



Registration no. 2018/217803/07

**TRANSNET'S PROPOSED NEW LEPHALALE RAILWAY YARD,  
STEENBOKPAN, LEPHALALE LOCAL MUNICIPALITY, WATERBERG  
DISTRICT, LIMPOPO PROVINCE**

**In support of an EIA process, Water Use License Application Procedure and  
Mining Permit Application (Borrow Pits)**

DEA Project Reference number: Pending (former 14/12/16/3/3/2/1116 )

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**ISSUES AND RESPONSE REPORT**

*Version 3*

- Volume 3 Appendix 3I to Public Participation Process-

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**Transnet Ref:** Lephalale Railway Yard Environmental Assessment: 3424302.023S

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## 1. INTRODUCTION

This Issues and Response Report (IRR) presents comments from Interested and Affected Parties (I&APs), stakeholders and organs of state received during the following public engagements:

### Scoping Phase

- Public registration period on the Background Information Document (BID) from 23 July to 28 August 2018; and
- Public review and comment period on the Draft Scoping Report from 29 October to 5 December 2018; and
- Public meeting of 13 November 2018 at Lephalale
- Focus Group Meeting of 26 November 2018 with Mr. H. Hills at Brits
- Public meeting of 13 February 2019 with Lesedi Community
- Public comments submitted by I&APs whilst DEA was considering the final Scoping Report

The IRR provides a summary of the issues received and offers a response to the issues raised. As indicated, the public is consulted in two stages during the Scoping and EIA Phase and thus the IRR consists of versions. These versions include:

- Version 1 – IRR appended to the draft Scoping Report available for public review
- Version 2 - IRR appended to the final Scoping Report submitted to DEA for approval
- Version 3 – IRR appended to the draft EIR available for public review
- Version 4 – IRR appended to the final EIR submitted to DEA for approval

Version 1 of the IRR was appended to the draft Scoping Report made available for public review and comment from 29 October to 5 December 2018. Version 2 of the IRR was appended to the final Scoping Report submitted to the Department of Environmental Affairs for consideration in its decision making as to whether to approve or reject the Scoping Report and approach to the EIA Phase. The IRR Version 2 was made available to I&APs on the Naledzi website at [www.naledzi.co.za/publicdocuments](http://www.naledzi.co.za/publicdocuments).

This IRR Version 3 is attached to the draft EIR made available for public review and comment. It includes the additional comments placed on record at the 13 February 2019 Lesedi Community public meeting including additional comments submitted by the public whilst DEA considered the final Scoping Report.

## 2. ISSUES AND RESPONSE REPORT

Please refer to page 5 for the summary of issues raised by I&APs, stakeholders and organs of state to date on the project and responses provided thereto.

Refer to page 64 *Annexure A* for copies of the written comments as well as completed Comments & Response forms received during the Public Registration period on the BID *and* page 66 for *Annexure C* for Comments received on the draft Scoping Report including official responses provided thereto. Also refer to page 67 of *Annexure D* for comments received from I&APs whilst DEA considered the final Scoping Report.

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## LIST OF ACRONYMS

|                   |   |
|-------------------|---|
| <b>I&amp;AP</b>   | Interested and Affected Party   |
| <b>BID</b>        | Background Information Document   |
| <b>IRR</b>        | Issues and Response Report  |
| <b>PPP</b>        | Public Participation Process  |
| <b>PPP Report</b> | Public Participation Process Report   |
| <b>DEA</b>        | National Department of Environmental Affairs                                  |
| <b>LEDET</b>      | Limpopo Department of Economic Development, Environment & Tourism             |
| <b>LLM</b>        | Lephalale Local Municipality  |
| <b>WDM</b>        | Waterberg District Municipality   |
| <b>DAFF</b>       | Department of Agriculture, Forestry and Fisheries                             |
| <b>SACAA</b>      | South African Civil Aviation Authority  |
| <b>DWS</b>        | Department of Water and Sanitation  |
| <b>SANRAL</b>     | South African National Roads Agency Limited                                   |
| <b>SAHRA</b>      | South African Heritage Resources Agency                                       |
| <b>EWT</b>        | Endangered Wildlife Trust   |
| <b>DMR</b>        | Department of Mineral Resources   |
| <b>DRDLR</b>      | Department of Rural Development and Land Reform                               |
| <b>NEC</b>        | Naledzi Environmental Consultants Pty Ltd                                     |
| <b>Transnet</b>   | Transnet SOC Ltd  |
| <b>EIA</b>        | Environmental Impact Assessment   |
| <b>SR</b>         | Scoping Report  |
| <b>EIR</b>        | Environmental Impact Report   |
| <b>dB</b>         | Decibels  |
| <b>SOC</b>        | State Owned Company   |
| <b>WWTW</b>       | Waste Water Treatment Works   |
| <b>NEMA</b>       | National Environmental Management Act, 1998 (Act 107 of 1998)                 |
| <b>NEM:AQA</b>    | National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004)     |
| <b>LEMA</b>       | Limpopo Environmental Management Act, 2003 (Act 7 of 2003)                    |
| <b>NFA</b>        | National Forest Act, 1998 (Act 84 of 1998)                                    |
| <b>NEMPA</b>      | National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003) |
| <b>SIP</b>        | Strategic Infrastructure Projects   |
| <b>LN</b>         | Listing Notice  |

**Table 1: Issues and Responses recorded from written submissions and meetings during the Scoping Phase**

| Number   | Comment   | Date of comment, comment name of I&AP                                      | Response from EAP/Specialist/Applicant  |
|--|---|--|---|
| <b>1. Comments from Limpopo Department of Economic Development, Environmental and Tourism (LEDET)_23 August 2018:<br/>Comment on Background Information Document</b> |   |  |   |
| 1.1  | Provide the capacity and the position of the proposed water reservoir to confirm whether it is listed in terms of Listing Notice 3 Activity 2 of the NEMA EIA Regulations.  | 23/08/2018<br>Letter<br>LEDET: Environmental Impact Management (ME Molepo) | <p><b>EAP, Marissa Botha, NEC:</b> 14 May 2019 (updated)</p> <p>Capacity: 260m<sup>3</sup><br/>Dimensions: 7.32m x 7.32m x 4.8m<br/>Location: 23°45'41.75"S 27°27'6.52"E.</p> <p>Addressed in Scoping Report (Section 7.1 and 7.8.1) and in EIR (Section 4.2, Table 5 (Item 6) and Section 4.3.5.)</p> <p>The construction of a water reservoir triggers Listing Notice 3 Activity 2 due to its volume (more than 250m<sup>3</sup>). It will be positioned in a geographical area namely Koedoe Nature Reserve and in a CBA (Ecological Support Area 1). The listed activity is being applied for.</p> <p>Addressed in Scoping Report (Section 7.2 Table 6) and EIR (Table 7 (Item 5)).</p> |
| 1.2  | Part of the site is classified as a CBA2 where loss of natural habitat should be minimized, i.e. land in this category should be maintained as natural vegetation cover as far as possible. These areas of land can | 23/08/2018<br>Letter<br>LEDET –  | <p><b>EAP, Marissa Botha, NEC:</b> 14 May 2019 (updated)</p> <p>In line with the Limpopo Conservation Plan an</p>   |

| Number | Comment   | Date of comment, comment name of I&AP       | Response from EAP/Specialist/Applicant   |
|--------|---|---|--|
|        | act as possible biodiversity offset receiving areas. Degraded and disturbed CBA's should be prioritized for rehabilitation. | Environmental Impact Management (ME Molepo) | <p>Ecological Impact Assessment Study was conducted by RF. Terblanche. (EIR, Volume 2-Appendix 2F) to assess the impact of the different land use on the CBA unit.</p> <p>The findings indicate it is unlikely that the project will result in loss of Threatened, Near Threatened and Declining plant or animal species. The site does not appear to be specific breeding habitat for any large carnivore and bird species which roam large areas of which the site is part. Scope for the site to be part of a corridor of particular conservation importance is small. The two small pan depressions and three drainage lines (sandbeds) at the site are part of corridors of particular conservation importance. In the case of the small seasonal pans, a stepping stone corridor applies.</p> <p>All activities will be limited to the expansion footprint; the three stream crossings will be limited to extension of culverts from the existing to the new railway tracks. The buffer zones of pans are already compromised. Pan 1 &amp; 2 is to be moved forty metres from the edge of the road</p> |

| Number | Comment  | Date of comment, comment name of I&AP                                 | Response from EAP/Specialist/Applicant  |
|--------|--|---|---|
|        |  |   | <p>next to the proposed Railway Line site during construction. Wetland characteristics of these pans may even slightly improve in such a case</p> <p>If the development is approved and these recommendations, which lead to two rehabilitated small pans and buffer zones, could be successfully implemented the risk of loss of biodiversity corridors and stepping stone small wetlands in the larger area shifts will be moderate to low. A rehabilitation plan which includes the re-establishment of indigenous vegetation at the site will be implemented.</p> <p>Addressed in EIR (Section 5.3.2; 8.10.2.3). Also see identified ecological risks for all phases of the project including cumulative risks from Section 10.3-10.6. Mitigation measures at address the impacts are included under Section 10.7 (Table 35).</p> |
| 1.3    | Based on the Waterberg Environmental Management Framework part of the site is classified as Zone 2 (Nature and cultural tourism focus area with high quality natural setting). This zone represents areas with high, natural visual and cultural quality with the potential for development of nature and/or cultural based tourism. | 23/08/2018<br>Letter<br>LEDET –<br>Environmental Impact<br>Management | <p><b>EAP, Marissa Botha, NEC:</b> 14 May 2019 (updated)</p> <p>This point is addressed under Section 5.3.3 of the EIR.</p>   |



| Number | Comment | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant   |
|--------|---------|---------------------------------------|--|
|        |         | (ME Molepo)                           | <p>Visual-, Ecological-, Noise-, Heritage- and Social Impact Assessment (SIA) Studies were conducted for the project including a Palaeontological Desktop Study to determine the potential impacts the project may have on these aspects. These aspects are important for tourism based activities. The studies are included under Volume 2 of the EIR.</p> <p>Primarily, the Lephalale railway yard is an existing facility which will be expanded. Noise levels will be high during operation but can be managed to comply with the relevant noise regulations. The additional visual impact will be very low and won't increase the already high visual impact in the area. No sites of cultural or heritage significance or Palaeontological significance were identified onsite.</p> <p>According to the SIA the sense and spirit of place will be altered permanently by the project but can be mitigated to lower its intensity by managing visual and noise impacts.</p> <p>Industrial activities are present near the site and Threatened species and Near Threatened species are absent from the project footprint area. The project will have a moderate to low impact on ecology given mitigations are upheld within the planned footprint. The cumulative impact on</p> |

| Number  | Comment  | Date of comment, comment name of I&AP  | Response from EAP/Specialist/Applicant  |
|---|--|--|---|
|   |  |  | <p>sensitive species and connectivity of ecosystems are limited.</p> <p>See Section 8.10, 8.12, 8.13, 8.15, 8.16 (8.16.1.1.2 and 8.16.1.1.4) for a description of potential impacts on these attributes and Section 10.7 (10.7.20 and 10.7.23) of the EIR for recommended mitigation measures.</p>  |
| <p><b>2. Comments from Limpopo Department of Economic Development, Environmental and Tourism (LEDET) _27 November 2018:</b></p> <p><b>Comment on draft Scoping Report</b></p> |  |  |   |
| 2.1   | <p>It is indicated that Boikarabelo Coal Mine has already started with Phase 1 of the holding yard. Is Section 24G of NEMA not applicable?</p> | <p>27/11/2018<br/>Letter<br/>LEDET: Environmental Impact Management (MC Rodgers)</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>Section 24 G of NEMA is not applicable to the project. The Lephalale Railway Yard is an existing 100 wagon yard which will be expanded to accommodate 200 train wagons in future for increase in load and capacity.</p> <p>Resgen Boikarabelo Coal Mine is presently constructing its 36km rail link next to and from the existing Lephalale-Thabazimbi railway track to its Resgen Plant towards the farm Kruishout 271LQ. The rail link was approved in 2020 by LEDET as part of the Boikarabelo Coal Mine EIA.</p> <p>Transnet will augment the existing Transnet infrastructure and Resgen rail link holding yard</p> |

