

COMMENTS AND RESPONSE REGISTER

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DEDEAT 02 December 2025	Comments on the acknowledgement Letter for the proposed development of a new landfill site in Maletswai in Walter Sisulu Local Municipality The department received the application form on 01 December 2025 from Rambuda Consultants for the subject mentioned above. The application was acknowledged on 02 December 2025, with the Reference number JG/B/M/001/2025. The following inputs were provided for consideration in the preparation of the draft Scoping report: Please be advised that, in terms of NEMA (NEMWA) and EIA Regulations, the investigation of alternatives is mandatory. Alternatives must therefore be identified and investigated to determine if they are feasible and reasonable. It is also mandatory to investigate and assess the option of not proceeding with the proposed activity (the “no go” option). This project requires a Water Use Licence from the Department of Water and Sanitation; you are therefore required to submit proof that such an application has been submitted as part of the scoping/ EIR Report. The associated infrastructure includes a storage facility for sorting waste. Please submit amended page 15 of 26 of the application form with the inclusion of Category C (Norms and Standards) activities.	The project alternatives have been expanded upon in line with DFFE Guideline for determining alternatives states. Kind refer to Section 3 of the Scoping Report, from Page 55. Several locations, activity, layout and no go alternatives were assessed. Based on the project assessment, the proposed landfill assessment will require a Water Use Licence for Section 21 (a) and (g) water uses (Taking water from a borehole for commercial use and use of a septic tank for

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	Please note that the due date for the submission of the Final Scoping Report is 06/02/2026. The EAP must, to give effect to regulation 40(2) of the EIA Regulations, before submitting the Scoping Report to the Department, give registered interested	storage of sewage onsite). Both the triggered water uses qualify for GA in terms of National Water Act, 1998 (36/1998): Revision of General Authorisation for the Taking and Storing of Water, National Water Act, 1998 (Act No. 36 of 1998), Government Notice 538 of 2016 and Government Notice No. 665: Revision of General Authorisation in terms of Section 39 of the National Water Act, 1998 (Act No. 36 of 1998) (06 September 2013). The required application will be made once the Detailed Engineering Design report is ready, as guided by the ECSA project reporting sequence. Proof of WUL submission will be attached to the Draft EIA Report. Kindly refer to Section 2.1.6 of the Scoping Report for details regarding water use. The disposal of waste through a general landfill is managed in terms of Section 21 g. However, a Record of Decision (RoD) application will be made with the Department of Water and Sanitation. Please refer to Figure 9 (page 51) for the RoD business process. Noted, the Final Scoping report will be submitted on or before 06/02/2026. Refer to Appendix D of the Final Scoping Report for proof of PPP, inclusive of proof of the draft Scoping Report distribution.

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	and affected parties access and an opportunity to comment on the report in writing. You are hereby reminded of Section 24F of the National Environmental Management Act, Act 107 of 1998, as amended, that no listed activity may commence prior to environmental authorisation being granted by the Department.	The Applicant has been notified of the offence of commencing with Listed Activity without EA. It should be noted that the proposed activity will not commence without relevant authorisations.
DEDEAT 15 January 2026	Comments on Draft Scoping for the proposed development of a new landfill site in Maletswai in Walter Sisulu Local Municipality: Reference number JG/B/M/001/2025 The department has reviewed the Draft Scoping Report submitted by Rambuda Consultants for the subject mentioned above and has identified the following gaps: 1. Application form, Project background, and Listed Activities 1.1 Provide a full list (4 corners) of coordinates demarcating the boundary of the site. 1.2 The description of activities is vague — needs detail on landfill cells, liners, leachate systems, stormwater diversion, and operational areas.	The preferred site for the proposed landfill is located on the Remaining Extent of Portion 1 of Farm Melk Spruit No. 12, Walter Sisulu Local Municipality. The central coordinates are 30°41'28.28"S, 26°39'48.62"E. The full four-corner boundary coordinates are provided on page 2 of the Scoping report. However, these will only be finalised during the Draft Environmental Impact Assessment Report (DEIAR) using cadastral survey data. The proposed landfill will comprise four engineered cells designed for phased

