

APPENDIX E.6

Comments and Response Report

ISSUE AND RESPONSE REPORT

CLIENT : Richards Bay Minerals
PROJECT : Extension of the East Central Arterial Road to the RBM Smelter Site
PROJECT No : J31285
PURPOSE : Collation of all the comments and summary of all the issues raised by Interested and Affected Parties (I&APs) on the Background Information Document (May 2012); and GIBB's response to the issues raised. All I&APs listed below were registered on the I&AP database for the project.
COMMENTS PERIOD : 18 May 2012 to 22 June 2012
DATE OF REPORT : March 2013
COMPILED BY : Katherine de Jong
REVIEWED BY : Gisela Fechter and Elisabeth Nortje

Acronyms		
	: GIBB	GIBB (Pty) Ltd
	RBM	Richards Bay Minerals
	BID	Background Information Document
	BA	Basic Assessment
	BAR	Basic Assessment Report
	CBD	Central Business District
	DoT	Department of Transport
	DWA	Department of Water Affairs
	DWAF	Department of Water Affairs and Forestry
	EIA	Environmental Impact Assessment
	EMP	Environmental Management Plan
	I&AP	Interested and Affected Party
	KZN	KwaZulu-Natal
	MOU	Memorandum of Understanding
	WESSA	Wildlife and Environment Society of South Africa
	WULA	Water Use Licence Application
	RBCAA	Richards Bay Clean Air Association

No	Issue Raised by	Correspondence Date	Issue Text	Key Environmental Issues (Summarised)	Response
1	<p>Ezemvelo KZN Wildlife Dominic Wieners Tel: 033 845 1437 Fax: 0865326442 Email: wienersd@kznwildlife.com Mail: P.O. Box 13053 Cascades 3202</p>	<p>Email: <u>18 May 2012</u></p>	<p>"Thanks for the notification. Please advise whether a hard copy will be sent, and whether you are able to provide either a shape file, or a google earth kml."</p>		<p>GIBB gave a hard copy of the BID to Ms Jenny Longmore at the RBM Authority Meeting held on the 11th April 2012. A google earth image and other maps were also sent to Mr Dominic Wieners on the 31st of May 2012.</p>
2	<p>Nicole Stone Email: nicolat5@mweb.co.za</p>	<p>Email: <u>18 May 2012</u></p>	<p>"To whom it may concern Driving home last night , I noticed very small signs put up regarding the expansion of the East arterial road (Birdswood) Please could you send response to below questions 1) map of where new road will be built 2) how this will impact on current road congestion in Birdswood 3) will this road only be for light motor vehicles or will heavy vehicles (trucks & etc.) have usage of this road too Thanking you for your response to this email"</p>	<p><i>Provision of Maps</i></p> <ul style="list-style-type: none"> Requested a map of where new road will be built <p><i>Road Congestion</i></p> <ul style="list-style-type: none"> Impact on current road congestion in Birdswood? Will the road be used by heavy vehicles? 	<p>GIBB sent a hard copy of the BID to Ms Stone on the 22nd of May 2012, showing a map of the proposed road routes.</p> <p>Refer to Section E of the Draft BAR and Appendix D3 – Traffic Impact Assessment Report where the issue of road congestion is further clarified.</p> <p>The road will mainly be used for light motor vehicles and is not a haul road. Nevertheless, heavy vehicles are expected as the road will also be used by the general public. The traffic composition will change along the proposed extension as all heavy vehicle trips along Dune Road to the RBM site are expected to relocate to the proposed extension, thus resulting in a higher percentage of heavy vehicles of 14%.</p> <p>However, with more RBM vehicles using the new link road, hence reducing the number of vehicles along Dune Road, the number of incidents along Dune Road is expected to decrease.</p>
3	<p>DWA Ms. Nompumelelo Ndjalose 88 Field Street Southern Life Building 7th Floor Durban 4000 PO Box 1018 Durban 4000 Tel: 031 336 2889 Fax: 031 305 9915 Cell: 082 305 9915</p>	<p>Fax: <u>21 May 2012</u></p>	<p><i>Completed Comment Sheet</i></p> <ol style="list-style-type: none"> Will there be any wetland crossings If yes, what impacts are foreseen and what are the proposed mitigation measures Will there be any river crossings? Will comment further during the BA process 	<p><i>Watercourse Crossings</i></p> <ul style="list-style-type: none"> Impacts and mitigation measures on/for wetlands and river crossings 	<ol style="list-style-type: none"> Yes there will be watercourse crossings. Refer to Section E of the Draft BAR where the impacts and mitigation measures of the watercourse crossings are discussed. Yes there will be river crossings. Noted. Please note that a Water Use Licence Application (WULA) will be submitted.

4	<p>Email: mdlalosen@dwa.gov.za</p> <p>Cilr Alen Viljoen Chief Whip of Democratic Alliance, City of uMhlatuze 10 Duifdal, Birdswood, Richards Bay, 3900 Mobile: 082 498 4216 Fax: 0866847547 e-mail: alchris@mweb.co.za</p>	<p>Email: <u>21 May 2012</u></p>	<p>"Please register me as an interested party as this is of particular interest to me."</p>	<p>Noted. Registered as an I&AP.</p>
5	<p>Kohli Nxumalo Cell: 073 522 7614 Email: Kknxumalo@webmail.co.za</p>	<p>Email: <u>21 May 2012</u></p>	<p>"Good evening Mrs Gisela, this is Kohli from Richards Bay I'm interested to this, and I'm holding BA degree in Environmental Management can I register." Telephone Call on 5 June 2012 where he noted that he has seen the BID at the library and enquired about employment opportunities.</p>	<p>Noted. A copy of the BID was emailed to Kohli on the 22nd May 2012. Addressing specific employment opportunities falls outside the scope of the Basic Assessment Process.</p>
6	<p>Woodpecker Inn Mr Jacques Myburg Cell : 082 834 9803 Email : woodpeckerinn@satcom.co.za</p>	<p>Telephone Call: <u>21 May 2012</u></p>	<p>Wishes to register as an I&AP and receive further information on the project.</p>	<p>Noted.</p>
7	<p>City of Mhlatuze Sharin Govender Department: City Development Projects Manager: Environment Planning Tel: 035 907 5174 Fax: 035 907 5426 E-mail: Sharin.Govender@richemp.org.za</p>	<p>Email: <u>23 May 2012</u></p>	<p>"This may not relate directly to the EIA process, but I believe it would be useful at this stage to initiate an internal working team to provide planning, technical/civil and legal inputs pertaining to this road." Please advise me on whom we should be liaising with in Roland Rode's absentia"</p>	<p>An Internal Working Group was formulated, which allows key stakeholders of the project to meet and discuss any pressing issues regarding planning, and legal inputs for the road. The Internal Working Group includes members of the City of Mhlatuze, Mbonambi Municipality, Mondi & Sappi reps (if available), GIBB representatives and RBM representatives. In the absence of Roland Rode, the lead Engineer is Hendrik van Niekerk (t: +27 (0)35 901 3369)</p>
8	<p>Richards Bay Minerals Henk van Niekerk Tel: 035 901 3369 Fax: 086 6329354/035 901 3324 Cell: 083 454 7968</p>	<p>Email: <u>22 May 2012</u></p>	<p>"Please keep me in the loop"</p>	<p>Noted. Registered as an I&AP.</p>

<p>9</p>	<p>Richards Bay Minerals Jeremy Smith Bottlebrush Road Veldenvlei PO Box 10584 Meerensee 3901 Cell: 083 780 7070 Email: Jeremy.smith@rbm.co.za</p>	<p>Email: <u>23 May 2012</u></p>	<p>Completed Comment Sheet Personal Interest in the project "I support the construction of the road. However heavy traffic through the suburbs of Veldenvlei and Birdswood must be limited to light/medium trucks (tonnage to be decided). It will not be acceptable to have any large transport/delivery vehicles passing through the Suburbs."</p>	<p>✓ Supports the construction of the Road <i>Heavy Vehicle Traffic</i></p> <ul style="list-style-type: none"> Heavy Traffic must be limited through suburbs of Veldenvlei and Birdswood. 	<p>Noted. Refer to the Traffic Impact Assessment Report in Appendix D3 where Traffic recommendations are discussed in further detail. As noted above, the road is mainly for light motor vehicles and is not a haul road. Nevertheless, heavy vehicles are expected as the road will also be used by the public. The traffic composition will change along the proposed extension as all heavy vehicle trips along Dune Road to the RBM site are expected to relocate to the proposed extension, thus resulting in a higher percentage of heavy vehicles of 14%. However, with more RBM vehicles using the new link road, hence reducing the number of vehicles along Dune Road, the number of incidents along Dune Road is expected to decrease.</p>
<p>10</p>	<p>Richards Bay Minerals Geoff Botha 12 Jacana Jaunt Birdswood PO Box 215 45 Richards Bay 3901 Cell: 079 0466119 Email: Geoff.botha@rbm.co.za</p>	<p>Email: <u>23 May 2012</u></p>	<p>Completed Comment Sheet Personal Interest in the project "Only comment I got is that this proposed road is about 5 years late in coming. Just don't "speed bump" it. The only sad fact is I've only two years before retirement and it would be nice if I was still able to use this road"</p>	<p>✓ Supports the construction of the Road</p> <ul style="list-style-type: none"> The proposed road was needed five (5) years ago Requests that the road does not have "speed bumps" 	<p>Noted. The decisions on whether to deploy speed bumps or not rests with the operations of the road. Speed bumps and other traffic control measures will be utilized where necessary to control the traffic speed, particularly where there is potential for interaction with pedestrians or animals, or where the risk of accidents is high.</p>
<p>11</p>	<p>Richards Bay Minerals Geoff Lagerwall 42 (A) Weaverwing Birdswood 4 Umhlanga Gardens, 42 Chartwell Drive Umhlanga Rocks 4319 Cell: 083 2825281 Email: Geoff.lagerwall@rbm.co.za</p>	<p>Email: <u>23 May 2012</u></p>	<p>Completed Comment Sheet Business and Personal Interest in the Project 1. The East Central Arterial is fairly congested at this stage, especially during peak hours. What contingency planning is in place to account for additional traffic volumes with respect to this proposed alternative route to RBM 2. Will the new proposed route to RBM be able to handle abnormal road traffic"</p>	<p><i>Traffic Congestion</i></p> <ul style="list-style-type: none"> East Central Arterial is fairly congested at this stage, especially during peak hours. What contingency planning is in place to account for additional traffic volumes <p><i>Abnormal Loads</i></p>	<p>Should the proposed link road be constructed, the traffic flowing towards the Central Business District (CBD) in the morning is likely to reduce as traffic flowing towards RBM will be moving to the opposite direction and vice versa during the evening. Refer to the Traffic Impact Assessment Report Appendix D3 where these issues are discussed in further detail.</p>