| Number | Comment  | Date of comment, comment name of I&AP                                       | Response from EAP/Specialist/Applicant   |
|--------|--|---|--|
|        |  |   | with the expansion/development of the Lephale Railway Yard to accommodate a further 100 train wagons. This was updated in the Scoping Report under Section 6.1 and highlighted in Section 3.5 and 4.2 of the EIR.  |
| 2.2    | The combined storage capacity of the dangerous goods exceeds 500 cubic metres for which activity 4 of Listing Notice 2 of the EIA Regulations of 2014, as amended is included. It is advised that the applicability of activity 6 of Listing Notice 2 be considered taking into consideration subcategory 2.2 on the storage and handling of petroleum products in the NEM: AQA 2004 for which is license is required. | 27/11/2018<br>Letter<br>LEDET: Environmental Impact Management (MC Rodgers) | <b>EAP, Marissa Botha, NEC: Updated 14 May 2019</b><br><br>The combined diesel storage capacity at the Lephale Railway Yard will be 600m <sup>3</sup> . The threshold for Section 21 Listed Activities Subcategory 2.4 ‘Storage and Handling of Petroleum Products’ under NEM: AQA applies to all permanent immobile liquid storage facilities at a single site with a combined capacity of greater than 1000m <sup>3</sup> . The proposed storage capacity for the railway yard is thus well below the Licensing requirement threshold. See Section 4.2, Table 5 and 4.3.6 Table 7. |
| 2.3    | The site must be investigated for occurrence of the succulent stapeliad and related species, <i>Piarranthus atrosanguineus</i> indicated as endemic or near endemic species, as they are considered to be protected in terms of the LEMA, taking into consideration that the <i>Huerniopsis</i> and <i>Stapelias</i> (closely related synonyms) are protected.   | 27/11/2018<br>Letter<br>LEDET: Environmental Impact Management (MC Rodgers) | <b>EAP, Marissa Botha, NEC: Updated 14 May 2019</b><br><br>Based on the Ecological Survey and Impact Report (Volume 2, Appendix 2F of EIR) the succulent stapeliad <i>Piarranthus atrosanguineus</i> was not recorded onsite and is unlikely to be resident onsite based on lack of habitat. Refer to Section 8.10.2.1 of EIR.   |

| Number | Comment   | Date of comment, comment name of I&AP                                       | Response from EAP/Specialist/Applicant   |
|--------|---|---|--|
| 2.4    | Information in paragraph 11.10.2 (b) of the Scoping report does not distinguish between protected trees protected under LEMA and those under the NFA, as only some are protected by both. Tamboti ( <i>Spirostachys Africana</i> ) included in the list of protected trees is protected through LEMA not NFA. | 27/11/2018<br>Letter<br>LEDET: Environmental Impact Management (MC Rodgers) | <p><b>EAP, Marissa Botha, NEC:</b><br/>This has been corrected in the Final Scoping Report under Section 11.10.2 (b).</p> <p>Three protected tree species confirmed onsite appear on the national list of protected tree species as promulgated by the National Forest Act, 1998 (Act 84 of 1998). One tree species confirmed onsite, Tamboti, is protected provincially protected in terms of LEMA.</p> <p>A permit for removal of any Tamboti (<i>Spirostachys Africana</i>) species found in the project footprint will be obtained from LEDET in terms of LEMA.</p> <p>Permits for removal of protected tree species will be obtained from DAFF for removal of any listed nationally protected tree species found within the footprint areas such as Marula, and Sherpards Tree observed onsite.</p> |
| 2.5    | Red Listed, Important, Endemic and Protected Faunal Species indicated in paragraph 11.10.3, the specialist study should make provision for addressing the Cape Vulture and Eurasian bitted, to determine if relevant with regards to the project.   | 27/11/2018<br>Letter<br>LEDET: Environmental Impact Management (MC Rodgers) | <p><b>EAP, Marissa Botha, NEC:</b> The requirements has been included in the Final Scoping Report under Section 11.10.3 under ‘Red Listed, Important, Endemic and Protected Faunal Species’ and will form part of the scope for the Ecological Impact Assessment.</p> <p><b>Updated 14 May 2019</b><br/>Based on the Ecological Impact Study completed</p>   |

| Number | Comment  | Date of comment, comment name of I&AP                                       | Response from EAP/Specialist/Applicant  |
|--------|--|---|---|
|        |  |   | for the project Cape Vulture and Eurasian bittern were not recorded onsite and are unlikely to occur onsite. Threatened vulture species such as <i>Gyps africanus</i> (White-backed Vulture) listed nationally as Critically Endangered could cross the site from time to time. There are no signs (such as nests) or observations that indicate a specific importance of the site for threatened or near threatened bird species. This is addressed under Section 8.10.2.2 (b) of the EIR and Volume 2, Appendix 2F attached to the EIR.   |
| 2.6    | It is indicated that the relocation of borrow pit area 1, which may pose a risk for structural damage to the power line will be addressed as part of the DMR application process. Will viable alternatives not be best addressed in the EIA Process since it's an integrated process? It is not clear if the borrow pit application has already been submitted to the DMR. | 27/11/2018<br>Letter<br>LEDET: Environmental Impact Management (MC Rodgers) | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The alternative position for Borrow Area 1 will be discussed in the draft EIR for the project. The Mining Permit / Borrow Pit Application have not been submitted to the DMR yet. It will be submitted during the EIA Phase once the preferred Borrow Pit location has been confirmed. See Section 5.3 and 9.3 of the final Scoping Report.</p> <p><b>Update 14 May 2019</b></p> <p>To lodge the application for borrow areas to DMR Transnet requires landowner consent from Mr. Hills. Mr Hills has requested consideration of alternative borrow areas than initially preferred by Transnet. See Section 4.4.8, Figure</p> |

| Number | Comment   | Date of comment, comment name of I&AP  | Response from EAP/Specialist/Applicant  |
|--------|---|--|---|
|        |   |  | 6 and Section 7.1 (b) of the EIR. Transnet is still considering these alternatives and are subject to further discussion with Mr Hills. Accordingly the relevant borrow pit applications and subject reporting must still be submitted to the DMR.  |
| 5.4    | <p>According to our records it is clear that Geelhoutkloof farm and specifically the remainder, is declared as Koedoe private nature reserve. As it is still a gazetted reserve it is advised that the owner of the property request for deproclamation of the farm or that the boundaries of the nature reserve be amended.</p> <p>The area is declared and recognised under the Protected Areas Act and must thus be handled as mentioned in the act.</p> | <p>20/11/2018<br/>Email<br/>LEDET: Protected Areas<br/>(Christiaan Visagie</p> | <p><b>EAP, Marissa Botha, NEC:</b><br/>NEC has conducted a Focus Group Meeting on 26 November 2018 with Mr Hendri Hills, the owner of farm Geelhoutkloof in this regard. Negotiations between Mr Hills and Transnet first need to be secured before any action can be taken with regard to the amendment of the Koedoe Nature Reserve boundary. It is anticipated that these discussions will be continued throughout the EIA Phase of the project. See Section 10.1.8 and 11.11 of the Scoping Report including, Appendix D9 for the FGM Notes with Mr Hendri Hills.</p> <p><b>Updated response 14 May 2019</b><br/>Some landowners have traded land. The Koedoe Nature Reserve now extends over Geelhoutkloof 745LQ and a portion of Enkeldraai 718LQ. The reserve is owned by Mr Hendrie Hills south of the railway track and Mr Sauer north of the track.</p> <p>The northern section of Koedoe Nature Reserve was cut off before by the existing railway line.</p> |

| Number  | Comment  | Date of comment, comment name of I&AP   | Response from EAP/Specialist/Applicant  |
|---|--|---|---|
|   |  |   | <p>The extension of the railway reserve for this project will further isolate the different parts of the Nature Reserve. According to Social and Ecological Specialists Transnet must negotiate with Mr Hills and Mr Sauer about amending the boundaries of the Koedoe Nature Reserve to an extent which is practical for the foreseeable future in terms of most likely developments.. Transnet must carry all the costs associated with this process.</p> <p>Refer to Section 3.4, 5.1.8, 8.10.2.5 and 8.16 (8.16.1.1.4) of the EIR regarding the Koedoe Nature Reserve. Also refer to the Social Impact Study under Volume 2, Appendix 2K and the Ecological Impact Study under Appendix 2F.</p> |
| <b>3. Comments from Limpopo Department of Economic Development, Environmental and Tourism (LEDET) _7 February 2019:</b><br><b>Comment on Final Scoping Report</b> |  |   |   |
| 3.1   | The final SR contains responses to comments raised by the Department clarifying details of the project not clearly understood at the time of consultation.   | 07/02/2019<br>Letter<br>LEDET: Environmental<br>Impact Management<br>(MC Rodgers) | <b>EAP, Marissa Botha, NEC:</b><br><br>Transnet has confirmed that extensive cut and fill activities will be undertaken and two borrow areas will be required. Materials that cannot be sourced from the borrow areas will be purchased from commercial quarries in the local area.   |
| 3.2   | The Department would like to enquire whether it is feasible to investigate the use of waste rock from mine dumps as alternative to establish a borrow pit in the application to the Department of Mineral Resources. |   |   |
| 3.3   | The Department has no objection to the approval of the SR.   |   |   |

| Number   | Comment   | Date of comment, comment name of I&AP   | Response from EAP/Specialist/Applicant   |
|--|---|---|--|
| <b>4. Department of Environmental Affairs: Integrated Environmental Authorisations_5 December 2018 (Case Officer): Comment on draft Scoping Report</b> |   |   |  |
| 4.1  | All listed activities applied for, must be specific, and linked to the development activities described in project description. EAP must establish if Activity 10 (e)(i) of LN3 is applicable to the development. If the activities applied for in application form differ from those mentioned in SR, an amended application form must be submitted. | 05/12/2018<br>Letter<br>DEA: Integrated Environmental Authorisations Strategic Infrastructure Projects (Mmamohale Kabasa) | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The relevant listed activities, specific and linked to the development activities are tabled in Table 3 Section 4.1 and Table 7 Section 7.1 in the Scoping Report.</p> <p>Activity 10 (e)(i) of Listing Notice 3 is not applicable the storage exceeds 80m<sup>3</sup>. The railway yard will store a total of 600m<sup>3</sup> of diesel. It is thus not applicable to the project.</p> <p>Since Transnet will be using an alternative sewage system Activity 25, LN 1, GNR 327 is no longer applicable since the Bio-Mite sewage treatment system capacity will be well below the daily throughput capacity threshold of 2000m<sup>3</sup> of Activity 25. The application for EA has been amended accordingly and submitted to DEA with the final Scoping Report.</p> |
| 4.2  | The development is located within the Tierkop Nature Reserve and Koedoe Nature Reserve. The applicant must secure the necessary permissions as per Section 46 and 50 of NEMPA.  | 05/12/2018<br>Letter<br>DEA: Integrated   | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>NEC has conducted a Focus Group Meeting on 26 November 2018 with Mr Hendri Hills, the</p>  |



