



GA Environment

COMMENTS AND RESPONSES REPORT FOR THE PROPOSED BASIC ASSESSMENT PROCESS FOR THE PROPOSED MINING OF QUARRY 5 ASSOCIATED WITH THE UPGRADE OF NATIONAL ROAD R573 (MOLOTO ROAD), GAUTENG PROVINCE

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1. INTRODUCTION

This Comments and Responses Report (CRR) captures the comments and issues raised by Interested and Affected Parties (I&APs) during the initial notification phase, of the Basic Assessment Process for the clearance of indigenous vegetation. These activities are associated with the proposed mining of borrow material on Quarry 5 for the upgrade of National road R573 (Moloto road), Gauteng province. The necessity for the CRR is based on Regulation 44 of the National Environmental Management Act's (NEMA) Environmental Impact Assessment (EIA) Regulations of 2014 (as amended).

In addition, on the 5th of June 2020, the Minister of Environment, Forestry and Fisheries issued directions regarding the measures to address, prevent and combat the spread of the COVID-19 relating to the National Environmental Management Permits and Licences. A Public Participation Plan was submitted to the DMRE on the 22nd of June 2020. Public Participation for the proposed project commenced on the 3rd of July 2020. Thus far, the Public Participation Process has been undertaken in line with the directions regarding the measures to address, prevent and combat the spread of the COVID-19 relating to the National Environmental Management Permits and Licences. All protocols have been observed to ensure these regulations are upheld whilst the public is afforded an opportunity to comment and participate in the Basic Assessment Process.

A summary of the Public Participation Process undertaken for the project to date is as follows:

- Notification letters were compiled and distributed to all adjacent landowners on the 3rd of July 2020. Notification letters were also handed out on the 18th of August 2021;
- A newspaper advertisement notifying I&APs of the proposed development was placed on page 2 of the Pretoria News on the 9th of July 2020 and on Page 4 of the Pretoria North Rekord on the 10th of July 2020;
- Site notices presenting the project were erected on site and at visible and accessible locations close to the site on the 3rd of July 2020
- A focus group meeting was held with the Ward Councillor of Ward 99 on the 30th of June 2020
- A focus group meeting was held with the Ward Councillor of Ward 99 on the 18th of August 2021

Table 1 indicates the name of the I&AP, their organisation, the date of the receipt of the comments, their communication methods as well the response of the Environmental Assessment Practitioner (EAP) to the comment. This report contains all comments that have been received to date. All comments received have been acknowledged and responded to by GA Environment. All correspondence between GA Environment and the I&APs have been included in **Appendix D7**.

2. COMMENTS AND RESPONSES

Table 1: Comments and responses for the SANRAL R573 Upgrade: Quarry 5 (Initial Notification)

	NAME AND SURNAME OF PARTY/PARTIES	COMMENTS/QUESTIONS/CONCERNS	EAP's RESPONSE
2.1 Comments received on the project			
2.1.1	Johan Welmans (Previous ward councillor of Ward 99)	<p>Comment provided on the 30th of June 2020</p> <p>I previously received complaints from residents in the area regarding the noise levels from the sand mining as these operations were operating 24/7.</p>	<p>The potential noise impacts have been assessed as part of the Basis Assessment Report (BAR). Mitigation measures have also been included in the EMP. Prior to the commencement of construction activities, baseline monitoring will be undertaken at sensitive receptors (within 1km from the site) and at the site. Daily noise monitoring will be undertaken at sensitive receptors (should there be any noise complaints) when construction activities occur within 1 km of the receptor, and at mining and crushing areas. Operating hours of the Quarry will be between 07:00 in the morning and 18:00 in the afternoon.</p> <p>There will be community structures in place during the operation of the Quarry, as a Community Liaison Officer will be appointed by the Contractor and an Environmental Monitoring Committee will be established. Such committee will include the adjacent landowners. The creation of such platform will give an opportunity to landowners to raise any complaints including noise.</p>
	Councillor Phuti Kwenaitse	<p>Comment provided on the 18th of August 2021</p> <p>How will the proposed project add value to the community and employment opportunities.</p>	<p>The material that will be borrowed from Quarry 5 will be used for the upgrading of the R573 Moloto Road which is an important economic route connecting Gauteng, Mpumalanga, and Limpopo provinces. Current traffic problems will be significantly reduced as</p>