				<ul style="list-style-type: none"> Will the new proposed route to RBM be able to handle abnormal road traffic 	<p>The proposed new link road will be able to handle abnormal loads. In special circumstances, where vehicle or load exceeds the regulated maximum weights and dimensions, the relevant standard requirements (warning signs and embargo requirements) will and should be put in place.</p>
12	Ndumiso Email: Mckaladge@ovi.com	Email: <u>24 May 2012</u>	"I hereby wish to ask to a receptionist or anyone in charge, what is the main purpose of the extension of the east main road from RBM. For correspondence....email me back on this email address or just reply on my subject.thank you.Ndumiso"		GIBB sent a copy of the BID to Ndumiso on the 25 th May 2012, which indicates the purpose of the Extension of the East Central Arterial to the RBM Smelting and Processing site.
13	Richards Bay Minerals Jerry Mngomezulu Specialist: Community Liaison, Community & Corporate Relations. Tel: 035 9013383 Cell: 083 414 6441 Fax: 035 901 3151 Email: Jerry.Mngomezulu@rioti nto.com	Email: <u>29 May 2012</u>	"This is just to acknowledge receipt of the e-mail you copied us regarding the East central Arterial road (around Birdswood)."		Noted. Registered as an I&AP.
14	Hokmah (Pty) Ltd Consulting Engineers Andrew Hodsdon Pr Eng Suite 3A Montego Park Richards Bay Tel: 035 789 3805 Fax: 035 789 3820 Email: andrew@hokmah.co.za	Email: <u>6 June 2012</u>	"To Whom It May Concern: I would like to register as an interested and affected party. Please can you send through all available details with regard to the proposed new road route, as well as what measures are being taken to upgrade the existing road infrastructure leading up to the start of the new road."	<p>Upgrade of existing road infrastructure</p> <ul style="list-style-type: none"> What measures are being taken to upgrade the existing road infrastructure leading up to the start of the new road 	<p>Registered as an I&AP.</p> <p>GIBB sent a copy of the BID to Mr Hodsdon on the 6th of June 2012, which included all the project details.</p> <p>The upgrade of existing infrastructure falls outside the scope of the proposed project and is within the development program of the City of Mhlathuze.</p>
15	Richards Bay Clean Air Association Sandy Camminga Tel: + 27 (35) 786 0076 Cell: + 27 (83) 515 2384 Fax: + 27 (35) 907 5340 E-mail : camminga@iafrica.com Visit : www.rbcaa.co.za	Email: <u>6 June 2012</u>	"Kindly register me as an Interested and Affected Party. Thank you"		Noted. Registered as an I&AP.

<p>16</p>	<p>James Reeves (BHP Billiton) 8 Lark Loop Birdswood Richards Bay 3900 P.O. Box 30547 Arbex Richards Bay 3904 Cell: 083 357 6200 Email: james.reeves@bhpbilliton.com</p>	<p>Email: <u>9 June 2012</u></p>	<p>"I would like to register as an I&AP for the proposed road extension linking RBM and Birdswood. As a resident of Birdswood I have a personal interest in the development of the road. I have a concern regarding the project. At present, the traffic flow out of Birdswood in the morning and into Birdswood in the evening is very congested. It is not uncommon for the traffic to back up to Essenwood Road from the T junction at the end of East Central Arterial. The increase in traffic flow resulting from the use of this extension by RBM related vehicles and vehicle from its surrounding townships would increase this problem. For this reason, the entrance into Birdswood would need to be reviewed prior to the road extension."</p>	<p><i>Traffic Congestion</i></p> <ul style="list-style-type: none"> The traffic flow out of and into Birdswood is very congested in the mornings and evenings. The increase in traffic flow resulting from the use of this extension road by RBM related vehicles and vehicles from the surrounding townships would increase this problem. For this reason, the entrance into Birdswood would need to be reviewed prior to the road extension. 	<p>Refer to the Traffic Impact Assessment Report Appendix D3 where this issue is discussed in further detail.</p> <p>The traffic composition will change along the proposed extension as all heavy vehicle trips along Dune Road to the RBM site are expected to relocate to the proposed extension, thus resulting in a higher percentage of heavy vehicles of 14%. It is very likely that speeding will occur along the new link road, particularly before any residential developments occur along the road, this may lead to an increase in traffic accidents. The speed limits and signage on the new road need to be restrictive and corrective enforcement should form part of the operation of the road. The use of speed bumps may reduce speeds of motorists, limiting the potential for car accidents.</p> <p>The proposed link road is not expected to have any direct access along it, but in future may have residential streets intersecting with it, of which most would likely be signalised and is therefore expected to have fewer vehicle conflicts. With more RBM vehicles using the new link road, hence reducing the number of vehicles along Dune Road, the number of incidents along Dune Road is expected to decrease.</p>
<p>17</p>	<p>Candice Henderson (Water Solutions Southern Africa) Sheq Manager 8 Comorant Cove Birdswood Richards Bay PO Box 1635 Empangeni 3880 Tel: +27 35 787 0729 Fax: 0866369399 Cell: +27 83 648 9341 Email: CHenderson@wssa.co.za</p>	<p>Email: <u>12 June 2012</u></p>	<p>Completed Comment Sheet "Personal Interest (Health, Security, Aesthetic and Financial – value of residence) Detail of whether the road will impact on my privacy at home with the removal of vegetation in the Greenbelt. How close will the proposed road be to my back yard wall. What is the volume of traffic estimated to be and will there be trucks on the road in the evening (20:00 – 06:00) to RBM. Will there be a change in the value of my home if its now backed onto a main road? What will the Noise, Dust, Emission Impact be?" Preferably send on any further communication and response by email." Email request: "if you could also send me a closer arterial view of the proposed road to see whether it does run behind my home. A snap shot indicating the co-ordinates to my home in Birdswood (circled)"</p>	<p><i>Privacy</i></p> <ul style="list-style-type: none"> Provide detail of proximity of the road and will the road impact on residents privacy at home with the removal of vegetation in the Greenbelt <p><i>Road Traffic</i></p> <ul style="list-style-type: none"> Volume of traffic estimated to be and will there be trucks on the road in the evening (20:00 – 06:00) to RBM <p><i>Property Value</i></p> <ul style="list-style-type: none"> Will there be a change in the value of my home <p><i>Noise, Dust and Emission Impacts</i></p> <ul style="list-style-type: none"> Extent of the Noise, Dust and Emission Impacts 	<p>GIBB responded to Ms. Henderson on the 12th of June 2012 and explained the proposed route in relation to Ms. Henderson's house.</p> <p>Refer to the Traffic Impact Assessment Report Appendix D3 where this issue is discussed in further detail. And refer to response above.</p> <p>Since the road network in this area is largely developed already, it is unlikely that there will be a significant change in property value. Depending on the property type, it's value may increase due to an improved road network</p> <p>Refer to Section E of the Draft BAR where these impacts are clarified.</p>

<p>18</p>	<p>Frans van der Walt (QS2000 Plus -Quantity Surveyors & Project Managers) 22 Pompano Place Meerensee 3901 P O Box 10376 MEERENSEE 3901 Tel: 035 7534184/5 Fax: 035 753 4185 Cell: 082 4600 875 Email: frans@qs2000plus.co.za</p>	<p>Email: <u>12 June 2012</u></p>	<p>"Hallo Mrs. Fechter, I hereby wish to register as I&AP on the above EIA process. I wish to use this opportunity to : 1. Commend the Private Sector involved in this process to expedite the delivery of such infrastructure through coming to the party with co-funding. 2. Urge the planners to ensure that the road is a double road and not a single carriage way as indicated for at least future expansion, but ideally from the onset. This road is going to become a development corridor between the Richards Bay CBD, via the Airport and Mzingazi to RBM with lots of entrepreneurial opportunities that would be created along the way. 3. Urge those involved to expedite the process to see this infrastructure implemented and completed urgently. The area that this would affect has massive unemployment (to my knowledge more than 50%, but probably closer to 65%), and expedited delivery should go a long way to provide opportunities for entrepreneurship and associated economic and socio-economic opportunities and much needed job creation. 4. Ideally the road should provide for intersections (similar to the Manguzi road) with future spines off the main road. Looking forward to hearing more and being invited and involved in public processes, meetings, etc."</p>	<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Commend the Private Sector involved in this process to expedite the delivery of such infrastructure <p><i>Road Design</i></p> <ul style="list-style-type: none"> • Ensure that the road is a double road and not a single carriage way as indicated for at least future expansion <p><i>Unemployment</i></p> <ul style="list-style-type: none"> • Expedite the process to see this infrastructure implemented and completed urgently. The area that this would affect has massive unemployment. <p><i>Future Plans</i></p> <ul style="list-style-type: none"> • Ideally the road should provide for intersections with future spines off the main road. 	<p>Noted. Construction is anticipated to start in 2014.</p> <p>The current plan is for a single carriage road commensurate to the traffic anticipated.</p> <p>Noted.</p> <p>This has been taken into consideration and will form part of the design.</p>
<p>19</p>	<p>Theuns van Tonder PO Box 102485 Meerensee 3901 Tel: 083 468 1542. Email: Theuns.vanTonder@arcelormittal.com</p>	<p>Email: <u>14 June 2012</u></p>	<p>"Good Afternoon Gibb Please register me as an interested and affected party to the EIA. We would like to receive all documentation and attend meetings with regard herewith. Awaiting your earliest response."</p>		<p>Noted. GIBB sent a copy of the BID to Mr van Tonder on the 15th of June 2012..</p>
<p>20</p>	<p>Ravis Reddy Manager/Director SBS Engineering Tel: 035 797 5589 Fax: 035 797 4812 Cell: 082 452 6966 E-mail: sbseng@telkomsa.net</p>	<p>Email: <u>20 June 2012</u></p>	<p>"Good Day Mrs Fechter, This new road extension linking RBM to East Central Arterial, is a great concern for me being a resident who lives, Right next to the main road. You basically shifting problems from area to another. This new road is going to decrease safety for the residents and increase congestion on the roads. Have you seen the road at peak hours, and we now have to put up trucks running up and down at all times of the day and night. The new road creates more quick access for criminals."</p>	<p><i>Concerned about the proposed Link Road</i></p> <ul style="list-style-type: none"> • Affect on residents neighbouring the road • Shift of problems from one area to another 	<p>Noted. There may well be an element of this, particularly as traffic will indeed be diverted. The impact on neighbouring residents cannot be avoided nor fully mitigated however mitigation measures have been provided in Section E of the Draft BAR and Appendix D3 – Traffic Impact Assessment Report. Construction is anticipated to start in 2014 and the project is expected to reduce the current congestion experienced along Dune Road.</p>

