

**PROPOSED UPGRADING OF THE EXISTING SENWAMOKGOPE SEWERAGE TREATMENT PLANT AT SEKGOSESE SECONDARY SCHOOL ON PART OF THE  
FARM ROERFONTEIN 161-LT, SENWAMOKGOPE, LIMPOPO PROVINCE**

**ISSUES TRAIL: RECORD OF COMMENTS RAISED AND/OR SUBMITTED DURING THE PUBLIC PARTICIPATION PROCESS**

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**ABBREVIATIONS:**

CLO	Community Liaison Officer	GLM	Greater Letaba Municipality
DEA	Department of Environmental Affairs	I&AP	Interested and/or Affected Party
DWA	Department of Water Affairs	MDM	Mopani District Municipality
ECO	Environmental Control Officer	MRC	Mamaila Royal Council
EIA	Environmental Impact Assessment	NEMWA	National Environmental Management: Waste Act
EIR	Environmental Impact Report	NWA	National Water Act
EMP	Environmental Management Plan	PM	Public Meeting
ESR	Environmental Scoping Report	SAHRA	South African Heritage Resources Agency

COMMENT	RAISED BY	RESPONSE
<b>1. Ecological Issues / Natural Environment</b>		
Enquired into whether Polygon Environmental Planning would be responsible for environmental management through to the operational phase.	<b>Mr Joseph Lekitima</b> , community member. Comment at PM, 31.07.2010	Polygon has so far only been appointed for the EIA, which runs up to the point where DEA will issue a decision on the proposed project. If the project is authorised by LDEDET, the applicant (MDM) will have to appoint an ECO (which may or may not be Polygon) to monitor environmental compliance during the construction phase. During the operational phase, environmental management and monitoring may be handled by an official from MDM, or an environmental officer may be contracted to perform those duties. The most important environmental monitoring during the operational phase will be the periodic sampling and testing of groundwater and water from the nearby river to monitor water quality.

<b>2. General Issues</b>		
Fertilizer.	<b>SJ Kgekolo</b> , Mamaila Traditional Authority. Comments completed on comment form accompanying draft ESR at MRC, Sept 2010	Do you mean that the sludge from the treatment system should be used as fertilizer? The possibility exists that the sludge may eventually be used for fertilization of fields.
Enquired into the process for reporting a burst pipe.	<b>Mr Jeffrey Kungwa</b> , community member. Comment at PM, 31.07.2010	A plant operator is at the sewerage treatment plant at Sekgosese Secondary School daily, and pipe bursts could be reported to him. Alternatively, the GLM Sekgosese sub-office could be contacted; they will then pass the message to the appropriate officer within GLM. It is very important that community members do report any such incidents (leakage, pipe bursts, etc), as the GLM does not have enough staff to monitor all their pipelines daily, and rely on the vigilance of community members to bring these incidents to their attention.
Enquired as to whether the MRC had been consulted with regards to the proposed project.	<b>Mr Jeffrey Kungwa</b> , community member. Comment at PM, 31.07.2010	Ms Machaba and Ms Agenbag met with representatives of the MRC several times at the start of the EIA. An agreement has been reached with the MRC for the use of the site for the proposed upgrading of the sewerage system.
If work is done on sewer pipelines situated under paved areas, the paving should be re-done following construction work.	<b>Mr Joseph Lekitima</b> , community member. Comment at PM, 31.07.2010	Comment noted.
Enquired as to whether the upgrading was proposed by the traditional authority or the municipality.	<b>Mr Raymond Mahoma</b> , community member. Comment at PM, 31.07.2010	The project is being proposed by MDM on land belonging to the Mamaila Royal Council (MRC). Authorisation on the EIA will have to be issued by DEA.
We would like to acknowledge the receipt of your letter addressed to the Office of the Regional Land Claims Commissioner: Limpopo, faxed 18 August 2010. The matter is receiving our attention; we will revert back to you in due course.	<b>TA Maphoto</b> , Regional Land Claims Commissioner: Limpopo. Faxed comments, 06.09.2010	Comment noted.
Manure.	<b>Ms Maphoko Melida Mapyesa</b> , Modudi wa Mamaila. Comments completed on comment form accompanying draft ESR at MRC, Sept 2010	Do you mean that the sludge from the treatment system should be used as fertilizer? The possibility exists that the sludge may eventually be used for fertilization of fields.
The proposed project is a good thing and that it should proceed as quickly as possible.	<b>Ms Sovie Mashau</b> , community member. Comment at PM, 31.07.2010	Comment noted.
Appointment of the Council officer to act as a liaison officer.	<b>Mr FM Mogale</b> , MRC.	We will forward your comment to Mošomo Consulting Civil Engineers to take