			<p>the road accommodates extremely high number of buses and light motor vehicles, thereby improving regional mobility.</p> <p>The Moloto Road Upgrade project is a Strategic Infrastructure Project (SIP) that will significantly contribute to the unlocking of the northern mineral belt with Waterberg as the catalyst, which includes the development of a logistics corridor to connect Gauteng with Mpumalanga.</p> <p>The road has been dubbed the “road of death” due to the high number of accidents that has happened on it over the years. In order to address safety, mobility functions and ensure that reasonable access is provided to adjacent properties and areas to enable the future land use development. SANRAL is proposing the upgrade of the R573 Moloto Road, hence the need for G5 material and material testing investigations have revealed that proposed Quarry 5 is able to provide such material.</p> <p>The project falls within the SANRAL 14-point plan, socio economic benefits such as local community involvement, appointment of local contractor’s and work force, where applicable.</p>
		<p>Information to be provided on the timeframes of the project. When will the advertisements for the contractor be placed out? Public meetings to be held before and after the adverts are placed.</p>	<p>The proposed mining of Quarry 5 can only proceed once the required approvals have been obtained for example the Environmental Authorisation and the land acquisitions process. Only once the required approvals are in place, will SANRAL go out to tender. Should the required approvals be obtained, it is anticipated that SANRAL will go out to tender within the second quarter of 2022, and construction will commence within the first quarter of 2023. These are indicative dates as final dates are determined by the approvals required.</p> <p>Any public meetings associated with the construction phase of the project will be done in consultation with the local stakeholder forums.</p>
		<p>The community, more importantly the schools shall be involved in the process. Environmental awareness and school</p>	<p>All issues related to community engagements will be undertaken by the Contractor in accordance with SANRAL’s 14-point plan.</p>

		sponsorship (Scouts) shall be undertaken by SANRAL in terms of the Social Development Plan for the Quarry	
Ms Masilela Della	Comment provided on the 18 th of August 2021	I am Concerned about the blasting that will be undertaken on site, the structures on the property as well as the effects of blasting on poultry farming. Noise and dust will also be a problem.	<p>The appointed Contractor will prepare a blast specification/design in consultation with a blasting specialist. SANRAL will ensure that the recommended blasting method that has been pre-determined to have the least impact on the site and its surrounding Environment while ensuring that legislative requirements are met.</p> <p>Once the blast design has been confirmed, an asset condition survey will be undertaken on adjacent properties as a basis for comparing complaints or allegations of structural damage to property. The Contractor shall keep a record of the condition (e.g. cracks, existing damage) of the structures within the affected radius. A grievance procedure will be implemented in such a way that the Contractor's Community Liaison Officer is able to manage and address any complaints received.</p> <p>The potential noise and dust impacts have been assessed as part of this BAR. Mitigation measures have also been included in the EMPr. As indicated in the BAR, air quality will be monitored (baseline and during construction) for dust fallout and particulate matter as well as noise monitoring. There will be community structures in place during the operation of the Quarry, as a Community Liaison Officer will be appointed by the Contractor and an Environmental Monitoring Committee will be established. Such committee will include the adjacent landowners.</p>
Riaan van den Berg	25 th August 2020	I would like to register as a stakeholder in the Moloto road upgrade. I stay on a farm in the Dinokeng area. I would like to participate and keep up to date on progress during the project.	GA Environment acknowledges your email. You have been registered as an Interested and Affected Party and your contact details will be included on the Stakeholder database. Your comments have been noted and have been captured in the BAR. The Draft Basic Assessment Report (BAR) will be made available for

			public review. You will be notified of the review period as well as the availability of the Draft Report for your review and comment.
Mr Dewald Groenewald	Comment provided on the 6 th of July 2020		
	<p>I am a direct neighbor to where they are planning to mine for material for the upgrade of the R 573.</p> <p>I would really like to be part of the PPP process as the project will affect me directly and most definitely financially.</p> <p>If there is any further information that I need to know. Please send it to me.</p>	<p>GA Environment acknowledges your email. You have been registered as an Interested and Affected Party and your contact details will be included on the Stakeholder database. Your comments have been noted and have been captured in the BAR. The Draft BAR will be made available for public review. You will be notified of the review period as well as the availability of the Draft Report for your review and comment.</p>	
	<p>I would like to be included in the PP process. I have concerns about the crime and the land value decrease, environment in Boekhoutsdrift, trees that are to be removed, and our farming that will be affected will lead to financial loss. Please contact me as I am a direct neighbor and will be directly affected.</p>	<p>Your comment has been acknowledged by GA Environment. The impact on land values and farming cannot be confirmed at this early stage of the project. The development footprint will remain within the approved area and not encroach within adjacent properties. The environmental monitoring committee will be established by the project stakeholders to address all potential issues that may emanate by the neighbouring properties affected by the project.</p> <p>The main trigger to the BA process was for the removal of indigenous vegetation including trees, hence the need to undertake the current process. These impacts have been assessed in detail in this report.</p> <p>The comment on security bears reference, SANRAL will ensure that the entire Quarry 5 area is fenced off and security personnel are stationed on site. These issues are already assessed in the BAR.</p>	
	<p>27th July 2021 (GAE followed up with Mr Groenewald telephonically)</p> <p>How will the groundwater be affected by the mining activities</p>		<p>The quarry area is positioned in locations to the extent that the water table should not be reached. The intended depth of the quarry is between 2m and 8m.</p>