<p>21</p>	<p>Lize Shaw (Mondi) Environmental Specialist – Zululand & Ntonjaneni Area Umfolozi Area 26 Bredelia Street Kwambonambi 3915 P. O. Box 35 Kwambonambi 3915 South Africa Tel: 035 5808117 Fax: 035 580 4703 Cell: 082 5271845 E-mail: lize.shaw@mondigroup.co.za</p>	<p>Email: <u>22 June 2012</u></p>	<p>There is an existing gravel road that runs from the N2 to RBM, why don't you look at that option. It won't infringe on fauna, flora, safety of residents and road congestion. I believe it will be more cost effective as well. If you have any queries please do not hesitate to contact me.</p>	<p>Traffic Congestion</p> <ul style="list-style-type: none"> This new road is going to increase congestion on the roads particularly at peak hours, and with trucks running up and down at all times of the day and night. <p>Safety</p> <ul style="list-style-type: none"> Safety concerns for residents due to the creation of quick access for criminals. <p>Alternative Routes</p> <ul style="list-style-type: none"> There is an existing gravel road that runs from the N2 to RBM, why don't you look at that option 	<p>Refer to the Traffic Impact Assessment Report Appendix D3 where this issue is discussed in further detail. Refer to the response in 16 above.</p> <p>It is not expected that tarring the proposed road will lead to an increase in social evils (crime and drunken driving). Safety concerns will however be discussed between the Municipality and RBM.</p> <p>The bush road was considered in a Transportation Risk Assessment and was deemed inferior compared to the preferred proposed options to get to the CBD. While it is longer, using this road will lead to an increase in the mix of trucks, bicycles and sedans as it would be considered easy access to N2 and could increase the likelihood of accidents occurring.</p>
<p>22</p>	<p>WESSA Ms Carolyn Schwegman EIA Co-ordinator WESSA KZN Region Tel: +27 (0)39 975 2147 Cell: +27 (0)83 9814814 Fax: +27 (0)39 9752147 (on request) Email: afromatz@teikomsa.net Website: www.wessa.org.za Address:</p>	<p>Email: <u>22 June 2012</u></p>	<p>"Thank you for the information. WESSA notes that in most parts the road exists as gravel/sand road and that the route is through Sappi and Mondli plantations however impacts on the natural environment, particularly water resources, have been identified. WESSA is concerned about development in the Richards Bay area impacting on the wetland systems and we would like to receive additional information on the proposed link road."</p>	<p>Wetland Impacts</p> <ul style="list-style-type: none"> Concerned about development in the Richards Bay area impacting on the wetland systems <p>Use of existing road</p> <ul style="list-style-type: none"> Notes that in most parts the road already exists as gravel/sand road. 	<p>Noted. Mitigation measures are provided below:</p> <ul style="list-style-type: none"> Place signage along the route to prohibit illegal waste dumping Follow up on vigorous fining systems if culprits are caught dumping Regular follow up and patrolling may restrict illegal dumping (this will be further discussed with RBM and the municipality).
					<p>Refer to Section E for further details on wetland impacts.</p> <p>The route was specifically selected to make use of existing roads and tracks, as much as possible, to minimise environmental impacts and costs. A WULA will be submitted for any anticipated impacts on the wetlands.</p>

23	<p>P O Box 343, Pennington, 4184</p> <p>Geoff Hurd (Mondi) Roads Specialist – Mondri SA 380 Old Howick Road Hilton Tel: 033 329 5338 Cell: 082 740 5861 E-mail: geoff.hurd@mondigroup.co.za</p>	Email: <u>25 June 2012</u>	<p>"Thanks for the mail on the notification of the Basic Assessment."</p>		Noted. Registered as an I&AP.
24	<p>MITTAL Steel SA Theuns van Tonder (Resident) 34 Perlemoen Meerense Posbus 102485 Meerense 3901 Cell: 082 305 9915 Fax: 035 7979622 Email: theuns.vantonder@arcelormittal.com</p>	Fax: <u>26 June 2012</u>	<p>Completed Comment Sheet Interest:</p> <ol style="list-style-type: none"> 1. Safeguarding Meerensee from heavy vehicle traffic running 24/7 365 days 2. Reduce Noise levels 3. Safe entry into Dune Road from Residential <p>Concerns, suggestions and or potential impacts to be investigated during the BA:</p> <ol style="list-style-type: none"> 1. Restrict RBM heavy trucks to 06H00 to 16h00. 2. Increase bus service to employees to reduce traffic 3. Consider "Bush road" connecting to N2 as preferred road for heavy vehicles 4. Stop using road transport move material to Port. USE RAIL ONLY! 5. Install road humps along Dune Rad to reduce speed until alternative road is available 6. Check/Stop parking of heavy vehicles at LAC Centre 7. Provide toilets at RBM/Intersection for Drivers 8. Reduce Crime in meerensee/Mzingazi by stopping drivers from using road. Illegal Liquor and Drug sales/trade will be reduced with no/less customers via dune road. 	<p><i>Suggestions for Traffic Control</i></p> <ul style="list-style-type: none"> • Restrict RBM heavy trucks to 06H00 to 16h00 • Increase bus service to employees to reduce traffic <p><i>Road/ Alternative Route</i></p> <ul style="list-style-type: none"> • Consider "Bush road" connecting to N2 as preferred road for heavy vehicles <p><i>Road to Rail Transportation</i></p> <ul style="list-style-type: none"> • Stop using road transport, move material to the Port by using rail only. <p><i>Other Road concerns</i></p> <ul style="list-style-type: none"> • Install road humps along Dune Road to reduce speed until alternative road is available <p>Provide a Check/Stop parking of heavy vehicles at LAC Centre</p> <ul style="list-style-type: none"> • Truck stop/parking/amenities • Provide toilets at RBM/Intersection for Drivers <p><i>Safety</i></p> <ul style="list-style-type: none"> • Reduce Crime in Meerensee/Mzingazi by stopping drivers from using road (e.g.illegal 	<p>Noted. Refer to Section E of the Draft BAR and the Traffic Impact Assessment Report Appendix D3 where these issues are discussed in further detail.</p> <p>The bush road was considered in a Transportation Risk Assessment and was deemed inferior compared to the preferred proposed options to get to the CBD. While it is longer, using this road will lead to an increase in the mix of trucks, bicycles and sedans as it would be considered easy access to N2 and could increase the likelihood of accidents occurring. Materials to the Port are currently being moved by rail. This will remain the case.</p> <p>The decisions on whether to deploy speed bumps or not rests with the operations of the road. Speed bumps and other traffic control measures will be utilized where necessary to control the traffic speed, particularly where there is potential for interaction with pedestrians or animals, or where the risk of accidents is high</p> <p>Appropriate stops and amenities will be considered during the design phase.</p> <p>It is not expected that tarring the proposed road will lead to an increase in social evils (crime and drunken driving). RBM does not encourage drunken driving by its employees and will continue to encourage its employees to adhere to its safety standards. Safety warning signs will be installed where appropriate.</p>

				<p>Liquor and Drug sales/trade)</p> <p>Noise</p> <ul style="list-style-type: none"> • Reduce Noise levels 	<p>Refer to Appendix D4 - The Noise Impact Assessment. With regards to the RBM Link Road Project, the Noise specialist concluded that the biggest impacts are expected at the residential areas located directly adjacent to the proposed alignment.</p> <p>Typical mitigation measures during the construction/operation phase to reduce noise include the following:</p> <ul style="list-style-type: none"> • Consider noise screens in the design of the road to limit the impact on nearby residents • Restrict very noisy construction activities, e.g. breaking up concrete hardstanding with pressure hammers to daytime, if feasible; and if not, obtain authorisation from the local authority for alternative arrangements • Refrain from operations during the night as sound may travel to residential areas and communities • Refrain from using routes for haulage through or close to residential areas during night time. Alternatively, provide residents with prior knowledge of scheduling for ultra-heavy-duty vehicles and advise on the frequency and day periods of exposure to such noise • Ensure that all vehicles and where possible noisy equipment are fitted with silencers that are regularly and properly maintained • Meet regulatory requirements in terms of site boundary noises.
<p>25</p> <p>Murray Wilson-Browne Forestry Manager - Zululand Forestry – KZN</p> <p>Sappi Forests Waterton Road Kwambonambi 3915 SOUTH AFRICA</p> <p>Tel: +27 (0)35 580 1211 Fax: +27 (0)35 580 1698</p>	<p>Email: 28.June.2012</p>	<p>"I realise that I have missed the deadline for comments, but there is one issue (that I think has been addressed already) I just want to ensure is looked after and that is that Sappi is not keen to lose plantable area which is land that currently has trees growing on it."</p>	<p><i>Loss of Plantable Forest area</i></p> <ul style="list-style-type: none"> • Sappi would not like to lose plantable area which is land that currently has trees growing on it. 	<p>Noted. The loss of plantable forest area has been minimised by aligning the proposed route alternatives with existing roads/tracks as much as possible. However loss of some minor plantable area is expected.</p>	