	Comments completed on comment form accompanying draft ESR at MRC, Sept 2010	into account if and when construction commences.
Fertilizer.	<b>Mr Albert Mohale</b> , local resident. Comments completed on comment form accompanying draft ESR at MRC, Sept 2010	Do you mean that the sludge from the treatment system should be used as fertilizer? The possibility exists that the sludge may eventually be used for fertilization of fields.
Enquired as to how Mamaila would benefit from the proposed project.	<b>Mr LM Mohale</b> , MRC. Comment at FGM, 15.03.2010	A large number of households in Senwamokgope will benefit from service delivery through the provision of waterborne sewerage infrastructure (to which flushing toilets can connect). Construction phase job creation will also benefit the community.
Senwamokgope has a problem in terms of the availability of water. The new flushing toilets (to be connected to the proposed expanded reticulation network) would lead to a further increase in local water use.	<b>Mr Makoro Nteu</b> , community member. Comment at PM, 31.07.2010	<b>Clr Sebelemetja</b> , the local ward councillor, confirmed that there is a shortage of water, but indicated that MDM had appointed Mošomo for this sewerage project and would still in future need to address the water supply issue. However, water provision did not form part of this project.  <b>Mr NE Netswinga</b> of the Department of Water Affairs (DWA) explained that the municipality had already applied to DWA for an allocation of water from Nandoni Dam, but that this Water Use Licence Application (WULA) still had to be finalised by DWA, following which bulk water infrastructure would have to be established to deliver the water to this area from Nandoni.
The project should be kick-started, as the community is hungry for jobs. She also emphasised the importance of community members attending meetings such as this one, so that they can be informed of what is being planned in their area.	<b>Clr HM Sebelemetja</b> , ward councillor. Comment at PM, 31.07.2010	Comment noted.
<b>3. Health Issues</b>		
Enquired as to the risk of illness if people used water from the river which might be contaminated by <i>E. coli</i> .	<b>Mr Peter Letswalo</b> , community member. Comment at PM, 31.07.2010	Sewage can cause contaminate of water sources with the <i>E. coli</i> bacterium, which can lead to illness such as diarrhoea in people who drink such water. Currently, the partially functional sewerage system, the leaking outfall sewer and the large number of pit toilets in Senwamokgope pose a risk of water pollution (both surface water and groundwater) by <i>E. coli</i> and other organisms. One of the main aims of the proposed upgrading of the sewerage system is to reduce water pollution and the associated health risks. Contamination is anticipated to be greatly reduced following the proposed upgrade.
<b>4. Heritage Issues</b>		
What would happen if graves or fossils were uncovered during	<b>Mr Peter Letswalo</b> ,	The Phase 1 HIA which was undertaken by Shasa Heritage Consultants