			<p>The percussion drilling holes undertaken as part of the drilling investigations revealed to be significantly deeper than the proposed quarry depths. Further water level readings in the core locations where standpipes were established will be taken prior to the commencement of constructions activities.</p>
		<p>What will happen to the site subsequent to mining activities</p>	<p>The proposed Quarry 5 is temporary in nature, but with the intention of SANRAL to undertake a land acquisition process for the permanent acquisition of the portion of property required.</p> <p>Upon cessation of the mining activities, the site will be rehabilitated. The rehabilitation of the mining area will comply with the minimum closure objectives as prescribed by DMRE. Rehabilitation shall be undertaken in line with a comprehensive rehabilitation and Closure Plan to be developed prior to the closure of the proposed quarry operation.</p>
Mr Petrus Matheus Vos	<p>Comment provided on the 7th of July 2020</p> <p>The proposed site falls with the Seringveld conservancy a complex area containing high biodiversity. It is a species rich area with complex vegetation patterns, that is important to conserve as part of the conservation plan of Gauteng. The proposed area is undeveloped, and it would not be ideal. Clearing all of the above ground vegetation will result in irreversible damage and restoration will be impossible since the topsoil would be lost.</p>		<p>GA Environment acknowledges the comment provided. The Terrestrial Biodiversity Assessment undertaken by Field and Form Landscape Science revealed that the project area is not located within a listed threatened ecosystem, or within an area earmarked as being of high conservation importance in terms of the Gauteng C-Plan (2011) and the 2012 Mining and Biodiversity Guidelines. The project area is however located within the Seringveld Conservancy. The main trigger to the Basic Assessment process was for the removal of indigenous vegetation including trees, hence the need to undertake the current process. These impacts have been assessed in the Basic Assessment Report (BAR). The Gauteng Conservancy and Stewardship Association (GCSA), has been informed of the proposed development within the conservancy and their input if available will be included the report.</p>

			<p>GA Environment acknowledges the sensitive nature of the site, which has been clearly outlined in the BAR and the impact assessment has been compiled accordingly, in line with the specialist assessment. The findings of the specialist assessment as well as the mitigation measures have been included in the BAR for the DMRE to consider in their decision-making process.</p> <p>The proposed mining of Quarry 5 is for the acquiring of G5 material for the R573 Moloto Road Upgrade which has been identified to be available within the proposed site. Approximately 48km of road will be required to be upgraded as part of the project, hence SANRAL requires material sources. The cost of importing the G5 material from commercial sources, haulage and transportation of material over long distances for sections of the Moloto Road upgrade would not be economically and environmentally feasible for SANRAL.</p>
	<p>Mr Reay Hecker (Landowner of Portion 46 of the Farm Boekenhoutskloofdrift.)</p>	<p>Comment provided on the 23rd of August 2020</p> <p>We would like to be registered as affected parties as we are the owners of 45, 46 and 52 of the Boekenhoutskloofdrift. The three properties are fenced together to form a larger parcel of land.</p> <p>The proposed Quarry will negatively impact the land values of the adjacent properties (45 & 52) and be detrimental to the quality of life of the inhabitants of the properties in a way of noise and dust pollution as well as security.</p>	<p>GA Environment acknowledges your email. You have been registered as an Interested and Affected Party and your contact details will be included on the Stakeholder database. Your comments have been noted and have been captured in the BAR. The Draft BAR will be made available for public review. You will be notified of the review period as well as the availability of the Draft Report.</p> <p>Your comment has been acknowledged by GA Environment. The impact on land value and farming cannot be confirmed at this early stage of the project. The development footprint will remain within the approved area and not encroach within adjacent properties. The environmental monitoring committee will be established by the project stakeholders to address all potential issues that may emanate by the neighbouring properties affected by the project.</p>