<p>Cell: +27 (0)82 329 7106 Email: Murray.Wilson-Browne@sappi.com</p>					
<p>26 Ezemvelo KZN Wildlife Dominic Wiemers Tel: 033 845 1437 Fax: 0865326442 Email: wienersd@kznwildlife.com Mail: P.O. Box 13053 Cascades 3202</p>	<p>Email: <u>28 June 2012</u></p>	<p>"Unfortunately Felicity is not currently here, otherwise I would have asked her first, but did you by any chance send her the kml file for the RBM Link road?"</p>	<p>"EXTENSION OF THE EAST CENTRAL ARTERIAL ROAD TO THE RICHARDS BAY MINERALS SMELTING AND PROCESSING SITE, RICHARDS BAY District Municipality: uThungulu</p> <p>The Background Information Document (BID) for the abovementioned application has been received and reviewed by Ezemvelo KZNWildlife's IEM Planning Committee. Ezemvelo has been informed that the proposed alignment of the road (as in the BID) will be changed. Ezemvelo will therefore await the new alignment of the proposed development for further review and comment.</p> <p>Should you wish to discuss any points regarding the proposed development or should any biodiversity issues arise, please do not hesitate to contact our offices.</p> <p>Please acknowledge receipt of this email."</p>	<p><i>Proposed Road Alignment</i></p> <ul style="list-style-type: none"> Ezemvelo will therefore await the new alignment of the proposed development for further review and comment. 	<p>GIBB had already sent a Google image file on 31 May 2012.</p> <p>GIBB Response: "Thank you for confirming receipt of the BID.</p> <p>There was some debate on potentially changing the route over the past week or so, but there were then some issues raised with the proposed new alignments. The client indicated to us this week that the proposed route will unlikely be changed at this stage. We will therefore appreciate it if you could comment on the route as indicated in the BID as soon as possible."</p>
<p>27 Ezemvelo KZN Wildlife Ms A. Nerissa Pillay Telephone: 033 845 1917 Fax: 033 845 1499 Email: pillaya@kznwildlife.com Mail: P.O. BOX 13053 Cascades, 3200</p>	<p>Email: <u>10 July 2012</u></p>				
<p>28 MITTAL Steel SA Theuns van Tonder (Resident) 34 Perlemoen Meerensee Posbus 102485 Meerensee 3901 Cell: 082 305 9915 Fax: 035 7979622 Email: theuns.vantonder@arcelormittal.com</p>	<p>Email: <u>2 August 2012</u></p>	<p>"Please advise the status of this investigation. Where can I access the report? When will the report be presented? Awaiting your guidance.</p>			<p>GIBB left a voice message on the 2 August 2012 to explain that the project had a few delays. All registered I&APs will be advised on the available documents.</p>
<p>29 Frik Bosman Clir Ward 1 uMhlatuze Municipality Email: frik.bosman@gmail.com</p>	<p>Email: <u>31 January 2013</u></p>	<p>"Trust that you are keeping well. As ward councillor I am receiving a lot of complaints on the heavy RBM traffic on the Dune Road through Meerensee and Mzingazi Village. I have noticed the adverts for the EIA for your new proposed road to the airport in the local press. What is the progress with this road and is there a possibility that RBM will make an announcement on the construction?"</p>	<p><i>Traffic complaints along Dune Road have been received by the Ward 1 Councillor.</i></p> <p><i>Project Progress</i></p>		<p>RBM Response: "Thank you for your inquiry.</p> <p>The Basic Assessment Report is currently being completed. The requested specialist studies was undertaken and completed in December 2012. It is anticipated that the Report will be submitted to the Department for review by May 2013.</p>

					<p>RBM is now in the process of finalizing the road design. The designs and time will be affected by:</p> <ul style="list-style-type: none"> - Landowner permissions (Mondi, Sappi, and Umhlatuze and Mbonambi municipalities) - MOU with landowners - Servitudes and possibly Survey General registration or rezoning <p>Should the Department approve the Basic Assessment Report and issue a favorable environmental authorization, RBM still need to consider the timeframe on the appeal period (should there be any). Should there be no appeals and above agreements have been signed, construction is anticipated to start in 2014."</p>
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Comments and Response Report

CLIENT : Richards Bay Minerals (RBM)
PROJECT : Extension of the East Central Arterial Road to the RBM Smelter Site
PROJECT No : J31285
PURPOSE : Collation of all the comments and summary of all the issues raised by Interested and Affected Parties (I&APs) on the Draft Basic Assessment Report (April 2013); and GIBB's response to the issues raised. All I&APs listed below were registered on the I&AP database for the project.
COMMENTS PERIOD : 4 April 2013 to 14 May 2013 and further extended to 11 June 2013
DATE OF REPORT : 8 August 2013
COMPILED BY : Katherine de Jong
REVIEWED BY : Kabelo Mphahle/ Elisabeth Nortje

Acronyms	:	BA	Basic Assessment
	:	BAR	Basic Assessment Report
	:	BID	Background Information Document
	:	CBD	Central Business District
	:	DoT	Department of Transport
	:	DWA	Department of Water Affairs
	:	DWAF	Department of Water Affairs and Forestry
	:	EIA	Environmental Impact Assessment
	:	EMP	Environmental Management Plan
	:	GIBB	GIBB (Pty) Ltd
	:	I&AP	Interested and Affected Party
	:	KZN	KwaZulu-Natal
	:	MOU	Memorandum of Understanding
	:	PPP	Public Participation Process
	:	RBCAA	Richards Bay Clean Air Association
	:	RBM	Richards Bay Minerals
	:	SANRAL	The South African National Road Agency Limited
	:	TFR	Transnet Freight Rail
	:	URRA	Umhlatuze Ratepayers & Residents Association
	:	WESSA	Wildlife and Environment Society of South Africa
	:	WULA	Water Use Licence Application
	:	ZS	Zuliti South

No	Issue Raised by	Correspondence Date	Issue Text	Key Environmental Issues (Summarised)	Response
1	QS2000 Plus Frans van der Walt Quantity Surveyors & Project Managers	Email: <u>4 April 2013</u>	<p>In response to GIBB's E-mail sent on 4 April 2013 with the Draft BAR attachment:</p> <p>"This road should be absolutely supported and is long overdue in being constructed. The development corridor that would be created as a result would create substantial and much needed economic - and socio-economic opportunities. Unemployment in the immediate region of the proposed routes are very high, and the road should present many opportunities to the local community and entrepreneurs.</p> <p>If at all possible, and I do appreciate that funding is an issue, it would actually be great if both Options 1 & 2 could be built, since I doubt very much if the Municipality would in the medium term have budget for it due to other priorities. Often in life the cost of not doing something is more than the cost of doing it.</p> <p>I also included consultants involved in the planned SAPPI development which may, or may not be on your mailing-list, and should be part of the process. (Mr Wimpie Malan and Thys de Wet)</p> <p>I again congratulate RBM in their wisdom to develop this, and other, critically needed infrastructure in the region, and trust that the EIA process would not be unduly and unnecessarily delayed and extended by bureaucratic stumbling blocks.</p> <p>Regards"</p>	<p>∨ This road should be absolutely supported and is long overdue in being constructed.</p> <p><i>Creation of a Development Corridor and Socio – Economic Opportunities</i></p> <ul style="list-style-type: none"> • Unemployment in the immediate region of the proposed project is very high, and the road should present many opportunities to the local community and entrepreneurs. <p><i>Other General Comments</i></p> <ul style="list-style-type: none"> • Since the Municipality will not have medium term budget, it would be great if both Options 1 & 2 could be built. Understands that funding is an issue. • Keep Mr Wimpie Malan and Thys de Wet of the SAPPI development notified. • Congratulate RBM in their wisdom to develop this and other critically needed infrastructure in the region. 	<p>Noted.</p> <p>Noted. As per the Draft Basic Assessment Report (BAR), the construction phase of the project will provide approximately 200- 300 new opportunities, most of which would benefit the local community and this will allow for skills transfer to previously disadvantaged individuals.</p> <p>Although this would be an ideal situation, the cost of building both options is too expensive and RBM cannot afford this. They will however consider the most preferred option.</p> <p>They will be further consulted with and given an opportunity to comment on the Final Basic Assessment Report.</p> <p>Noted.</p>
		Email: <u>17 April 2013</u>	<p>In response to GIBB's email requesting attendance at the public meeting scheduled for 23 April 2013:</p> <p>At this stage I can only tentatively confirm my attendance, due to another business commitment which may require my late notice attendance.</p>	<p><i>Public Meeting Attendance</i></p>	<p>Noted.</p>

<p>2</p>	<p>City of Mhlatuze Sharin Govender City Development Projects Manager: Environment Planning</p>	<p>Email: <u>4 April 2013</u></p>	<p>In response to GIBB's E-mail sent on 4 April 2013 with the Draft BAR attachment: "Thanks for the notice - Let me try and download the reports of the Gibb website, failing which I would let you know. So this, by and large, takes care of the EIA. The other issue we need to address however, is the MOU with the landowners and the municipality for future responsibilities towards maintaining the infrastructure. I am not sure what was agreed on in terms of PDA also? May I suggest that we meet with the project team to discuss a way forward. Alan Moss, who steered this ship from our Infrastructure and Technical Services Department, no longer works for the municipality so Mr Jogie Naidoo and Jaco Schutte would be relevant people to talk to if this has not happened already. We would be happy to host the meeting as we have done in the past."</p>	<p><i>Environmental Impact Assessment (EIA)</i></p> <ul style="list-style-type: none"> The Draft BAR takes care of the EIA and the City will download the necessary reports off the GIBB website. <p><i>Memorandum of Understanding (MoU)</i></p> <ul style="list-style-type: none"> Need to address the MOU with the landowners and the municipality for future responsibilities towards maintaining the infrastructure. What was agreed on in terms of PDA? Suggested a meeting with the project team to discuss a way forward and that the municipality was happy to host the meeting. 	<p>Noted.</p> <p>Mr Okello of RBM responded to Ms Govender on 5 April 2013 and stated that "Your comment is noted and appreciated. I will discuss internally with the aim of coming up with possible meeting dates/ agenda for circulation then revert."</p> <p>An environmental working group was set up between RBM and the municipality in order to discuss the MoU and the PDA. These are separate processes to the EIA.</p>
<p>3</p>	<p>Theuns van Tonder Interested and Affected Party</p>	<p>Email: <u>5 April 2013</u></p>	<p>"Hi Kath Hope you well Can you please send me a direct link to the Traffic Impact Assessment (TIA), or try emailing the report to me if you can please. I also previously couldn't download the locality plans. Jaco from our Infrastructure and Technical Services Department is busy compiling a report to council" "Sorry for the trouble Cath. I also need the link to the Wetland and ecological assessments reports. That's it!" In response to GIBB's E-mail sent on 4 April 2013 with the Draft BAR attachment: "Hi Katherine Thank you. I received today's mail. Will revert."</p>	<p><i>GIBB Downloadable Documents Request : TIA and Locality Plan</i></p> <p><i>GIBB Downloadable Documents Request: Wetland/Ecological Assessment</i></p>	<p>Ms de Jong sent Ms Govender a link for the TIA and locality maps on 23 May 2013. She could not email the TIA report as it was too large to email.</p> <p>Ms de Jong sent Ms Govender a link for the wetland assessment report on 23 May 2013.</p> <p>Noted.</p>

