

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.

Turn 180 Environmental Consultants would like to make the following representations on the directives as set out in Annexure A to the Section 24G application form for the above-mentioned project.

	Directive	Representation
i	immediately cease the activity pending a decision on the application submitted in terms of this subsection	Turn 180 Environmental Consultants believe that this instruction is not relevant to the purposes of this application. The Asphalt Plant was established for the purpose of upgrading the N4 road (MDC sections 11 and 12) from east of the Crocodile River to the Magnesite mine intersection. This is a temporary activity and the Asphalt Plant will be removed once the activity and future projects in the area the applicant plans to tender for is completed. If the operation of the Asphalt Plant is to be ceased, the upgrading of the N4 road will be incomplete and cause inconvenience to motorists using the road and even pose a danger.

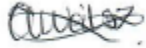
ii	investigate, evaluate and assess the impact of the activity on the environment	Turn 180 Environmental Consultants investigated, evaluated and assessed the impact of the activity on the environment. All findings are included in the S24G application and appendixes. Turn 180 also appointed numerous specialist to conduct specialist studies.
iii	remedy any adverse effects of the activity on the environment	Once the current road upgrading project and future projects the applicant intends to tender for is completed, the Plant will be removed from site and the site will be rehabilitated to its former state. It should be noted that the site is located on an active mining area and the site was significantly disturbed prior to establishment of the Plant.
iv	cease, modify or control any act, activity, process or omission causing pollution or environmental degradation	An Environmental Management Programme Report for the Asphalt Plant is attached in the S24G application which discusses mitigation and management measures for the activity.
v	contain or prevent the movement of pollution or degradation of the environment	An Environmental Management Programme Report for the Asphalt Plant is attached in the S24G application which discusses mitigation and management measures for the activity.
vi	eliminate any source of pollution or degradation	It will be impossible to eliminate pollution that is generated by the Asphalt Plant. Some atmospheric emissions are emitted from the plant. However, an air emission monitoring

		programme will be implemented to verify compliance to the air emission standards in terms of the NEM:AQA. A Dust monitoring programme is already in place on site. The Atmospheric Impact Report conducted also indicates that the impacts of emissions is expected to be low.
vii	compile a report containing -	The S24G application contains all this information.
	aa A description of the need and desirability of the activity	
	bb assessment of the nature, extent, duration and significance of the consequences for or impacts on the environment of the activity, including the cumulative effects and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity	
	cc description of mitigation measures undertaken or to be undertaken in respect of the consequences for or impacts on the environment of the activity	
	dd description of the public participation process followed during the course of compiling the how the issues raised have been addressed	
	ee an environmental management programme	

	Provide such other information or undertake such further studies as the Minister, Minister responsible for mineral resources or MEC, as the case may be, may deem necessary.	
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We trust you find the above in order.

Kind regards



Ansuné Weitsz