

APPENDIX E6: COMMENTS & RESPONSE TABLE

THE PROPOSED CONSTRUCTION OF A NEW INDUSTRIAL PARK (WAREHOUSING AND OFFICES) SITUATED ON ERF 10301, WELLS ESTATE, GQEBERHA, EASTERN CAPE PROVINCE.

ROUND 1

Comment period: 15 January – 16 February 2026 (Pre-application Draft BAR)

NO	COMMENT	RESPONSE	RESPONDENT
	I&AP: Ayanda Mncwabe-Mama - Archaeologist - Department of Sport, Recreation, Arts and Culture: Museums & Heritage- 14 January 2026		
1	Noted, and the ECPHRA heritage comment was provided and still stand.	Noted. Refer to ECPHRA comment included in Appendix E7 of the BAR. <i>“ECPHRA Final Comment:</i> <i>ECPHRA acknowledges the submitted project via the SAHRIS inventory system. Following assessment of the development and the heritage sensitivity of the area, ECPHRA hereby confirms that the project is exempted from further heritage studies in terms of Section 38(4) of the NHRA, but with the following conditions:</i> <u><i>General pre/construction phase requirements:</i></u> - <i>The project proponent/representative must notify ECPHRA of the date of commencement of the project or share the project schedule and Environmental Authorisation (EA).</i> - <i>The developer must get specialists’ input in order to submit a detailed, site specific heritage & paleontological chance finds procedure (CFP), before the start of the pre/construction phase, for ECPHRA’s approval. The CFP must outline stop-work procedures, emergency protection measures, reporting protocols, contact details for ECPHRA and approved heritage specialists, guidance on recognising heritage materials and graves. The CFP must form</i>	Jenna Theron – PHS (EAP)

		part of the EMPr and be available on site at all times. - Heritage induction and training for all ground crew, must include identification of archaeological, palaeontological, historical, and burial-related material. This ensures lawful heritage compliance during all phases of the project. - Heritage monitoring. <u>Post Construction phase requirements:</u> Upon completion of the project, a final heritage compliance report to be submitted to ECPHRA.” These requirements were included as conditions within the BAR Form and will be implemented through the EMPr which includes all the aforementioned conditions.	
I&AP: ESKOM – 14 January 2026			
2	Dear Valued Customer, This is an automated message, please do not reply to this message. Thank you for using Eskom’s email facility. This email serves to confirm that we have received and are attending to your email. It is important to note that the email channel is no longer available for reporting electricity supply faults, submitting meter readings or to enquire about account balances. For a quicker and more efficient service, we encourage you to use Eskom’s alternative self-service channels to check your account balance, submit your meter reading, report power outages, follow up on existing faults, and access other services	Noted.	Jenna Theron – PHS (EAP)

	without waiting in queue. • Alfred Chatbot: https://alfred.eskom.co.za/chatroom/ • USSD: Dial *120*37566# on your mobile phone • Interactive Voice Response (IVR): Call 08600 37566 and follow the voice prompts Kind regards ESKOM CUSTOMER SERVICES TEAM		
I&AP: Londeka Jilimane - ECPTA - Environmental Planner - 21 January 2026			
3	Please note that the project area occurs outside ECPTA managed Protected Areas and buffers thereof, no direct impacts thereto are anticipated at this stage. It is the responsibility of the EAP to inform the entity of the change in scope or locality as this may result in a different response.	Noted.	Jenna Theron – PHS (EAP)
I&AP: Thando Booï - Manager (Environmental Management Systems) Public Health: Environmental Management - 16 February 2026			
4.1	1. Basic Assessment Report (BAR): The following comments relate directly to statutory compliance, procedural completeness and information requirements under the NEMA EIA Regulations: • EAP Registration Details The declaration section of the BAR must clearly reflect the	Please note that the EAPs EAPASA Registration Certificate (including the registration number) was/ is included under Annexure 2 of the EAPS	Jenna Theron – PHS (EAP)

	EAPASA registration number of the appointed Environmental Assessment Practitioner to confirm legal competency and compliance with Regulation 18. - Listed Activities and Screening Tool Confirmation The BAR should explicitly reference the outcome of the DFFE Screening Tool, confirming that the additional aquatic or terrestrial sensitivity triggers apply beyond those already assessed. - Water use Authorisation Consideration Confirmation is required as to whether a Water Use Licence or General Authorisation in terms of the National Water Act is applicable, or whether the activity is exempt. This confirmation should be clearly recorded in the BAR. - Cumulative Impact Assessment A concise cumulative impact assessment is recommended, with specific focus on stormwater run-off implications and incremental habitat fragmentation associated with surrounding developments.	Declaration Form (Appendix G2). Please refer to the following Appendices to the BAR which were/are included: - Appendix G4: Site Sensitivity Verification Report - Appendix G5: DEA Screening Tool Report Appendix G4 and G5 therefore provides a detail overview of the Screening Tool and the verification of the site sensitivity. According to the Aquatic and Terrestrial Specialist there are no development constraints regarding wetlands: <i>“as the catchment of this system is well away from the site and disconnected by current road infrastructure. Only the 500m regulated area applies.”</i> A Risk Assessment Matrix was undertaken and is included in Appendix D1. The impact rating was founded to be LOW. A General Authorisation would therefore be required. The Department of Water Affairs and Sanitation (DWS) are included as I&APs. Section D.2: Addresses Impact Assessment which includes ‘Cumulative Impact’. The EMPr have been updated to include the inclusion of the conceptual Stormwater Management Plan (Appendix D5).	
4.2	2. Specialist Studies (Aquatic & Terrestrial Ecology) - No Go Area Delineation The specialist study outputs should include surveyed coordinates or reference to a GIS shapefile for the no-go area boundaries to ensure spatial certainty and enforceability during the construction and compliance monitoring. - Protected Species Permitting and Relocation	Please note that a kmz. file of the no-go area was provided by the specialist which was converted to CAD and included in the SDP layout. The exact no-go area is to scale on the SDP and will be set-out by land surveyor prior to start of works. Furthermore, in terms of section 4.1.3 (Site Establishment Requirements) of the EMPr (Appendix F) it currently states: <i>“C. Protection of Sensitive Features: Sensitive areas within the development area, as identified by the ECO, should</i>	Jenna Theron – PHS (EAP)