4	<p>Ezemvelo KZN Wildlife Nerissa Pillay Development Planner</p>	<p>Email: <u>5 April 2013</u></p>	<p>In response to GIBB's E-mail sent on 4 April 2013 with the Draft BAR attachment: "Hi Katherine Please could you advise me as to when the Draft Basic Assessment Report for the Proposed Extension of the East Central Arterial Road to the Richards Bay Minerals Smelting and Processing Site, will be submitted to Ezemvelo's IEM Offices seeing as the deadline for comments ends on the 14 May 2013. Best Regards"</p>	<p><i>Request for a hard copy of the Draft Basic Assessment Report</i></p>	<p>Ms de Jong responded to Ms Pillay on 8 April 2013 indicating that GIBB had tried to deliver a hard copy of the report on Friday 5 April 2013 late and unfortunately missed their office hours. She confirmed that a hard copy would be delivered to the offices at Queen Elizabeth Park (QEP) on 8 April 2013. Ms Pillay confirmed receipt of the Draft BAR on 8 April 2013.</p>
5	<p>Richards Bay Coal Terminal Julius Kietzmann Mechanical Inspector: Interested and Affected Party</p>	<p>Email: <u>5 April 2013</u></p>	<p>In response to GIBB's E-mail sent on 4 April 2013 with the Draft BAR attachment (forwarded to Mr Kietzmann by Mrs Camminga on 5 April 2013): "Hi Katherine, Has this TIA taken into account that the existing road into Birdwood is not handling the existing traffic at peak times and with this new road additional traffic will be attracted? Kind regards"</p>	<p><i>Increased Traffic</i></p> <ul style="list-style-type: none"> The existing road into Birdwood is not handling the existing traffic at peak times and with this new road additional traffic will be attracted 	<p>Ms de Jong of GIBB sent a reply to Mr Kietzmann on 10 April 2013, noting that she had spoken to the GIBB Traffic Specialist with regards to his query. She stated that the traffic specialist has taken cognisance of the existing conditions at the Nkoninga Road / East Central Arterial (ECA) intersection by including it in their assessment area as well as numerous other intersections along the ECA. They indicated that traffic counts were conducted during the morning and afternoon peak periods, when traffic is at its worst, to assess the current performance of the intersection and they are fully aware of the situation. In order to improve current conditions and mitigate the impact of the additional traffic due to the extension, they have proposed an upgrade of the intersection. They have assessed the intersection layout against dramatically increased traffic volumes and it has yielded excellent results. They are therefore confident that their report has adequately addressed the impact on the residential areas of Birdwood, adjacent to the East Central Arterial. Mr Kietzmann thanked Ms de Jong for her response on 10 April 2013.</p>

<p>6</p>	<p>Clive Honman Interested and Affected Party</p>	<p>Email: <u>05 April 2013</u></p>	<p>In response to GIBB's E-mail sent on 4 April 2013 with the Draft BAR attachment (forwarded to Mr Kietzmann by Mrs Camminga on 5 April 2013):</p> <p>"I have been made aware of a plan for a road from RBM to join onto the East Central Arterial Road moving through Arboretum, Veld-en-Vlei and Birdswood. This road is already a very busy road with buses etc. moving to Mandlazini and serving the residential areas.</p> <p>The building of this road will create a shorter route to RBM. In doing so all the heavy traffic, trucks and buses will use this route right through the CBD and residential areas it makes no sense. Furthermore it will move through the proposed extension area of Richards Bay which will presumably be residential as well adding even more traffic. The ideal would be to try and find a route around the residential area not through it.</p> <p>I say challenge this route if you live in this area. It will make your residential suburb noisier, unsafe and further congested.</p> <p>Send you emails and letters to</p> <p>GIBB (Pty) Ltd Website: www.gibb.co.za Postal Address: P O Box 1365, Westville, 3630 Physical Address: 2nd Floor, IBM House, 54 Norfolk Terrace, Westville, 3630 Contact Person: Katherine de Jong Email Address: kdejong@gibb.co.za Telephone No.: 031 267 8567 Fax No. : 031 266 3310</p> <p>Concerned Citizen"</p>	<p><i>Heavy Traffic</i></p> <ul style="list-style-type: none"> • All the heavy traffic, trucks and buses will use this route right through the CBD and residential areas • Furthermore it will move through the proposed extension area of Richards Bay which will presumably be residential as well adding even more traffic. • The ideal would be to try and find a route around the residential area not through it. • I say challenge this route if you live in this area. It will make your residential suburb noisier, unsafe and further congested. 	<p>Concerns were noted.</p> <p>The main intention of constructing the road is to ease traffic congestion, improve safety along the Dune road and provided alternative access to RBM in the event of road closure of the current road due to flooding or similar events. Although the road is not intended for haulage, it is expected that some trucks and buses will use the proposed road. The impacts of traffic have been addressed by the traffic study and mitigation measures proposed for implementation. These mitigation measures will form part of design and construction criteria.</p> <p>The impact study took into consideration the City of Umlhathuze's Development Plan with the proposed expansion area of Richards Bay. The road is expected to improve access to and out of these areas.</p>
<p>7</p>	<p>Richards Bay Clean Air Association (RBCAA) Sandy Camminga Interested and Affected Party</p>	<p>Telephone Call: <u>5 April 2013</u></p> <p>Email: <u>12 April 2013</u></p> <p>Email: <u>16 April 2013</u></p> <p>Email: <u>13 May 2013</u></p>	<p>Requested a layout of the proposed road options</p> <p>In response to GIBB's email requesting attendance at the public meeting scheduled for 23 April 2013:</p> <p>"Your circle is off the map ☺</p> <p>I have attached a google earth image that may be of assistance."</p> <p>"I am unable to locate the report on your website."</p> <p>"Please can we have the minutes of the public meeting held on 23 April 2013."</p>	<p><i>Layout request</i></p> <p><i>GIBB Downloadable Documents Request: Draft BAR</i></p> <p><i>Notes of Public Meeting request</i></p>	<p>Ms de Jong sent Mrs Camminga the layout of the proposed road options on 8 April 2013. Ms Camminga confirmed receipt on 8 April 2013.</p> <p>Noted. GIBB recirculated the updated directions map to all registered I&APs.</p> <p>GIBB sent Mrs Camminga a direct website link to access the reports off the GIBB website on 16 April 2013.</p> <p>GIBB confirmed that they would circulate the notes of the public meeting within the next few</p>

		Thank you		days. The notes of the public meeting were sent to all registered I&APs on 20 May 2013.
Email: <u>4 June 2013</u>	In response to GIBB's E-mail sent on 4 June 2013 reminding I&APs about the second public meeting to be held on 5 June: "Thank you for the reminder."			Noted.
Email: <u>5 June 2013</u>	"Dear All As a representative of the Richards Bay Clean Air Association (RBCAA), and the uMhlatuze Ratepayers & Residents Association (URRA), I would like to commend GIBB, in particular you Katherine, and RBM for running what has been one of the best public participation processes in many years. GIBB and RBM took note of the concerns expressed at the first meeting, and went beyond the legal requirements to ensure effective public participation. This is how a public participation process should be run.	<i>Public Participation</i> <ul style="list-style-type: none"> • Commended GIBB and RBM for running what has been one of the best public participation processes in many years. GIBB and RBM took note of the concerns expressed at the first meeting, and went beyond the legal requirements to ensure effective public participation 	Response from Ms Sharin Govender of the City of Mhlatuze on 5 June 2013: "I concur with Sandy's sentiments. I must point out that we have witnessed a trend of stakeholder fatigue with public participation processes - not just with EIAs but generally, from IDPs to PDA applications. So yesterday was certainly refreshing." Response from Ms Katherine de Jong of GIBB on 5 June 2013: "Thank you so much for your comment; we really appreciate the positive feedback! We would also like to thank you for your attendance at both meetings and for your valued input on the project."	
Email: <u>10 June 2013</u>	Dear Katherine "In reviewing my records I see that I only registered the RBCAA as an I&AP, and neglected to register the Ratepayers Association. Please would you register the uMhlatuze Ratepayers & Residents Association (URRA) as an I&AP. My apology for the oversight."	<i>Register Umhlatuze Ratepayers & Residents Association (URRA)</i>	Response from Mrs Michelle Boshoff of RBM on 6 June 2013: "Thank you for your email and kind words. As always, your input and that of the RBCAA and uMhlatuze Ratepayers & Residents Association are very important and we appreciate the time, effort and knowledge you provide on commenting on assessments and adding value to the EIA process."	
Email: <u>10 June 2013</u>	Dear Katherine Comment: RBM Link Road EIA: Draft Basic Assessment Report (Reference: KZN/EIA/0000770/2012) DC28/0017/2012 We have reviewed the relevant documentation, and attended		Noted URRA were registered as an I&AP.	

			<p>the public meetings held on 23 April 2013, and 5 June 2013.</p> <p>The issues of concern in terms of air quality are;</p> <ol style="list-style-type: none"> 1. Dust generation and fumes from vehicles during construction phase. 2. Fumes and Odour from Asphalt during construction phase, which does not appear to have been addressed in the EMPr. It is anticipated that the laying of asphalt is going to result in odour issues for the residents in close proximity to the construction site. We strongly recommend that mitigation measures be investigated. 3. Vehicle fumes during operational phase. 	<p><i>Air Quality Concerns</i></p> <ul style="list-style-type: none"> • Dust generation and fumes from vehicles during construction • Fumes and odour from asphalt during construction are not addressed in the EMP, recommend mitigation is provided • Vehicle fumes during operation 	<p>Noted. Refer to the EMP Section 8.4.12 which has been updated to include mitigation measures to address these concerns.</p>
8	<p>SNA Civil & Structural Engineers (Pty) Ltd Lou-Anne Von Locherenberg</p>	<p>Email: <u>09 April 2013</u></p>	<p>The RBCAA supports the mitigation measures as outlined on pages 71, 72 and 73 of the Draft EMPr.</p> <p>We would like to request that;</p> <ol style="list-style-type: none"> 1. The Air Quality Monitoring Programme be made available to the RBCAA. 2. The dust fallout data be made available to the RBCAA, including the baseline data. <p>We recommend that RBM set up a dedicated line to deal with public concerns and complaints, and that the number be communicated to the public, with emphasis on the residents of Birdwood.</p> <p>Thank you for affording the Richards Bay Clean Air Association (RBCAA) the opportunity to comment.</p>	<ul style="list-style-type: none"> • The RBCAA supports the mitigation measures as outlined on pages 71, 72 and 73 of the Draft EMPr. • The Air Quality Monitoring Programme be made available to RBCAA • The dust fallout data be made available to the RBCAA • RBM to set up a dedicated telephone line (communicated to the public, particularly all residents of Birdwood) to deal with public concerns and complaints 	<p>Noted.</p> <p>Noted. These will be made available to RBCAA once they are completed.</p> <p>All responses from the public can be directed to RBM on telephone number: +27 35 901 3111 and/ or e-mail: communication@rbm.co.za. Contact information is also available on RBM's website (www.rbm.co.za).</p>
			<p>In response to GIBB's E-mail sent on 4 April 2013 with the Draft BAR attachment (forwarded to Lou-Anne by Mr Frans van Der Walt on 5 April 2013):</p> <p>"Good Morning Katherine,</p> <p>I wonder if you could help me please, with regard to your email sent below, it states that the draft BAR and associated draft EMP'r can be downloaded from the GIBB website.</p> <p>Please could you tell me exactly where about on your website I can download it from. Have been browsing around and can't seem to find it."</p> <p>Thanks very much, found it. I have printed out the attachments that were originally sent with your first email, is the draft much different, or can I just print out the appendices?</p>	<p><i>GIBB Downloadable Documents Request: Draft BAR and associated draft EMP</i></p>	<p>GIBB sent Mrs Von Locherenberg a direct link to access the reports off the GIBB website on 8 April 2013.</p>
				<p><i>GIBB Downloadable Documents Request: Draft BAR and associated draft EMP</i></p>	<p>Ms de Jong indicated that the draft report is the same, and suggested that Mrs Von Locherenberg could print out the appendices from the website.</p>

