



Royal HaskoningDHV  
The Boulevard Umhlanga  
19 Park Lane  
UMHLANGA ROCKS  
4319

CLIENT: Royal HaskoningDHV  
K&A REF: RK/Letter/0223  
DATE: 21<sup>st</sup> August 2017

**ATTENTION: HUMAYRAH BASSA**

Dear Madam

## **EXTERNAL PEER REVIEW: CBAR FOR THE PROPOSED REHABILITATION OF PROVINCIAL ROAD P50-1 FROM KM 17,34 TO KM 26,00, WITHIN THE UMLALAZI LOCAL MUNICIPALITY, KWAZULU-NATAL**

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 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 (as amended).

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

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- \* The cBAR and EMPr were assessed and proved to be comprehensive. However, detail regarding the actual activities, in particular relating to the manner in which the culverts were to be upgraded or replaced, was not evident. General information, recommendations and standard best practices were provided. The peer reviewer through interactions with the EAP, was told that in order for the detailed assessment of the culverts to be undertaken, wetland vegetation as well as the wetlands would be interfered with, thus triggering an activity requiring Environmental Authorisation.
  - \* These investigations and activities would require an Environmental Authorisation to be in place, prior to commencing with said works and thus the detail would only be evident post authorisation. On this basis the peer reviewer would recommend that the detailed information (in the form of a Construction Method Statement) be submitted to the peer reviewer prior to any works commencing, post investigation for comment and that the proposed works be detailed as Construction Method Statements that are appended to the EA. Note: the tender documents and EMPr must take a conservative approach and that any bill of quantities should have an additional provision made by the contractor of 20%, to allow for any potential deviations or currently unidentified issues.
  - \* The mapping was satisfactory, however, a number of recommendations regarding the manner in which the information is graphically displayed were provided.
  - \* The impact assessment was substantial and well worded. The measures that have been recommended to mitigate impacts are practical and implementable.
  - \* The EMPr, was required to be reviewed in order to ensure that it was auditable and that the information was accurately captured and thus the mitigations and impacts correctly recorded. Some of the wording required re-visiting, as it was suggestive as opposed to prescriptive, i.e. words such as should, may, needed to be replaced with must. The reviewer made said changes.

The following comments bear consideration:

The Construction Method Statements must be submitted to the Competent Authority for approval and sign-off to ensure consistency with the EMPr and the EA, which will ensure that the overall impact remains within the identified levels of impact.

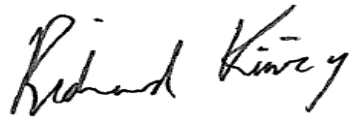
The proposed project if undertaken correctly and in strict adherence to the EMPr and the conditions of Environmental Authorisation, in our opinion, should have a low impact as presented by the cBAR.

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

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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**

