

## **Appendix E: Pre-application Draft BAR– Comments and Response Report**

**Upgrading of Waste Water Treatment Works at Woodlands  
Koukamma Local Municipality  
Sarah Baartman District Municipality, Eastern Cape  
September 2025**

This document records the details of the public participation process and records any comments received from Interested and Affected Parties (IAPs) on the proposed development, as well as the responses provided by the Environmental Impact Assessment Practitioner, specialists, engineers and the proponent.

The following public participation activities have been carried out to date:

- Initial IAP register – applicant, landowner, adjacent landowners, organs of state, identified stakeholders and any NGOs
- The notice of intention to submit a Water use license application and environmental authorisation application and call for registration of interested and affected parties was distributed as follows:
  - Placing two posters close to the site to inform the public of the process, dated 27 March 2025
  - Emailing notice and BID to organs of state, landowners, adjacent landowners and potential IAPs on 27 March 2025
  - Placing an advertisement in the KOUGA EXPRESS on 27 March 2025
- **30-day registration period: 27 March to 2 May 2025 (NEMA and WUL)**
- *Update IAP register with additional registrations / identified parties (e.g. WUL officials, potential interested farmers / local brick making facilities)*

The following public participation will take place:

### **EA in terms of NEMA**

- *The pre-application draft basic assessment report will be distributed to all registered interested and affected parties for a 30-day review and comment period **prior to submission of the NEMA EA application to the competent authority**; adverts and site notices will be placed.*
- *The pre-application DBAR and accompanying PP and CRR (this report) will be updated accordingly*
- *The NEMA EA application will be submitted to the competent authority*
- *Upon receipt of the reference number the draft report will be distributed for a further 30-day review and comments period*
- *The post-application DBAR and accompanying PP and CRR (this report) will be updated accordingly*
- *The final report submitted to the competent authority for consideration within 90 days of submission of the application (BAR process).*
- *The NEMA decision-making time frame is 107 days. Once a decision is reached the decision will be distributed to all registered interested and affected parties and provided with a 20-day timeframe to submit an appeal against the decision.*

Bluepebble cc has been appointed to carry out the EA application process on behalf of KKLM. A Basic Assessment process is proposed to be carried out as part of the EA application process. A public participation process is being

carried out in terms of the NEMA Regulation 41 of GN R. 326, 2014, as amended. The preapplication draft BAR is hereby made available for a 30-day review and comment period by any interested and affected party: 4 September to 6 October 2025. Once the application for EA has been submitted, all registered interested and affected parties will receive the draft report for 30-days comment and review.

Comments on the preapplication BAR are requested to be submitted to: Claire De Jongh | Tel: 0846074743 | Email: [claire@bluepebble.co.za](mailto:claire@bluepebble.co.za) | [admin@bluepebble.co.za](mailto:admin@bluepebble.co.za)

### ***WULA in terms of NWA***

The pre-application draft basic assessment report will be distributed to all identified interested and affected and site notices and an advert will be place. This public participation process will provide a 60-day comment and objection period on the NWA Section 21 water use activities and accompanying information (Refer to preapplication DBAR and accompanying annexures with WULA information in Appendix G7) that will be submitted to the DWS as part of the WULA. Once all information has been accepted by the DWS, the decision-making process on the WULA is 90 days.

Confluent has been appointed to carry out WULA process on behalf of KKLM. The technical summary WUL report is hereby made available in Appendix G of the preapplication draft BAR. Further information on the WULA or water uses may be obtained from Confluent Environmental, Aquatic Consulting and Research; Written comments or objections on the WULA may be lodged by any interested and affected party and submitted to Confluent no more than 60 days from this notice: 4 September to 4 November 2025

Sonia Jordaan | Tel: 062 743 2416 | Email: [sonia@confluent.co.za](mailto:sonia@confluent.co.za)

Refer to the following accompanying appendices for details of public participation activities carried out:

- Annexure E1: Full Register of interested and affected parties
- Appendix E2: Adverts, Notices and Background information document
- Appendix E3: Meetings and submissions – organs of state
- Appendix E4: Registrations, Comments and Responses



BLUEPEBBLE INDEPENDENT ENVIRONMENTAL AGENCY CC

Joclyn Marshall (Manager)

EAPASA NO: 2022/5006 admin@bluepebble.co.za  
MSc Environmental Science www.bluepebble.co.za  
joclyn@bluepebble.co.za 067 314 4069

Based in the Garden Route, Western Cape

REGISTRATION NO: 2009/189352/23

S u s t a i n a b l e   S o l u t i o n s

## Comments and Response Report, March - August 2025

Name	Date of comment / registration	COMMENT / RESPONSE	Date of response	EAP COMMENT / RESPONSE
<b>Organs of state</b>				
<b>ECPHRA – Ayanda Mncwabe-Mama</b>	2 May 2025	Find attached the ECPHRA heritage comment on the proposed development in the subject line. Note that I have also attached our process guideline for Section 38 applications including the NID form.	Pre-application DBAR	NID has been submitted as requested.

## Appendix E1: Full Register of interested and affected parties

### Upgrading of Waste Water Treatment Works at Woodlands LIST OF INTERESTED AND AFFECTED PARTIES, March to August 2025

Name	Contact Person	Email
<b>State Departments</b>		
DWS	Portrait Tshatshu	<a href="mailto:TshatshuP@dws.gov.za">TshatshuP@dws.gov.za</a>
DWS	Marisa Bloem	<a href="mailto:BloemM@dws.gov.za">BloemM@dws.gov.za</a>
DWS	Vuyiseka Jack	<a href="mailto:jackv@dws.gov.za">jackv@dws.gov.za</a>
DWS	Mpumela Ntombiyamayirha	<a href="mailto:MpumelaN@dws.gov.za">MpumelaN@dws.gov.za</a>
DWS	Sonke Ngxeba	<a href="mailto:NgxebaS@dws.gov.za">NgxebaS@dws.gov.za</a>
DWS	Chauke Hasani (PLZ)	<a href="mailto:ChaukeH@dws.gov.za">ChaukeH@dws.gov.za</a>
DWS	Somdaka Odwa (PLZ)	<a href="mailto:SomdakaO@dws.gov.za">SomdakaO@dws.gov.za</a>
DWS	Dweni Ncamile (PLZ)	<a href="mailto:DweniN@dws.gov.za">DweniN@dws.gov.za</a>
DWS	Ngcobo Siyabonga Brilliant	<a href="mailto:NgcoboS@dws.gov.za">NgcoboS@dws.gov.za</a>
DWS	Nyambi Musa Sifiso (PLZ)	<a href="mailto:NyambiM@dws.gov.za">NyambiM@dws.gov.za</a>
DWS	Heymann Ncumisa (PLZ)	<a href="mailto:HeymannN@dws.gov.za">HeymannN@dws.gov.za</a>
DWS	Gqotana Asanda(PLZ)	<a href="mailto:GqotanaA@dws.gov.za">GqotanaA@dws.gov.za</a>
DWS	Magwebu Bongani (PLZ)	<a href="mailto:MagwebuBongani@dws.gov.za">Magwebu Bongani (PLZ)</a>

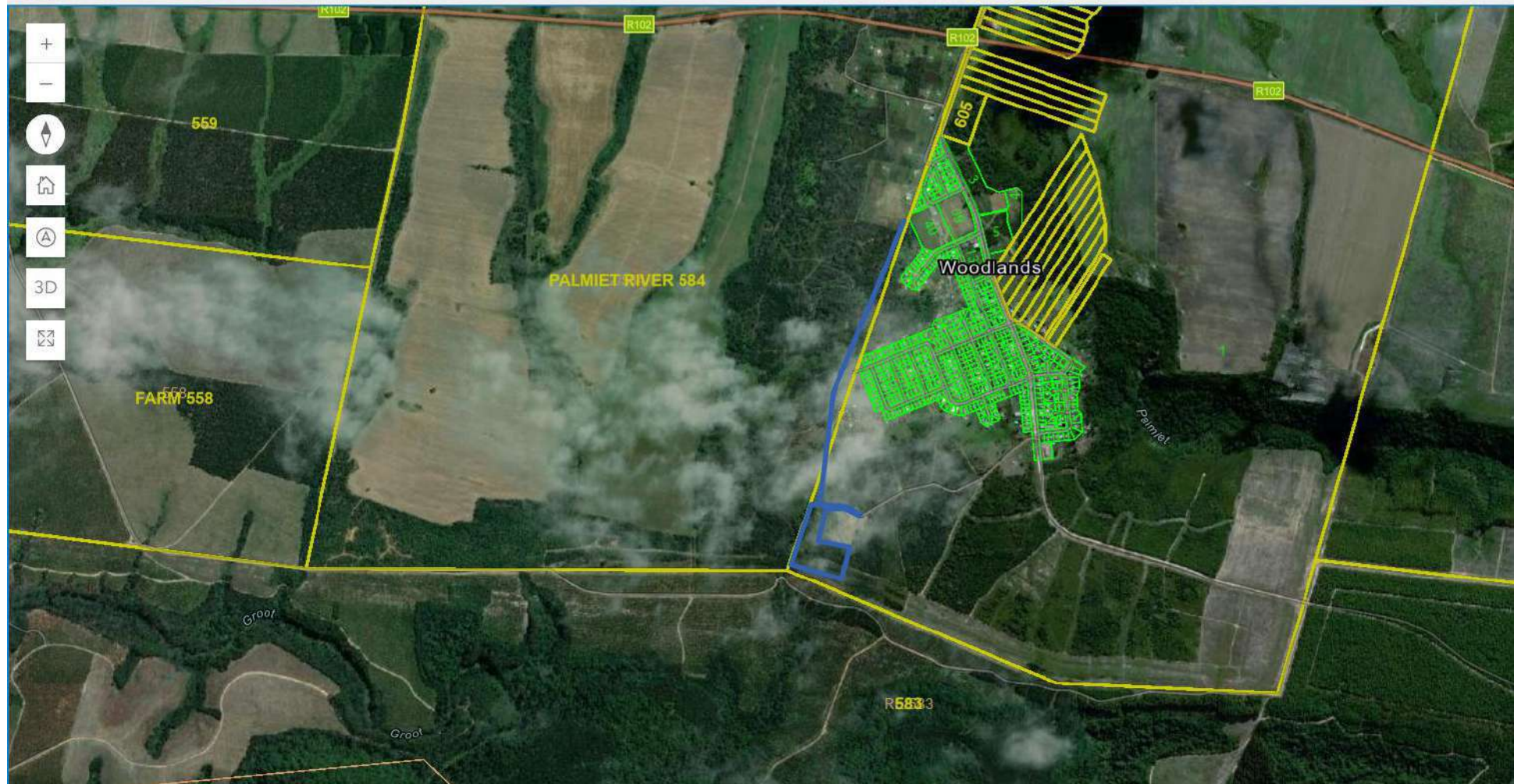
Name	Contact Person	Email
DWS	Visagie Hammond	VisagieH@dws.gov.za>;
DWS	Van Rooyen Esmeralda	VanRooyenE2@dws.gov.za
DFFE: Waste	Lucas Mhlangu	<a href="mailto:LMahlangu@dfpe.gov.za">LMahlangu@dfpe.gov.za</a> ; Cell: 0846946115
DFFE Oceans and Coast	Thandeka Mbambo	TMbambo@dfpe.gov.za
DFFE Oceans and Coast		OCEIA@dfpe.gov.za
ECHRA	Ayanda Mncwabe-Mama	ayanda.mncwabe-mama@ecsrac.gov.za
ECHRA	Lungiswa Mzazi	lungiswam@ecphra.org.za
EC Roads – Sarah Baartman DM	Randall Moore	Randall.Moore@ectransport.gov.za; Monde.Manga@ectransport.gov.za
Dept of Agriculture (EC)	Ruffus Maloma	Ruffus.Maloma@drdar.gov.za
Department of Agriculture - Regional Manager: Land Use & Soil Management	Gcinile Dumse	GcinileD@daff.gov.za
DFFE - Forestry	Babalwa Layini	BLayini@dfpe.gov.za
DEDEAT	Andries Struwig	Andries.Struwig@dedea.gov.za / cc Charmaine.Mostert@dedea.gov.za
DEDEAT	Jeff Govender	dayalan.govender@dedea.gov.za
DEDEAT	Vuyo Maqutu	Vuyo.Maqutu@dedea.gov.za
DEDEAT	Adriaan Le Roux	Adriaan.leroux@dedea.gov.za
DEDEAT	Tembela Mapukata	Thembela.Mapukata@dedea.gov.za
SANBI	Vathiswa Zikishe	V.Zikishe@sanbi.org.za
<b>Koukamma Local Municipality</b>		
Mr Mziwamadoda M. Qalaba	Representative of KKLM	mzi.qalaba@koukamma.gov.za

