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**07 September 2022**

The Director  
Zutari (Pty) Ltd  
P.O Box 74381  
**LYNNWOOD RIDGE**  
0040

**Attention:** Ms. N. Whitehorn

Dear Madam,

**DRAFT BASIC ASSESMENT REPORT FOR THE PROPOSED GOD'S WINDOW SKYWALK PROJECT ON FARM DE HOUTBOSCH 503 KT AND PORTION 2 OF THE FARM LISBON 531 KT: THABA CHWEU LOCAL MUNICIPALITY.**

Reference is made to the above-mentioned report received on 23 August 2022 with the reporting deadline of 23 September 2022.

The Inkomati-Usuthu Catchment Management Agency (IUCMA) assessed the report and has no objection towards the project. The following comments are made for noting and/or actioning:

1. **Page 49: Wastewater Treatment** – It is indicated in the report that there is no municipal sewer network in the vicinity, and it is proposed that a Wastewater Treatment Package Plant (WWTPP) be installed to manage wastewater from the development site. A 90kl containerized WWTPP (biological treatment plant) will be provided to treat wastewater to general discharge limits as required by DWS and the treated effluent will be discharged into the environment.

*The Applicant must note that discharging waste or water containing waste into a water resource through a sewer or pipe is a water use in terms of section 21 (f) of the National Water Act (Act 36 of 1998) (the Act) and must be authorised prior commencement of the activity. The treatment facility must be designed to discharge effluent that complies with the special limits.*

2. **Page 129: Delineated wetland and riparian areas** – It is indicated in the report that there is a total of four riparian networks that were delineated within the study area and within 500m downstream from the study area.

*The Applicant must note that conducting an activity within a regulated area is a water use activity in terms of Section 21 (c)&(i) of the Act and must be authorised prior to such activities taking place.*

*A Regulated area is the outer edge of the 1:100-year floodline or delineated riparian habitat or whichever is the greatest. In the absence of determined 1:100- year flood-line or riparian zone, 100 metres from the edge of the watercourse must be considered. The regulated buffer zone for wetland or a pan is a 500 metres radius from the delineated boundaries.*

3. **Page 210: Taking of water** – It is indicated in the report that water might be sourced from boreholes as other water sources in the area are being used to full capacity.

*The Applicant must note that taking of water from the water resources is a water use in terms of section 21 (a) of the Act and must be authorised prior commencement of the activity.*

4. **Waste Management** – It is indicated in the report that waste streams during the construction phase will include general site waste and spoil with bins placed at suitable locations. During the decommissioning phase, all waste and materials will be required to be removed from site and disposed of in a legal and appropriate manner.

*The Applicant must note that general waste must be handled and disposed at a registered waste disposal facility/site. The Applicant must note that the IUCMA may request a proof of service level agreement (SLA) or a letter of consent from the owner of the facility indicating that there is enough space to accommodate additional waste from the proposed project.*

5. From the report and identified activities, the possible water uses that will be triggered in terms of Section 21 of the Act are as follows:
  - i. Section 21 (a) - taking of water from the water resource for construction purposes.
  - ii. Section 21 (c) - impeding or diverting the flow of water in a watercourse.
  - iii. Section 21 (i) – altering the bed, banks, course or characteristics of a watercourse
  - iv. Section 21 (f) – discharging of waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit.

6. In terms of section 22(1) of the Act “a person may only use water-

*(a)without a licence-*

- i. If that water use is permissible under Schedule 1;*
- ii. If that water use is permissible as a continuation of an existing lawful use (section 32); or*
- iii. If that water use is permissible in terms of general authorisation issued under section 39;*

*(b) if the water use is authorised by a licence under this Act; or*

*(c) if the responsible authority has dispensed with a licence requirement under subsection (3)”.*

Therefore, any other water use activities associated with this project that are not permissible as indicated above, must be authorized prior to such water use activities taking place.

7. Any pollution incidents originating from the proposed activity must be reported to the Responsible Authority within 24 hours.
8. The Applicant is therefore advised to engage with IUCMA or DWS for the guidance on the requirements for water use authorisation process. In addition, water use applications can be lodged on-line via the e-WULAAS platform accessible at [www.dws.gov.za](http://www.dws.gov.za).

Should you have any queries, please do not hesitate to contact the official indicated above

Yours faithfully,

A handwritten signature in black ink, appearing to read 'T. Sawunyama'.

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Dr. T. Sawunyama  
**Acting Executive: WRM**