| Number | Comment   | Date of comment, comment name of I&AP  | Response from EAP/Specialist/Applicant  |
|--------|---|--|---|
|        |   | Environmental Authorisations_Strategic Infrastructure Projects (Mmamohale Kabasa)  | owner of farm Geelhoutkooft in this regard. Negotiations between Mr Hills and Transnet first need to be secured before any action can be taken with regard to the amendment of the Koedoe Nature Reserve boundary. It is anticipated that these discussions will be continued throughout the EIA Phase of the project. See Section 10.1.8 and 11.11 of the Scoping Report including, Appendix D9 for the FGM Notes with Mr Hendri Hills.  |
| 4.3    | <p>All comments from all relevant stakeholders are to be submitted with the final SR. This includes DAFF, Department of Agriculture, SACAA, Department of Transport, LLM, WDM, DWS, SANRAL, SAHRA, EWT, Birdlife SA, DMR, DRDLR. Engage with the DEA: Trans-Frontier Conservation Areas and Protected Areas Planning, Karl Naude (contact details supplied). All comments from I&amp;APs and organs of state must be adequately addressed in the final SR.</p> <p>Proof of correspondence with the various stakeholders must be included in final SR and or proof of attempts to obtain comments.</p> | <p>05/12/2018<br/>Letter<br/>DEA: Integrated Environmental Authorisations_Strategic Infrastructure Projects (Mmamohale Kabasa)</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>All comments are recorded in the IRR and copies thereof are included under Annexure C to the IRR. The DSR was submitted to LLM, WDM, DWS, LEDET, DAFF, Eskom, SAHRA, DMR and DRDLR as well as DEA Trans-Frontier Conservation Areas and Protected Planning Areas. Comments were received from DWS, LEDET (Protected Areas and Environmental Impact Management), Eskom, SACAA, DEA Trans-Frontier Conservation Areas and Protected Planning. All comments have been addressed in the Scoping Report.</p> <p>Proof of correspondence with the various</p> |

| Number | Comment  | Date of comment, comment name of I&AP  | Response from EAP/Specialist/Applicant  |
|--------|--|--|---|
|        |  |  | <p>stakeholders is included under Appendix D6 to D9 as part of the Final Scoping Report. Proof of correspondence with stakeholders based on comments submitted is included under Annexure C of this IRR.</p> <p>NEC will continue to solicit comments from stakeholders such as LLM, WDM, SAHRA, DMR, DRDLR, Eskom, Department of Agriculture, Department of Transport, EWT and Birdlife SA during the EIA Phase and will be included in the final EIR.</p>                 |
| 4.4    | <p>The IRR must incorporate all comments for the development and must be a separate document from the main report. The PPP must be conducted in terms of Regulations 39-44 of the EIA Regulations of 2014. The final SR must indicate draft SR was subject to PPP. The final SR must clearly indicate the name of the newspaper that the advertisement for the draft SR has been advertised.</p> | <p>05/12/2018<br/>Letter<br/>DEA: Integrated<br/>Environmental<br/>Authorisations_Strategic<br/>Infrastructure Projects<br/>(Mmamohale Kabasa)</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The IRR is attached under Appendix D10 to the Final Scoping Report yet provided as a standalone document.</p> <p>The PPP has been conducted in terms the NEMA EIA Regulations of 2014 (as amended). See Section <b>13 of the final Scoping Report.</b></p> <p>The draft SR was subject to public review and engagement from 29 October to 5 December 2018. See Section 13.1, 13.4, 13.5 and 13.6 of the final Scoping Report.</p> |

| Number | Comment   | Date of comment, comment name of I&AP   | Response from EAP/Specialist/Applicant   |
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|        |   |   | Availability of the draft SR was published in the Mogol Post on 26 October 2018. See Section 13.4 under Newspaper Advertisements included in the final SR. A copy of the newspaper tear sheet is included under Appendix D4 of the final SR. |
| 4.5    | Provide a description of any identified alternatives that are feasible and reasonable, including advantages and disadvantages it will have on the environment and on the community that may be affected by the activity. Indicate which alternative is preferred and provide detailed motivation on why it is preferred.                      | 05/12/2018<br>Letter<br>DEA: Integrated Environmental Authorisations Strategic Infrastructure Projects (Mmamohale Kabasa) | <b>EAP, Marissa Botha, NEC:</b><br><br>The identified alternatives have been updated in the Scoping Report. Refer to Section 9, 9.1 – 9.6 of the SR.   |
| 4.6    | The TOR for the ecological assessment must also investigate: <ul style="list-style-type: none"> <li>• Impact of the proposed development on the integrity of the protected areas;</li> <li>• Indicate and describe the competing land uses in the area</li> <li>• Assessment and ground truthing for both summer and winter months</li> </ul> | 05/12/2018<br>Letter<br>DEA: Integrated Environmental Authorisations Strategic Infrastructure Projects (Mmamohale Kabasa) | <b>EAP, Marissa Botha, NEC:</b><br><br>The aspects to be covered by the Ecological Assessments have been updated in the Plan of Study of the EIA. See Section 14.4.2 (A) of the final SR.  |
| 4.7    | The SR indicates that the 11-33kV Eskom distribution line south of the existing railway track would be relocated to make way for the facility. The final SR must indicate to where the line will be relocated and evidence of engagements with Eskom.<br>Who will be responsible for the relocation?  | 05/12/2018<br>Letter<br>DEA: Integrated Environmental Authorisations Strategic  | <b>Applicant Transnet:</b><br><br>Transnet will avoid any interference with Eskom's infrastructure with regards to the development of the Lephale Yard.  |

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|        | If it's the applicant an assessment of the relocation must be included as part of this project.   | Infrastructure Projects (Mmamohale Kabasa)  | <p>Infrastructure within the railway yard design will be relocated to accommodate the 22kV Theunispans Stockpoort power line.</p> <p>Transnet is also seeking an alternative site for Borrow Area 1 further away from the Medupi Spitskop 1400kV power line to avoid any impact on the servitude. See Section 5.3 of the final SR.</p> |
| 4.8    | The final SR must provide technical details of the railway line in a table format as well as their description and dimensions as per the provided example.                    | 05/12/2018<br>Letter<br>DEA: Integrated Environmental Authorisations Strategic Infrastructure Projects (Mmamohale Kabasa) | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>See updated Section 7.1, Table 3 for technical details in table format. Please note no table format example was attached to DEA's comments.</p>  |
| 4.9    | The SR must provide a clear indication of the envisioned area for the proposed railway line route and all associated infrastructure should be mapped at an appropriate scale. |   | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>See Section 7.1 of the final SR. The new railway yard goes beyond Transnet servitude and requires approximately 22 hectares of land to be acquired.</p> <p>See Appendix B for the Railway Yard Layout Plan.</p>  |
| 4.10   | The SR must provide clear description of location of all associated infrastructure:   |   | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>See updated Section 7.1, Table 3 of the final SR</p>   |

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|        | <ul style="list-style-type: none"> <li>Start, middle and end point of all linear activities to be authorised;</li> <li>All supporting onsite infrastructure such as buildings, laydown area, access and service roads</li> </ul> <p>A copy of the preferred route layout map. All available biodiversity information must be used in the finalisation of the layout map. Use existing infrastructure as far as possible. The layout must indicate the following: of</p> <ul style="list-style-type: none"> <li>Wetland, rivers, water crossings, roads, power lines, indicate type of bridge structures to be used;</li> <li>Location of sensitive environmental features onsite that will be affected by the facility;</li> <li>Substation and transformer sites</li> <li>Location of access and service roads</li> <li>All existing infrastructure onsite, railway lines and roads;</li> <li>Buffer areas</li> <li>Buildings</li> <li>No-go areas</li> </ul> <p>An environmental sensitivity map indicating environmental sensitive areas and features.</p> <p>A map combining the final layout map overlain on the environmental sensitivity map.</p> |                                       | <p>for technical details in table format and respective GPS coordinates. The Layout Plan is attached as Appendix B.</p> <p>The preliminary environmental sensitivity maps for the project have been included under Section 12.10 of the final SR as Figures 28, 29 and 30.</p> <p>Please note the environmental sensitivity map is preliminary and needs to be updated and finalised based on the outcomes of the Ecological Impact Assessment (ecologically sensitive features) and updated Geohydrological Impact Assessment (wetlands, drainage lines). The detailed environmental sensitivity map will be provided in the draft EIR.</p> |
| 4.11   | <p>The final SR must include a visual assessment to investigate:</p> <ul style="list-style-type: none"> <li>Conduct a visual sensitivity analysis based on preferred</li> </ul>  | 05/12/2018<br>Letter                  | <b>EAP, Marissa Botha, NEC:</b>  |

| Number   | Comment  | Date of comment, comment name of I&AP  | Response from EAP/Specialist/Applicant  |
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|  | <p>alternative and topographical data available for broader study area;</p> <ul style="list-style-type: none"> <li>Identify key visual issues and potential extent of visual impacts</li> <li>Characterising of the visual environment and identification of areas of potential visual sensitivity (nature reserves) that may be subject to visual impacts;</li> <li>Visual impact assessment report must clearly provide clear distinction of the categories used for the assessment of the visibility impact intensity of the facility.</li> </ul> | <p>DEA: Integrated Environmental Authorisations_Strategic Infrastructure Projects (Mmamohale Kabasa)</p>                           | <p>The Visual Impact Assessment will be commissioned during the EIA Phase of the project. The outcomes of the VIA will be included in the draft and final EIR. It is thus not included as part of the final SR. See Section 11.15 of the final SR.</p>          |
| 4.12   | <p>The Geohydrological Impact Assessment must clearly indicate how many water crossings will be affected by the development footprint. Clearly indicate this on the sensitivity map.</p>   | <p>05/12/2018<br/>Letter<br/>DEA: Integrated Environmental Authorisations_Strategic Infrastructure Projects (Mmamohale Kabasa)</p> | <p><b>EAP, Marissa Botha, NEC:</b><br/>Based on the Preliminary Geohydrological Investigation conducted by Naledzi Waterworks (D. Munyai, 2018) no groundwater seepage or surface water was encountered on site. See Section 11.7 and 11.8 of the final SR.</p> |
| <p><b>5. Department of Environmental Affairs: Integrated Environmental Authorisations_19 February 2019 (Case Officer): Comment on Final Scoping Report</b></p> |  |  |   |
| 5.1  | <p>All comments and recommendations by all Stakeholders and I&amp;APs in draft and final SR must be taken into consideration when preparing the EIR. All mitigation measures and recommendations in specialist studies must be addressed and included in final EIR and EMPr.</p>   | <p>19/02/2019<br/>SR Acceptance Letter<br/>DEA: Integrated Environmental</p>   | <p><b>EAP, Marissa Botha, NEC:</b><br/>All comments by I&amp;APs and stakeholders have been recorded in this IRR. The IRR was circulated to specialists to consider the issues by</p>   |

| Number | Comment   | Date of comment, comment name of I&AP                               | Response from EAP/Specialist/Applicant  |
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|        |   | Authorisations_Strategic Infrastructure Projects (Mmamohale Kabasa) | I&APs during the preparation of Specialist Reports. The Specialist studies have informed the environmental attribute description in the EIR (Section 8) and informed the impact and risks identified for the project (Section 10). The findings of the specialist studies and recommended mitigation measures have been included under Section 10.7 and 10.8 of the EIR. The findings of the EIR (informed by specialist studies) have been the point of departure for the preparation of the EMPr to manage impacts during the project's implementation. |
| 5.2    | All comments from stakeholders must be submitted to DEA with the final EIR. Proof of correspondence must be included in the EIR. If unable to obtain comments, submit proof of attempts to obtain comments.                                     |   | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The EIR is circulated for a 30 day public review period to organs of state and I&amp;APs. All comments submitted by these parties on the draft EIR will be recorded in the IRR and copies of the comments will be appended to this IRR and submitted to DEA.</p>  |
| 5.3    | Address all issues raised by organs of state and I&APs prior to submission of the EIR to DEA. Give registered I&APs access to and an opportunity to comment in writing on the EIR & EMPr within 30 days before submitting the final EIR to DEA. |   | See response above.   |