<b>Koukamma Local Municipality</b>		
Koukamma Municipality	Nosipho N. Bota	<a href="mailto:nosipho.bota@koukamma.gov.za">nosipho.bota@koukamma.gov.za</a>
Mr Pumelelo Maxwell Kate	Mayor Koukamma LM	<a href="mailto:katepm@koukamma.gov.za">katepm@koukamma.gov.za</a>
Koukamma LM	Nathan Jacob	<a href="mailto:koukamma@koukamma.gov.za">koukamma@koukamma.gov.za</a>
Mr Pumelelo Maxwell Kate	Thozamile Sompani	<a href="mailto:thozamile.sompani@koukamma.gov.za">thozamile.sompani@koukamma.gov.za</a>
Koukamma LM	Mziwamadoda M. Qalaba	<a href="mailto:mzi.qalaba@koukamma.gov.za">mzi.qalaba@koukamma.gov.za</a>
Ward 5 councillor	Shannon May Ward 5	<a href="mailto:koukamma@koukamma.gov.za">koukamma@koukamma.gov.za</a>
Personal Assistant to the Community Services:	<u>Chantelle Snyders,</u>	<a href="mailto:chantelle.snyders@koukamma.gov.za">chantelle.snyders@koukamma.gov.za</a>
Personal Assistant to the Director Technical Services:	<u>Raquel Grootboom,</u>	<a href="mailto:Racquel.grootboom@koukamma.gov.za">Racquel.grootboom@koukamma.gov.za</a>
Henni Britz 0825684031		<a href="mailto:britzco@mweb.co.za">britzco@mweb.co.za</a>
PR Councillor 0735543860	Baker Smit	<a href="mailto:barker.smit@gmail.com">barker.smit@gmail.com</a> could be <a href="mailto:baker.smit@gmail.com">baker.smit@gmail.com</a>
<b>Sarah Baartman District Municipality</b>		
Sarah Baartman District Municipality: Municipal Manager	Ted Pillay Natasha Peterson	<a href="mailto:ted@sbdm.co.za">ted@sbdm.co.za</a> <a href="mailto:npeterson@sbdm.co.za">npeterson@sbdm.co.za</a>
Sarah Baartman District Municipality:	Ms Unati Daniels	<a href="mailto:cmabindla@sbdm.co.za">cmabindla@sbdm.co.za</a>
Service Delivery		<a href="mailto:danielsu@sbdm.co.za">danielsu@sbdm.co.za</a>
Refuse & Waste		<a href="mailto:tmokoena@sbdm.co.za">tmokoena@sbdm.co.za</a>
Roads		<a href="mailto:mmbanga@sbdm.co.za">mmbanga@sbdm.co.za</a>
Water		<a href="mailto:ksanyamandwe@sbdm.co.za">ksanyamandwe@sbdm.co.za</a>
Sarah Baartman DM Environmental Health	Zoleka Sumi	<a href="mailto:zsomi@cacadu.co.za">zsomi@cacadu.co.za</a>
Sarah Baartman District Municipality –	Kellelo Makgoka	<a href="mailto:kmakgoka@sbdm.co.za">kmakgoka@sbdm.co.za</a>

<b>Koukamma Local Municipality</b>		
Manager:		
Environmental Health		
<b>Stakeholders</b>		
WESSA	Gary Koekemoer	
WESSA	Kevin Taylor	
Bird Life EC	Samantha Ralston	
Bird Life EC	Mark Anderson	
EWT	Ian Little	
ECPTA	Brian Reeves	
<b>Engineer</b>		
SMEC	Damian SHARP	
SMEC	Michelle Kruger	
<b>Applicant</b>		
Koukamma Municipality	<u>Nosipho N. Bota</u>	<u><a href="mailto:nosipho.bota@koukamma.gov.za">nosipho.bota@koukamma.gov.za</a></u>
Mr Mziwamadoda M. Qalaba	Representative of KKLM	<u><a href="mailto:mzi.qalaba@koukamma.gov.za">mzi.qalaba@koukamma.gov.za</a></u>
<b>Landowners - WWTW site, Woodlands – Woodlands Farm 585 - Erf Nr: RE/1; Area (Sqm):3273903.6; SG Code: C03400160000000100000</b>		
Koukamma Municipality	KKLM	
Remainder of Erf 1 Woodlands	Provincial Department	
Farm Palmiet River 584	KKLM	
<b>Adjacent Landowners</b>		
Landfill	KKLM	
Remainder of Erf 1 Woodlands	Provincial Department	
West - Farm Palmiet River 584		
Farm Nr: 2/584		
Area (Ha): 386.66		
Legal Status: Surveyed		
South –		
Re/583		
Farm Nr: RE/583		
Area (Ha):1943.16		

<b>Identified / Registered Additional Interested and affected parties</b>	
Georgie Muller	Farmer
Johnny Van Niekerk owner of the Southlands Dairy Group	Farmer
Pow Fontein	Farmer
Dian Landman	Farmer
Danie Erasmus	Farmer
Justin Davies - Greenside Dairy	Farmer
Robbehoek Stal	Farmer
<b>Langkloof Bricks</b>	Clay brick maker
<b>Nomvelo Siwela</b>	Environmental Officer Kouga Local Municipality







## **Appendix E2: Advert, notices, BID**

*Two notices were placed at the site; outside local shop and adjacent to sports field*



## Notification of Public Participation

### Proposed upgrade of Bulk Sewers, Replacing of Small-Bore Sanitation System at Woodlands, Koukamma Local Municipality, Eastern Cape

The existing small-bore gravity sewer reticulation and digester system servicing Woodland's settlement is in urgent need of upgrade. The system overflows in peak conditions; limited capacity to clean the digesters has often led to unsanitary conditions.

The Koukamma Local Municipality (KKLM) has commissioned SMEC South Africa to design and implement the required upgrade; the following is proposed:

- Discontinue current digester tank system; replace internal reticulation pipes
- Re-route and upgrade bulk sewer collector; The new system will operate as a gravity sewer
- WWTW capacity upgrade from 250 kl/d to 1000kl/d; development footprint of 2.2 ha; head of works, treatment process, sludge management (

In terms of the National Water Act 36 of 1998, the upgrade requires an integrated Water Use License (WUL) for Section 21 water uses:

- c - Impeding or diverting the flow of water in a watercourse
- i - Altering the bed, banks, course, or characteristics of a watercourse
- f- Discharging waste or water containing waste into a water resource (Woodlands WWTW currently has a valid General Authorization (Ref 27/2/2/K480/7/8) for S21f)
- g - Disposing of waste in a manner which may detrimentally impact on a water resource (confirm)

In terms of the National Environmental Management Act (Act 107 of 1998), the proposed upgrade requires Environmental Authorisation (EA) for the following:

2014 Environmental Impact Assessment (EIA) Regulations, as amended, 2017:

- GNR. 327 - Activity 19 - infilling or depositing of any material of more than 10 cubic meters...
- GNR. 327 - Activity 27 - clearance of 1 hectares or more, less than 20 hectares...
- GNR. 324 -Activity 14 - development of (ii) infrastructure or structures (10m2 or more) within watercourse/ 32 m of watercourse...
- GNR. 324 -Activity 23 - expansion of (ii) infrastructure or structures (10m2 or more) within watercourse/ 32 m of watercourse...

To be confirmed - In terms of the National Environmental Management: Waste Act (Act 59 of 2008) (NEMWA) the WWTW will not require a waste management license; Category C: Norms and Standards for the treatment of organic waste may apply.

**Notice is hereby given in terms of** Regulation 41 of the NEMA EIA regulations that KKLM will be applying for an EA from the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism and for a WUL from the Department of Water and Sanitation. A Basic Assessment process will be carried out as part of the EA application process.

