
31 August 2020

THE RECTIFICATION OF THE UNLAWFUL COMMENCEMENT OF A LISTED ACTIVITY: THE ESTABLISHMENT OF AN ASPHALT PLANT ON PORTION 57 OF THE FARM STRATHMORE 214, NELSPRUIT DISTRICT, MPUMALANGA.

This letter serves as an explanation as to why At-Road Construction ("**the applicant**") did not obtain an Environmental Authorisation ("**EA**") for the above-mentioned project prior to establishment.

Firstly, the applicant was unaware of the volumes of material classified as "dangerous goods" stored on their site. The largest volume of this material is the heated bitumen inside the plant itself before mixing with aggregate. This matter is still disputed. The applicant would have been under the threshold of 80 000L had it not been for this heated bitumen.

Secondly, the applicant is a company that specializes in road construction and maintenance. To obtain projects, the applicant must go through a tender process. If appointed, they only have a limited amount of time before they need to start with the project. Within this limited time, they must find a site to move their site offices, workshop and plant to. For this specific project, the applicant had a month to start their work from receiving the tender.

Applying for EA is a very time-consuming process. It would have been impossible for the applicant to go through the EA process and obtain EA before they needed to move to the site and start their work.

For this reason, the applicant did not apply for EA before they moved their site offices and Asphalt Plant to this site. However, the applicant did choose a site that is located on an active mining area (Strathmore Mine). Therefore, the site was already cleared of vegetation and significantly disturbed prior to establishment of the Plant. It should also be noted that the activity is temporary in nature. It is planned that the Plant be removed once work in this area is completed.

It must be considered that by undertaking the activities, the applicant conducts road maintenance work which is of national importance.

COMPANY DIRECTOR: G. L. DE VILLIERS

VAT NO: 4220284154 | BUSINESS REGISTRATION NO: 2018/110720/07 – SOUTH AFRICA

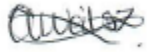
BUSINESS ADDRESS: 21 DROMEDARIS STREET | DAN PIENAAR | BLOEMFONTEIN | 9301 - REGISTERED PHYSICAL ADDRESS: 8 CONDE STREET | BAYSWATER | BLOEMFONTEIN | 9301

POSTAL ADDRESS: SUITE 221 | PRIVATE BAG X01 | BRANDHOF | 9324

TEL: 072 967 7962 | E-MAIL: admin@turn180.co.za

We trust you find the above in order.

Kind regards

A handwritten signature in black ink, appearing to read 'Ansuné Weitsz', with a small flourish at the end.

Ansuné Weitsz