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	1.3 Application indicates a Material Recovery Facility (MRF) and sorting facilities. Provide the correct listed activity as per NEMWA. 1.4 Amend the listed activities applied accordingly.	operation over a 20-year horizon. Each cell will be constructed with a Class B composite liner system and a leachate collection and evaporation dam to ensure groundwater protection. Stormwater diversion structures, including cut-off drains and berms, will be installed to prevent clean water ingress. Supporting operational areas will include a material recovery facility, weighbridge, administrative buildings, workshops, access roads, and perimeter security. The report has been updated to reflect the available information, refer to Section 1.1 to 1.4 of the Scoping Report. The project details will be updated once the Detailed Engineering Design report is ready, as guided by the ECSA project reporting sequence. These details will be fully reflected in the DEIAR once. The establishment and operation of a Material Recovery Facility (MRF) and associated sorting facilities fall under the listed waste management activities in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), specifically GN 921 of 29 November 2013, as amended. The application form and the scoping report has been amended to add

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	1.5 Describe the listed activities as per EIA Regulations 2014 and Waste Management Activity List, in relation to the proposed activity. 1.6 Application Form Section 2.2: “Recovery, Reuse, Recycling, Treatment and Disposal Quantities” do not correlate with Section 1.3 of the Draft Scoping Report. Provide clear calculations. 1.7 Section 2.2 “onsite disposal” column not selected, Draft Scoping Report silent. Explain why the Department must continue processing the application.	activity C(1) – “The storage of general waste at a facility that has the capacity to store in excess of 100m3 of general waste at any one time, excluding the storage of waste in lagoons or temporary storage of such waste”. Refer to the application form and section 2.1.4 of the Scoping report. The proposed landfill triggers listed activities under the EIA Regulations, 2014 and the Waste Management Activity List (GN 921 of 2013, as amended). Please refer to Table 11 and 12 in the Scoping Report for description of the listed activities in relation to the application. The required information has been updated to correlate with the municipal IWMP, 2024. Please refer to Section 2.2: “Recovery, Reuse, Recycling, Treatment and Disposal Quantities” of the amended application form and Section 1.3 of the Scoping Report. The identified shortcomings in the application

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	1.8 Justify putrescible waste quantities using Maletswai-specific data. 1.9 Provide full calculations for: I. Waste stream quantities and landfill capacity requirements II. Estimated waste volumes III. Landfill airspace demand IV. Climatic water balance 1.10 Provide windows for prevailing wind directions.	have been addressed. The need and desirability of the proposed development is clearly outlined inclusive of the compatibility of the proposed project on the identified location. As such, no continuing with the application would be detrimental to the applicant and service delivery at large. This could also compound the environmental pollution which is currently experienced on the existing landfill site. The required information has been updated to correlate with the municipal IWMP, 2024. Additionally, the errors in the space calculations have been updated. Refer to Section 1.3 of the Scoping Report. The wind directions were based on information for the past 10 years. Site-specific wind data for Maletswai were sourced from the South African Weather Service and local monitoring records to establish seasonal wind windows. These prevailing wind directions will be presented in the form of wind roses and tabulated summaries in the DEIAR, ensuring accurate representation of local conditions for impact assessment and mitigation planning.

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	2. Project alternatives 2.1 Provide a motivation and concluding statement indicating the preferred alternatives, including the preferred location of the activity, which must be submitted with Final Scoping, considering inter alia: I. Clearly describe all alternatives considered (including the no-go option), II. Provide a transparent alternatives assessment methodology, III. Present a defensible site selection matrix, and IV. Provide a clear conclusion motivating the preferred alternative.	Please refer to Section 3 of the Scoping Report
	3. Needs and desirability 3.1 The motivation for the need and desirability of the proposed landfill is not adequately substantiated; the focus is given to the existing landfill site. Please provide: I. Clear demonstration of the need and desirability of the development within the context of the preferred location, taking into consideration the three pillars of sustainable development.	Kindly refer to Section 1.7 of the Scoping Report for the project 's need and desirability.
	4. Impacts and Risk Identification Please provide impact identification (in a table format) to adequately inform the EIA phase and specialist studies: I. The nature, extent, duration, probability and significance of impacts, II. The reversibility of impacts, III. Potential irreplaceable loss of resources, and IV. The extent to which impacts can be avoided, managed or mitigated.	Please refer to Sections 6 and 7 of the Scoping Report for the preliminary identification of potential impacts. The detailed assessment, including quantification and specialist input, will be presented in the Draft Environmental Impact Assessment Report (DEIAR). For scoping purposes, the following key impact categories have been noted:

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		• Soil and groundwater: risk of contamination from leachate, with mitigation through engineered liners, leachate collection, and monitoring. • Surface water: potential alteration of runoff and stormwater contamination, managed through diversion structures and sediment controls. • Air quality: dust and odour emissions, mitigated by daily cover, buffer zones, and operational controls. • Biodiversity: habitat disturbance and species displacement, addressed through site selection, rehabilitation, and buffer zones. • Socio-economic: employment and service delivery benefits, alongside nuisance impacts, are managed through community engagement and operational measures. • Visual and noise: changes in landscape character and operational noise, mitigated by screening and restricted operating hours. • Climate and water balance: changes in infiltration and evaporation, managed through engineered design and monitoring.