A public participation process will be conducted in terms of the NEMA Regulation 41 of GN R. 326, 2014, as amended. All interested and affected parties (IAPs) are encouraged to participate in the process. Register and / or submit initial comments as an IAP within 30 days of this notice to contact details provided. **Registration period: 27 March to 2 May 2025**

A draft basic assessment report will be made available to all registered IAPs for a 30-day review and comment period.

**Environmental Assessment Practitioner:** Claire De Jongh (EAPASA Reg: 2021/3519)

Tel: 0846074743

Fax: 086 402 9562

Email: [claire@ecoroute.co.za](mailto:claire@ecoroute.co.za) | [admin@bluepebble.co.za](mailto:admin@bluepebble.co.za)

### Details of site Notice and advert





**claire@bluepebble.co.za**

---

**From:** admin@bluepebble.co.za  
**Sent:** Thursday, 27 March 2025 13:16  
**To:** TshatshuP@dws.gov.za; BloemM@dws.gov.za; jackv@dws.gov.za; MpumelaN@dws.org.za; TMbambo@dffe.gov.za; 'OCEIA'; ayanda.mncwabe-mama@ecsrac.gov.za; lungiswam@ecphra.org.za; Randall.Moore@ectransport.gov.za; Monde.Manga@ectransport.gov.za; Ruffus.Maloma@drdar.gov.za; GcinileD@daff.gov.za; Blayini@dffe.gov.za; V.Zikishe@sanbi.org.za  
**Cc:** claire@ecoroute.co.za; claire@bluepebble.co.za; janet@bluepebble.co.za  
**Subject:** NOTIFICATION OF PUBLIC PARTICIPATION - Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape  
**Attachments:** BID - Woodlands WWTW\_27 March 2025.pdf

Dear State Department,

Register and / or submit initial comments as an IAP within 30 days of this notice to contact details provided.

**Registration period: 27 March to 2 May 2025**

The BID can also be viewed on our website: [Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality | Blue Pebble](#)

**claire@bluepebble.co.za**

---

**From:** admin@bluepebble.co.za  
**Sent:** Thursday, 27 March 2025 13:19  
**To:** katepm@koukamma.gov.za; koukamma@koukamma.gov.za; thozamile.sompani@koukamma.gov.za; chantelle.snyders@koukamma.gov.za; Racquel.grootboom@koukamma.gov.za; britzco@mweb.co.za; barker.smit@gmail.com; baker.smit@gmail.com  
**Cc:** claire@ecoroute.co.za; claire@bluepebble.co.za; janet@bluepebble.co.za  
**Subject:** NOTIFICATION OF PUBLIC PARTICIPATION - Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape  
**Attachments:** BID - Woodlands WWTW\_27 March 2025.pdf

Dear I&AP,

Register and / or submit initial comments as an IAP within 30 days of this notice to contact details provided.

**Registration period: 27 March to 2 May 2025**

The BID can also be viewed on our website: [Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality | Blue Pebble](#)

**claire@bluepebble.co.za**

---

**From:** admin@bluepebble.co.za  
**Sent:** Thursday, 27 March 2025 13:20  
**To:** claire@ecoroute.co.za; claire@bluepebble.co.za  
**Subject:** FW: NOTIFICATION OF PUBLIC PARTICIPATION - Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape  
**Attachments:** BID - Woodlands WWTW\_27 March 2025.pdf

Hi Claire,

Forgot to copy you in.

Kind regards,

Carina

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**From:** admin@bluepebble.co.za <admin@bluepebble.co.za>  
**Sent:** Thursday, 27 March 2025 13:12  
**To:** 'Andries Struwig' <Andries.Struwig@dedea.gov.za>; 'Dayalan Govender' <Dayalan.Govender@dedea.gov.za>; 'Vuyo.Maquutu@dedea.gov.za' <Vuyo.Maquutu@dedea.gov.za>; 'Adriaan.leroux@dedea.gov.za' <Adriaan.leroux@dedea.gov.za>  
**Cc:** 'Charmaine Struwig' <Charmaine.Mostert@dedea.gov.za>  
**Subject:** NOTIFICATION OF PUBLIC PARTICIPATION - Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape

Dear State Department,

Register and / or submit initial comments as an IAP within 30 days of this notice to contact details provided.

**Registration period: 27 March to 2 May 2025**

The BID can also be viewed on our website: [Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality | Blue Pebble](#)

**claire@bluepebble.co.za**

---

**From:** admin@bluepebble.co.za  
**Sent:** Thursday, 27 March 2025 13:22  
**To:** ted@sbdm.co.za; npeterson@sbdm.co.za; cmabindla@sbdm.co.za; danielsu@sbdm.co.za; tmokoena@sbdm.co.za; mmbanga@sbdm.co.za; ksanyamandwe@sbdm.co.za; zsomi@cacadu.co.za; kmakgoka@sbdm.co.za  
**Cc:** claire@ecoroute.co.za; claire@bluepebble.co.za; janet@bluepebble.co.za  
**Subject:** NOTIFICATION OF PUBLIC PARTICIPATION - Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape  
**Attachments:** BID - Woodlands WWTW\_27 March 2025.pdf

Dear I&AP,

Register and / or submit initial comments as an IAP within 30 days of this notice to contact details provided.

**Registration period: 27 March to 2 May 2025**

The BID can also be viewed on our website: [Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality | Blue Pebble](#)



**claire@bluepebble.co.za**

---

**From:** admin@bluepebble.co.za  
**Sent:** Thursday, 27 March 2025 13:25  
**To:** garyk22@me.com; kmt ecologist@gmail.com; energy@birdlife.org.za; ceo@birdlife.org.za; ianl@ewt.org.za; Brian.Reeves@ecpta.co.za  
**Cc:** claire@bluepebble.co.za; janet@bluepebble.co.za; claire@ecoroute.co.za  
**Subject:** NOTIFICATION OF PUBLIC PARTICIPATION - Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape  
**Attachments:** BID - Woodlands WWTW\_27 March 2025.pdf

Dear I&AP,

Register and / or submit initial comments as an IAP within 30 days of this notice to contact details provided.

**Registration period: 27 March to 2 May 2025**

The BID can also be viewed on our website: [Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality | Blue Pebble](#)

**claire@bluepebble.co.za**

---

**From:** admin@bluepebble.co.za  
**Sent:** Thursday, 27 March 2025 13:25  
**To:** Damian.Sharp@smec.com  
**Cc:** claire@bluepebble.co.za; janet@bluepebble.co.za; claire@ecoroute.co.za  
**Subject:** NOTIFICATION OF PUBLIC PARTICIPATION - Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape  
**Attachments:** BID - Woodlands WWTW\_27 March 2025.pdf

Dear I&AP,

Register and / or submit initial comments as an IAP within 30 days of this notice to contact details provided.

**Registration period: 27 March to 2 May 2025**

The BID can also be viewed on our website: [Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality | Blue Pebble](#)

**claire@bluepebble.co.za**

---

**From:** admin@bluepebble.co.za  
**Sent:** Thursday, 27 March 2025 13:26  
**To:** simphiwe.rosi@koukamma.gov.za  
**Cc:** claire@bluepebble.co.za; janet@bluepebble.co.za; claire@ecoroute.co.za  
**Subject:** NOTIFICATION OF PUBLIC PARTICIPATION - Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape  
**Attachments:** BID - Woodlands WWTW\_27 March 2025.pdf

Dear Applicant,

Register and / or submit initial comments as an IAP within 30 days of this notice to contact details provided.

**Registration period: 27 March to 2 May 2025**

The BID can also be viewed on our website: [Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality | Blue Pebble](#)

## **Notification of Public Participation**

### **Proposed upgrade of Bulk Sewers, Replacing of Small-Bore Sanitation System at Woodlands, Koukamma Local Municipality, Eastern Cape**

The existing small-bore gravity sewer reticulation and digester system servicing Woodland's settlement is in urgent need of upgrade. The system overflows in peak conditions; limited capacity to clean the digesters has often led to unsanitary conditions.

The Koukamma Local Municipality (KKLM) has commissioned SMEC South Africa to design and implement the required upgrade; the following is proposed:

- Discontinue current digester tank system; replace internal reticulation pipes
- Re-route and upgrade bulk sewer collector; The new system will operate as a gravity sewer
- WWTW capacity upgrade from 250 kl/d to 1000kl/d; development footprint of 2.2 ha; head of works, treatment process, sludge management

In terms of the National Water Act 36 of 1998, the upgrade requires an integrated Water Use License (WUL) for Section 21 water uses:

- c - Impeding or diverting the flow of water in a watercourse
- i - Altering the bed, banks, course, or characteristics of a watercourse
- f - Discharge of waste or water containing waste into a water resource through a pipe, canal, sewer or other conduit (Woodlands WWTW currently has a valid General Authorization (Ref 27/2/2/K480/7/8) for S21f)
- g - Disposing of waste in a manner which may detrimentally impact on a water resource

In terms of the National Environmental Management Act (Act 107 of 1998), the proposed upgrade requires Environmental Authorisation (EA) for the following:

2014 Environmental Impact Assessment (EIA) Regulations, as amended, 2017:

GNR. 327 - Activity 19 - infilling or depositing of any material of more than 10 cubic meters...

GNR. 327 - Activity 27 - clearance of 1 hectares or more, less than 20 hectares...

GNR. 324 -Activity 14 - development of (ii) infrastructure or structures (10m<sup>2</sup> or more) within watercourse/ 32 m of watercourse...

GNR. 324 -Activity 23 - expansion of (ii) infrastructure or structures (10m<sup>2</sup> or more) within watercourse/ 32 m of watercourse...

To be confirmed - In terms of the National Environmental Management: Waste Act (Act 59 of 2008)

Kind regards,

**Carina Leslie**  
**Admin Assistant/ Accounts**  
**Office: 067 314 4069**



## **BACKGROUND INFORMATION DOCUMENT (BID)**

### **Upgrading of Waste Water Treatment Works at Woodlands**

**Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape**

## **Introduction**

Woodlands Settlement is a rural settlement located in the Koukamma Local Municipality (KKLM) and situated on the R102 route in the Eastern Cape. The existing small-bore gravity sewer reticulation and digester system servicing Woodland's settlement is in urgent need of upgrade. The system overflows in peak conditions; limited capacity to clean the digesters has often led to unsanitary conditions.