					Public Meeting Attendance	Noted.
				In response to GIBB's email requesting attendance at the public meeting scheduled for 23 April 2013: "This is to confirm Mr. Vlok from SNA Civil & Structural Engineers will be attending the meeting." In response to GIBB's E-mail sent on 4 April 2013 with the Draft BAR attachment: "Hi Katherine Please send me the Wetland Study, too."	Wetland Study Request	Noted. GIBB sent WESSA the wetland study on 09 April 2013.
9	WESSA Ms Carolyn Schwegman EIA Co-ordinator, WESSA KZN Region	Email: <u>9 April 2013</u>		In response to GIBB's E-mail sent on 4 April 2013 with the Draft BAR attachment (circulated internally to all RBM Staff on 5 April 2013): "Hi Katherine, 1. Going through documentation referred to above, I did not see records of consultation with the local TC's (Mthiyane & Mbuyazi), were these left out deliberately or is an oversight on my part, please clarify?	Consultation with Traditional Councils	In a response sent to Mr Nzuza on 10 April 2013, Ms de Jong forwarded correspondence regarding registration of the Traditional Council representatives (which is attached in Appendix E7). Ms de Jong emailed Mr Nick Okello requesting the correct contact for all the tribal authorities so that she could circulate information on the RBM Link Road Project. The information was then circulated to Mr Jerry Mgomomezulu who is the Specialist in Community Liaison, Community & Corporate Relations. As per the attached correspondence in Appendix E7 . The Tribal Communities were also represented at the public meeting on 23 April 2013.
10	Richards Bay Minerals Nzuza, Musa	Email: <u>10 April 2013</u>		2. You may be aware there is only one road in & out of Mandlanzini Village. I feel there is an opportunity to relief traffic congestion further in Birdswood suburb, by providing escape from the proposed road to and out of Mandlanzini Village on the north west of lake Mzingazi. This will allow residents who want to travel northward towards RBM from Mandlanzini easy escape from Birdswood suburb traffic jam, and relieving traffic congestion in Birdswood"	Opportunity to relieve traffic congestion	All comments and proposals will be considered and evaluated as part of the design phase by RBM. Imperative to note that RBM is not the responsible authority concerning town planning and addressing traffic needs eventuating from the creation of informal settlements. However, RBM will be working closely with the relevant authorities and where within scope and budget will certainly consider any contribution it can make.
11	Richards Bay Minerals Jerry Mngomezulu Specialist: Community Liaison, Community & Corporate	Email: <u>12 April 2013</u>		In response to GIBB's E-mail sent on 4 April 2013 with the Draft BAR attachment: "Good afternoon	Consultation with Communities	

	Relations.		I am prepared to drop reports to both Mandlazini and Mbonambi as well as to relay the message that appears below. As per the contact persons- Mbonambi – Senior Induna Mpangela-0717566262 - none from Mandlazini.”	<ul style="list-style-type: none"> Mr Mngomezulu was prepared to drop reports to both Mandlazini and Mbonambi as well as to relay the message to these communities. 	Thank you for offering assistance to relay the message in the communities. Please be advised that the communities were represented at the public meeting held on 23 April 2013.
12	Water Solutions Southern Africa Candice Henderson SHEQ Manager	Email: <u>17 April 2013</u>	In response to GIBB's email requesting attendance at the public meeting scheduled for 23 April 2013: "We will be attending the public meeting. Thanks Candice"	<i>Public Meeting Attendance</i>	Noted.
13	Woodpecker Inn Jacques Myburgh	Email: <u>17 April 2013</u>	In response to GIBB's email requesting attendance at the public meeting scheduled for 23 April 2013: "I will be attending the public meeting"	<i>Public Meeting Attendance</i>	Noted.
14	Department of Water Affairs (DWA) Mpumy Mdlalose	Email: <u>23 April 2013</u>	In response to GIBB's email requesting attendance at the public meeting scheduled for 23 April 2013: "Good morning Katherine I will be coming for the public meeting from the DWA. Will you have hard copies of the document at the meeting? I ask because we haven't received one at the office."	<i>Public Meeting Attendance</i> <i>Request for a hard copy of the Draft Basic Assessment Report</i>	Noted. Noted. A hard copy of the Draft BAR was submitted to Ms Colleen Moonsamy of DWA on 8 April 2013, proof of delivery is attached in Appendix E7.
15	Frik Bosman Clir/Ward 1 uMhlatuze Municipality	Email: <u>23 April 2013</u>	I've just received it. It was still with registry people....thanks See you this afternoon. In response to GIBB's email requesting attendance at the public meeting scheduled for 23 April 2013: "Thank you for the invitation to the meeting. Unfortunately I need to tender my apology as it clashes with Council meeting that I need to attend. I am however in full support of the planned RBM Link Road as it is long overdue."	<i>Confirmation of receipt of document</i> <i>Public Meeting Attendance</i> <i>√ In full support of the planned RBM Link Road as it is long overdue</i>	Noted. Noted. Noted.
16	Chief Whip of Democratic Alliance, City of uMhlatuze Clir Alen Vijjoen	Email: <u>13 May 2013</u>	"AS per discussion at the Protea Hotel Richards Bay. 1. No movement of vehicles over 10T to be allowed on		Noted. The main intention of constructing the

			<p>the road.</p> <ol style="list-style-type: none"> 2. Access via Egyptian Goose to this road to be planned and implemented. This will alleviate the pressure on one intersection at Koninga/east Central arterial. 3. Noise mitigation and access from and to suburb to be controlled with high walling from Koninga 4 way stop up to airport. Both sides of road. No pedestrian or car should be allowed access to this road except via Koninga and Egyptian Goose. 4. During Construction extra policing by security companies to prevent increase in crime. <p>I believe that this road is long overdue and would assist RBM/ RBM employees and the residents of Mzingazi/Meerensee in safer road conditions.</p>	<ul style="list-style-type: none"> • No movement of vehicles over 10T to be allowed on the road. • Access via Egyptian Goose to this road to be planned and implemented. This will alleviate the pressure on one intersection at Koninga/east Central arterial. • Noise mitigation and access from and to suburb to be controlled with high walling from Koninga 4 way stop up to airport. Both sides of road. No pedestrian or car should be allowed access to this road except via Koninga and Egyptian Goose. • During Construction extra policing by security companies to prevent increase in crime. 	<p>road is to ease traffic congestion, improve safety along the Dune road and provided alternative access to RBM in the event of road closure of the current road due to flooding or similar events. Although not intended as haulage road, the presence of large vehicles cannot be guaranteed for delivery of construction materials, equipment and people (busses) or the transport of product to the harbour. The impact is carefully being considered and mitigated where possible.</p> <p>A link between Egyptian Goose road with the RBM Link road will be evaluated, considering that this would contribute to reduced traffic volumes on the Nkonging/ East Central Arterial intersection.</p> <p>Noise calming measures as indicated in the EMP will be taken into consideration. The proposed mitigation measures in the EMP will form part of the design criteria.</p> <p>Security is a preserve of the local police service, municipal authorities in collaboration with residents and private security firms. Concerns will be addressed in conjunction with them, the construction contractor, the local community and RBM.</p>
<p>17</p>	<p>Mfolozi Municipality Dante van Eeden Director Technical Services</p>	<p>Email: <u>17 May 2013</u></p>	<p>In response to RBM's circulation of the first public meeting minutes on 17 May 2013: "Good afternoon Thank you for the minutes. Please note that all references made to Mbonambi Municipality should be changed to Mfolozi Municipality."</p>	<p><i>Name Change</i></p> <ul style="list-style-type: none"> • All references made to Mbonambi Municipality should be changed to Mfolozi Municipality. 	<p>Noted.</p>
<p>18</p>	<p>Ezemvelo KZN Wildlife Felicity Elliott</p>	<p>Email: <u>21 May 2013</u></p>	<p>"Hi Katherine, please can you take my name off the stakeholder list as I am no longer working in the EIA section. Thanks Felicity"</p>	<p><i>Removal from I&AP Database</i></p>	<p>Noted. Mrs Elliott was removed from the I&AP Database.</p>
<p>19</p>	<p>Liz Scateswood Interested and Affected Party</p>	<p>Email: <u>4 June 2013</u></p>	<p>In response to GIBB's E-mail sent on 4 June 2013 reminding I&APs about the second public meeting to be held on 5 June: "Hi Katherine. I did not see any notice in the local papers in this regard so I wonder how you are going to advise the locals of this important meeting. My apologies but I have a prior commitment."</p>	<p><i>Public Notification and Public Meeting Attendance</i></p>	<p>Noted. Ms de Jong confirmed that an advert was placed in the Zululand Observer on 23 May 2013 and a Zulu advert was also placed in the Umlozi paper on 28 May 2013. GIBB also placed posters at the Richards Bay Library, the Engen garage,</p>

					the Woodpecker Inn, the post office and Essenwood Mall in Birdwood. GIBB also sent out email notification to all registered I&APs on 20 May 2013 and again on 4 June 2013.
20	WESSA Bianca Morgan Conservation Manager WESSA KZN Region	Email: <u>4 June 2013</u>	In response to GIBB's E-mail sent on 4 June 2013 reminding I&APs about the second public meeting to be held on 5 June: "Dear Katherine Thank you for sending WESSA the reminder. Please be advised that WESSA will not be engaging directly with this project or other individual EIAs) at this stage, given WESSA's recent decision to engage with development issues at a more strategic level (please see a letter from our Chief Operations Officer and Director: Conservation, in this regard)."	<i>WESSA no longer a commenting authority for EIAs</i>	Noted.
21	Richards Bay Minerals (RBM) Vincent Qwabe	Email: <u>4 June 2013</u>	In response to GIBB's E-mail sent on 4 June 2013 reminding I&APs about the second public meeting to be held on 5 June: "Sorry Katherine Apology, I will be at work doing day shift from 07h00 to 19h00 Thanks Vincent"	<i>Public Meeting Attendance</i>	Noted.
22	uMhlatuze Ratepayers and Residents Association Sandy Camminga	Email: <u>11 June 2013</u>	"Hi Katherine I haven't been able to finalise the comments from the Ratepayers Association, and I have to urgently go to Durban today. Please could I have an extension until tomorrow, 12 June, to submit comments?"	<i>Request for extension of public comment period</i>	GIBB accepted.
		Email: <u>13 June 2013</u>	"I was delayed in Durban, only got back last night. I will get Ratepayers comments to you today, if that is ok? My sincere apology for any inconvenience this may cause."	<i>Request for extension of public comment period</i>	GIBB accepted.
		Email: <u>13 June 2013</u>	Comment: RBM Link Road EIA: Draft Basic Assessment Report (Reference: DC28/0017/2012: KZN/EIA/0000770/2012) – Amended Comment We apologise for the late submission, and thank you for your patience in this regard.		