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		The full assessment, including quantified values and specialist studies, will be provided in the DEIAR to ensure defensible evaluation and regulatory compliance.
	5. Layout and sensitivity map 5.1 Kindly provide a topographic layout map that indicates the following: I. The proposed landfill site (Preferred) and alternative sites II. Position of all proposed and associated infrastructure III. All supporting onsite infrastructure (existing and proposed) IV. The location of sensitive environmental features on site (CBAs, ESAs, heritage sites, wetlands etc., that will be affected by the proposed activity) 5.2 A final layout map must be overlaid by the sensitive features and its buffer zone, with a clear and detailed legend that communicates the details of the map.	5.1 The requested topographic layout map, including the preferred and alternative sites, associated and supporting infrastructure, and the overlay of sensitive environmental features (CBAs), has been provided in Appendix B of the Final Scoping Report. 5.2 The Master Layout, inclusive of aquatic delineations and associated buffer zone, will be included in the draft EIAR. The final layout will only be available once all specialist input has been concluded.
	6. Public Participation 6.1 Please be advised that the draft scoping should be subjected to a 30-day public review for commenting, taking into consideration the closure of timeframes from 15 December to 5 January. 6.2 Kindly be advised that ECHRA is a key stakeholder in this project and, therefore, ensuring that they have access to the draft report is crucial. Based on the contact details provided under public participation, the	The Draft Scoping Report was subjected to the required 30-day public review period, with due consideration of the closure timeframe from 15 December to 5 January. Although the ECHRA was recognised as a key stakeholder, and the draft report was shared with them, all future communications will be

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	department advises that the document be sent to ayanda.mncwabe-mama@ecsrac.gov.za. 6.3 Landfill site designs must be submitted to the Department of Water and Sanitation for the application of the Record of Decision. 6.4 Any comments and recommendations from stakeholders should be incorporated in the Final Scoping report, including all mitigation, protection and remedial measures to be undertaken to protect the environment from negative impacts associated with the activity. 6.5 Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.	directed to Ms. Ayanda as per the department's advice. In line with Figure 9 of the final scoping report (DWS ROD business procedure), the ROD application will be made during the EIAR phase when the detailed engineering designs are in line with the ECSA project design stages. All comments and recommendations received from stakeholders will be incorporated into the FSR and DEIAR, together with mitigation, protection, and remedial measures to address potential environmental impacts. No comments were received from stakeholders on the draft scoping report, referring to Appendix D of the Final Scoping Report. However, it must be noted that the draft EIAR (with detailed information is still to be circulated for comments. Additionally, two newspapers are still to be placed in English and Sotho to invite further input into the project reports.

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DEDEAT 02 July 2026	Comments on Draft EIR for the proposed development of a new landfill site in Maletswai in Walter Sisulu Local Municipality: Reference number JG/B/M/001/2025.	Please note that the reference to phased development relates to the operational use of the cells, not to the construction of the landfill infrastructure. The appointed contractor will be responsible for constructing all four cells, together with associated infrastructure including the leachate management system, stormwater systems and roads. This clarification has been included in the amended Draft EIA Report. Refer to Section 1.3.3 of the report.
	The department has reviewed the Draft Environmental Impact Assessment Report submitted by Rambuda Consultants for the subject mentioned above and has identified the following gaps: - 1. Project description 1.1 The FEIR must provide the rationale for the phased development approach.	
	2. Project alternatives 2.1 Please note, technological alternatives, including alternative landfill liner technologies, must be assessed.	Kindly refer to Section 1.3.5 and Section 4 of the amended DEIAR, which detail all alternatives considered, including the liner technologies.
	3. Impacts Assessment 3.1 The impact assessment is inadequate, and must assess impacts related to insects, rodents, and fauna, including mitigation measures for the operational and closure phases.	The Impacts assessment in section 8.5 of the amended DEIAR has been updated to include impacts related to insects, rodents, & Fauna, including the proposed mitigation measures. The impact assessment section includes the construction, operational and closure phases of the proposed development.
	4. Specialist Studies 4.1 The project site is identified as having high civil aviation sensitivity. However, no specialist study has been conducted to assess the potential impacts of the proposed development. Please note that FEIR must contain the following;-	The sensitivity verification report has been updated to include the civil aviation sensitivity. Moreover, the Civil Aviation Compliance statement has been provided in

