socio-Economic Impact Assessment; 2. Refer to No. 20 for response on eco-tourism; Refer to No. 10 for response on compensation; 3. Impacts on existing infrastructure to be assessed in the Socio-Economic Impact Assessment; 4. Refer to No. 17 for response on wildlife impacts.

No.	COMMENT / QUERY / ISSUE	RAISED BY	SOURCE	RESPONSE
	<p>have a disruptive effect on the behaviour of the animals being hunted. This might also propose an element of risk as far as safety due to the use of hunting firearms being used in the area.</p> <p>As you can see the establishment of proposed borrow pit on portion 16 will result in a huge loss of income due to the inability to carry out our normal day to day business. We wish to place this on record and hope you take cognizance of the above.</p>			
38.	<p>Hunting and game breeding near or at borrow pits – specialist studies the following properties will be impacted by borrow pits</p> <p>Mecklenburg 310 KQ P 1- Game breeding and hunting; Karoobult 126 KQ P 0 – Game breeding and hunting; Buffelsvlei 127 KQ P 0 – Game breeding – very expensive 170 herd strong buffalo project Leeuwbosch 129 KQ P1 – area of pit rented with option to buy Rietfontein 15 KQ P 4 – the pit is on ptn 0 but next to my client’s breeding camps and hunting concession Inkerman 819 KQ P 0 - game breeding camps Zandfontein 382 LQ - THIS WILL DIRECTLY IMPACT JULIUS ERASMUS ON Rooipan 357 LQ P 4 Rooipan 357 LQ P 4- CUMULATIVE IMPACT WITH PIT ON</p> <p>Zandfontein 382 LQ P 0 - Please ensure studies that takes all factors in account on these properties and the fact that these borrow pits may have a massive impact over a long period of time. Game will have to be relocated and big trees will be destroyed and all hunting will cease. Future potential losses on brand building for hunting concessions must be addressed and discussed and progeny loss must be dealt with.</p>	B. Enslin	Reply Form (23/10/2018)	<p>Refer to the following responses:</p> <ul style="list-style-type: none"> • No. 15 lists the various specialist studies identified. • No. 17 above for response in terms of the Wildlife Impact Assessment; and • Refer to No. 20 for response to impacts to ecotourism and fauna and flora. <p>Provision will be made in the EMPr for the reinstatement and rehabilitation of the areas affected by construction activities, as well as managing impacts to flora and fauna. Where avoidance is not possible, permits will be obtained from the Department of Agriculture, Forestry and Fisheries (DAFF) if protected trees are to be cut, disturbed, damaged, destroyed or removed in terms of the National Forests Act (No. 84 of 1998).</p> <p><i>Impacts of borrow pits to be assessed in the EIA phase.</i></p>
39.	<p>Sediment removal and return – cumulative impacts</p> <p>The impacts due to sand-mining at borrow pit SS1 (removal of sediment from the river bed) are considered in isolation. Removal of sand from the riverbed is likely to result in increased flows and increased erosion as subsurface alluvial flows are reduced. In addition, water quality is likely to decline due to increased turbidity. These impacts, together with</p>	G. Tyler	Letter (25/10/2018)	<p>Impacts of borrow pit (SS1) on watercourses will be assessed in the Aquatic Baseline and Impact Assessment and the Wetland Impact Assessment, as part of the EIA phase.</p> <p><i>All mitigation measures provided by the specialist will be incorporated in the EMPr</i></p>

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	<p>reduced flows from the weir (due to abstraction) and the removal of an additional 2% of sediment via the desilting works, are likely to result in modifications, in the long term, to instream and riparian habitat downstream of the weir. While it is understood that the sediment load is currently elevated due to erosion upstream, if sediment yield is reduced by approximately 2% per annum, the cumulative impact to habitats 50-100 years from now, remains uncertain. The manner of returning the sediment to the Crocodile River from the desilting works also needs to be included in the impact assessment and management recommendations.</p>			
40.	<p>At this stage, as you are aware, that the preferred route will impact greatly on the Buffalo and Sable project on Buffelsvley and the game camps on Karoobult. Both these properties is directly and indirectly affected by both the pipe line route and the borrow pits. I humbly request to assess this area with us to minimize the impact and to minimize a potentially unaffordable situation for both parties.</p> <p>The cumulative impacts on the farm Rooipan 357 Ptn 4 is in my opinion not adequately addressed in either the Agri Study or the Draft report. This intended activities that includes a break pressure reservoir, pipe line, construction camp, borrow pit and the current power lines, road and railway line is not addressed or assessed adequately and again left in the hands of valuers and TCTA who are not experts to voice an opinion. This leaves the owner Mr Julius Erasmus in an unfair and vulnerable position. We humbly request a more detailed analysis on this property.</p>	B. Enslin	Letter (29/10/2018)	<p>Refer to No. 10 for response on compensation;</p> <p>Impacts on existing infrastructure to be assessed in the Socio-Economic Impact Assessment;</p> <p><i>Cumulative impacts to be assessed in the EIA phase.</i></p>
41.	<p>Draft Scoping Report Borrow Pits</p> <p>This report is basically a repeat from the draft EIA all comments made on the draft EIA is applicable on the draft scoping report for the pits. I think, after reading and commenting on the draft EIA that the Borrow pits are not adequately addressed and the impacts associated with such intended works. As many focus groups meetings were held where many different issues were discussed and brought to your attention, I think it is crucial to have a focus group discussion with the property owners where these intended pits</p>	B. Enslin	Letter (29/10/2018)	<p><i>Impacts of borrow pits and associated works will be assessed in the EIA phase.</i></p> <p><i>A meeting will be convened with the landowners that are affected by the proposed Borrow Pits during the EIA phase. The details of this meeting still need to be confirmed.</i></p>