excavation for the sewer pipelines or components of the sewerage system?	community member. Comment at PM, 31.07.2010	investigated the likelihood of graves or other objects of heritage value occurring on the site. Because many such items occur below ground and graves are sometimes unmarked, the archaeologists looked for clues such as disturbances on the surface. They did not find any heritage resources during the Phase 1 HIA, but the possibility still exists that such objects may be discovered during construction. Should any such discovery be made, construction activities will need to stop immediately, until an archaeologist and a representative of SAHRA has been able to investigate and make recommendations as to the preservation or removal of the objects. In the case of graves, a process would have to be followed to determine whether there are still living relatives of the deceased in the area. If relatives can be traced, these relatives will have to be consulted to determine whether the grave can be relocated to a different site which will not be impacted by the project. If the relatives do not agree to this, it may be necessary to preserve the grave in its current position ( <i>in-situ</i> ) and the layout of the proposed sewerage system may then need to be changed so as not to affect the grave.
Guided by the HIA report, LIHRA concurs with the findings laid by the heritage specialist that there are no visible heritage resources identified. However, experience taught that some heritage resources are often found during excavations and digging that takes place during construction. It is for this reason that we advise that should you during construction unearth objects of cultural significance, LIHRA should be informed. This memo serves to inform that from a heritage management point of view LIHRA has no objection. We trust that you will find the above matters in order.	<b>Mr Noel Nemauluma</b> , LIHRA. Faxed comments, 15.09.2010	Comments noted.
<b>5. Socio-Economic Issues</b>		
Lack of job opportunities.	<b>MM Lesoka</b> . Comment completed on comment sheet accompanying draft ESR at MRC, Sept 2010	Comment noted.
Creating job.	<b>Ms Sewela Cathrine Madongwane</b> , Modudi wa Mamaila. Comment completed on comment sheet accompanying draft ESR at MRC, Sept 2010	Comment noted.

Creation of decent jobs.	<b>Ms Maggy Ramare</b> , Ramotlotlo wa Sekgosese Heritage. Comment completed on comment sheet accompanying draft ESR at MRC, Sept 2010	Comment noted.
Creating job opportunities.	<b>P.J. Mamaila</b> , MRC. Comment completed on comment sheet accompanying draft ESR at MRC, September 2010	Comment noted.
Development.	<b>SC Mamaila</b> , Mamaila Kolobetona Traditional Council. Comment completed on comment sheet accompanying draft ESR at MRC, Sept 2010	Comment noted. The proposed sewage system is anticipated to facilitate development in Senwamokgope; this would be an indirect impact of the treatment system.
She had been under the impression that there would be recruitment at this meeting.	<b>Ms Jane Mamorobela</b> , community member. Comment at PM, 31.07.2010	Neither Ms Agenbag nor Ms Machaba have the authority to appoint / employ people to be involved in the proposed project. This meeting was only being held as part of the EIA process to inform the community of the project which was being proposed in their area, as well as to offer community members the opportunity to raise any issues that should be taken into account as part of the EIA or to ask questions regarding the project. Recruitment would only be done at a much later stage of the process, after the project has been authorised by DEA (if it is authorised).
Enquired into the name of the contractor, and asked whether the contractor would bring their own labourers or use local labour. He also asked if the project would be advertised.	<b>Mr Kenneth Manganyi</b> , community member. Comment at PM, 31.07.2010	If and when the proposed project is authorised by DEA, Mošomo would advertise tenders for contractors, and the successful contractor will then have to recruit labourers. It could not be said for certain at this stage how the contractor would recruit labourers and how many local labourers they will use; however, normally contractors are required to spend a specific percentage of the contract value on local labour, and usually recruit the unskilled and semi-skilled labourers locally. Skilled staff such as machine operators are usually employed by the contractor and are "imported" to the area for the project. Normally, a Community Liaison Officer (CLO) is appointed once the contractor has been appointed; the CLO then recruits the required number of labourers from the area where the project is to be implemented.
Labour during the construction phase must be sourced from the local community.	<b>Mr LM Mohale</b> , MRC. Comment at FGM, 15.03.2010	As large a component of the labour force as possible will be sourced locally, and where feasible, labour-intensive methods will be used.