| Number | Comment  | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant  |
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| 5.4    | EIR must provide an assessment of impacts and mitigations for each listed activities applied for. Listed activities listed in the EIR must be the same as in application form. If listed activities no longer become relevant, the application form and EIR must be updated.                                     |                                       | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>Please refer to Section 10.2 – 10.7 for the assessment of impacts and mitigation measures provided. Additional listed activities have been added to Table 7 under Section 4.5 in the EIR. An updated/amended application form has been submitted to DEA with the draft EIR.</p> |
| 5.5    | Comments from I&APs must not be split and arranged into categories. Comments from each submission must be responded to individually.   |                                       | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The IRR has been revised according to this request. Comments have now been listed per submission. See Sections 1-13 of this IRR.</p>  |
| 5.6    | <p>It is mentioned that the Resgen Rail Link is currently constructing its 36km rail link next to the existing Lephalale-Thabazimbi railway track. The EIR must show the approved layout of this area against the proposed development.</p> <p>The EIR must identify the main access road and service roads.</p> |                                       | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>This has been addressed in the EIR under Figure 3 and Figure 4, under Section 4.4.2, Appendix 1E6 and in the Traffic Impact Report attached under Volume 2, Appendix 2I.</p>  |
| 5.7    | Cumulative impacts recommendations from specialist studies must incorporate the area referred to as Resgen Rail link.  |                                       | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>This has been addressed under Section 8 of the EIR (environmental attributes) specific to ecology, noise, visual, traffic and social aspects of the site. The existing impacts have been provided under Section 10.2.1 and the</p>  |



| Number | Comment  | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant  |
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|        |  |                                       | cumulative impacts under Section 10.6 of the EIR.   |
| 5.8    | The draft EIR must investigate the possibility of a construction camp that includes accommodation for workers and clearly assess the impacts. Appointed specialists must provide recommendations to the suitability of the area. This must be clearly shown on the site layout.  |                                       | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>Refer to Section 4.13.2 of the EIR. Transnet has confirmed no construction camp will be required, local labour will be employed. There is an existing site office within Transnet servitude which will be used as a laydown area. Construction staff will commute to the construction site on a daily basis.</p>                      |
| 5.9    | A Biodiversity, Noise & Vibration, Visual, Hydrological, Traffic Impact Assessment and Waste Management Plan must be conducted as part of the EIR.   |                                       | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The requested Specialist Studies are included under Volume 2 of the EIR and have informed Section 8 (environmental attributes) of the project site and also informed the potential risks and recommendation mitigations for the project. Refer to Section 10.8 Table 36 for a summary of specialist findings and recommendations.</p> |
| 5.10   | The final EIR must include details of plans for the site and infrastructure after decommissioning in 20-30 years and possibility of upgrading infrastructure to more advanced technologies. The total footprint of the development must be indicated. Exact locations of all associated infrastructure must be mapped at an appropriate scale. |                                       | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>Decommissioning of the railway yard and tracks are not foreseen in the near future since the yard will service mining companies each which may</p>  |

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|        |   |                                       | <p>have a life of mines of over 40 years if not more. General decommissioning impacts expected from the railway yard based on the environmental attributes have been provided. The only potential infrastructure upgrade foreseen for the expanded railway yard may include the electrification of the Thabazimbi - Lephalale railway track by Eskom. The track is not currently electrified therefore diesel locomotives are used and provision has been made in the railway yard design for diesel storage. The diesel storage area may in future become redundant, when the track is electrified yet the stage and timing at which this will take place is unknown.</p> |
| 5.11   | The final EIR must include a construction and operational phase EMPr including mitigation and monitoring measures. Should blasting be required, appropriate mitigation measures should be provided. |                                       | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The EMPr is included under Volume 4 of the EIR.</p>  |
| 5.12   | The final EIR must include at least one A3 regional map of the area and locality maps that illustrate the different proposed alignments and above ground storage of fuel.                           |                                       | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>Refer to Volume 1 Appendix 1C of the EIR for large format maps.</p>  |
| 5.13   | If the application for Environmental Authorisation is subject to provisions of Chapter II, Section 38 of the NHRA, 1999, then DEA   |                                       | <p><b>EAP, Marissa Botha, NEC:</b></p>   |

| Number  | Comment  | Date of comment, comment name of I&AP  | Response from EAP/Specialist/Applicant  |
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|   | will not be able to make nor issue a decision in terms of your application for EA pending a letter from the heritage authority categorically stating that the application fulfils the requirements of the heritage authority as per the said act.  |  | SAHRA on 31 January 2019 notified the applicant that the HIA requires amendment and the additional of a Palaeontological Desktop Study. This has been completed and uploaded onto the SAHRIS online system for review and decision making by SAHRA. Also see Volume 2, Appendix 2J of the EIR for the HIA and Palaeontological Study. Once received SAHRA's decision on the reports will be sent to DEA.  |
| <b>6. Department of Water and Sanitation_30 November 2018: Comments on draft Scoping Report</b> |  |  |   |
| 6.1   | <p>On page 19 item 4.2 of the Scoping Report water uses that may be triggered include Section 21 c, i, e, f and g. Therefore all the water uses identified must be applied for before implementation of the project.</p> <p>DWS has no objection on the proposed development provided that all mitigation measures are applied to prevent environmental impacts and necessary authorisations are acquired such as water use authorisations and environmental authorisations.</p> | <p>30/11/2018<br/>Letter<br/>DWS: Institutional Establishment, Director<br/>(L. Hlekane)</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The project triggers Section 21 (c), (i) and (g) water uses under the National Water Act (Act 36 of 1998) (NWA) and requires a water use license from Department of Water and Sanitation (DWS). The railway yard will discharge wastewater into a submerged Bio-Mite sewage treatment system which collects; treat (to national standards required by DWS) and discharges treated content into a soak away system. It will also include a septic tank at the Guard House and will potentially cross drainage lines with the new rail tracks and access roads.</p> |

| Number   | Comment   | Date of comment, comment name of I&AP                                | Response from EAP/Specialist/Applicant  |
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|  |   |  | NEC will submit the water use license application to DWS: Polokwane Regional Office during May 2019.  |
| <b>7. South African Heritage Resources Agency_31 January 2019: Comment on draft Scoping Report and HIA</b> |   |  |   |
| 7.1  | The Heritage Specialist undertook a field assessment of the proposed development and did not identify any heritage resources within the proposed development area. The author recommends no further mitigation measures.  | Case Officer<br>Nokukhanya Khumalo<br>Official comment<br>31/01/2019 | <b>EAP, Marissa Botha, NEC:</b><br><br>Correct.   |
| 7.2  | SAHRA cannot provide comments because the HIA report submitted to the case does not comply with the 2007 SAHRA Minimum Standards for the archaeological component of a HIA Report and it does not contain a tracklog. Furthermore, a desktop palaeontological assessment was not undertaken even though the development area is in a moderately palaeontological sensitive zone as seen on the SAHRIS palaeo-map. Although the commenting period has ended, heritage has not been fully assessed as per section 38(3) of the NHRA and the developer must ensure that it is before development goes ahead.<br><br>Therefore, SAHRA requires the HIA be amended to adhere to the SAHRA 2007 Minimum Standards and the HIA must be submitted to the case once it has been amended. Also, a desktop Palaeontological Assessment must be undertaken by a suitably qualified palaeontologist and the report submitted to SAHRA. |  | <b>EAP, Marissa Botha, NEC:</b><br><br>The updated Heritage Impact Report and Desktop Palaeontological Study has been prepared and are attached to the EIR under Volume 2, Appendix 2J. The reports have also been submitted to SAHRA on 15 May 2019. |

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| <b>8. Department of Agriculture and Rural Development_11 February 2019: Comment on final Scoping Report</b>   |  |   |   |
| 8.1   | Railway lines are managed by Transnet. Transnet is considered as a statutory body; as such Act 70/1970 is not applicable. However it is advised that the line refrain from affecting high potential agricultural land and therefore there should be a servitude agreement for those farms that will be affected.   | 11/02/2019<br>Comment Sheet<br>Johanna Mphela Matlou<br>Department of<br>Agriculture: Waterberg<br>District, Lephhalale           | <b>EAP, Marissa Botha, NEC:</b><br><br>The project site does not correspond to high potential agricultural land. The vegetation types present on site is suitable for game farming practices. Its land capability could be considered as grazing. Transnet will acquire approximately 22 hectares of land from Mr. Hills to expand the railway servitude. See Section 3.2 of the EIR.   |
| <b>9. Department of Environmental Affairs: Trans-Frontier Conservation Areas and Protected Areas Planning_30 November 2018: Comment on Draft Scoping Report</b> |  |   |   |
| 9.1   | Thank you for submitting the EIA document to Mr Karl Naude. You must request comments from provincial Department of Environmental Affairs for technical comments, as they are mandated to oversee private nature reserves. The affected protected area is under the jurisdiction of the provincial department. We are only required to look at national protected areas. | 30/11/2018<br>Email<br>DEA: Trans-Frontier<br>Conservation Areas and<br>Protected Areas<br>Planning<br>(Thivhulawi<br>Nethononda) | <b>EAP, Marissa Botha, NEC:</b><br>The draft Scoping Report was submitted to LEDET: Protected Areas for technical comments which were provided to NEC on 20/11/2018. LEDET requires that the landowner request for either deproclamation or amendment of the private nature reserve boundaries. This has been recorded in the Scoping Report. See Section 10.1.8 and 11.11 including, Appendix D9 for the FGM Notes with Mr Hendri Hills and LEDET's comments included under Appendix D10_Annexure C. |

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|   |   |   | <p><b>Updated response 14 May 2019</b><br/>The EIR has been submitted to LEDET Protected Areas for a 30 day public review and comments.</p> <p>The extension of the railway reserve for this project will further isolate the different parts of the Nature Reserve. Transnet will engagement with the affected landowners and apply for amendment of the Koedoe Nature Reserve boundaries to an extent which is practical for the foreseeable future in terms of most likely developments.</p> <p>Transnet must still engage Mr Hills and Mr Sauer to apply for the amendment of the nature reserve boundaries to LEDET.</p> |
| <b>10. Directly Affected Landowner Geelhoutkloof 359LQ and 745LQ: Hendrie Hills</b> |   |   |   |
| 10.1  | <p>We conduct hunting activities on the farm Geelhoutkloof, next to the existing rail corridor. Transnet wants to build the new railway yard on the farm Geelhoutkloof. Transnet will need to consider building a boundary wall between the new railway yard and Geelhoutkloof to address the safety issue of human activity at the yard in such close proximity to the hunting farm.</p> <p>Currently activities at the existing railway line are limited to trains passing by. The new railway yard will include administration buildings and movement of people/employees.</p> | <p>19/07/2018<br/>Telephonic<br/>Landowner<br/>Portion 1 &amp; remainder<br/>Geelhoutkloof 359LQ<br/>(Hendri Hills)</p> | <p><b>Applicant_Transnet, Sindiswe Ngubane, October 2018:</b></p> <p>Transnet can either build a concrete palisade fence or pre-cast wall for a boundary wall.</p> <p><b>Applicant_Transnet, Dylan Jacobs (Senior Engineer) 6 December 2018:</b></p> <p>Transnet will consider constructing an earth</p>  |