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	<p>will be located. The pits will be excavated for the whole term of construction and will comprise of offices, explosive storing sheds, works shops, offices and fuel storage. The Agri Study and the wild life study did not focus on the pits but rather just discussed it in an overview. The pits needs more attention please.</p> <p>When can we have such a meeting that all affected can have the opportunity to voice concerns and ask questions?</p> <p>Your assistance here will be greatly appreciated. Thank you for the opportunity to take part in this process.</p>			
42.	<p>Farms Leliefontein 672 LQ and Zandheuwel 356 LQ</p> <p><u>Borrow Pits Comments:</u> I do not like the borrow pit at all. Spent R2 000 000 to fence and electrify. Do a study for a suitable camp to breed sables. It cost a lot of money. We had to move them from another camp and it seems to be the most suitable camp. Zandheuwel's camp houses black herds for hunting and golden wildebeest. Payed R1 000 000 to get the farm predator free. Camp will no longer be suitable for the breeding of sables. R10 million paid for Leliefontein and game, upgraded the lodge for a further million. Borrow pit is at the entrance to the lodge and at the workers' homes that can cause health problems.</p> <p>A few aspects that should be taken into account, should it take place:</p> <ol style="list-style-type: none"> 1. Borrow pit must be matched like existing outside fence (pig wire, conveyor band and electrified wire). 2. Existing fence must be fitted with sliding gate with H-bars on either side. 3. Water in Sable antelope camp must be moved northwards to at least 100 meters away from borrow pit - there is no other suitable camp. 4. Noise from machinery can seriously affect the breeding process of sable antelope, golden wildebeest. If sable antelope are moved, but no adequate camp is available - will have to feed immensely. Serious loss of income. 	A. Steenkamp	Email (29/10/2018)	<p><i>Impacts to be assessed in the EIA phase.</i></p> <p>Provision will be made in the EMPr to manage impacts with regards to the following matters raised (amongst others):</p> <ul style="list-style-type: none"> • Existing infrastructure; • Noise and dust from borrow pit and machinery; • Wildlife; • Reinstatement and rehabilitation; and • Security.

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	<p>5. Noise factor is close to the lodge which will be able to accommodate no clients during the construction phase. We must then temporarily stop the hiring of the lodges to prevent negative permanent damage. (Claim loss). The entire view of the lodge and entrance will be damaged.</p> <p>6. The health of the workers will be highly impacted by dust.</p> <p>7. Hunting of trophy animals with hunters will also have to be totally stopped due to noise and construction. Hunters will definitely not hunting at us with foreign clients.</p> <p>8. These camps were cleared at the expense of at least R1 000 000 to be suitable for sable antelope breeding.</p> <p>9. Security at entry of the farm will be adversely affected.</p>			
43.	62. Finally, the location of borrow pit SS1 within the watercourse will also have a significant local and downstream impact on sediment transport. Removal of sand from this site will release sand into the water and lead to sedimentation of habitat downstream.	N. Loser	Letter (31/10/2018)	See response to No. 39 with regards to impacts on watercourses.
44.	KQ RE/51 area is approximately 506 ha, a borrow pit on the property will negatively affect the viability of the farm and can't be accepted. The impact from the use of the access roads can also affect the farming, there is farming with expensive game. The impact from dynamite blasting can affect my borehole. Suggest that the borehole is tested before and after.	C. Maritz	Reply Form (02/11/2018)	Refer to No. 17 for impacts on wildlife. <i>To be assessed in the EIA phase.</i>