

23 September 2008

Cymblan Enviro-Social Consulting Services (PTY) Ltd.
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Attention: Paula Tolksdorff

Comment on MMTS Phase 2 Environmental Review

Dear Ms Tolksdorff

Thank you for forwarding an electronic copy of the draft EIA report for review.

The proposed water resource is a key component in allowing Umgeni Water to meet its statutory mandate of providing bulk water services to municipalities in our area of supply. In light of this, the report has been reviewed with respect to consideration of the impacts by the proposed development on Umgeni Water bulk water supply services. Areas where further clarity in the report is required have also been noted.

The Environmental Impact Assessment Matrix makes reference to a "post de-commissioning criteria" on the duration column of the matrix. It is firstly recommended that the section 21.1.3 be updated to reflect these criteria. It is also suggested that many of the impact variables that are identified to occur in the "post-de-commissioning period" will also occur in construction and operation. The table 24.1 should therefore be improved to reflect this.

The environmental impact matrix is also silent (the column is left blank) on the significance after mitigation (section 21, point 9.3.2) of impacts on the receiving streams. It is suggested that an explanatory note should be placed below the matrix as to why it is not addressed. It is understood that the ROD for the Receiving Stream has already been granted for a 4.6 cumec transfer. However, it may be interpreted by the affected parties that there are additional structures being developed which are associated with this phase of MMTS-2 which were not previously identified under MMTS-1, and which may contribute toward an incremental impact on the receiving stream. Some consideration should have been given to this issue in this EIR.

In section 23.5 (recommendation regarding ecological impacts) it is stated that after considerable investigation, there is a shortage of 154ha of wetlands to be rehabilitated and that DWAF at the time indicated a limitation in negotiating conditions being proposed by land-owners for acquisition of wetlands that would meet this shortfall. The main concern was the cost of acquiring additional land for this project on the projected water tariff. In the management of the MMTS-1 to date, Umgeni Water has responded to frequent complaints of flooding on Mr. Bischoff's property, which is situated immediately upstream of Midmar Dam, during periods of transfer. This property is a degraded (drained) wetland that if expropriated and rehabilitated, will assist in meeting the requirements for off-site mitigation of the proposed MMTS-2 project. More important however, is that it may also assist in ameliorating the sediment and other pollution of Midmar Dam that can be attributed to the impact of the existing MMTS-1 as well as impacts of increased flows associated with MMTS-2. It has been

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observed that the MMTS-1 Impact on the "receiving streams" has resulted in considerable scouring of the Mpofana river basin.

With respect to the draft Environmental Management Plan the following recommendations are made

- Pg 13 of the EMP makes recommendation that a Water Management Plan is drawn up by the Contractor and indicates that DWAF will stipulate the acceptable level of sedimentation. It is recommended that a monitoring program must be drawn up in consideration of the various uses of downstream water during the construction period including
 - the possible impacts on water transfer from Mearns dam to Mgeni catchment
 - the acceptable water quality levels for water treatment for potable use
 - the acceptable water quality levels for irrigation.

- The grass seed specification for rehabilitation described in Appendix 5 should be updated with information from EKZN wildlife and/or Cedara to reflect local conditions.

Umgeni Water looks forward in supporting DWAF to ensure a successful and timely implementation of this project.

Yours faithfully




P.M.M. JONAS
GENERAL MANAGER: ENGINEERING AND SCIENTIFIC SERVICES