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|        |         |                                       | <p>berm/wall. The project will have enough excess spoil material for a 2 meter high wall with 1:1 slopes for 5km on either side of the railway line/yard. See Appendix B to the Scoping Report for a design plan proposal.</p> <p><b>Updated response 20 February 2019_ Naledzi and Transnet to Mr Hills:</b></p> <p>Transnet, Naledzi and the Visual Specialist conducted a field investigation on 12 February 2019 to the project site. The intent of the investigation was to evaluate the feasibility of constructing the earth berm at the a height above 4m along the railway track and yard.</p> <p>Based on the site visit it has been confirmed that an extensive part of the railway yard will be located in cuttings with the North Facility located on a fill area. The Visual Specialist confirmed that the yard will have limited visual impact on surrounding properties. Therefore, not only will the earth berm not suffice, it will not be practical for Transnet to construct.</p> <p>The elevation of the railway track and yard varies and so too the heights of several of the yard infrastructure and train wagons. The train</p> |

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|        |         |                                       | <p>wagons are 3.6m high, meaning that Transnet would need to build the earth berm greater than the wagon height or as indicated the highest building which is not feasible. At these heights Transnet will not be able to achieve the required slope for the earth berms and it will require extensive additional land to build with a significant construction cost. The earth berms will also result in a greater impact on the ecology.</p> <p>Alternatively, it was proposed that reasonable safety measures are implemented on the farms Geelhoutkloof 359LQ and 745LQ, instead of within the Transnet servitude.</p> <p>According to the 'Law of Servitudes' the rights of the holder of the servitude may not be interfered with, we hence suggest that safety management measures are in place on aforementioned farms to manage the risk. There should be reasonable awareness of the safety risk of hunting in proximity of the Transnet servitude and reasonable care should be taken when hunting in close proximity to the railway yard operations. The total terms of agreement on the management measures will still be subject to</p> |



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|        |         |                                       | <p>further terms agreed to between Mr. Hills as the landowner and Transnet.</p> <p>It has been highlighted, in the EIR and IRR, that Transnet has made the decision to exclude the earth berms.</p> <p><b>Updated response by Social Specialist, Dr Ilse Aucamp, Equispectives, as per Social Impact Report_ March 2019:</b></p> <p>The impact has been assessed. There will be a moderate risk for safety impacts during construction and operation of the railway yard with the presence of workers close to hunting activities.</p> <p>As per Section 10.7.24 of the EIR a barrier must be constructed between the railway yard and the affected properties. The dimensions and nature of the barrier should be determined by the engineering team and relevant specialist, with input from the landowner. The ability of the structure to absorb impacts from bullets must be considered. This is an also a safety impact management outcome included under Section 11.4 of the EIR and has also been added under Section 11.7 of the EIR as an aspect for</p> |

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|        |   |  | inclusion as a condition of the Environmental Authorisation. This aspect is also addressed in the Social Impact Report appended under Volume 2, Appendix 2K.   |
| 10.2   | Transnet must redesign the railway yard and shift it to an alternative location at Medupi power station where the ambient conditions are more suited for industrial activities. Transnet must first show they have considered the alternative yard location at Medupi and indicate if it's not feasible. I am convinced it will be more financially viable then to develop the yard at the Geelhoutkloof based on all the required mitigations to address the potential impacts on my land. | 26/11/2018<br>Focus Group Meeting<br>Landowner<br>Portion 1 & remainder<br>Geelhoutkloof 359LQ<br>(Hendri Hills) | <p><b>Applicant_Transnet, 20 February 2019:</b></p> <p>The Lephalale Railway Yard is an existing 100 wagon yard along the existing Lephalale – Thabazimbi railway track in the Waterberg District, which just requires extension for it to accommodate 200 train wagons in future for the increase in load and capacity. Transnet has indicated it will not pursue location alternatives due to the following factors:</p> <ul style="list-style-type: none"> <li>○ the location of the existing 100 wagon yard,</li> <li>○ the gradient south of the existing track (level terrain required),</li> <li>○ simulated train turnaround times and trip times,</li> <li>○ points of congestion along the Waterberg system; and</li> <li>○ Position of prospective client Resgen Boikarabelo Coal Mine's 36km rail link turn off along the existing railway track.</li> </ul> |

| Number | Comment  | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant   |
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|        |  |                                       | <p>The mentioned site at Medupi also does not provide Transnet the flexibility for expansion of the yard in future, if or and when the need may arise based on demand.</p> <p>Preliminary to the EIA Process Transnet considered alternative positions for the railway yard yet when moving the yard site to alternative positions, the simulated turnaround times and trip time for trains resulted in loss of trip times, train slots, revenue and suitable turnaround times were not reached. Secondly the gradient towards Thabazimbi is too steep which will be difficult and inconvenient for the trains to operate. More importantly when the rail yard expansion location is shifted Transnet will miss the Resgen Boikarabelo rail link turn off.</p> <p>The location being pursued in the EIA Process is hence the preferred and Transnet will not be considering other sites.</p> |
| 10.3   | The farm Buffelsjagt 317LQ, Vergulde Helm, Enkeldraai 314LQ and Geelhoutkloof 359LQ and 745LQ are operated as a unit of hunting farms. Security will be a major issue for me. The railway yard cannot only provide access control from the start of the yard premises. There |                                       | <p><b>Applicant_Transnet, 20 February 2019:</b><br/>The above security requests are not feasible for Transnet to implement. However the railway yard will be access controlled with security at the point of entry and exit.</p>   |

| Number | Comment  | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant   |
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|        | <p>must be access control with a boom gate and camera already starting at the Afguns road turnoff to avoid strikes and uncontrolled access of employees/job seekers to my land. The entire road from the Afguns road turnoff must be tarred.</p> |                                       | <p>Transnet has further stated that it will upgrade the servitude road to accommodate deliveries from heavy vehicles. Also, during the operation of the railway yard it will provide transportation vans to collect and drop employees at the yard, thus each employee will not necessarily travel to site in their private vehicles.</p> <p>With regards to the request to tar the entire Afguns road, Transnet will implement dust suppression measures along its servitude road leading to the railway yard as to minimise the dust impact on vegetation along the bordering hunting farms.</p> <p><b>Updated response 14 May 2019_Traffic Engineer, Cobus Havenga, as per Traffic Impact Report March 2019:</b></p> <p>The request for access control at Afguns road was considered during the Traffic Impact Assessment and it is noted that the existing service road is also used by the surrounding farms and access will therefore not only be limited to Transnet employees. The TIA has considered two alternative alignments for the access road:</p> <ol style="list-style-type: none"> <li>Existing gravel road alignment, with lane widening around curves with access control point 150m from D 2649;</li> </ol> |

| Number | Comment  | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant   |
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|        |  |                                       | <p>2. Re-alignment of first part of access road to remove sharp curves and lane widening around curves. If required an access control point can be located at 100m from Road D2649. From a geometric point of view this option is preferred. From a geometric point of view this option is preferred.</p> <p>The existing gravel road alignment will be upgraded with lane widening (up to 4.5m) around curves with access control 150m from the D2649. See Appendix 1E6 of the EIR for Conceptual Intersection Layout D2649 and Access Road. The Traffic Impact report is included under Volume 2, Appendix 2I of the EIR.</p> <p>The access control point from Afguns Road has also been included under Section 8.14.6 as part of the required road upgrade and included as a recommended mitigation measure under Section 10.7.17 of the EIR.</p> |
| 10.4   | <p>3) A precast wall along the yard is not practical; the ammunition will penetrate the wall easily. Transnet must come up with another alternative.</p> <p>4) A statement was made during our last telephonic discussion that a 2 meter high earth berm along the boundaries of the railway yard will not suffice. The earth berm must be the height of the tallest</p> |                                       | See response under Section 10.1 above.   |

| Number   | Comment   | Date of comment, comment name of I&AP   | Response from EAP/Specialist/Applicant  |
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|  | building.   |   |   |
| 10.5   | Transnet must first discuss and secure the purchase price for the servitude before any considerations will be given to amend the Koedoe Nature Reserve boundary. I strongly feel the yard should be shifted to Medupi.  |   | <p><b>EAP, Marissa Botha, NEC:</b><br/>It has been confirmed that Transnet will engage with regards to the purchase of land. With regards to an alternative location for the railway yard, please refer to response under Section 10.2.</p>   |
| <b>11. Geelhoutkloof 359LQ and 745IQ Farm Manager: Gavin Cronk</b> |   |   |   |
| 11.1   | The noise from the trains along the existing railway line is excessive during day and night at my residence at Geelhoutkloof. The noise survey must ensure to measure noise levels generated by loaded trains, not only empty trains, in order to consider the actual increase that is experienced. Loaded trains generate higher noise levels than empty trains. | 26/07/2018<br>Telephonic<br>Farm Manager<br>Portion 1 & remainder<br>Geelhoutkloof 359LQ<br>(Gavin Cronk) | <p><b>EAP, Marissa Botha, NEC:</b> Noise and vibration has been identified as a significant impact to be assessed through a specialist investigation during the EIA Study. Measurement of noise levels from loaded and empty trains have been added to the aspects to be assessed by the Noise Specialist.</p> <p>Individual farmsteads have been identified as noise receptors in the project area. Preliminary measurements indicate the ambient noise level at Geelhoutkloof is below 30.0dBA and when trains pass the rail corridor the noise levels increase at the residence to above 50.0dBA (measurement taken 900m from railway line). This noise increase lasts for 4 minutes and is finite.</p> <p>The Noise and Vibration Impact Assessment</p> |

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|        |         |                                       | <p>will be conducted at all the identified noise receptors. The noise study will determine the prevailing environmental ambient noise levels within and adjacent to the proposed rail yard area and this information will be used to determine the possible noise intrusion at the different noise receptors. This will assist in the management of the project in terms of noise mitigatory measures and management principles for implementation during the construction and operational phases of the project.</p> <p>The noise survey will be done:</p> <ul style="list-style-type: none"> <li>• during the day and the night time periods;</li> <li>• Will measure increased noise levels from loaded and empty trains along the existing corridor as requested.</li> </ul> <p>Identified activities from the proposed project that may result in an increase in noise levels include:</p> <ul style="list-style-type: none"> <li>• Construction Phase: preparation and provision of infrastructure;</li> <li>• Operation phase: Shunting, train activities, hooting;</li> </ul> <p>See Section 14.4.2 (D) under Section I_Plan of</p> |

| Number | Comment | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant  |
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|        |         |                                       | <p>Study of the Scoping Report for aspects to the assessed by Noise Specialist.</p> <p><b>Updated response by Noise Specialist, Barend van der Merwe, dBA Acoustics, as per Noise Impact Report_ March 2019:</b></p> <p>The Noise Impact Study attached under Volume 2, Appendix 2G of the EIR; found that the noise increase will be very high during the operational phase. The threshold value of 7.0dBA will be exceeded at noise receptors K, L and M (Geelhoutkloof Farm Manager's House) for the duration the hooter will be activated inside the yard area and at intersections. See Section 8.12.3 of the EIR.</p> <p>But by actively managing the railway yard activities and implementing the noise management plan it will ensure compliance to the noise regulations and/or standards. Noise management and monitoring has been recommended as a management measure under Section 10.7 and included under Section 11.7 as an aspect for inclusion as conditions in the Environmental Authorisation. These include:</p> <ul style="list-style-type: none"> <li>▪ Noise monitoring is to be implemented</li> </ul> |



