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2019-02-12

Mr T.A Luvha
Mulambwane CPA

Per Email: mulambwanecpa@gmail.com

Dear Sir

RE: RESPONSE TO BACKGROUND INFORMATION DOCUMENT FOR THE 24G ENVIRONMENTAL AUTHORISATION APPLICATION FOR ACTIVITIES COMMENCED WITH AT EKLAND SAFARIS, LIMPOPO PROVINCE

1. Your letter dated 28 January 2019 refers.
2. I have considered it apt to furnish you with pertinent clarification on some of the issues raised in the said letter.
3. From the onset, I must clarify that Aurecon South Africa (Pty) Ltd (Aurecon) is the appointed consultant required in terms of the provisions of the National Environmental Management Act 107 of 1998 (NEMA), as amended, read with NEMA Regulations to conduct Environmental Impact Assessment ("the EIA") for this project.
4. In this regard, Aurecon is supposed to be independent according to NEMA Regulations. I therefore assure you that Aurecon was not involved with the project during the purchasing of the property. For this reason, Aurecon is unable to provide any comments concerning the sale of the property.
5. Having clarified the legislative framework and compliance, I now turn on the questions raised in the following sequence. Please note that:
 - 5.1. All representatives who were included within the email, have been registered on the Stakeholder database;
 - 5.2. A meeting with the Mulambwane CPA will be scheduled to provide clarification.
 - 5.3. As soon as a date is confirmed, a meeting request will be sent to the Secretary of the Mulambwane CPA;
 - 5.4. The Limpopo Department of Economic Development, Environment and Tourism (LEDET) on or around March 2018, issued Ekland Safaris with a Non-Compliance Notice in accordance with the NEMA;
 - 5.5. After receiving the Non-Compliance Notice from LEDET, Ekland Safaris appointed Aurecon as their Environmental Consultant to assist with the Environmental Application as per the requirements of the NEMA;
 - 5.6. Various site meetings were held with the LEDET and a decision was made that the environmental process in terms of Section 24G in terms of NEMA should be followed as legislatively prescribed;

- 5.7. A Water Use Licence is required for specific activities at Ekland Safaris. In this regard, an Integrated Water Use License is in the process of being compiled and submitted;
 - 5.8. A pre-application meeting with the Department of Water and Sanitation (DWS) was held on 25 January 2019. We are conducting a combined public participation process for both the Section 24G Environmental Application as well as the Integrated Water Use Licence Application;
 - 5.9. Mulambwane CPA is therefore also registered as an interested and affected party for the water use licencing process;
 - 5.10. The LEDET issued a Non-Compliance notice for some of the activities commenced with at Ekland Safaris and this notice ordered the client to stop with specified construction activities until the Section 24G Environmental process has been completed;
 - 5.11. Various consultations were held with the LEDET to discuss all other activities commenced with at site, and no directive was issued by the LEDET to halt any other activities. Instead, the LEDET requested that all activities be applied for within the Section 24G Environmental Application process; and
 - 5.12. All questions that require further clarity will be addressed at the meeting to be held with Mulambwane CPA and will also be addressed within the EIA report that will be distributed for public comment.
6. With regards to the specialist studies requested, it must be noted that most of the development entailed the upgrading and refurbishment of existing facilities. The area impacted by development activities was mostly restricted to areas that have been transformed by the existing facilities prior to 2001.
 7. When an area has already been impacted, specialist investigations are seldomly required, because an impact can only be assessed if the conditions prior to development were known and investigated.
 8. A Biodiversity Assessment is, however, currently being conducted for specific areas identified by the LEDET to be of high sensitivity and a Geo-hydrological Assessment will provide information regarding the impact on water quantity and quality.
 9. We trust that the above information provides some clarity on the issues raised. We stand ready to be of assistance should you require any further clarity.

Yours sincerely



Anne-Mari White
Senior Consultant