	The relevant permitting authority must be clearly identified, and confirmation provided that a Search and Rescue/Relocation Method Statement will be finalised and approved prior to construction commencement.	<i>be fenced off prior to the start of construction on site (where applicable), to ensure minimum disturbance to these areas during construction activities. Any required buffer areas or no-go areas should be marked prior to the start of construction on site and communicated to the Site Manager.</i> <u>Search & Rescue:</u> <i>A Search and Rescue/ Relocation Method Statement will be finalised and approved prior to construction commencement. Any protected or listed species that are mentioned in the Terrestrial Ecologists Report must be relocated with the requisite permits in place. All search and rescue specifications as per the permits issued are to be complied with. Any species collected will be relocated to the No-Go area, enhancing the conservation of this area with the site."</i>	
4.3	3. Environmental Management Programme (EMPr) - Stormwater Management Governance A conceptual Stormwater Management Plan should be appended to the EMPr to translate impact mitigation commitments into implementable controls during construction and operation. - Alien Invasive Species Management The EMPr must explicitly reference compliance with the NEM:BA Alien and Invasive Species Regulations (2020) and include an Alien Vegetation Eradication and Management Plan. - Environmental Control Officer (ECO) Provisions Minimum ECO qualifications, scope of authority, reporting frequency, and compliance reporting requirements should be clearly defined to strengthen environmental oversight and	Please refer to Appendix 7 of the EMPr for the conceptual Stormwater Management Plan. Section '4.2.5 Stormwater and Erosion Control/Management' addresses construction aspects. Section 4.3 of the EMPr addresses Operational Management. Goal 1 addresses Stormwater Management and refers to the conceptual Stormwater Management Plan included as Appendix 7. The EMPr includes detailed Alien Clearing and Management aspects (Section 4.3.1 Goals (Management Outcomes and Actions): Goal 4). An independent Alien Vegetation Eradication and Management Plan is not required considering almost the entire site will be developed and the management of the no-go area will be in accordance with the EMPr which includes detailed Alien Clearing Management for the long-term. The EMPr has been updated to include compliance with the Alien and Invasive Species Regulations (2020). Section 3 (Key Stakeholders) in the EMPr (Appendix F) addresses the role of the ECO as follows: <i>"A suitably qualified individual will be designated to fulfil the role of</i>	Jenna Theron – PHS (EAP)

	accountability.	<i>Environmental Control Officer, to ensure and oversee the implementation of the EMPr in its entirety on site during construction and earthworks on the entire site. The role of the ECO is essentially seen as an interactive one which involves site visits approximately once a month at the start of construction. Site visits may need to be less frequently during certain stages of the development, depending on the sensitivity of the area in which construction is taking place.</i> <i>The responsibilities of the ECO or designated person during the construction phase of the project will include:</i> <i>• To environmentally educate and raise the awareness of the Contractors and their staff as to the sensitivity of the site and to target responsible individuals as key players for environmental education, to facilitate the spread of the correct environmental attitude during the contract work.</i> <i>• To review method statements and to determine the most environmentally sensitive options of modus operandi for the development tasks.</i> <i>• To oversee the implementation of environmental procedures set out in this document.</i> <i>• To attend site contractor's meetings and report on environmental issues.</i> <i>• To receive notices and minutes of all site meetings.</i> <i>• To maintain an open and direct channel of communication with the RE, who will be immediately aware of the actions of the ECO at all times, especially as they relate to implementation policy and corrective actions as detailed in this document.</i> <i>• To take immediate action on site where clearly defined no-go areas are violated, or in danger of being violated, and to inform the RE and Site Manager immediately of the documents and the action taken.</i> <i>• To keep an up-to-date record of works on site, as they relate environmental issues in the site diary.</i> <i>• To be contactable by the public regarding matters of environmental</i>	
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		<i>concern as they relate to the development. Such matters shall be recorded in the Site Diary.</i> <i>To be responsible for auditing and reporting."</i> Section 5 of the EMPr addresses 'COMPLIANCE AND MONITORING'.	
4.4	4. Overall Municipal Services Readiness While the report indicates that the site is located within an urban area with available bulk services infrastructure, most service descriptions remain at a conceptual level. It is therefore recommended that the final draft submission include written confirmations or conditions of service from all relevant municipal directorates. This will enhance regulatory defensibility and ensure that environmental authorisation is aligned with practical service delivery constraints.	Noted. Service Capacity Letters have been requested from the relevant Departments and will be included in Appendix G1.	Jenna Theron – PHS (EAP)