| Number | Comment   | Date of comment, comment name of I&AP   | Response from EAP/Specialist/Applicant  |
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|        |   |   | <p>at the railway yard footprint, noise sources within the railway yard and at abutting residential areas on a monthly basis by Transnet Environmental Department after which the frequency can change to quarterly/annual basis should there be no noise intrusion levels at the residential properties especially receptor M (Geelhoutkloof Farm Manager's residence).</p> <ul style="list-style-type: none"> <li>▪ Quarterly Noise Audits are to be done by a qualified environmental noise specialist to ensure that the legislated noise will be adhered to at all times.</li> <li>▪ Noise readings are to be carried out measuring points stipulated in the Noise Impact Report (dBA Acoustics, 2019). Noise levels are to be evaluated in terms of the baseline noise levels.</li> </ul> |
| 11.2   | We are concerned about the impact the increased noise levels from the rail yard will have on our game breeding and hunting activities at Geelhoutkloof. | 26/07/2018<br>Telephonic<br>Farm Manager, Portion 1 & remainder<br>Geelhoutkloof 359LQ<br>(Gavin Cronk) | <p><b>EAP, Marissa Botha, NEC:</b> Please refer to response given under Section 6.1.</p> <p>See Section 11.18 and Appendix C6 (Social Scoping Report) of the Scoping Report. The socio-economic impact on direct and surrounding land uses from the development and operation of the railway yard will be assessed through a Social Impact Assessment Study during the EIA Phase.</p>   |

| Number | Comment | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant   |
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|        |         |                                       | <p>See response under Section 6.1 of the IRR regarding the noise impact. Transnet will consider constructing an earth berm/wall. The project will have enough excess spoil material for a 2 meter high wall with 1:1 slopes for 5km on either side of the railway line/yard. See Appendix B to the Scoping Report for a design plan proposal.</p> <p>Transnet will further adhere to the mitigation of the bio-physical studies.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b><br/> A Social Impact Assessment Study has been conducted for the project and is attached under Volume 2, Appendix 2K. The study has considered the impact from the project on the directly affected properties and their livelihood activities due to noise and visual impact.</p> <p>Based on the study the project will have a negative impact on the directly affected landowners (Geelhoutkloof and Enkeldraai) and some of the livelihood activities undertaken on the farms due to noise increase. A game pen on Geelhoutkloof will also need to be relocated which is situated to close the railway yard expansion.</p> |

| Number | Comment | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant  |
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|        |         |                                       | <p>The sense and spirit of place which is important for hunting and tourism activities will be negatively impacted by increased noise levels from trains stopping and starting, airbrakes, shunting, whistles and maintenance activities. The sense and spirit of place will be altered permanently. See Section 8.16.1.1.2 of the EIR.</p> <p>The project will also impact negatively on the livelihood of farmers as it will limit the area to hunt on Geelhoutkloof due to the safety risk of hunting with people present at the railway yard. Noise will also impact on tourists visiting the farm and hunters moving around on the farm. This will have a knock-on effect on the tourism potential of the farm.</p> <p>Some of the impacts can be mitigated by moving infrastructure around, but the direct financial impacts due to loss of revenue from hunting and tourism would need to be determined through a claims procedure that shows the actual losses.</p> <p>Mitigation measures are recommended to manage these impacts under Section 10.7.20 and 10.7.23 of the EIR. The Social Specialist also recommends that Transnet must engage with</p> |

| Number  | Comment  | Date of comment, comment name of I&AP  | Response from EAP/Specialist/Applicant  |
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|   |  |  | <p>farmers directly about aspects that may affect their livelihoods and compensate them in a fair manner if any assets are lost or compromised.</p> <p>Further noise</p>  |
| <b>12. Directly Affected Landowner: Tjaart Sauer, Susanna Sauer and Frans Sauer</b> |  |  |   |
| 12.1  | <p>The noise level in the area will increase significantly and impact on our game farming venture. Trophy hunting north of the railway yard will be directly affected. Our trophy game encampments border the existing railway track.</p> <p>We do not oppose the development but require that the noise levels be controlled.</p> | <p>16/11/2018<br/>Comment Sheet<br/>Trustee, Enkeldraai<br/>Trust, farm Enkeldraai<br/>314LQ<br/>(Susanna Sauer)</p> | <p><b>EAP, Marissa Botha, NEC:</b><br/>Refer to Response under Section 6.1 of the IRR regarding the impact from noise.</p> <p>A Social Impact Assessment will be conducted as part of the EIA Study which will consider the impact on game farming ventures and how it affects the farmer's livelihood. The outcome of the assessment will be included in the EIR.</p> <p><b>Applicant, Transnet:</b><br/>The railway yard north of the existing railway yard will be built within existing Transnet Servitude.</p> <p>Transnet proposes to build earth berms of 2m high on both sides of the yard to address visual, noise.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b></p> |

| Number | Comment | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant   |
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|        |         |                                       | <p>Please note the 2m earth berm is no longer proposed as a mitigation measure for the railway yard safety and noise impacts as stated by Transnet.</p> <p>See response provided for this issue under Section 11.2. The project will have a negative impact on the sense and spirit of place of directly affected game farms and also impact on directly affected landowners' livelihoods. Enkeldraai 718LQ will lose a small portion of the area available for hunting, due to increased noise levels and safety impacts, since the farm is next to the existing railway yard that will now be extended.</p> <p>The direct financial impacts due to loss of revenue from hunting and tourism would need to be determined through a claims procedure that shows the actual losses. The Social Specialist recommends that Transnet must engage with farmers directly about aspects that may affect their livelihoods and compensate them in a fair manner if any assets are lost or compromised.</p> <p>The noise impact can be actively managed by implementing the noise management plan it will ensure compliance to the noise regulations and/or standards. Noise management and monitoring has been recommended as a</p> |

| Number | Comment   | Date of comment, comment name of I&AP   | Response from EAP/Specialist/Applicant  |
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|        |   |   | management measure under Section 10.7 and included under Section 11.7 as an aspect for inclusion as conditions in the Environmental Authorisation. Please also refer to response given under Section 11.1.  |
| 12.2   | <p>Criminal elements will gain access to our property resulting in poaching and must be avoided at all costs. Access to private properties must be restricted. The game and trophy hunting is our livelihood.</p> <p>Years of input costs towards game feed has delivered quality game and led to an increase in breeding. The railway yard activities and associated noise increase will bring forth stress in game which in turn negatively affects their breeding ability, which has a direct loss of income for us.</p> | <p>16/11/2018<br/> Comment Sheet<br/> Trustee, Enkeldraai<br/> Trust, farm Enkeldraai<br/> 314LQ<br/> (Susanna Sauer)</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The railway yard will be fenced off and Transnet's planning is to construct a 2m high earth berm on either side of the railway yard. The railway yard will have access control and will implement strict prevention of access to private land.</p> <p>A Social Impact Assessment has been commissioned for the project to assess the impact of the railway yard on the game farming activities and the impact on farmer's livelihoods. The outcome of the assessment and management measures proposed will be included in the draft EIR and EMP.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b></p> <p>See response provided under Section 11.2 and 12.1 above.</p> |
| 12.3   | The farm Enkeldraai has trophy hunting camps on the northern side   | 18/11/2018  | <b>EAP, Marissa Botha, NEC:</b>   |

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|        | <p>of the existing railway track. The development will prohibit hunting in that area and affect the total property. Resulting impacts include:</p> <ul style="list-style-type: none"> <li>• No hunting within 1km radius of the yard. About a third of the farm will be lost for hunting activities;</li> <li>• Noise levels will increase significantly due to shunting of wagons, people movement;</li> <li>• Game poaching becomes a common problem in developed areas such as mines, sites and stations;</li> <li>• Economical game farming will be impacted and may need to be stopped due to the development;</li> <li>• More private farms will be impacted on the south side of the existing railway track. Instead build the station on the north side to minimise the impact on the area and keep it as compact as possible;</li> <li>• I will have to improve my security systems, permanent supervision on a daily basis including inspections. This will have a big financial impact on me as a landowner;</li> <li>• Due to farm attacks hanging over the country, there is a significant risk to me as a landowner due to development.</li> </ul> <p>I am not against the development in the area, but I am directly affected and need to be compensated accordingly.</p> <ul style="list-style-type: none"> <li>• I will be directly impacted financially;</li> <li>• To build up a property to an economical unit costs decades of planning, labour and substantial amounts of capital;</li> <li>• Increase in crime due to development since criminals can gain easier access to properties.</li> </ul> <p>Controls to be in place for the development and activities with the</p> | <p>Email<br/>           Enkeldraai Trust<br/>           Farm Enkeldraai 314LQ<br/>           Landowner<br/>           (Tjaart Sauer)</p> | <p>The railway yard infrastructure to be developed on the northern side of the existing railway track will be developed within Transnet Servitude.</p> <p>Transnet will further be constructing a 2 meter high wall earth berm wall with 1:1 slopes for 5km on either side of the railway line/yard available from excess spoil material.</p> <p>A Social Impact Assessment will be undertaken as part of the EIA Phase to determine the social-economic risks, significance and recommended management measures for the project.</p> <p>The Lephalale Railway Yard is positioned south of the existing railway track since it's an existing 100 wagon yard, which just requires extension for it to accommodate 200 train wagons.</p> <p>Transnet's has positioned the railway yard development south of the track based on:</p> <ul style="list-style-type: none"> <li>• the point of the existing 100 wagon yard,</li> <li>• the gradient south of the existing track,</li> <li>• Position of prospective client Resgen Boikarabelo Coal Mine's 36km rail link turn off along the existing railway track.</li> <li>• North of the existing railway track is Eskom servitude.</li> </ul> |

| Number | Comment   | Date of comment, comment name of I&AP                            | Response from EAP/Specialist/Applicant  |
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|        | <p>on-going operation:</p> <ul style="list-style-type: none"> <li>• Finger access control need to be in place for everybody to access from the existing main roads to the working place for better control at the work site;</li> <li>• Security guards for searching of vehicles and patrolling the perimeter fence;</li> <li>• Massive and effective security fencing between the building site and the farming area next to it;</li> <li>• Only one proper access control to the building site from the main road;</li> <li>• Flexibility to adjust security measures once made aware of issues experienced on neighbouring properties.</li> </ul> <p>I am not against development but it will have a significant impact on the farm Enkeldraai and its way of farming, my lifestyle is going to change dramatically.</p> <p>A solution needs to be found around the development that benefits both parties.</p> <p>We as a family started farming in the area before any farm fences, mines; water development came to the area. An impact study can't cover everything; it's only a solution for the present situation. It must be reviewed from time to time to cover new impacts never thought of which may prevail in future.</p> |  | <p><b>Applicant_Transnet</b><br/>Stakeholder engagement with affected landowners will continue throughout the EIA Phase.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b></p> <p>The 2m earth berm has now been excluded as a mitigation measure for noise and safety impacts. Transnet has confirmed it will not be feasible to construct.</p> <p>Regarding access control, this concern was shared by Mr. H. Hills and responded to under Section 10.3. It can be provided along the existing gravel road 150m from the D2649 Afguns Road. It has been included as a mitigation measure in the EIR (Section 10.7.17).</p> <p>The railway yard will be fenced off with access control. The request for security guards for searching of vehicles and patrolling the perimeter fence will be considered as part of the operational management measures of the railway yard.</p> |
| 12.4   | The development will have a direct impact on us. Hunting is conducted with high calibre firearms that cannot be fired close to any development where human lives are at risk. We will lose a third of property to generate income, in affect reducing the jobs we can afford  | 19/11/2018<br>Email<br>Enkeldraai Trust<br>Farm Enkeldraai 314LQ | Refer to response under Section 7.1 of the IRR.<br><br><b>Applicant_Transnet, Dylan Jacobs (Senior</b>  |



