

Ref: LUA 20/2555
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Attention: Justin Bowers

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Dear Mr. Bowers

SUBJECT: THE MTPA COMMENTS ON THE BAR FOR THE PROPOSED SAPPI NGODWANA DAM REMEDIATION DEVELOPMENT ON THE ELANDS RIVER ON THE FARM NGODWANA 1030 JT MPUMALANGA PROVINCE. REF 1/3/1/16/IE-268.

With reference to your correspondence of October 2020 with reference 1/3/1/16/IE-268, our comments:

MTPA has no objection to the proposed development on the proposed site.

The MBSP based terrestrial biodiversity assessment with reference to figure 1, indicates that areas of Critical Biodiversity Areas will be affected. From a freshwater biodiversity assessment perspective (figure 2), the riparian aquatic buffer from a CBA river will be affected.

Biophysical studies on site indicate that the impact on the environment will be low. From a risk assessment view the dam remediation development of this class III dam is needed and desirable. "The dam remediation is to ensure the continued safe operation of this Category III dam and the stability of the main and right flank embankments and its foundations "(Ecoleges 2020).

An Ecological assessment by Dr Andrew Deacon for EA and WUL is summarised below. The reports indicates that the PES of the proposed river course is a category C- moderately modified.

EcoClassification
PES of the Project Area:

The table below provides the available parameters that were instrumental to establish the PES of the Project Area:

Parameter	Score %	Category	Description
In-stream IHI	69.2	C	Moderately modified
Riparian IHI	61.6	C/D	Moderate change.
VEGRAI	64.1	C	Moderately modified
MIRAI	68.9	C	Moderately modified
FRAI	54.9	D	Largely modified
Mean EI Class			Moderate
Ecological Sensitivity			Very high
EcoStatus		C	Moderately modified
PES		C	Moderately modified

The table lists the parameters that were instrumental in providing the project area with a very favourable PES Category of a "C", which equates to a "Moderately modified" status.

Figure 3. Ecological assesment(Dr Deacon 2020).

The summary of the risk ratings been classified as "Low" by Ecoleges is supported. The identified risk will according to Ecoleges not alter the PES of these drainage lines or the down stream ecology in any way should the prescribed control measures be adhered to.

The MTPA request that in the event that any conservation important plants or bird nests be encountered during the construction phase that the ECO should inform the authorities accordingly.

The ECO should ensure that no pollution taskes place on the development site. All exotic trees should be removed within a radius of 500 meters of this development site.

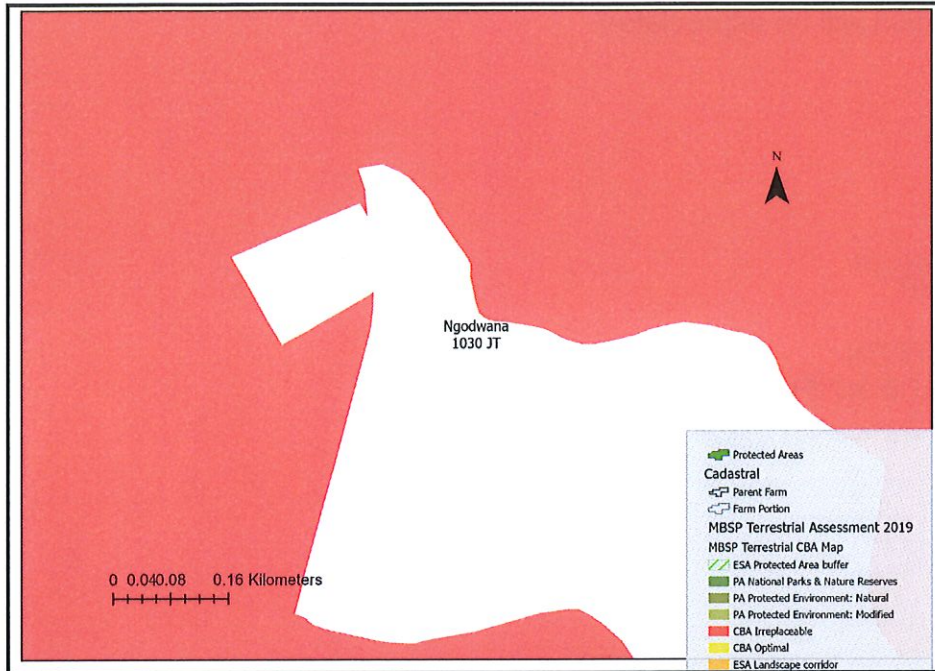


Figure 1. MBSP based Terrestrial assessment, indicating CBA irreplaceable areas surrounding the dam.

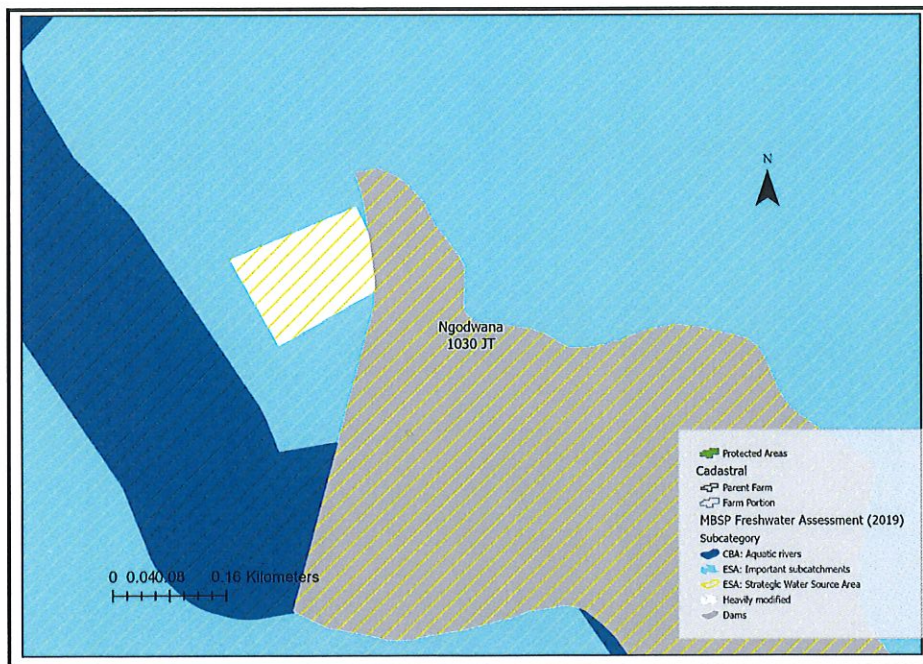


Figure 2. Freshwater status of portion 1 of the farm Waterval 461 JT, indicating CBA river

Your cooperation will be appreciated.

Kind Regards



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MR.J.J. EKSTEEN
MANAGER SCIENTIFIC SERVICES
DATE: 02 DECEMBER 2020