The KKLM has commissioned SMEC South Africa (SMEC) for the design and implementation of the internal sewer reticulation, bulk sewer reticulation, and wastewater treatment works within the Woodlands Settlement.

A concept and viability report has been prepared by SMEC. A summary of the proposed upgrade includes:

- Discontinue current digester tank system; replace internal reticulation pipes with 160mm diameter class 34 uPVC pipes. The new system will operate as a gravity sewer, directing all pipes towards the settlements lower points.
- The current Bulk Sewer Main runs adjacent to the boundary of the Woodlands Development. Future development will place dwelling units over the pipe route, which can potentially cause unsanitary conditions if a pipe bursts, to mitigate, the Bulk Main sewer will be rerouted to run alongside the new developments and within the road reserves. The existing bulk mains will be removed where they intersect future developments. A 160mm diameter pipe, operating at 80% capacity, is sufficient for the development. To accommodate more than the anticipated 20% stormwater ingress, the pipe size will increase to a 200mm diameter class 34 uPVC pipe for the final 900 meters, connecting to the WWTW. Manholes should be placed every 80m, at pipe bends and all pipe connections.
- The WWTW capacity will be increased from 250 kl/d to 1000kl/d.
- The head of works will consist of:
  - o A tanker dumping area
  - o 1x 10mm coarse mechanical screen
  - o 2x degritting channels.
- Waste water treatment processes have been investigated, and the preferred treatment process is the Biological Nutrient Removal process consisting of anaerobic (no oxygen), anoxic (no oxygen, some nitrate), and aerobic (with oxygen) zones. Clarification will be applied (settling of activated sludge - Flux loading in summer can be expected to be 50 kg TS/m<sup>2</sup>/day and 65kg/m<sup>2</sup>/day in winter); treated effluent will gravitate to 2x chlorine contact tanks; sludge management options are being investigated and the preferred option will be confirmed during the process.
- A stormwater dam whereby the excess flow overflows at the Inlet works and gravitates to a stormwater dam is recommended. However, the available land needs to be investigated, and this will be confirmed during the process
- The WWTW is located on Remainder of Erf 1 Woodlands (Erf RE/1; SG Code:C03400160000000100000) which is approximately 327 ha in extent. The new development footprint will be approximately 2.2 ha in extent. Central coordinates: 34° 0'45.35"S; 24° 9'35.41"E)



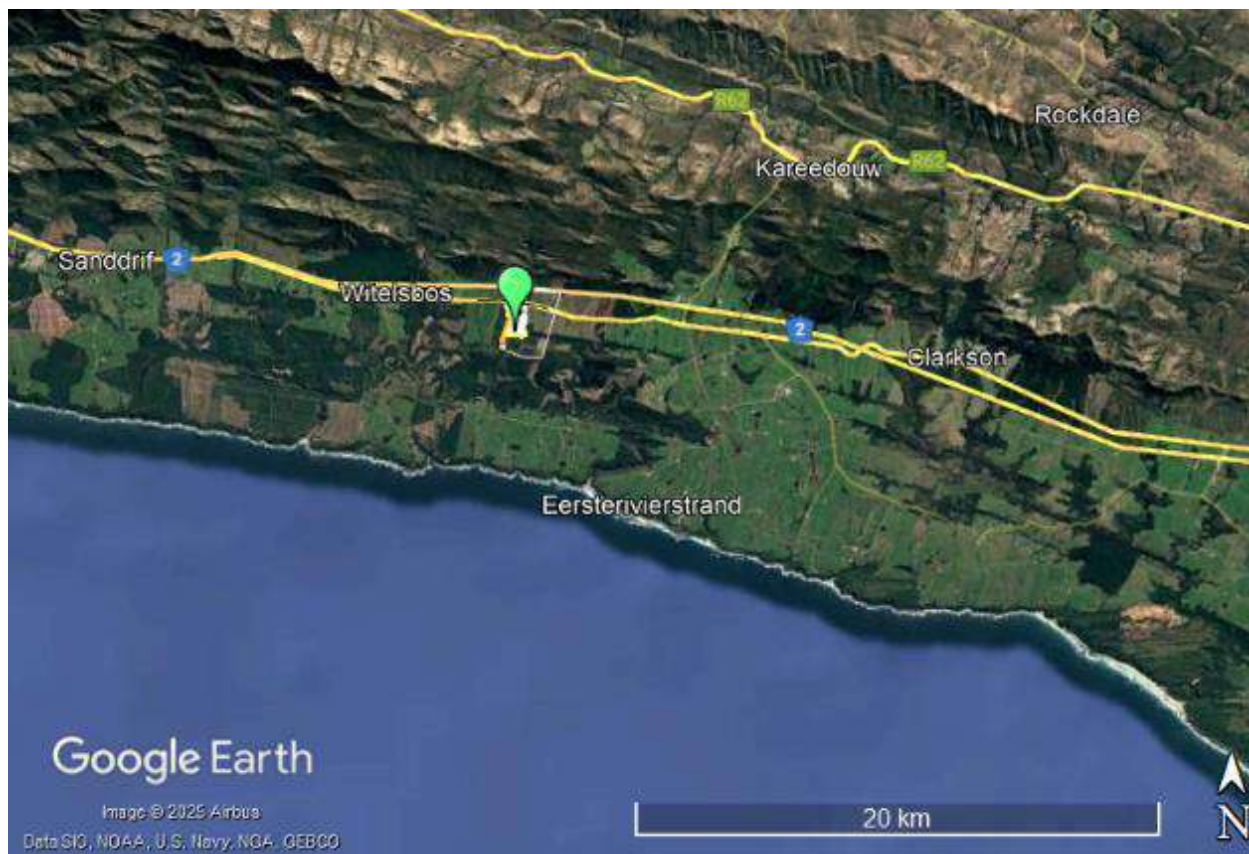


Figure 1: Woodlands settlement located on R102 between Clarkson and Witelsbos in the Koukamma Local Municipality

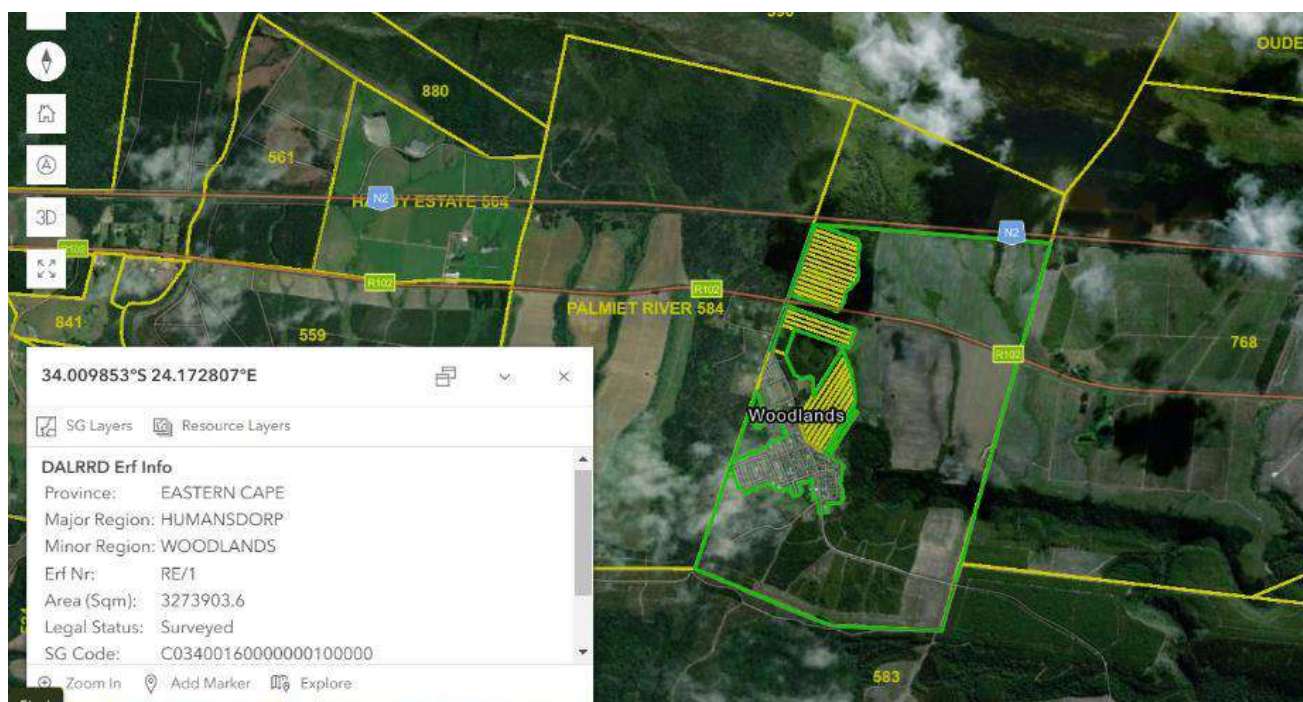


Figure 2: Woodlands WWTW and bulk line situated on Erf RE/1 (adapted from Cape Farm Mapper)