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|        | <p>to keep.</p> <p>Clients come to the farm expecting a bush experience with limited noise and unsightly constructions. This will in effect destroy the rest of the possible income generated from the farm.</p>   | (Frans Sauer)  | <p><b>Engineer) 6 December 2018:</b></p> <p>Transnet will consider constructing an earth berm/wall. The project will have enough excess spoil material for a 2 meter high wall with 1:1 slopes for 5km on either side of the railway line/yard. This will significantly reduce the visual and noise impact from the railway yard. See Appendix B to the Scoping Report for a design plan proposal.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b></p> <p>See response provided under Section 11.2, and 12.1.</p> |
| 12.5   | <p>The increase in people movement in the area will pose a risk for increased game theft. Not having patrols on the fences and doing daily sweeps of the area around the development will result in uncontrollable game theft. We as a small business do not have the resources to establish these security measures.</p> <p>The increase in people movement in the area will pose a safety risk. Older people on farms are easy targets for crime.</p> <p>Requirements from our side in terms of security measures and control of people movement:</p> <ul style="list-style-type: none"> <li>• Finger access control need to be in place for everybody to</li> </ul> | <p>19/11/2018<br/>Email<br/>Enkeldraai Trust<br/>Farm Enkeldraai 314LQ<br/>(Frans Sauer)</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The concerns have been recorded in the final Scoping Report under Section 11.18 and in Appendix D10 in the IRR. A Social Impact Assessment will be undertaken as part of the EIA Phase to determine the risks, significance and recommended management measures for the project.</p> <p><b>Applicant_Transnet:</b> In terms of security</p>  |

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|  | <p>access from the existing main roads to the working place for better control at the work site;</p> <ul style="list-style-type: none"> <li>• Security guards for searching of vehicles and patrolling the perimeter fence;</li> <li>• Massive and effective security fencing between the building site and the farming area next to it;</li> <li>• Only one proper access control to the building site from the main road;</li> <li>• Flexibility to adjust security measures once made aware of issues experienced on neighbouring properties.</li> </ul> <p>My request is that the farm owner and myself as partner in the venture be allowed to negotiate opportunities for compensation and allow us to continue with running our business in the game industry.</p> |  | <p>measures and control of people movement, the railway yard will be fenced off and have one access control. A 2m high earth berm of 5km will be constructed on either side of the railway yard.</p> <p>The request for security guards for searching of vehicles and patrolling the perimeter fence will be considered as part of the operational management measures of the railway yard.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b></p> <p>See response provided under Section 11.2, 12.1 and 12.3.</p> |
| <b>13. Eskom Distribution (22kv Theunispan Stockpoort 22kV Power line)</b> |   |  |  |
| 13.1   | <p>We have a number of network components in your study area including a new project. It is linked to the Lephalale Railway Yard customer Transnet. We need to supply 4 Traction substations between Lephalale to Thabazimbi with 132kV. Our Basic Assessment process has not commenced yet. Please forward your project geographical data for consideration.</p>   | <p>31/10/2018<br/>Email<br/>Eskom Distribution:<br/>Land Development &amp;<br/>Environmental<br/>Management<br/>(Xander Neethling)</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p><b>Response provided 31 November 2018</b></p> <p>Geographical data (kml) files have been submitted to Eskom on 31/10/2018. Based on the data neither the Medupi Lephalale Theunis power line nor Lephalale Traction Alternative 2</p>  |

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|        |  |   | <p>is affected by the railway yard.</p> <p>More importantly, the 11-33kV Eskom power line south of the existing railway track needs to be relocated to make way for the railway yard. See Section 5.3 of the Scoping Report.</p> <p><b>Applicant_Transnet Response 12 December 2018:</b></p> <p>Transnet will avoid any interference with Eskom's infrastructure with regards to the development of the Lephalale Yard. Infrastructure within the railway yard design will be relocated to accommodate the 22kV Theunispan Stockpoort power line.</p> <p>Transnet is also seeking an alternative site for Borrow Area 1 further away from the Medupi Spitskop 1400kV power line to avoid any impact on the servitude.</p> |
| 13.2   | <p>Borrow Area 1 is in close proximity of the Medupi Spitskop 1400kV Transmission power line. If the borrow area extends into the servitude area of the line, approval should be obtained from Eskom Transmission, Lungile Motsisi (011 800 5734).</p> <p>The power line requiring relocation is the Theunispan Stockpoort</p> | <p>12/10/2018<br/>Email<br/>Eskom Distribution:<br/>Land Development &amp;<br/>Environmental<br/>Management</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The I&amp;AP Database has been updated with the details of Eskom Transmission, Lungile Motsisi. See the I&amp; AP Database attached under Appendix D1 of the Scoping Report.</p>  |

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|  | <p>22kV line with structure number TST5/77/132.</p> <p>To arrange for the relocation, please contact Ms Keneuoe Kojana (+27 15 299 0374) who is the Transnet Customer Executive responsible for relocation applications.</p> <p>Transnet will be responsible, also financially, for the relocation of the 22kV power line and will need to lodge an 'Infrastructure Relocation Application' to Eskom for these purposes.</p> | (Xander Neethling)  | <p><b>Applicant_Transnet 12 December 2018:</b></p> <p>See response under Section 10.1.</p>  |
| <b>14. Adjacent Landowner: Prof. Jan Meiring, Taaiboschpan 320LQ: Comment on BID</b> |  |   |   |
| 14.1   | <p>I am opposed to this project. The area is used to farm game and for hunting activities. This industrial activity would impact on our land uses. We have spent significant capital on our farms for hunting and tourism activities.</p>  | <p>21/07/2018<br/>Telephonic<br/>Taaiboschpan Landgoed<br/>BK<br/>(Prof. Jan Meiring)</p> | <p><b>EAP, Marissa Botha, NEC:</b> The objection has been recorded in the IRR under Appendix D10 of the Scoping Report.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b></p> <p>Based on the specialist investigations conducted as part of the EIA Study for the project the only directly affected landowners include Geelhoutkloof 359 and 745LQ also Enkeldraai 718LQ. The sense and spirit of place of these farms will be affected including their livelihood activities. See responses under Sections 11 and 12.</p> |

| Number | Comment  | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant   |
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|        |  |                                       | <p>To assess the visual impact from surrounding properties onto the railway yard expansion the Visual Specialist considered the impact from Key observation points (KoP) within 10km radius of the study site as viewpoints for assessing the potential visual impacts from the activity. KoP 19 is the viewpoint at Taaiboschpan 320LQ. The assessment found that the areas to the north of the railway infrastructure, all KOP's (KOP17 – KOP21) further than 500m had no visual disturbance of the railway of the proposed new buildings, as the vegetation gave a total screen of the existing and proposed facilities (offices, stores, communications tower). The only possible change can be with lights used at night (no direct impact, but a background glow).</p> <p>According to the Noise Impact Assessment 'Noise Contour Map (included as Figure 33 of EIR) the predicted noise levels at the border of Taaiboschpan 320LQ will be very low at 20-25dBA to insignificant. Also refer to the Noise Impact Assessment Report attached under Volume 2, Appendix 2G to the EIR.</p> |
| 14.2   | I hereby confirm receipt of the BID and notification letter. | 23/07/2018                            | <b>EAP, Marissa Botha, NEC:</b> Communication  |

| Number | Comment  | Date of comment,<br>comment name of<br>I&AP               | Response from EAP/Specialist/Applicant   |
|--------|--|---|--|
|        | Please make sure that no correspondence for the project is sent to me via registered post. I don't have the time to collect it during office hours at the Post Office. | Email<br>Prof. Jan Meiring<br>Taaiboschpan Landgoed<br>BK | with I&APs will be via telephone and through email. Response provided on 23 July 2018 via email. |

| Number                               | Comment  | Date of comment, comment name of I&AP  | Response from EAP/Specialist/Applicant  |
|--------------------------------------|--|--|---|
| <b>15. Lephale Development Forum</b> |  |  |   |
| 15.1                                 | Consider including a sewage treatment package plant for waste water treatment in the design of the railway yard. No provision is made in the medium term for additional WWTW capacity at Lephale Local Municipality (LLM). Current WWTW capacity is insufficient and in dysfunctional state. | 13/11/2018<br>Comment Sheet<br>Lephale Development Forum<br>(Jacques Snyman) | <p><b>Applicant, Transnet:</b></p> <p>Transnet has considered a small package plant to process grey water, yet this option was omitted due to its expensive set up cost and since volumes generated at the yard would not substantiate such.</p> <p>A Bio-Mite submerged Waste Water Treatment system is proposed for wastewater collection, treatment and discharge into a soak away system. It has a lower set up cost and is more suitable for the volume of wastewater to be generated at the yard. See Section 4.1, 7.3.1 and Appendix B6 of the Scoping Report.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b></p> <p>A Bio-Mite System will be constructed at the North and the South Facility of the railway yard. Details are included under Section 4.4.3 of the EIR.</p> |
| 15.2                                 | Please consider relocating/replanting protected trees where possible and practical. Learn from the Exxaro GMEP project as to how they  | 13/11/2018<br>Comment Sheet  | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The I&amp;AP Database has been updated with the</p>   |

| Number | Comment   | Date of comment, comment name of I&AP  | Response from EAP/Specialist/Applicant   |
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|        | <p>did it. The contact details for Filomaine Swanepoel have been provided.</p>  | <p>Lephalale Development Forum<br/>(Jacques Snyman)</p>                                  | <p>contact details of Filomaine Swanepoel.</p> <p>The request will be considered in the EIA Process and discussed with the landowner from whose property these trees will be removed.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b></p> <p>Based on the recommendations from the Ecologist nationally protected trees <i>Boscia albitrunca</i> (Shepherd's Tree) and <i>Sclerocarya birrea</i> (Marula Tree) will be marked for removal under permit. Marula trees should be replanted at appropriate sites at the study area. Shepard's tree cultivation success is too low at present to be practical in which case other indigenous trees should be cultivated at appropriate sites at the study area. See Section 8.10.2.1 in the EIR under Environmental Attributes.</p> |
| 15.3   | <p>Please let us know what skills you will require by when, this will help inform local skills development projects, to provide you with at least a percentage of local skill.</p> <p>Also let us know regarding local business opportunities e.g. what kind of business/products/services Transnet will need to inform LED/ED/Supplier Development projects.</p> | <p>13/11/2018<br/>Comment Sheet<br/>Lephalale Development Forum<br/>(Jacques Snyman)</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>Transnet has confirmed during the construction phase 50-80 job opportunities will be created mainly comprising unskilled labour. Labour will be sourced from the local area; no construction</p>   |



| Number | Comment   | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant  |
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|        | Please refer to the DHET 'Skills for SIPs through SIPS' skills development program. |                                       | <p>camp will be required.</p> <p>During the operation phase it is estimated that 50-100 people will work at the yard as the railway yard will provide facilities to two (2) different operating units of Transnet. Permanent staff will be sourced from the local area as far as possible.</p> <p>A typical Yard will have the following Permanent positions:</p> <p>I. Operations:</p> <ul style="list-style-type: none"> <li>- Area Manager</li> <li>- Section Manager</li> <li>- Yard Manager</li> <li>- Crew Manager</li> <li>- Safety Manager</li> <li>- Yard officials</li> <li>- Refuelling and sanding</li> </ul> <p>II. Infra Crew:</p> <ul style="list-style-type: none"> <li>- 1x Track Master</li> <li>- 21 x Infra Workers</li> <li>- 3 x Flagmen</li> </ul> <p>III. Fire and hazmat: Fire Officials</p> <p>IV. TE: Carriage &amp; Wagon, Locomotive</p> |

