



Royal HaskoningDHV
6 Payne Street
PINETOWN
3610

CLIENT: Royal HaskoningDHV
K&A REF: RK/Letter/0061
DATE: 19th October 2015

ATTENTION: NOVASHNI MOODLEY

Dear Madam

EXTERNAL PEER REVIEW: THE BHUDLU ACCESS BRIDGE AND LINK ROAD IN KWAZULU-NATAL AND EASTERN CAPE; cBAR, ISSUES REPORT & EMPr

This letter confirms that the above information has been reviewed in alignment with the requirements that were stipulated by Royal HaskoningDHV in the sub-consultancy agreement.

Dr. Richard Kinvig of Kinvig & Associates:

- i. Has independently peer-reviewed the documentation, and other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that could have compromised my objectivity and independence when assessing said documentation;
- ii. Is fully aware of and meets all of the requirements of Regulation 13, and that failure to comply with any of the requirements may result in disqualification;
- iii. Has reviewed all the work (mentioned above) undertaken by the EAP;
- iv. Will disclose, to the applicant, the EAP, other specialist (if any), the Department (National Department of Environmental Affairs, DEA) and interested and affected parties, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared or to be prepared as part of the application; and
- v. Is aware that a false declaration is an offence in terms of regulation 48 of the 2014 NEMA EIA Regulations.

The following comments about the information that was reviewed has context:

- * The cBAR, EMPr and the Issues Trail documentation, was of a high standard, with the project description being well articulated and accurate.

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- * The impact assessment was substantial and well worded. The separation of the impacts into the phases of the project is good. The measures that have been recommended to mitigate impacts are practical and implementable.
 - * The EMPr was comprehensive and easy to interpret and was well considered and articulated.

The ecological assessment, was requested as supporting documentation, as a result of the interrogation of the cBAR and EMPr.

The following comments bear consideration:

The assessment was undertaken in May and thus, potentially species may have been missed. A further assessment was undertaken in September (29th). The species list was very limited and this indicates the deductions made that the area is utilised quite heavily for livestock grazing. Further, where *Aristida* sp. are dominant it is often reflected in a lower species richness.

Having undertaken a considerable amount of work in the assessment area, and due to the positioning of the proposed roads and the Umtamvuna River Crossing, we would suggest that the grassland areas are potentially degraded and of lower ecological significance. This would be in line with the findings of the ecological assessment.

Having assessed the Ecological Report we would have the following comments:

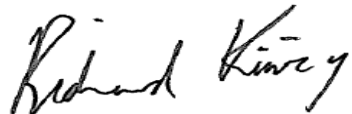
- No Assumptions and / or Limitations have been noted, and these need to be included in terms of the requirements of a specialist study;
- Option 2 (two) is the preferred option which aligns with the findings of the other specialists, and;
- A walkthrough has been proposed to be undertaken prior to construction commencing. This is particularly pertinent in the areas identified as having a slightly elevated sensitivity. The walk through will ensure that the receiving environment is free of any protected, rare and threatened plant species, and should said species exist allow an opportunity for the necessary legislated steps to be taken (e.g. permit applications).

We therefore submit that having reviewed the document we are satisfied with the content and believe that the appointed EAP has undertaken the scope of works to the best of their ability and have been independent and objective in their assessment.

We hope to have made a positive contribution to your project team.

Should you have any queries please don't hesitate to contact the undersigned at (083) 463-2919.

Yours faithfully



Dr. Richard Kinvig (Pr. Sci. Nat.)
Director / Ecologist