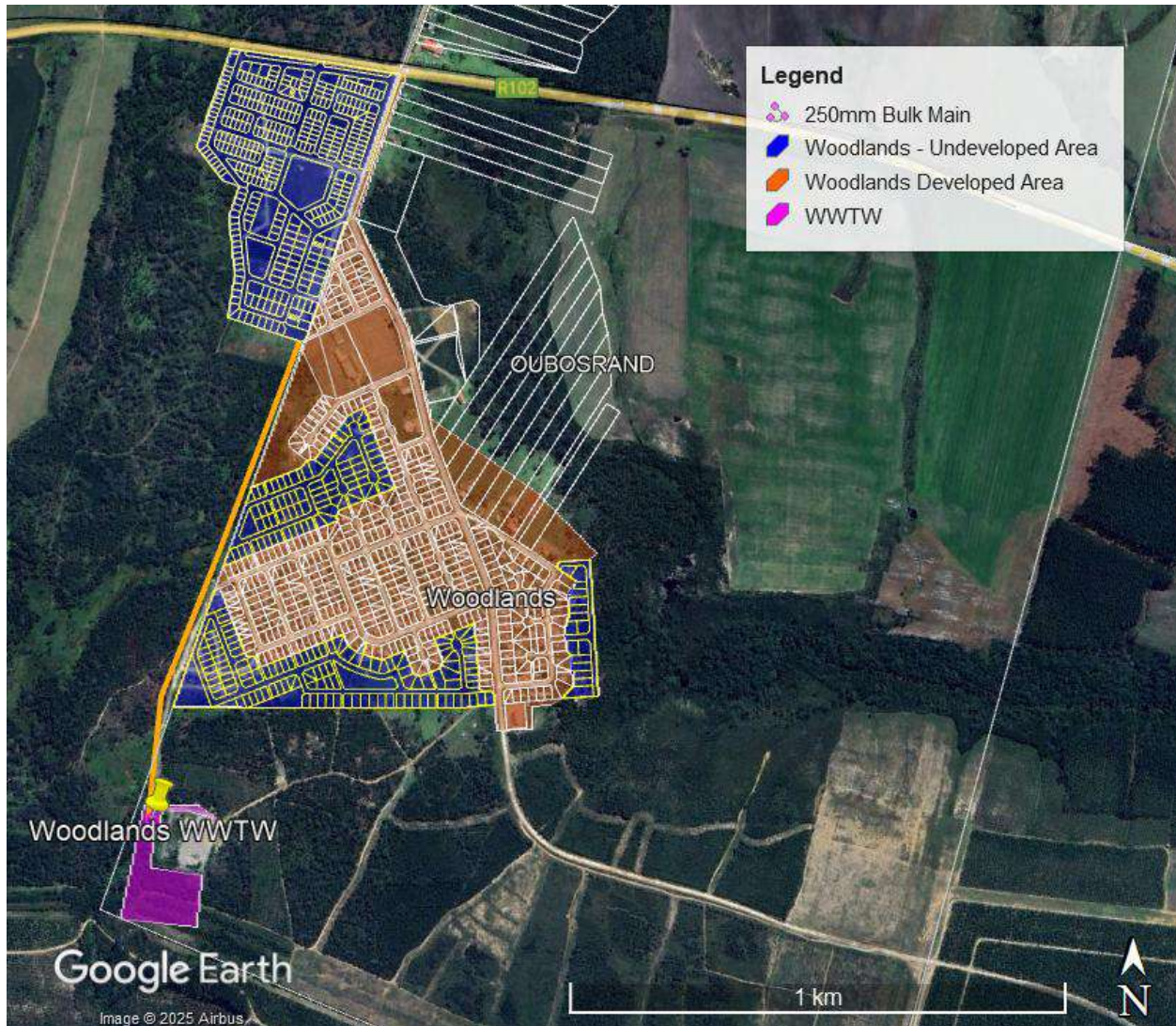


Figure 3: Woodlands Waste water treatment works upgrade footprint (purple); new bulk line (orange)

## Purpose of the Background information document

The main purpose of this Background Information Document (BID) is to:

- Provide potential Interested and Affected Parties (IAPs) with information regarding the proposed development;
- Describe the environmental authorisation process required in terms of the National Environmental Management Act (Act 107 of 1998) and the 2014 Environmental Impact Assessment (EIA) Regulations (as amended, 2017)
- Describe the requirements in terms of the National Environmental Management: Waste Act (Act 59 of 2008)
- Describe the water use license process being undertaken in terms of the National Water Act 36 of 1998
- Outline the public participation process



## Environmental Sensitivities

The following is applicable to the site:

- The site (200masl) is situated within the Mzimvubu-Tsitsikamma water management area in quaternary catchment K80D. The Groot Rivier, mapped in terms of the National Biodiversity Assessment, 2018, is located approximately 800 meters south of the development site. No wetlands or rivers are mapped within the project area in terms of the National Freshwater Ecosystem Priority Areas (NFEPA).
- According to the Kouga Spatial Development Framework (draft review, 2022) the source of water to Woodland's settlements is provided via Natural mountain spring plus 1 borehole (360kl/day).
- In terms of the National Vegetation Map, 2018, vegetation on the WWTW and majority of the pipeline route is mapped as Tsitsikamma Sandstone Fynbos (FFs 20) (Ecosystem Status, 2022: *least concern*); a strip of Eastern Coastal Shale Band Vegetation (FFb6) (Ecosystem Status, 2022: *endangered*) is mapped in a section of the pipeline route.
- In terms of the Eastern Cape Biodiversity Conservation Plan, 2019 (ECBCP) the WWTW and the pipeline route is located within a terrestrial Critical biodiversity area (CBA) 1 and an aquatic Ecological Support Area (ESA) 1.

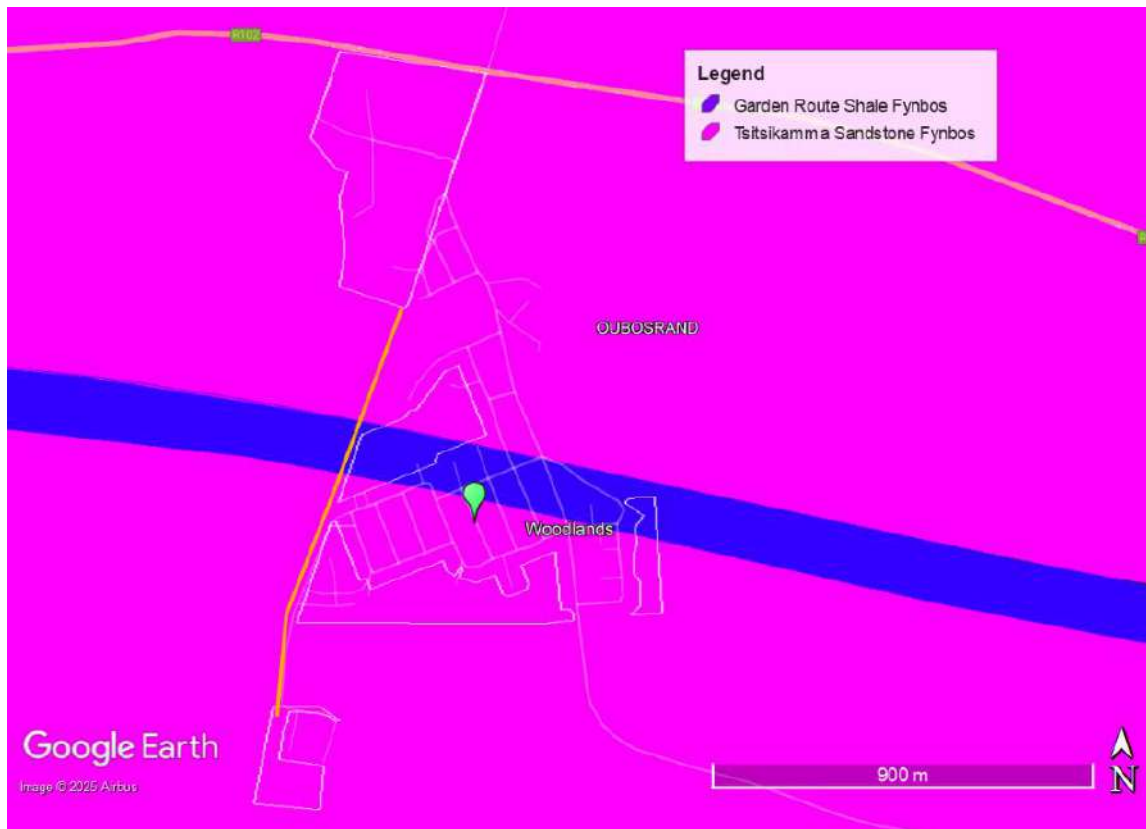


Figure 4: Vegetation types in terms of NatVEG Map, 2019



Figure 5: Site falls within terrestrial CBA 1 (ECBCP, 2019)

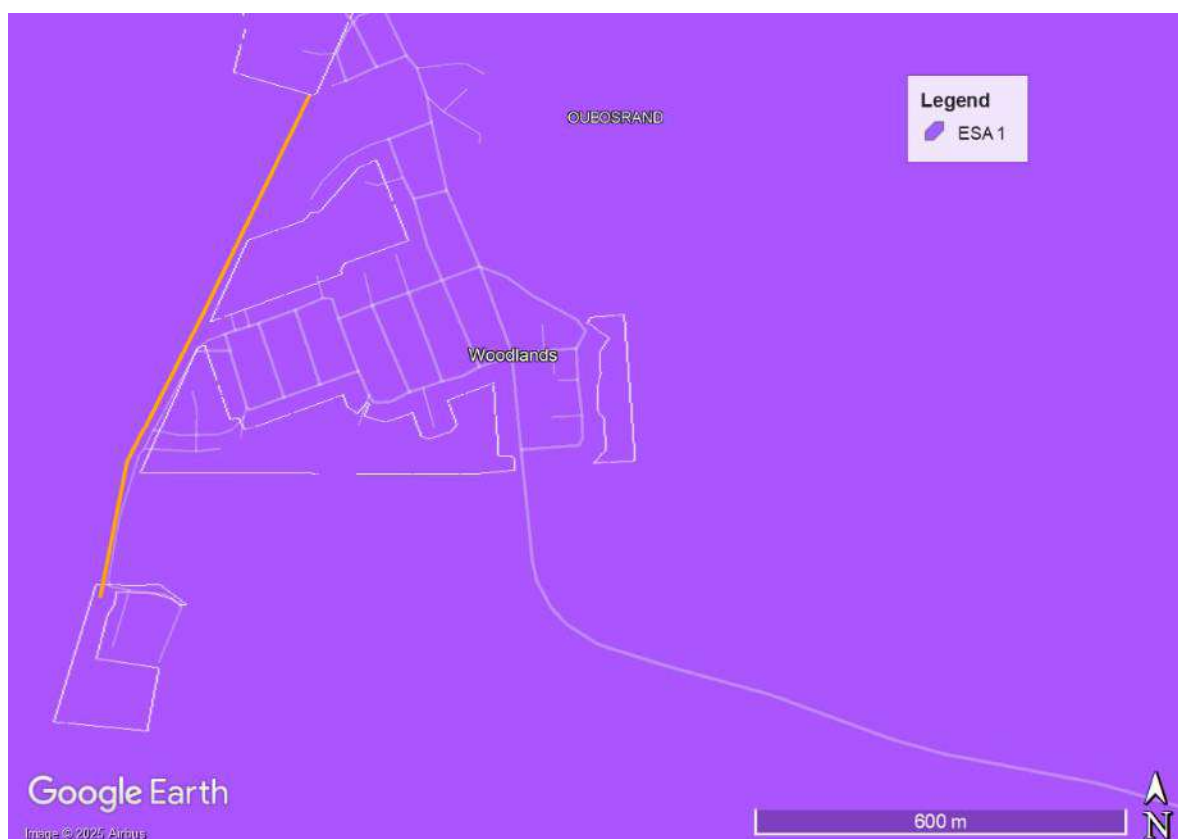


Figure 6: Site falls within aquatic ESA 1 (ECBCP, 2019)

## Legal Requirements

### National Water Act 36 of 1998

An integrated Water Use License (WUL) for the proposed WWTW is required for the following water uses:

- Section 21(c) of the Act: Impeding or diverting the flow of water in a watercourse.
- Section 21(i) of the Act: Altering the bed, banks, course, or characteristics of a watercourse.
- Section 21(f) of the Act: Discharging waste or water containing waste into a water resource.
- Section 21 (g) of the Act: Disposing of waste in a manner which may detrimentally impact on a water resource (confirm)

The Woodlands WWTW currently has a valid General Authorization in place dated 28 September 2017. The GA (Ref 27/2/2/K480/7/8) allows a volume of **1772.8 m<sup>3</sup>/annum** into the Groot River. (S21f)

A water use license application will be submitted to the Department of Water and Sanitation.

