

REGISTRATION & COMMENT SHEET

BACKGROUND INFORMATION DOCUMENT (BID) SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED EXPANSION OF FARMING ACTIVITIES ON PORTION 5 OF THE FARM DUMA 201-JU, CITY OF MBOMBELA MUNICIPALITY, MPUMALANGA PROVINCE

Contact Information:	
Title: <i>Mr</i>	Name: <i>JJ Terblanche</i>
Organisation: <i>Terblanche Orange (Pty) Ltd</i>	Nature of interest: <i>Access to farm via air farm.</i>
Postal Address:	Telephone number: <i>082 388 0107</i>
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	Email: <i>admin@terblanche@imgginet.co.za</i>

*The NEMA EIA Regulations, 2014, require that an IAP discloses any direct business, financial, personal or other interest in the approval or refusal of the application. Preferred method of communication. The absence of email / facsimile facilities may result in a delay in receipt of IAP notifications. Please write clearly.

Comments (please use additional sheets of paper if required):

See attached letter.

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TERBLANCHE ORANGE

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Date: 17 October 2022

MP STREAM ENVIRONMENTAL AND SAFETY PLANNERS (PTY) LTD

Cell: 073 173 3894

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Attention: Mr Sibusiso Langa

SUBJECT: COMMENTS ON SCOPING AND ENVIRONMENTAL IMPACT

ASSESSMENT FOR THE PROPOSED CLEARANCE OF APPROXIMATELY 60HA OF VEGETATION ON PORTION 5 OF THE FARM DUMA 201-JU, FOR THE EXPANSION OF EXISTING FARMING ACTIVITIES

Terblanche Orange (Pty) Ltd commented on the first EIA process that was conducted during 2021 and 2022 which received environmental authorisation on 15 February 2022.

We are directly adjacent the proposed site and we are directly affected by the access to the farm Portion 5 Duma 201 JU as it runs over our property.

The newly lodged application is of concern to us as it follows only 8 months after authorisation was received for the first application.

Please refer to our previous comment dated 27 January 2022 on the first EIA process:

‘Upon meeting our neighbor we understood that he had plans to develop a much larger area than what is currently applied for in the environmental application. Our concerns are there for on what is currently on the table but also includes consideration of phased development that will be larger and have long term impacts on us.’

This is now exactly what is happening. The applicant is now applying to clear an area of 60 hectares.

Our concerns are as follows:

- **Access**

A servitude road provides access over our property to the said application site. We also farm on a small to medium scale on our property and are directly affected by the plans of our neighbor.

The servitude road was previously only used for residential access and now will be changed to commercial access. This will result in a few challenges for our own operations. We commented on the expected traffic associated with the 19,8 ha of macadamias. With the large areas now proposed for cultivation, our concern is raised again. The heavy moving vehicles will create dust on the current dirt road which is detrimental to the fruits of our trees as well as health conditions of our orchard. Dust is a major problem in harvesting/winter time. In the winter and harvesting times (from March to August/September) we wet the road once or twice a day depending on the dust. We use our irrigation water for these purposes. We will need a written commitment from the applicant to meet us halfway and come up with a feasible solution.

- **Safety and security**

Safety is still a main concern and we put systems in place for safety of all the residence on our own property that will now be overruled with more people and vehicles traveling in and out of the applicant farm and our own property without control. The safekeeping of our harvest is also a concern as theft is a mayor risk to any farmer as the fruit can be carried out in bags. Several bags can result in a huge impact on our profit. On the point of safety and security we also request written communication on a way forward as the impact will increase with the increase in activity on the applicant farm.

With the previous EIA process we requested a legal agreement and we now want to reiterate the importance of such to protect all parties involved.

- **Water**

Please provide proof of a sustainable water source for the 60 ha area that is proposed to be cultivated. You mentioned in the response to our letter dated 27 January 2022 that the applicant has 48 000m³ of water rights per annum for portion 5 of the farm Duma 201 JU. The final BAR for that project stated: *Although the applicant only has 6ha of water rights, 19.8 ha of Macadamia/ Citrus trees require 0.18m³ of water per week for each mature tree. Approximately 250 trees will be planted per hectare on this portion (19.8 ha will be cultivated) which totals a current water use of 46 332m³ per annum. The applicant will therefore have sufficient water available for the proposed cultivation activities.*

This would have resulted in a balance of 1 668 m³. Where will the additional water come from? If ground water is being considered we need proof that the aquifers will be able to handle it and that ourselves and others in the catchment will not suffer as a result.

We also request proof of a licence application that will need to be submitted to the Department of Water and Sanitation (presented by the IUCMA in this region) for water uses under the National Water Act, Act 36 of 1998. We also again ask proof of registration of the irrigation dam on the farm.

- **Ecology**

With reference to the Ecological Investigation by Afrika & Biology dated October 2021 most of the area is not suitable for agriculture (Appendix A2, Final BAR, February 2021 which we suppose should be 2022). The biodiversity assessment concludes that most of the site is largely in a natural state and of significant biological and ecological importance. Refer to the map included in this letter after the points of concern.

- **Soil**

According to the soil survey that was available to us for the farm Portion 5 Duma in the final BAR for the site, only an area of 13,76 ha was surveyed at the top northern corner of the site out of the total 224,6 ha farm. The report does not offer any information on the soil qualities of the rest of the farm. Two sites with little information has already been approved outside of the 13,76 ha. We request more detail in terms of the suitability of proposed sites that will bring the cultivation on the farm to 60 hectares.

Once the applicant provides proof that he can sustainably farm 60 hectares, we would appreciate it if agreements with regards to the other issues can be reached prior to the authorisation of the NEMA activities as applied and that it be recorded in the final submission to the MDARDLEA.

Yours sincerely,



Director: JJ Terblanche
Contact: 082 388 0107