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	➤ A qualified specialist study on civil aviation impacts must be undertaken. ➤ Comments from the relevant Civil Aviation Authority must be obtained and incorporated into the FEIR. ➤ Site Sensitivity Verification Report does not address the high civil aviation sensitivity identified. This report must be updated. 4.2 The Aquatic Impact Assessment did not include pH and Electrical Conductivity (EC) measurements, which are key water quality indicators. The FEIR must provide these measurements and assess their implications for the receiving aquatic environment. 4.3 The Ecological Impact Assessment is inadequate as it focuses mainly on aquatic impacts and does not sufficiently assess terrestrial biodiversity impacts associated with the proposed landfill development. 4.4 The Agricultural and Aquatic Specialist Studies provide conflicting information on the presence of a wetland. This discrepancy must be clarified in FEIR, and the wetland's ecological status be provided.	line with the EIA Protocols for Specialist Assessments. Refer to Appendix D8 and I4 of the amended DEIAR. Please note that pH and EC are considered under the Aquatic report (under PES section). The water quality indicators are also included as part of the mitigating measures (regular monitoring and sampling that must be undertaken). The Terrestrial report has been updated to include more biodiversity information, including amendment of the impact assessment section. It must be noted that the main biodiversity sensitivity of the project is the aquatic ecosystem, hence the focus. The feature of confusion is an artificial impoundment (dam), not a wetland. Although it is often mapped as a wetland in biodiversity management plans and referenced as such in the Agricultural Impact Assessment, the Aquatic Impact Assessment provides the correct watercourse classification and delineation. Additionally, both the Aquatic Impact Assessment and Agricultural Impact Reports have been

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	4.5 The Cultural Heritage Impact Assessment identifies Activity 27 of Listing Notice 2 as triggered; however, this activity was not applied for in the application. Please clarify. 4.6 The Aquatic, Agricultural, and Terrestrial Specialist Assessments are rejected by the department, as they were not undertaken in accordance with the respective requirements of GN 320 of 20 March 2020 (Protocols for Specialist Assessments).	updated. Refer to Annexure D for the updated reports. The project only triggers listed activities under Listing Notice 1 and Waste Listed Activities as outlined in the application form submitted. The Report has been updated to align the listed activities with the application form. Additionally, ECPHRA has accepted the Heritage Impact Assessment (HIA) compiled by Coetzee FP (June 2026) and the Paleontological Impact Assessment (PIA) by Fourie H. (May 2026) and have confirmed that there are no objections and the development may continue as planned, in terms of Section 38(4) of the NHRA, provided that specialists' recommendations are adhered to. Aquatic, agricultural and Terrestrial reports have been reviewed to ensure alignment with the requirements of GN 320 of 20 March 2020 (Protocols for Specialist Assessments. A section has been added to each report listing the GN 320 requirements. Refer to Appendix D1, 2 and 5 of the of the updated DEIAR. A new Agricultural Impact Assessment was undertaken in accordance with the respective requirements of GN 320 of 20 March 2020 (Protocols for Specialist

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	4.7 All specialist studies must assess alternative development footprints within the preferred site. 4.8 Signed specialist declarations must be submitted as part of the FEIR	Assessments). Refer to Appendix D5 of the updated DEIAR. All specialists' studies have assessed the preferred location and the proposed two(2) project location alternatives. Refer to Appendix D for the specialist reports. While specialist declarations have been provided within the respective specialist reports, the signed declarations on the Department's prescribed forms will be included in the Final EIAR. The specialists' separate CVs will also be appended together with the relevant qualifications and registrations.
	5. Public Participation 5.1 The FEIR must provide proof that the application for a Record of Decision was submitted to the Department of Water and Sanitation for authorisation. 5.2 The Public Participation Process must ensure that all relevant Interested and Affected Parties (I&APs), including ratepayer associations, farmers' associations, and neighbouring landowners and businesses, are identified and afforded a reasonable opportunity to participate in the process for all alternative sites. 5.3 The FEIR must provide proof that the proposed development was advertised in a local newspaper. The submitted evidence should include a copy of the newspaper advertisement showing the name	Kindly refer to the ROD process workflow in Figure 12, page 37. The proof of ROD submission will be appended to Appendix H3 of the Final EIA Report The public participation process (PPP) has been undertaken in full compliance with Regulations 39–44 of the EIA Regulations, 2014 (as amended); refer to Appendix C (PPP documents). Two (2) newspaper adverts (in English and IsiXhosa) were placed in Die Aliwal Weekblad Newspaper on 07 November 2025.