### National Environmental Management Act (Act 107 of 1998)

The NEMA 2014 Environmental Impact Assessment (EIA) Regulations (as amended, 2017) sets out a list of identified activities that may not commence without environmental authorisation from the competent authority. Activities requiring environmental authorisation are provided in Table 1. An environmental authorisation application will be submitted to the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT).

Table 1: Activities requiring environmental authorisation

NEMA EIA Listed activity	Relevance to project
<b>Listing Notice 1</b>	
<b>GNR. 327 - Activity 10</b> The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes – (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more;  excluding where— (a) such infrastructure is for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes inside a road reserve or railway line reserve; or (b) where such development will occur within an urban area.	No Will not be triggered; internal diameter (max) is 160 mm; peak throughput is not 120 liters per second or more.
<b>GNR. 327 - Activity 19</b> The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving— (a) will occur behind a development setback; (b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within	Yes - Pipeline crossing watercourse/s

NEMA EIA Listed activity	Relevance to project
existing ports or harbours that will not increase the development footprint of the port or harbour; or (e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	
<b>GNR. 327 - Activity 27</b> The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	Yes – development footprint is approximately 2.2 ha
<b>GNR. 327 - Activity 48</b> The expansion of (i) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; (c) if no development setback has been adopted, within 32 m of a watercourse measured from the edge of the watercourse excluding— (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such expansion occurs within an urban area; or (ee) where such expansion occurs within existing roads, road reserves or railway line reserves.	Excluded - activity 14 in Listing Notice 3 of 2014 applies
<b>Listing Notice 3</b>	
<b>GNR. 324 -Activity 12</b> The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Eastern Cape i. Within any critically endangered or <b>endangered ecosystem</b> listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. <b>Within critical biodiversity areas identified in bioregional plans;</b> iii. Within the littoral active zone or 100 metres inland from the high water mark of the sea, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; iv. Outside urban areas, within 100 metres inland from an estuarine functional zone	Terrestrial CBA 1 in terms of ECBCP Tsitsikamma sandstone fynbos (2022 list ecosystems – least concern) Coastal Shale Band Vegetation (FFb6) (Ecosystem Status, 2022: endangered)
<b>GNR. 324 -Activity 14</b> The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— (a) within a watercourse; (c) if no development setback has been adopted, within 32 m of a watercourse measured from the edge of the watercourse Eastern Cape i. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies;	Terrestrial CBA 1 in terms of ECBCP Note: will be triggered by pipelines within 32 m of watercourse

NEMA EIA Listed activity	Relevance to project
(bb) National Protected Area Expansion Strategy Focus areas; (cc) World Heritage Sites; (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; (ee) Sites or areas identified in terms of an international convention; (ff) <b>Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</b> (gg) Core areas in biosphere reserves; (hh) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve;	
<b>GNR. 324 -Activity 23</b> The expansion of (ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— (a) within a watercourse; (c) if no development setback has been adopted, within 32 m of a watercourse measured from the edge of the watercourse Eastern Cape i. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies; (bb) National Protected Area Expansion Strategy Focus areas; (cc) World Heritage Sites; (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; (ee) Sites or areas identified in terms of an international convention; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; (gg) Core areas in biosphere reserves; (hh) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve;	Note: will be triggered

### **National Environmental Management: Waste Act (Act 59 of 2008)**

A waste management license is not likely to be required for the WWTW in terms of the Waste management activities, GN 921, 2013 (as amended) published in terms of the National Environmental Management: Waste Act (Act 59 of 2008) (NEMWA).

- **Category A, Activity 3 (Storage of Waste)** does **not apply to WWTWs** managing sludge as part of their treatment process.
- Sludge **managed within a WWTW** (e.g., stored, dewatered, treated) is **not considered "waste storage"** under GN R.921 unless it is moved **off-site** for disposal.



No WML is deemed necessary for the sludge stored and treated within a WWTW under a valid water use license.

Note - The treatment of organic waste using composting and any other organic waste treatment will require compliance to the Norms and standards. This will be confirmed when sludge management details are finalised.

### **Screening Tool**

The Department of Forestry, Fisheries and Environment (DFFE) has launched an on-line screening tool that is applied at the initial stages of an assessment. A Screening Report has been generated for the site; the DFFE National Screening Tool indicates the following environmental sensitivities:

- Agricultural Theme: High sensitivity
- Animal species theme: High sensitivity
- Aquatic biodiversity theme: Very High sensitivity
- Archaeological and Cultural Heritage theme: Low sensitivity
- Civil aviation theme: High sensitivity
- Defence theme: Low sensitivity
- Palaeontology theme: Very high sensitivity
- Plant species theme: Medium sensitivity.
- Terrestrial biodiversity theme: Very High Sensitivity

### **Specialist Studies**

The following specialist studies will be carried out:

- Aquatic Assessment And Risk Assessment Matrix
- Terrestrial Biodiversity Assessment
- Flora Assessment
- Fauna Assessment
- Groundwater assessment
- Agriculture desktop assessment
- Heritage screening assessment

In terms of the National Heritage Resources Act (Act 25 of 1999), a Notice of Intent to Develop (NID) will be submitted to the Eastern Cape Provincial Heritage Resources Authority (ECPHRA)

## **Application Processes – NEMA, NWA**

The following steps will be undertaken:

- Generation of screening tool report; complete
- Submission of Notice of Intent to apply for Environmental Authorisation and WUL to the competent authority (DEDEAT; DWS); (current)
- Public participation starts (**current**) and entails:
  - Identifying potential Interested and Affected Parties (IAPS) including landowners, adjacent landowners, relevant organs of state and stakeholders
  - Notice of intent to apply for EA and 30-day registration by IAPS (Current) (27 March – 2 May 2025)
    - Placement of Site Notices at the site
    - Placement of advert in a local newspaper
    - Email notice and background information

- Maintain stakeholder database; keep record of comments received, responses provided, throughout the process
- Comments for the WULA are requested to be submitted within 60-days from start of this public participation notice (Current) (27 March – 2 June 2025)
- Technical information, Specialist studies, site verification, impact assessment, Draft Environmental Management Programme report (EMPr), Comments and Response Report, confirm all listed activities with competent authorities (CA).
- Submission of EA to DEDEAT; initiate WULA process with DWS
- EA Basic assessment Process:
  - Draft BAR to IAPs for a 30-day comment and review period
  - Final BAR to DEDEAT (within 90 days of EA application accepted) for 107-day decision-making period
- WULA process with DWS
- The competent authority reviews the documents and decides whether the project can proceed or not.
- An Environmental Authorisation (EA) with conditions, is issued to the applicant if the proposed development may proceed.
- A copy of the EA is made available to all IAPs to consider, along with the reasons for the decision made. If you disagree with the decision, you are provided with information on how to lodge an appeal.
- A water use license (with conditions) is issued to the applicant

## Public participation process

A vital part of the process is public consultation. The public participation process provides IAPs with an opportunity to gain an informed understanding of the proposed development through the review relevant reports and provides an opportunity for IAPS to comment on the proposed development and raise issues or concerns to be considered during the planning process.

Should you (or any other party you may be aware of) want to participate in the process and / or have comments regarding the proposed development and social and / or environmental related concerns, ***you are invited to register as an IAP*** and submit initial comments.

**Registration period: 27 March to 2 May 2025.**

**To register as an IAP please send your registration request, name & full contact details, and any preliminary comments to:**

Claire De Jongh

[claire@ecoroute.co.za](mailto:claire@ecoroute.co.za)

P.O. BOX 1252 Sedgefield 6573

Tel: 044 343 2232

Fax: 086 402 9562

**Comments for the WULA are requested to be submitted within 60-days from start of this public participation notice: 27 March – 2 June 2025.**

**Written comments pertaining to the WULA Public Participation:**

Sonia Jordaan,

[sonia@confluent.co.za](mailto:sonia@confluent.co.za)

062 743 2416

## **Appendix E3: Meetings and submissions – organs of state**



**claire@bluepebble.co.za**

---

**From:** claire@bluepebble.co.za  
**Sent:** Thursday, 08 May 2025 09:47  
**To:** andries.struwig@dedea.gov.za; 'Admin'  
**Cc:** 'Dayalan Govender'; 'Charmaine Struwig'; 'joclyn@bluepebble.co.za'; 'admin@bluepebble.co.za'  
**Subject:** Request for pre application meeting - Proposed upgrade of Woodlands WWTW - KLM  
**Attachments:** BID - Woodlands WWTW\_27 March 2025.pdf; Proof wula submission.pdf  
  
**Importance:** High

Good day Mr Struwig

Could we please arrange a pre-application meeting for the proposed upgrade of Woodlands WWTW.

I would like to submit the application for environmental authorisation on behalf of KLM in the first week of June.  
The WUL process has been initiated (attached).

Could you kindly let me know your available dates.