Enquired into the possible involvement of local high school students in the process, so that they can be exposed to the engineering field.	<b>Mr LM Mohale</b> , MRC. Comment at FGM, 31.05.2010	Issues such as the possible involvement of students can be worked out at a later stage. If students are going to be involved, selection will have to be done through the ward councillor.
Enquired as to whether jobs would be created for local community members during the assessment phase, and indicated that, once royalties have been settled on, an agreement would also need to be entered into regarding employment of community members in the assessments.	<b>Mr LM Mohale</b> , MRC. Comment at FGM, 07.06.2010	Employment will only be created later, during construction. Ms Machaba will discuss the issue of job opportunities during the assessment phase with her colleagues and revert back to the MRC.
Income.	<b>ME Ramoseki</b> . Comment completed on comment sheet accompanying draft ESR at MRC, Sept 2010	The proposed sewage system as such will not generate income, but is anticipated to facilitate development in Senwamokgope, which may in turn generate income. This would be an indirect impact of the treatment system.
<b>6. Technical Issues</b>		
Asked whether the plant would be refurbished after its lifetime elapses.	<b>Mr Joseph Lekitima</b> , community member. Comment at PM, 31.07.2010	This proposed upgrading in fact already constitutes a type of refurbishment of the existing plant. The new plant was being designed for a projected life span of 20 years, and it was likely that the plant would be refurbished again after that time period elapses.
Asked whether toilets will be connected to the sewer pipelines.	<b>Ms Margaret Ralebepe</b> , community member. Comment at PM, 31.07.2010	This will be done.
Enquired into the size of the proposed outfall sewer.	<b>Mr Kenneth Manganyi</b> , community member. Comment at PM, 31.07.2010	The outfall pipe is to be 200mm in diameter.
Enquired as to when construction would begin.	<b>Mr Kenneth Manganyi</b> , community member. Comment at PM, 31.07.2010	Construction can only start if and when DEA authorises the proposed project. The EIA may still extend into 2011; it is not known for certain when the process would be completed. It would only be possible to give an indication of the start date at a later stage in the EIA.
What will be done with the treated effluent leaving the sewerage plant?	<b>Mr Kenneth Manganyi</b> , community member. Comment at PM, 31.07.2010	The treated (purified) effluent will be released back into the nearby river. At a later stage it was anticipated that the treated effluent would be used for irrigation of sports fields in a sport stadium.
<b>7. Water-related Issues</b>		
DWA would like the following issues to be addressed in terms of the National Water Act (NWA, Act 36 of 1998) before approval can be granted. <ul style="list-style-type: none"> <li>WUL should be applied for as it is stipulated by NWA section 21(e), (f), (g) and (37)(1)(a). Attached is a copy of IWWP that you should attach to as you will be submitting your application.</li> </ul>	<b>Ms Happy Mabasa</b> , DWA. Faxed comments, 23.11.2010	Thank you for your comments on the draft ESR.  Please note that an application for registration of the sewage treatment plant in terms of the General Authorisation was submitted to DWA on 22 November 2010, and also included the engineering details of the proposed upgrading of the sewage plant.

<ul style="list-style-type: none"> <li>• The application should contain engineering details of the works in order for the license to be considered.</li> <li>• Page 19, 5.2.8 indicates that during the construction phase portable chemical toilets are recommended to be provided therefore, the contents of those portable toilets should be disposed of in a suitable municipal treatment works</li> <li>• There is a need for two monitoring boreholes, one upstream and the other downstream in order to monitor the extent of ground water pollution.</li> <li>• Page 20, second paragraph, indicated that it is recommended that a proper management and monitoring programme be implemented over long term to ensure that ground water resources are not impacted on. Therefore the results should be sent to this office on monthly basis for compliance with the water use license conditions.</li> <li>• No construction should take place within 1:100 year flood line.</li> </ul> <p>Please do not hesitate to contact this department should you have any queries.</p>		<p>I can confirm that the EMP will stipulate that chemical toilets will have to be provided during construction, the contents of which will have to be disposed of at a licensed treatment works.</p> <p>Two boreholes, one upslope and one downslope of the sewage treatment plant, will be drilled for groundwater analysis as part of the second phase of the geo-hydrological study which will be done in the impact assessment phase of the EIA. These will also be used for long-term monitoring to determine if any groundwater contamination is caused by the treatment plant.</p> <p>Regular groundwater quality monitoring will be done during the lifetime of the treatment plant and the results submitted to DWA.</p> <p>I can confirm that the site is not impacted by any 1:100 year flood line. Therefore no construction will take place within a flood line.</p>
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