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	and date of publication.	Additionally, three (3) adverts in English, Sotho and Afrikaans will be placed on 04 September 2026 in the Rekord and/or Advertiser publication.
	6. EMPr 6.1 The Environmental Management Programme (EMPr) must be revised to include a comprehensive assessment of all environmental impacts during construction, operation, closure, and post-closure phases of the project and associated with mitigation measures.	The EMPr has been updated to include additional environmental impacts and associated mitigation measures. Refer to Appendix G for the updated EMPr.
	7. Other comments 7.1 The registration certificates from the relevant professional bodies (e.g., SACNASP) for specialists conducting aquatic and ecological studies have not been provided. The FEIR must include these certificates. 7.2 The landfill design must include climate resilience measures that address projected rainfall, flooding, drought, and extreme weather risks. 7.3 Landfill cell locations must consider prevailing wind directions to minimise odour, dust, and litter impacts on surrounding sensitive receptors.	Although the SACNASP registration number is provided in the specialist reports, a copy of the SACNASP registration certificate is appended to both Aquatic and Ecological Impact Assessment Reports. Additionally, the signed declarations on the Department's prescribed forms will be included in the Final EIAR. The specialists' separate CVs will also be appended together with the relevant qualifications and registrations. The proposed landfill designs considered all potential impacts, including climate change, wind conditions of the area, and impact on sensitive receptors. The amended EIA Report have been updated to provide more information on the issues; refer to Sections 6.11 – 6.13, 7.2.8 and 8.5.13.

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	7.4 In relation to 7.3, the FEIR must contain the following information: - ➤ Projections of wind direction must be provided. ➤ Average wind direction over 20 years period. 7.5 The Draft EIR includes a section on the “Repair and Rehabilitation of the Blue Bridge,” which is unrelated to the proposed landfill development. Please clarify this inclusion and revise the document accordingly. 7.6 The FEIR must include an Operational Management Plan, Groundwater Monitoring Plan, and Contingency Plan. 7.7 In relation to 7.6, the Operational Management Plan must be approved by the Municipal Council or an Authorised Municipality representative. Please note that these comments are for the Draft EIR that was submitted to the Department only and that a review of the Final EIR will be required. Failure to address these comments may jeopardise the success of the application.	The amended EIA Report has been updated to provide more information on the issues; refer to Section 6.12. The Aquatic Impact Assessment Study has been reviewed and corrected accordingly. The Draft plans are attached to the Amended EIA Report, and the Operational Management Plan is being submitted to the municipality for review and approval. The approved plan will be included in the Final EIA Report. The EMPr has been updated to include additional environmental impacts and associated mitigation measures for the construction, operational, closure and post-closure phases. The updated EMPr is included as Appendix G and should be read together with the amended impact assessment and specialist recommendations.
Rotondo Walnuts (Pty) Ltd, 12 June 2026	RE: OBJECTION AND WRITTEN COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT – PROPOSED DEVELOPMENT OF A CLASS B LANDFILL SITE AND ASSOCIATED INFRASTRUCTURE ON THE REMAINING EXTENT OF PORTION 1 OF THE FARM MELK SPRUIT NO. 12, WALTER SISULU LOCAL MUNICIPALITY, JOE GQABI DISTRICT, EASTERN CAPE – DEDEAT REFERENCE JG/B/M/001/2025	