Thank you

Kind Regards

**Claire De Jongh**  
0846074743  
EAPASA registration: **2021/3519**

---

**From:** [admin@bluepebble.co.za](mailto:admin@bluepebble.co.za) <[admin@bluepebble.co.za](mailto:admin@bluepebble.co.za)>  
**Sent:** Thursday, 27 March 2025 13:12  
**To:** 'Andries Struwig' <[Andries.Struwig@dedea.gov.za](mailto:Andries.Struwig@dedea.gov.za)>; 'Dayalan Govender' <[Dayalan.Govender@dedea.gov.za](mailto:Dayalan.Govender@dedea.gov.za)>; 'Vuyo.Maquutu@dedea.gov.za' <[Vuyo.Maquutu@dedea.gov.za](mailto:Vuyo.Maquutu@dedea.gov.za)>; 'Adriaan.leroux@dedea.gov.za' <[Adriaan.leroux@dedea.gov.za](mailto:Adriaan.leroux@dedea.gov.za)>

**Cc:** 'Charmaine Struwig' <[Charmaine.Mostert@dedea.gov.za](mailto:Charmaine.Mostert@dedea.gov.za)>

**Subject:** NOTIFICATION OF PUBLIC PARTICIPATION - Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape

Dear State Department,

Register and / or submit initial comments as an IAP within 30 days of this notice to contact details provided.

**Registration period: 27 March to 2 May 2025**

The BID can also be viewed on our website: [Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality | Blue Pebble](#)

## **Notification of Public Participation**

### **Proposed upgrade of Bulk Sewers, Replacing of Small-Bore Sanitation System at Woodlands, Koukamma Local Municipality, Eastern Cape**

The existing small-bore gravity sewer reticulation and digester system servicing Woodland's settlement is in urgent need of upgrade. The system overflows in peak conditions; limited capacity to clean the digesters has often led to unsanitary conditions.

The Koukamma Local Municipality (KKLM) has commissioned SMEC South Africa to design and implement the required upgrade; the following is proposed:

- Discontinue current digester tank system; replace internal reticulation pipes
- Re-route and upgrade bulk sewer collector; The new system will operate as a gravity sewer
- WWTW capacity upgrade from 250 kl/d to 1000kl/d; development footprint of 2.2 ha; head of works, treatment process, sludge management

In terms of the National Water Act 36 of 1998, the upgrade requires an integrated Water Use License (WUL) for Section 21 water uses:

- c - Impeding or diverting the flow of water in a watercourse
- i - Altering the bed, banks, course, or characteristics of a watercourse
- f - Discharge of waste or water containing waste into a water resource through a pipe, canal, sewer or other conduit (Woodlands WWTW currently has a valid General Authorization (Ref 27/2/2/K480/7/8) for S21f)
- g - Disposing of waste in a manner which may detrimentally impact on a water resource

In terms of the National Environmental Management Act (Act 107 of 1998), the proposed upgrade requires Environmental Authorisation (EA) for the following:

2014 Environmental Impact Assessment (EIA) Regulations, as amended, 2017:

- GNR. 327 - Activity 19 - infilling or depositing of any material of more than 10 cubic meters...
- GNR. 327 - Activity 27 - clearance of 1 hectares or more, less than 20 hectares...
- GNR. 324 -Activity 14 - development of (ii) infrastructure or structures (10m<sup>2</sup> or more) within watercourse/ 32 m of watercourse...
- GNR. 324 -Activity 23 - expansion of (ii) infrastructure or structures (10m<sup>2</sup> or more) within watercourse/ 32 m of watercourse...

To be confirmed - In terms of the National Environmental Management: Waste Act (Act 59 of 2008)

**claire@bluepebble.co.za**

---

**From:** claire@bluepebble.co.za  
**Sent:** Tuesday, 27 May 2025 08:25  
**To:** andries.struwig@dedea.gov.za  
**Cc:** 'Dayalan Govender'; 'Charmaine Struwig'; 'joclyn@bluepebble.co.za'; 'admin@bluepebble.co.za'  
**Subject:** FW: Request for pre application meeting - Proposed upgrade of Woodlands WWTW - KLM  
**Attachments:** BID - Woodlands WWTW\_27 March 2025.pdf; Proof wula submission.pdf  
  
**Importance:** High

Good day Mr Struwig

I trust you are well.

I am following up on the request for a pre-application meeting date for the proposed upgrade of Woodlands WWTW.

Thank you

Kind Regards

Claire

0846074743

---

**From:** claire@bluepebble.co.za <claire@bluepebble.co.za>  
**Sent:** Thursday, 08 May 2025 09:47  
**To:** andries.struwig@dedea.gov.za; 'Admin' <admin@ecoroute.co.za>  
**Cc:** 'Dayalan Govender' <dayalan.govender@dedea.gov.za>; 'Charmaine Struwig' <Charmaine.Mostert@dedea.gov.za>; 'joclyn@bluepebble.co.za' <joclyn@bluepebble.co.za>; 'admin@bluepebble.co.za' <admin@bluepebble.co.za>  
**Subject:** Request for pre application meeting - Proposed upgrade of Woodlands WWTW - KLM  
**Importance:** High

Good day Mr Struwig

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I would like to submit the application for environmental authorisation on behalf of KLM in the first week of June.  
The WUL process has been initiated (attached).

Could you kindly let me know your available dates.

Thank you

Kind Regards

**Claire De Jongh**  
0846074743  
EAPASA registration: **2021/3519**

---

**From:** [admin@bluepebble.co.za](mailto:admin@bluepebble.co.za) <[admin@bluepebble.co.za](mailto:admin@bluepebble.co.za)>

**Sent:** Thursday, 27 March 2025 13:12

**To:** 'Andries Struwig' <[Andries.Struwig@dedea.gov.za](mailto:Andries.Struwig@dedea.gov.za)>; 'Dayalan Govender' <[Dayalan.Govender@dedea.gov.za](mailto:Dayalan.Govender@dedea.gov.za)>; 'Vuyo.Maquutu@dedea.gov.za' <[Vuyo.Maquutu@dedea.gov.za](mailto:Vuyo.Maquutu@dedea.gov.za)>; 'Adriaan.leroux@dedea.gov.za' <[Adriaan.leroux@dedea.gov.za](mailto:Adriaan.leroux@dedea.gov.za)>

**Cc:** 'Charmaine Struwig' <[Charmaine.Mostert@dedea.gov.za](mailto:Charmaine.Mostert@dedea.gov.za)>

**Subject:** NOTIFICATION OF PUBLIC PARTICIPATION - Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality, Sarah Baartman District Municipality, Eastern Cape

Dear State Department,

Register and / or submit initial comments as an IAP within 30 days of this notice to contact details provided.

**Registration period: 27 March to 2 May 2025**

The BID can also be viewed on our website: [Upgrading of Waste Water Treatment Works at Woodlands, Koukamma Local Municipality | Blue Pebble](#)

**Subject:** FW: WSP : KOU-KAMMA MUNICIPALITY Woodlands WWTW Upgrade (WU42922)  
**Location:** Microsoft Teams Meeting

**Start:** Thu 2025/05/15 11:00  
**End:** Thu 2025/05/15 12:00  
**Show Time As:** Tentative

**Recurrence:** (none)

**Meeting Status:** Not yet responded

**Organizer:** Sonke Ngxeba (PLZ)

-----Original Appointment-----

**From:** Sonia Jordaan **On Behalf Of** Sonke Ngxeba (PLZ)  
**Sent:** Wednesday, 14 May, 2025 2:36 PM  
**To:** Damian SHARP  
**Subject:** FW: WSP : KOU-KAMMA MUNICIPALITY Woodlands WWTW Upgrade (WU42922)  
**When:** Thursday, 15 May, 2025 11:00 AM-12:00 PM (UTC+02:00) Harare, Pretoria.  
**Where:** Microsoft Teams Meeting

-----Original Appointment-----

**From:** Sonke Ngxeba (PLZ) <[NgxebaS@dws.gov.za](mailto:NgxebaS@dws.gov.za)>  
**Sent:** Thursday, 8 May, 2025 1:03 PM  
**To:** Sonke Ngxeba (PLZ); Chauke Hasani (PLZ); Somdaka Odwa (PLZ); Dweni Ncamile (PLZ); Ngcobo Siyabonga Brilliant; Nyambi Musa Sifiso (PLZ); Heymann Ncumisa (PLZ); Gqotana Asanda(PLZ); Magwebu Bongani (PLZ); Ross Sean (PLZ); Nomandla Sihlangule; Jackie Dabrowski; Sonia Jordaan  
**Cc:** Visagie Hammond; Vongwe Olwetu(ELS); Van Rooyen Esmeralda; Rambani Rachel (ELS); Joyi Mfesane (ELS)  
**Subject:** WSP : KOU-KAMMA MUNICIPALITY Woodlands WWTW Upgrade (WU42922)  
**When:** Thursday, 15 May, 2025 11:00 AM-12:00 PM (UTC+02:00) Harare, Pretoria.  
**Where:** Microsoft Teams Meeting

Good day colleagues

You are hereby invited to a virtual pre-application consultation meeting to discuss the subject application. I would appreciate consultant/ applicant to prepare a brief presentation or map layout to have a glimpse of the project meaning the background and the intent of the project. The presentation must clearly show the type of water source or abstraction point/ location, coordinates, size of the land, type of equipment are going to be used in the project and etc.

N.B. You may forward the link to the other relevant stakeholders. The link for connection purpose is here below:

---

## Microsoft Teams [Need help?](#)

### [Join the meeting now](#)

Meeting ID: 392 950 663 512 0

Passcode: ji2jQ6G3

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### Dial in by phone

[+27 21 836 0621,,187776418#](#) South Africa, Cape Town

[Find a local number](#)

Phone conference ID: 187 776 418#

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

---

**claire@ecoroute.co.za**

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**From:** Sonia Jordaan <sonia@confluent.co.za>  
**Sent:** Tuesday, 15 April 2025 11:13  
**To:** simphiwe.rosi@koukamma.gov.za  
**Cc:** Jackie Dabrowski; joclyn@bluepebble.co.za; Damian SHARP; claire@ecoroute.co.za  
**Subject:** FW: Pre-Application Water Use Enquiry has been submitted to the department (WU42922)  
**Attachments:** ATT00001.bin

Good morning Simphiwe,

Please see below email for your information and records. This is from DWS to acknowledge receipt of the request to apply for a water use license for the upgrade of the Woodlands WWTW.