		<p>The uMhlatuze Ratepayers and Residents Association (URRA) has reviewed the Draft Basic Assessment Report (DBAR), and attended the public meetings held on 23 April 2013, and 5 June 2013.</p> <p>While we acknowledge that the proposed road does not sit well with everyone, we have to accept that the road is necessary for future growth and development.</p> <p>Our comments on the proposed project are as follows:</p> <ol style="list-style-type: none"> 1. The proposed road will result in an increase in heavy vehicles entering Richards Bay residential and CBD areas. The impact would under normal circumstances not be significant, however, the current uncontrolled entry and illegal parking of heavy vehicles all over Richards Bay has reached epic proportions. The impacts are significant and are contributing to the deterioration of the City which is not conducive to attracting investment. <p>The proposed road is going to add to the current impacts of heavy vehicles, so cumulative impacts have to be assessed as part of the current EIA process, and mitigated, before approval is granted for the construction of the Link Road.</p> <p>The Port of Richards Bay has contributed significantly to this problem, as has TFR. We are of the opinion that the Port's planned Truck Staging Facility is not adequate to meet the current, let alone future demands. We are particularly concerned that this facility has been re-designed and will now only accommodate 120 trucks, and not 140 as originally planned.</p>	<p>The proposed road does not sit well with everyone, we have to accept that the road is necessary for future growth and development.</p> <p>Heavy Traffic</p> <ul style="list-style-type: none"> • The proposed road will result in an increase in heavy vehicles entering Richards Bay residential and CBD areas which may further exacerbate the illegal parking of heavy vehicles in Richards Bay. • The proposed road is going to add to the current impacts of heavy vehicles, so cumulative impacts have to be assessed, and mitigated, before approval is granted for the construction of the Link Road. • The Port's planned Truck Staging Facility is not adequate to meet the current, let alone future demands. 	<ul style="list-style-type: none"> • Noted. <p>Noted. A proposal was tabled at council and driven by some community members that all vehicles over 10 tons will not be allowed to use any of the roads in the CBD, with only access via Alton road.</p> <p>Currently the heavy vehicles using Dune Road makes up around 14% of the total traffic. The majority of this 14% will be transferred to the new road which has been planned for.</p> <p>This is outside the scope of this project but has been considered by RBM and the Municipality.</p>
		<p><u>In view of the above we would suggest that:</u></p> <ol style="list-style-type: none"> 1.1 The City to engage with the Port to increase the size of their Truck Staging Facility to ensure that the overflow doesn't impact outside the Port. 1.2 The City to engage with Transnet Freight Rail (TFR) to improve their rail service which will decrease the number of trucks on the road. 1.3 The Municipality should prohibit all heavy vehicles from entering Richards Bay along the R619 (North Central Arterial). 1.4 All heavy vehicles destined for the Port \ Richards Bay should enter via the John Ross, and those destined for the Port should enter, and exit, the Port through West Gate only. The only heavy vehicles that should be allowed to enter and exit at the East Gate are those going to and from RBM along Dune Road, and those destined for the IDZ. 	<ul style="list-style-type: none"> • The City to engage with the Port to increase the size of their Truck Staging Facility to ensure that the overflow doesn't impact outside the Port. • The City to engage with TFR to improve their rail service which will decrease the number of trucks on the road. 	<p>The Port are currently busy developing Truck Parking areas at both their entrances - Medway and along the West Central Arterial (WCA).</p> <p>According to the municipality, Transnet is planning to improve their rail facilities to accommodate more freight on rail. The municipality has also proposed that each company start negotiations with Transnet so that they can get a fair idea of the demand. The council cannot force that but they can just try to put stricter enforcement along their roads.</p>

			<p>1.5 A truck stop along the John Ross would ensure that heavy vehicles only enter Richards Bay when their loads are ready to be received.</p>	<ul style="list-style-type: none"> • The Municipality should prohibit all heavy vehicles from entering Richards Bay along the R619 (North Central Arterial). • All heavy vehicles destined for the Port \ Richards Bay should enter via the John Ross, and those destined for the Port should enter, and exit, the Port through West Gate only. The only heavy vehicles that should be allowed to enter and exit at the East Gate are those going to and from RBM along Dune Road, and those destined for the IDZ. • A truck stop along the John Ross would ensure that heavy vehicles only enter Richards Bay when their loads are ready to be received. 	<p>The City Council is busy looking at prohibiting heavy vehicles from entering Richards Bay along the R619, but the municipality want to have the Truck Stop in place before they enforce it. It will not be an easy process as it will have an influence on a lot of businesses.</p> <p>The John Ross Parkway is a Department of Transport (DOT) Road up to the Medway for the main reason to serve both the entrances to the port, thus heavy vehicles may enter from any side. The municipality believe that it is better that way as one gets an even distribution of the loads and not congestion at one place. Thus this will not be supported by Council.</p> <p>The municipality have indicated that this is a good idea and hopefully City Development will address this issue.</p>
			<p>2. Serious consideration should be given to the construction of a double carriageway. The need for such a road is inevitable.</p>	<ul style="list-style-type: none"> • Port's planned Truck Staging Facility is not adequate to meet the current, let alone future demands. 	<p>The East Central's design and configuration, according to Frik Bosman, called for a double carriage way. RBM will consider the design requirements to ensure that there is sufficient space for a double carriage way, at least for the first section of the road.</p> <p>The City will need to prioritise the doubling for the East Central from Zululand University's City campus to the proposed intersection, as well as the doubling of the North Central.</p> <p>The South African National Road Agency Limited (SANRAL) will be doubling the North Central from the N2 highway up to the cemetery. The designs for the doubling of the section of the North Central from the cemetery to the John Ross High School has been done, but the City do not have the funds to execute.</p> <p>Building the new link road, and the new property developments in the area adjacent to the extension of the East Central Arterial will eventually (sooner than later) place more pressure on the City to prioritize the doubling of the East Central and North Central Arterial.</p> <p>Strategically (i.e. Zulti South (ZS) access and harbour access for RBM) it is worthwhile to investigate the feasibility and benefits to consider a Public Participation Process (PPP) with the City to expedite the doubling of the remainder of the East Central Arterial (Zululand University's City campus to the proposed intersection).</p>

<p>3. The option of upgrading the existing gravel road from RBM to the N2, for the use of heavy vehicles, should be investigated as an alternative.</p>	<ul style="list-style-type: none"> Upgrading the existing gravel road from RBM to the N2 for the use of heavy vehicles should be investigated. 	<p>Although this option has been investigated as part of ZS haul strategies, the fact that pressure will mount on the City to ban heavies (assuming this means multi axle 21m and above) from the CBD, will add value to the feasibility of upgrading the gravel road.</p> <p>This road option was assessed as one of the alternatives (S3) in the Draft Basic Assessment Report.</p>
<p>4. Currently East Central Arterial is congested during peak hours, we need to understand how this will be mitigated, as the proposed road will exacerbate this problem.</p>	<ul style="list-style-type: none"> Currently East Central Arterial is congested during peak hours, we need to understand how this will be mitigated, as the proposed road will exacerbate this problem. 	<p>RBM have already requested a quote to do a recount of certain intersections over a 7 day period. Existing data was derived from counts during peak times and on 3 separate days. A 7 day count will provide more accurate information on current traffic volumes and for simulation on future volumes. The TIA used a growth of 5% in population for future trends (City's SDP 2007), while the updated SDP shows 1.5% based on recent census.</p>
<p>5. Speed humps should not be installed as traffic calming measures. This will further hamper traffic flow during peak periods, and since they are so poorly engineered they simply contribute to the deterioration of the our roads. We would like to see visible traffic law enforcement – which is something that is non-existent at the moment. We suggest that the City budget to increase the compliment of traffic officers, as it is understood that this sector is enormously under-staffed for a City our size.</p>	<ul style="list-style-type: none"> Speed humps should not be installed as traffic calming measures, since they are so poorly engineered they simply contribute to the deterioration of the our roads. We would like to see visible traffic law enforcement, City budget to increase the compliment of traffic officers 	<p>With regards to the speedhumps: The profile of the new Link Road will significantly differ from the Dune Road due to commercial timber operations and wider servitudes. It is not expected that we there will be the same congestion and presence of pedestrians on the road.. Both Mondri and Sappi will also not take kind to squatters in their commercial timber areas.</p> <p>Visible law enforcing falls outside our scope, but naturally RBM have an interest and involvement to assist where possible and encourage such to take place</p> <p>RBM will focus on alternatives of road calming, but if all fails speed humps will be the last resort.</p>
<p>6. Minimisation of impacts is going to be solely dependent on the implementation of mitigation measures. We would therefore recommend that the mitigation measures be consolidated into a working document, with the methodologies and responsibilities clearly defined, to facilitate compliance monitoring.</p> <p>We would like to commend GIBB and RBM on their public participation process.</p> <p>Thank you for affording the uMhlatuze Ratepayers & Residents Association (URRA) the opportunity to comment.</p>	<ul style="list-style-type: none"> Minimisation of impacts is going to be solely dependent on the implementation of mitigation measures. We would therefore recommend that the mitigation measures be consolidated into a working document, with the methodologies and responsibilities clearly defined, to facilitate compliance monitoring. Commend GIBB and RBM on their public participation process. 	<p>Impacts and mitigation are contained in the Environmental Management Plan (EMP) that will form part of contractual agreement with the road constructor. An Environmental Conservation Officer (ECO) will be appointed to ensure that mitigation measures are implemented as required.</p> <p>Noted.</p>