		<p>The property is currently used for grazing of sheep, horses, and wildlife. The proposed quarry will negatively affect our income as we rely on the sheep and wildlife as a source of food.</p>	<p>The potential noise and dust impacts and other potential environmental impacts have been assessed as part of this BAR. Mitigation measures have also been included in the EMPr. As indicated in the BAR, air quality will be monitored (baseline and during construction) for dust fallout and particulate matter as well as noise monitoring. There will be community structures in place during the operation of the Quarry, as a Community Liaison Officer will be appointed by the Contractor and an Environmental Monitoring Committee will be established. Such committee will include the adjacent landowners.</p> <p>The comment on security bears reference, SANRAL will ensure that the entire Quarry 5 area is fenced off and security personnel are stationed on site. These issues are already assessed in the BAR.</p> <p>Once environmental approval has been obtained, the land acquisition process will proceed. The SANRAL Property Portfolio Service Provider (PPSP) will consider all current activities affected by the land acquisition in the valuation of the property.</p> <p>A land acquisition process can only be finalized once the Environmental approvals have been obtained. SANRAL requires confirmation that the proposed material source is viable from an environmental perspective before they conclude the land acquisition. It follows that in most cases SANRAL will first conclude the Environmental process before they conclude the Land Acquisition process, as the Environmental process will determine if the land to be acquired is viable.</p>
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		<p>We are situated within the area of the Seringveld conservancy, and the quarry activities will certainly destroy the natural habitat for many years.</p>	<p>GA Environment acknowledges the comment and the sensitive nature of the site. The Terrestrial Biodiversity Assessment undertaken by Field and Form Landscape Science revealed that the project area is not located within a listed threatened ecosystem, or within an area earmarked as being of high conservation importance in terms of the Gauteng C-Plan (2011) and the 2012 Mining and Biodiversity Guidelines. The project area is however located within the Seringveld Conservancy. The main trigger to the BA process was for the removal of indigenous vegetation including trees, hence the need to undertake the current process. These impacts have been assessed in the BAR.</p> <p>The sensitive nature of the site is outlined in the BAR and the impact assessment has been discussed accordingly, in line with the specialist assessment. The findings of the specialist assessment as well as the mitigation measures have been included in the BAR for the DMRE to consider in their decision-making process. The Gauteng Conservancy and Stewardship Association (GCSA), has been informed of the proposed development within the conservancy and their input if available will be included the report.</p> <p>The proposed mining of Quarry 5 is for the acquiring of G5 material for the R573 Moloto Road Upgrade which has been identified to be available within the proposed site. Approximately 48km of road will be required to be upgraded as part of the project, hence SANRAL requires material sources. The cost of importing the G5 material from commercial sources, haulage and transportation of material over long distances for sections of the Moloto Road upgrade would not be economically and environmentally feasible for SANRAL.</p>
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	Desiree Tsholofelo Kgole	<p>Comment provided 25th August 2020</p> <p>We refer to your land claim enquiry dated 18th August 2020. We confirm that as at the date of this letter no land claims appear on our database in respect of the Properties listed as per attached list. This includes the database for claims lodged by 31 December 1998; and those lodged between 1 July 2014 and 27 July 2016 in terms of the Restitution of Land Rights Amendment Act, 2014.</p> <p>Whilst the Commission takes reasonable care to ensure the accuracy of the information it provides, there are various factors that are beyond the Commission's control, particularly relating to claims that have lodged but not yet been gazetted such as:</p> <ol style="list-style-type: none"> 1. Some Claimants referred to properties they claim dispossession of rights in land against using historical property descriptions which may not match the current property description; and 2. Some Claimants provided the geographic descriptions of the land they claim without mentioning the particular actual property description they claim dispossession of rights in land against. <p>The Commission therefore does not accept any liability whatsoever if through the process of further investigation of claims it is found that there is in fact a land claim in respect of the above property.</p> <p>If you are aware of any change in the description of the above property after 19 June 1913 kindly supply us with such description so as to enable us to do a further search.</p> <p>In conclusion, please note that enquiries should be forwarded to Desiree Tsholofelo Kgole who could be reached at the following contact details: Tel: (012) 310-6578 or via e-mail at desiree.kgole@drdlr.gov.za</p>	<p>The comment provided by the Department has been acknowledged by GA Environment. The comment has been included the BAR for the DMRE to consider in the decision-making process.</p>
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3 SUMMARY COMMENTS AND CONCLUSION

The comments captured in this report were obtained during the Notification Phase of the Basic Assessment process. The comments received highlights community issues ranging from dust, noise, land value, the impacts on the Seringveld conservancy and blasting activities. All comments received have been captured and responded to in this report.