Kind regards,  
Sonia

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**From:** [Ewulaas Do Not Reply@dws.gov.za](mailto:Ewulaas_Do_Not_Reply@dws.gov.za) <[Ewulaas Do Not Reply@dws.gov.za](mailto:Ewulaas_Do_Not_Reply@dws.gov.za)>  
**Sent:** Tuesday, 15 April 2025 10:31  
**To:** Jackie Dabrowski <[jackie@confluent.co.za](mailto:jackie@confluent.co.za)>  
**Subject:** Pre-Application Water Use Enquiry has been submitted to the department (WU42922)

Dear Dr Jackie Dabrowski (Consultant),

A request for consultation for the following Pre-Application Water Use Enquiry has been submitted to the department :

Woodlands WWTW Upgrade (WU42922)

Your request for consultation was submitted to :

Name : Mrs L. Fourie (WULA Manager)  
e-Mail : [FourieL4@dws.gov.za](mailto:FourieL4@dws.gov.za)  
Tel : 0437010248



[Click Here to access the Application](#)

Kind Regards,

e-WULAAS on Behalf of **Department of Water and Sanitation**

Private Bag X313, Pretoria, 0001

Sedibeng Building, 185 Francis Baard Street, Pretoria, 0001

Tel: (012) 336 7500

Fax: (012) 323-4472

Website: [www.dws.gov.za](http://www.dws.gov.za)

Email: [E-WULAASCalls@dws.gov.za](mailto:E-WULAASCalls@dws.gov.za)



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## **Appendix E4: Registration and comments**

**claire@bluepebble.co.za**

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**From:** Ayanda Mncwabe-Mama <ayanda.mncwabe-mama@ecsrac.gov.za>  
**Sent:** Friday, 02 May 2025 12:34  
**To:** claire@bluepebble.co.za; admin@bluepebble.co.za  
**Cc:** manager@ecphra.org.za; Lungiswa Mzazi  
**Subject:** Upgrading of Waste Water Treatment Works at Woodlands, Koukamma LM, SBDM  
**Attachments:** Upgrading of WWTW at Woodlands, Koukamma LM.pdf; ECPHRA APM Application Process.pdf; ECPHRA Living Heritage & Cultural Landscape Guidelines.pdf; ECPHRA NID Form.pdf

Dear Claire / Carina

Find attached the ECPHRA heritage comment on the proposed development in the subject line. Note that I have also attached our process guideline for Section 38 applications including the NID form.

**Best Regards,**

**Ayanda Mncwabe-Mama**  
**Archaeologist**  
**Department of Sport, Recreation, Arts and Culture: Museums & Heritage**  
5 Eales Street | Wilton Mkwayi Building | Qonce  
Private Bag 0020 | Qonce | 5600  
**Tel:** (043) 492 1370 | **Email:** [ayanda.mncwabe-mama@ecsrac.gov.za](mailto:ayanda.mncwabe-mama@ecsrac.gov.za) |

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No.17 Commissioner Street, 2<sup>nd</sup> Floor Old Elco Building,  
Telephone: 043 492 1940/1/2  
Website: [www.ecphra.org.za](http://www.ecphra.org.za)

**PROJECT:** UPGRADING OF WASTEWATER TREATMENT WORKS AT  
WOODLANDS, KOUKAMMA LOCAL MUNICIPALITY, SBDM.

Enquiries: Ayanda Mncwabe-Mama  
Date: 2025/05/02  
Email: [ayanda.mncwabe-mama@ecsrac.gov.za](mailto:ayanda.mncwabe-mama@ecsrac.gov.za)

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Applicant: SMEC South Africa (SMEC) o/b Koukamma LM  
Consultants: Bluepebble Independent Environmental Agency cc  
Contact Person: Claire De Jongh / Carina Leslie  
Email / Tel: [claire@bluepebble.co.za](mailto:claire@bluepebble.co.za) / [admin@bluepebble.co.za](mailto:admin@bluepebble.co.za) or 067 314 4069

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## **BACKGROUND**

The WWTW is located on Remainder of Erf 1 Woodlands which is approximately 327 ha in extent. The new development footprint will be approximately 2.2 ha in extent. The existing small-bore gravity sewer reticulation and digester system servicing Woodland's settlement is in urgent need of upgrade. The system overflows in peak conditions; limited capacity to clean the digesters has often led to unsanitary conditions.

## **ECPHRA (Eastern Cape Provincial Heritage Authority) COMMENTS in terms of Section 38 of the National Heritage Resources Act (25 of 1999).**

*This case was tabled at the Archaeology, Palaeontology and Meteorites (APM) Committee meeting held on 15 April 2025.*

### **ECPHRA Interim Comment:**

ECPHRA acknowledges the BID submitted and further requests:

1. ECPHRA Notice of Intent to Develop, for our records.
2. Phase 1 Heritage Impact Assessment (HIA) which includes all aspects of the development. The impact assessment should comprise of the ffg:
  - Phase 1 AIA (archaeological impact assessment), including a desktop and field assessment. The AIA must include cultural landscape and living heritage component (see NHRA 1999 Section 38.3.e).
  - PIA (paleontological impact assessment) done according to the SAHRIS *paleo-sensitivity* level.
3. Proof of Payment (R500 NID & R1 500 HIA), see administration details below.

**NOTE:** Heritage reports must meet the SAHRA (2007) reporting standards. Reports must be compiled by specialists (AIA by an archaeologist with a minimum of an Honours

degree qualification & a PIA by a palaeontologist with a minimum of a Master's degree qualification).



Mr. Azola Mkosana  
ECPHRA: Manager

**General information:**

1) ECPHRA fees

The following fees apply to your application:

R 500 - NID fee and

R 1 500 – HIA reports

**Banking Details:**

Bank name: First National Bank (FNB);

Account name: Eastern Cape Provincial Heritage Resources Authority;

Account type: Public Sector Business Account;

Account number: 62705406248;

Branch code: 211021;

Reference: Project or Development name / SAHRIS CaseID number

Proof of payment(s) must be emailed to:

[accounts@ecphra.org.za](mailto:accounts@ecphra.org.za) with the subject: Project or Development name / SAHRIS CaseID

2) SAHRIS

A South African Heritage Resources Information System (SAHRIS) case must be registered for the development/project (<https://sahris.sahra.org.za/about/sahris>):

- Complete all relevant sections of the SAHRIS case application.
- Proof of payment(s) must be uploaded on the SAHRIS case under the *Additional Documents* section.
- The requested NIDs must be uploaded on the SAHRIS case

Once the NID have been submitted on the SAHRIS case, notify ECPHRA by email at [lungiswam@ecphra.org.za](mailto:lungiswam@ecphra.org.za) with the subject SAHRIS CaseID number–development/project name. Your case will be tabled at the next APM meeting for purposes of a NHRA Section 38(4)/(8) comment.

3) Queries

Any queries regarding your case should be addressed to [lungiswam@ecphra.org.za](mailto:lungiswam@ecphra.org.za) / [ayanda.mncwabe-mama@ecsrac.gov.za](mailto:ayanda.mncwabe-mama@ecsrac.gov.za) with the subject SAHRIS CaseID number / Development/ Project name.

**claire@ecoroute.co.za**

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**From:** Georgie Muller  
**Sent:** Tuesday, 22 July 2025 08:52  
**To:**

**Cc:**  
**Subject:**

Morning guys

Please see below email from Confluent, they are an environmental consulting company based in George.

I think most of your farms are close to being within a 10km radius of the site so this could be of interest?

Please could you let me know and I will pass your contact details onto Jackie and her team

Kind Regards  
Georgie

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**From:** Jackie Dabrowski <jackie@confluent.co.za>  
**Sent:** Tuesday, 22 July 2025 07:57  
**To:** Georgie Muller  
**Cc:** 'Dabrowski, Jackie'  
**Subject:**

Hi Georgie,

Thanks in advance for agreeing to forward this query on to dairy farmers in the Woodlands area.

Some background:

The Koukamma Municipality are applying for environmental authorisations to upgrade the bulk sewer line and Wastewater Treatment Works (WWTW) in the settlement of Woodlands, Tsitsikamma. Currently the plant is dysfunctional, and raw sewage is dumped on a regular basis into the nearby stream and wetland, west of the settlement.

The upgrade is therefore urgently needed both from a human and environmental health perspective.



An aspect which has not yet been resolved, and may compromise the outcome of the application for the Water Use License, is the municipality's plan for handling sludge produced by the plant. Currently there is no clear plan, and sludge management in nearby plants provides no assurance that a plan acceptable to the Department of Water and Sanitation will be provided.

Our project team (environmental and engineering) therefore discussed the option of making the sludge available to nearby farms for use as a fertiliser, a practice which is undertaken in many places, although not always formalised. This arrangement would need to be formalised, because we would apply for the use of sludge on a particular farm(s) through the current Water Use License. The farmer would not need to concern themselves about the licensing, because it would form part of the application for the upgraded WWTW.

Attached is a preliminary report for the proposed services upgrade compiled by SMEC engineers (Damian, copied). This report mentions sludge a lot in terms of the current and proposed processes, but does not have clarity on the final destination for sludge. Damian will be able to provide further details on the likely quantity, quality and specs of the sludge, as this is not my field of expertise. I would imagine the closer the farmers are to the WWTW the better for reduced transport costs. I don't imagine that there would be any cost for the sludge as the municipality see it as a waste product that must be disposed of to make space for more in their sludge drying beds.

The finer details would need to be worked out in terms of timeframes, transport costs, quality control, contractual commitments etc. But for now, we'd like to get a sense of the level of interest from local farmers if possible, and that is where your local contacts in the area are invaluable! The location attached is for the new WWTW footprint. Feel free to forward this information on to farmers as an introduction to this discussion.

Much Appreciated,  
Jackie



**Dr. Jackie Dabrowski**  
Director & Aquatic Specialist  
Pr. Sci. Nat. (Aquatic Science & Ecology)

7 St. Johns Street  
Dormehls Drift,  
George, 6529

+27 83 256 3159  
[jackie@confluent.co.za](mailto:jackie@confluent.co.za)  
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