23	<p>Department of Agriculture, Forestry and Fisheries Thembile Belebese</p>	<p>Fax: <u>19 June 2013</u></p>	<p>“COMMENTS FOR THE DRAFT BASIC ASSESSMENT REPORT (DBAR) FOR THE PROPOSED EXTENSION OF THE EAST CENTRAL ARTERIAL ROAD TO THE RBM SMELTING AND PROCESSING SITE (REF:DC/0017/2012)</p> <p>The Department of Agriculture, Forestry and Fisheries (DAFF) appreciates the opportunity given to comment on the DBAR for the above mentioned development.</p> <p>DAFF has no objections to the proposed development as (according to the DBAR received on the 08 April 2013) there are no natural forests and or protected trees under the National Forests Act, 84 of 1998, that will be negatively impacted upon.</p> <p>This letter does not exempt you from considering other environmental legislations.</p> <p>Should any further information be required, please do not hesitate to contact this office.”</p> <p>“Dear Ms Jong</p>	<p><i>Forestry Impacts</i></p> <ul style="list-style-type: none"> • DAFF has no objections to the proposed development as there are no natural forests and or protected trees under the National Forests Act, 84 of 1998, that will be negatively impacted upon. 	<p>Noted. Should any natural forests be impacted on, GIBB will ensure that the necessary indigenous tree permits are obtained.</p>
24	<p>Ezemvelo KZN Wildlife Nerissa Pillay</p>	<p>Email: <u>02 July 2013</u></p>	<p>The Draft Basic Assessment Report for the above mentioned application is currently being processed and reviewed by Ezemvelo’s IEM Planning staff. Ezemvelo is aware the deadline for comments has passed. Ezemvelo is currently going through backlog and as a result, deadlines have been difficult to meet. Comments for the proposed application will be submitted as soon as clarity on certain issues regarding the development are sought (from external specialists). We do apologize for the delay in the process and thank you for your patience and understanding.”</p>	<p><i>Delays in providing comments on the DBAR</i></p> <ul style="list-style-type: none"> • Comments for the proposed application will be submitted as soon as clarity on certain issues regarding the development are sought (from external specialists). We do apologize for the delay in the process and thank you for your patience and understanding. 	<p>Noted. GIBB accepted late comments from EKZNW.</p>
25	<p>Department of Water Affairs Mpumy Mdialose</p>	<p>Post: <u>27 May 2013</u></p>	<p>DRAFT BASIC ASSESSMENT OF THE PROPOSED EXTENSION OF THE EAST CENTRAL ARTERIAL ROAD TO THE RBM SMELTER SITE, RICHARDS BAY</p> <p>Specific Comments.</p> <p>This Department acknowledges receipt of the above mentioned document and has the following comments:</p> <ol style="list-style-type: none"> 1. In the report submitted it is mentioned that both the options of the road will cross some water resources (rivers and wetlands). Please note that this Department requires that for any development that takes place within 500 meter radius of a wetland, a water use licence in terms of section 21 (c) and (i) of the National Water Act (Act 36 of 1998) be applied for. The applicant will have to submit together with the water use application all but not limited to the documents listed below: 	<p><i>Acknowledgement of receipt of the DBAR</i></p> <p><i>Water Use Licence Application</i></p> <ul style="list-style-type: none"> • Please note that this Department requires that for any development that takes place within 500 meter radius of a wetland, a water use licence in terms of section 21 (c) and (i) of the National Water Act (Act 36 of 1998) be applied for. The applicant will have to submit together with the water use application all but not limited to the documents listed below: 	<p>Noted.</p> <p>Noted. A Water Use Licence Application will be undertaken for the wetland crossings. The applicant will submit together with the water use application all but not limited to the documents as requested.</p>

		<p>o Licence application forms</p> <p>o Section 21 (c) and (l) water use information questionnaire (attached)</p> <p>o Master Layout Plan</p> <p>o Design Drawings</p> <p>o Method Statement (template attached)</p> <p>o EIA's/RoD and/or impact/risk assessment</p> <p>o EMP</p> <p>o Storm water management plan</p> <p>o Wetland Management and Rehabilitation Plan (template attached)</p> <p>o Monitoring Program</p> <p>o Specialist Studies (where applicable – all depending of type of application)</p> <ul style="list-style-type: none"> ▪ Hydrological studies ▪ Wetland delineation and assessment ▪ Geotechnical studies ▪ Geohydrological studies ▪ Aquatic assessment studies <p>o R114 administration fee</p> <p>o Section 27 Motivation</p> <p>o BBEEE Certificate</p> <p>o Impact and Mitigation measures</p> <p>o Adverts in the paper for the PPP</p> <p>o Financial Provisions</p> <p>o Title deed/lease agreement</p> <p>o Supporting Documentation in the following format:</p> <ul style="list-style-type: none"> ▪ Best Practice Guidelines ▪ Water Use Authorisation Application Process ▪ An Integrated Water and Waste Management Plan (IWWMP) should be prepared according to the Operational Guidelines set by this Department. <p>2. Please note that this department prefers that the road option with the least number of water resource crossings and least impacts be chosen between option 1 and options 2. It is also preferred that the existing roads be used as much as possible to minimise impacts on water resources.</p>	<p>o Licence application forms</p> <p>o Section 21 (c) and (l) water use information questionnaire (attached)</p> <p>o Master Layout Plan</p> <p>o Design Drawings</p> <p>o Method Statement (template attached)</p> <p>o EIA's/RoD and/or impact/risk assessment</p> <p>o EMP</p> <p>o Storm water management plan</p> <p>o Wetland Management and Rehabilitation Plan (template attached)</p> <p>o Monitoring Program</p> <p>o Specialist Studies (where applicable – all depending of type of application)</p> <p>o R114 administration fee</p> <p>o Section 27 Motivation</p> <p>o BBEEE Certificate</p> <p>o Impact and Mitigation measures</p> <p>o Adverts in the paper for the PPP</p> <p>o Financial Provisions</p> <p>o Title deed/lease agreement</p> <p>o Supporting Documentation in the following format:</p> <ul style="list-style-type: none"> ▪ Best Practice Guidelines ▪ Water Use Authorisation Application Process ▪ An Integrated Water and Waste Management Plan (IWWMP) should be prepared according to the Operational Guidelines set by this Department. <p><i>Preferred Road Option</i></p> <ul style="list-style-type: none"> • The road option with the least number of water resource crossings and least impacts be chosen between option 1 and options 2. It is also preferred that the existing roads be used as much as possible to minimise impacts on water resources. 	<p>Noted, Alternative S1 (Option 1) is the preferred alternative for the extension of the East Central Arterial Road. This route alternative follows an existing man-made fire break (sand track) which is approximately 20 m wide, through the forestry plantations of the Mondri and SAPPI in Richards Bay. The road option is currently undeveloped and not tarred.</p> <p>The main benefits of the proposed route are:</p> <ul style="list-style-type: none"> • It will allow for a more direct route between Richard's Bay and the RBM Smelting and Processing Site, resulting in economic and environmental efficiency. • This option will impact on the fewest number of wetlands.
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26	Ezemvelo KZN Wildlife Nerissa Pillay	Email: <u>08 August 2013</u>	<p>4. Good housekeeping and suitable waste minimisation techniques must be implemented to reduce the total quantity of waste emanating from the above development.</p>	<p>Good housekeeping and suitable waste minimisation techniques must be implemented to reduce the total quantity of waste emanating from the above development.</p>	<p>Noted. Section 8.2.6 of the EMP states that the contractor must "Adhere to and practice good housekeeping to ensure that construction camps and sites are well organised, material is neatly stacked and waste is regularly removed". Section 8.4.9 of the EMP covers aspects of Waste Management.</p>
<p>"PROPOSED EXTENSION OF THE EAST CENTRAL ARTERIAL ROAD TO THE RICHARDS BAY MINERALS SMELTING AND PROCESSING SITE District Municipality: uThungulu</p> <p>The Draft Basic Assessment Report for the abovementioned application has been reviewed by the Ezemvelo KZN Wildlife (Ezemvelo) IEM Planning Committee. Based on the information supplied, Ezemvelo's concerns pertain to the potential negative impacts on wetland habitats and swamp forest habitats along the proposed routes. Wetlands are characterised by intrinsically high biodiversity and perform a number of important ecological functions (or ecosystem services). In addition, wetlands are considered to be globally threatened ecosystems and have been recognized in both national and provincial environmental legislation¹ as important resources that need to be safeguarded. Forests are of high conservation significance, especially due to their exceptional biodiversity and ecosystem services, their dynamic nature and sensitivity to disturbance. Swamp Forest in particular is categorized as Critically Endangered, given that it has been impacted upon greatly by land transformation and developments.</p> <p>In lieu of the above, Ezemvelo is supportive of the recommendations in the Wetland Study, May 2012, with particular attention paid to the wetland offset ratios as outlined on page 45. In addition, given the extent of the swamp forest habitats along the proposed routes and thus potential negative impacts as a result of the construction and operational phases of the proposed development, Ezemvelo recommends that comments regarding the proposed development are sought from the Department of Forestry and Fisheries; natural forests sub-directory.</p> <p>Should you wish to discuss any of the points raised above or should any further biodiversity issues arise please do not hesitate to contact our offices."</p>			<p><i>Wetland Impacts</i></p> <ul style="list-style-type: none"> Ezemvelo's concerns pertain to the potential negative impacts on wetland habitats and swamp forest habitats along the proposed routes. <ul style="list-style-type: none"> In lieu of the above, Ezemvelo is supportive of the recommendations in the Wetland Study, May 2012, with particular attention paid to the wetland offset ratios as outlined on page 45. In addition, given the extent of the swamp forest habitats along the proposed routes and thus potential negative impacts as a result of the construction and operational phases of the proposed development, Ezemvelo recommends that comments regarding the proposed development are sought from the Department of Forestry and Fisheries; natural forests sub-directory. <p>Should you wish to discuss any of the points raised above or should any further biodiversity issues arise please do not hesitate to contact our offices."</p>	<p>Noted.</p> <p>Noted. The recommendations made by the wetland specialist in their study have been taken into consideration and incorporated in the Basic Assessment Report and associated EMP.</p> <p>Noted. Comment was received from the Department of Forestry and Fisheries (DAFF) above. Should any trees need to be removed the necessary permits will be undertaken and RBM will liaise closely with DAFF and EKZNW in conjunction with recommendations from the wetland specialist.</p> <p>Noted.</p>	