| Number                                   | Comment  | Date of comment, comment name of I&AP | Response from EAP/Specialist/Applicant   |
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|  |  |                                       | <p>It estimated that the project may only be commissioned in the year 2021.</p> <p>Transnet has agreed to notify the Lephalale Development Forum of any business opportunities.</p> <p>See Section 7.9 of the final SR.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b></p> <p>The Social Impact Assessment Report attached under Volume 2, Appendix 2K of the EIR recommends that Transnet liaise with the LDF to determine which skills are locally available and which skills would be required for the project. Through the LDF Transnet can determine whether there are any opportunities to offer internships and practical experience for local students. Transnet should ensure that skills development requirements form part of their contracts with sub-consultants.</p> |
| <b>16. Lesedi Community, Steenbokpan</b> |  |                                       |  |
| 16.1                                     | Lesedi Location at Steenbokpan has the Lesedi Tshukudu Thusong Centre whereby one BID can be placed. We fall in Ward 3 and would | 23/07/2018<br>Email                   | <b>EAP, Marissa Botha, NEC:</b> The BID was  |

| Number | Comment  | Date of comment, comment name of I&AP   | Response from EAP/Specialist/Applicant  |
|--------|--|---|---|
|        | like to receive more information for us to consider the social impact the project may have on us.                        | Ward Committee and Lesedi Community Steenbokpan (Ezekiel Mochambi)                        | emailed to Mr Mochambi on 26 July 2018.<br><br>See Appendix D6 attached to the Scoping Report as Proof of emailed BID notifications.  |
| 16.2   | I suggest you arrange a public meeting for the Steenbokpan community. The public meeting is too far and starts too late. | 01/11/2018<br>Email<br>Ward Committee and Lesedi Community Steenbokpan (Ezekiel Mochambi) | <b>EAP, Marissa Botha, NEC:</b><br><br>Based on the public participation programme for the project a focus group meeting will be scheduled with the Lesedi community at Lesedi Location, Steenbokpan during the EIA Phase of the project. The anticipated date will be communicated either during January of early February 2019. This has been included in the Scoping Report under Section 13.9 under PPP and has also been included in the Plan of Study for EIA under Section 14.7 (a).<br><br>Please note other avenues of consultation have been used during the Scoping Phase which included the placement of the draft Scoping Report at the Lesedi Thusong Community Centre for public review and comment including the provision of the Background Information Document for the project. See Appendix D6 and D7 appended to the Scoping Report for proof of distribution of the BID and DSR to Lesedi |

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|        |   |   | Community.   |
| 16.3   | We cannot attend the public meeting of 13 November 2018. The meeting is 60km from Lesedi and the time is 14:00. We are using public transport (taxis and bus) which travel from 7:00 – 15:00. The meeting starts at 14:00.  | 05/11/2018<br>Comments Sheet<br>Ward Committee and<br>Lesedi Community<br>Steenbokpan<br>(Ezekiel Mochambi) | <b>EAP, Marissa Botha, NEC:</b><br><br>Refer to response under Section 2.3 of this IRR.  |
| 16.4   | <p>Skills development and the education levels are very low at Lesedi. We have one combined school (Lerekhureng) teaching up to Grade 9. Transnet must adopt this school and assist our youth.</p> <p>Employment: Majority of us have Agricultural backgrounds, we do not have skills. It will be great if Transnet can implement some skills development. 50% of the available job opportunities need to be available to the locals.</p> <p>We need Transnet to take us seriously and assist us to develop. We want to be entrepreneurs. So assist us with training as your community social responsibility.</p> | 05/11/2018<br>Comments Sheet<br>Ward Committee and<br>Lesedi Community<br>Steenbokpan<br>(Ezekiel Mochambi) | <p><b>Applicant_Transnet:</b></p> <p>Transnet Foundation the Social Corporate Investment Unit (CSI) of Transnet has an education portfolio for the upliftment and Empowerment Through Education. Others include health, sport, and socio-economic infrastructure development.</p> <p>At this point only local employment can be made available as per the Transnet supplier development targets.</p> <p><b>Applicant_Transnet:</b></p> <p>Communities will benefit from potential local employment based on the supplier development targets. Unskilled labour will be required during the construction phase especially for laying of</p> |

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|        |   |  | the rail tracks. Job opportunities will be available for unskilled labour and will be sourced locally as far as possible.   |
| 16.5   | <p>Before and when Medupi was built the Lesedi community was told that they will not be impacted by the power station, yet the people in the community get TB, lung diseases and cancer.</p> <p>Don't come and tell us as a community the development will not impact us. We have been lied to before. There is a history of impacts on the Lesedi community that has not been recognized.</p> <p>The Lephale Local Municipality does not recognize the Lesedi community.</p> | <p>13/02/2019<br/>Lesedi Community Public Meeting<br/>Ditiro Majapholoa<br/>(Chairperson of Steenbokpan Community Forum)</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>A coal fired power station and a railway yard, such as the Lephale Railway Yard do not have the same environmental impacts. The Lephale Railway Yard will have site and localized environmental impacts which are distant from Lesedi. The impacts being referred to include clearing of indigenous vegetation, visual impact, traffic and noise. These impacts will not be felt by the community since you are located approximately 17km away from the site. The impacts from the project will be felt by the directly affected landowner and adjacent landowners.</p> <p>Medupi power station is a coal fired power station which is a source of Sulphur dioxide, Nitrogen oxide and Particulate Matter (fly ash/smoke) air pollution. These fumes are emitted into the atmosphere through tall stacks. Wind transports the pollutants making the pollution disperse over a large areas. The air</p> |

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|        |  |                                       | <p>pollution caused by the power stations can contribute to health problems that include lung diseases. The three mentioned primary pollutants are controlled by the Minimum Emission Standards published in terms of the National Environmental Management Air Quality Act. In summary the impact from the power station is felt over a greater distance from the source. The environmental impacts resulting from the two developments are thus entirely different. One needs to compare ‘apples to apples’ not ‘apples to oranges’.</p> <p>Naledzi is advising the community from a scientific point of view that the specialist investigations recently completed for the project found that most impacts would be site specific or localized. No environmental impacts are anticipated to extend beyond a 3km radius from the site.</p> |
| 16.6   | <p>We do not have a secondary school in Steenbokpan. The children have to travel too far by bus to commute to school so they don't persevere. 80% of the youth at Lesedi don't have matric.</p> <p>We want skills development in Lesedi community.</p> |                                       | <p><b>MB (NEC)</b></p> <p>This issue has been raised before by a Lesedi Ward Committee Member. Transnet's response to the issue was that it has a Social Corporate Investment Unit (CSI); Transnet Foundation has</p>  |

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|--|--|---|---|
|  |  |   | <p>an education portfolio for the upliftment and Empowerment through Education. Other portfolios include health, sport, grants, employee volunteer programme information and socio-infrastructure development. Transnet Foundation has objectives set in terms of delivering sustainable developmental projects through the efficient use of resources, and makes an effort to reach communities as far as it can.</p> <p><b>Applicant_Transnet:</b></p> <p>In relation to the Lephalale Railway Yard project, Transnet can at this point only provide local employment once the project is commissioned.</p> |
| <b>17. South African Aviation Authority_13 November 2018</b> |  |   |   |
| 17.1   | <p>If there are any structures higher than masts, antennas which fall within a 15km radius of any airport in close vicinity, we will need to conduct a formal assessment when the project is ready for construction. For us to carry out a successful assessment we require the following:</p> <ul style="list-style-type: none"> <li>• Location of each structure (coordinates)</li> <li>• Site/ground elevation</li> <li>• Height to the top of structure (in meters)</li> </ul> | <p>13/11/2018<br/>Email<br/>Civil Aviation Authority / ATNS<br/>Obstacle Evaluator<br/>(Siphiwe Masilela)</p> | <p><b>EAP, Marissa Botha, NEC:</b></p> <p>The project is situated 25km west of the ‘Ellisras Vliegvelde Aerodrome’ close to Medupi power station. The project is thus out of the 15km radius of the airport. There will also be no antennas or masts as part of the project. The highest structure would be the water reservoir</p>   |

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|        |         |                                       | <p>placed on a concrete slab at a maximum height of 4.8m. No formal assessment would there be required for the project.</p> <p><b>Updated response by EAP, Marissa Botha, NEC_14 May 2019:</b></p> <p>See Section 4.4.1 of the EIR. During the site visit in February 2019, it was mentioned by the Transnet Engineers that a communications antenna will be constructed. But the height has not been confirmed. It should not exceed the current height of the existing power lines close to the project site.</p> |



**ANNEXURE A**

**WRITTEN COMMENTS RECEIVED FROM I&APS DURING  
PUBLIC REGISTRATION PERIOD ON THE BID**

Project Site for new Lephalale Railway Yard

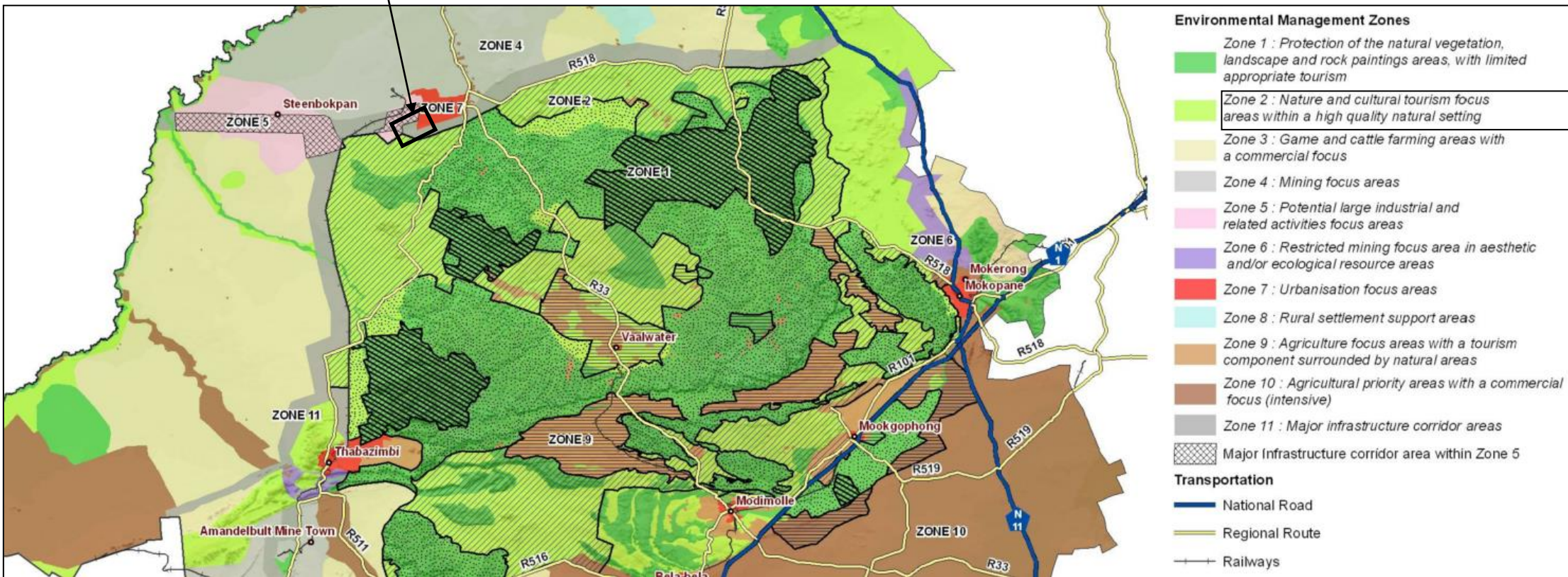


Figure 1: Location of project site (black polygon) in terms of Waterberg District Environmental Management Framework - Environmental Management Zones

**ANNEXURE C**

**WRITTEN COMMENTS RECEIVED FROM I&APS ON THE  
SCOPING REPORT AND OFFICIAL RESPONSES PROVIDED  
THERE TO**

**ANNEXURE D**

**WRITTEN COMMENTS RECEIVED FROM I&APS ON THE  
FINAL SCOPING REPORT**