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	This objection and comment are submitted within the public comment period ending 9 July 2026 and is submitted timeously. 1.CAPACITY AND INTEREST 1.1 We, Rotondo Walnuts (Pty) Ltd, are the owner and occupier of Farm 1093, Rouxville District (“our property”), an established, productive commercial walnut-farming enterprise under irrigation, producing for the export market, situated approximately 650 metres from the proposed preferred landfill site on the Remaining Extent of Portion 1 of the Farm Melk Spruit No. 12. 1.2We are a directly affected party and an Interested and Affected Party (“I&AP”) for the purposes of the Environmental Impact Assessment Regulations, 2014 (GN R982, as amended by GN R326), made under section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”), read with the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (“NEMWA”). To the extent not already so recorded, kindly register us as a registered I&AP with immediate effect and confirm such registration in writing.	The objection is hereby acknowledged, and a formal response letter is attached under C5. Noted, and we can confirm that the EIA team is aware of your location in relation to the proposed landfill site. Rotondo Walnuts (Pty) Ltd was pre-identified as an Interested Party during stakeholder identification and was registered as the Interested and Affected Party for the project. The BID was shared on 06/11/2025, the Draft Scoping Report on 02/12/2026 and the latest Draft EIA Report was shared on 08/06/2026 with all identified interested and affected parties, including Rotondo Walnuts (Pty) Ltd.
	2. THE OBJECTION 2.1We strenuously object to the proposed development at the preferred site and at Alternative Site 1. We do not object to the municipality's waste management objective as such. Indeed, at this stage we have no objection to Alternative Site 2, subject to our review of the further	The objection is noted. However, please note that comprehensive impact assessments, including specialist studies such as the Aquatic, Terrestrial, Agricultural,

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	development plans for that site and a proper comparative assessment of the kind described in Section 3 below. Our objection in respect of the preferred site and Alternative Site 1 is recorded against this Draft Environmental Impact Assessment Report (“EIAR”), the associated draft Environmental Management Programme (EMPr), and against every phase and instrument of the application in so far as it relates to those sites, including the Final EIAR, the Integrated Environmental Authorisation, the Waste Management Licence, and any associated water-use authorisation.	Geotechnical, Heritage, and Air Quality Impact Assessment, informed the selection of the preferred site. Please refer to the amended Draft EIAR and associated specialist studies for further details. Several parameters were assessed, as highlighted in the Alternative Section of the EIA Report, supported by various landfill sites, which supported the preferred site.
	3. THE SITE-SELECTION JUSTIFICATION IS FLAWED: A SAFER SITE WAS REJECTED FOR COST AND CONVENIENCE 3.1 The site-selection table in the application (Table 1, “Site Selection”, in the Detail Design Report prepared by Imbawula Civil Projects (Pty) Ltd, Contract 77/2024/2025) compares the preferred site against two alternatives on five criteria: visual impact, proximity to watercourses, geotechnical conditions, availability of services, and potential for future expansion. The supporting text states that the preferred site was selected “due to its favourable environmental conditions, availability of services and potential for future expansion”. 3.2 The “proximity to watercourses” criterion, as applied, is misleading and masks the decisive risk. The table records the preferred site as “more than 200 m” from a watercourse, Alternative 1 as “less than 100 m”, and Alternative 2 as “more than 100 m”, and on that basis presents the preferred site as the most favourable of the three on water. Those figures can only refer to the minor, non-perennial tributary drainage lines in the vicinity – not to the Orange River. On the locality mapping, the preferred site is in fact the closest of the three sites to the Orange River, the single largest water resource in South Africa, lying only approximately 550 metres from it; Alternative 1 sits adjacent to a minor tributary (hence its	Table 1, “Site Selection”, provides a summary of the options considered. However, the assessment criteria are broader than the summary table and include baseline ambient air quality, terrestrial sensitivity, aquatic conditions, engineering feasibility, service availability and cumulative impacts. These factors, supported by specialist input, informed the selection of the preferred site Although the preferred site is located approximately 400 m to 500 m from the Orange River, the assessment indicates that it does not have a direct impact on the river. Alternative 1 and 2 are located adjacent to a drainage lines connected to the Orange River and are

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	poor score), and Alternative 2 lies on higher open ground, away from both the tributaries and the river. The criterion as scored therefore penalises Alternative 1 for proximity to a minor stream while entirely failing to disclose, or to score, the preferred site's proximity to the major river. The decision-maker has been presented with a matrix that, on the issue that matters most, points in exactly the wrong direction. 3.3 Properly analysed, the table shows that a safer site for the water resource was available and was rejected for reasons of cost and convenience. Alternative 2 is, on the applicant's own table and on the mapping, distant from both the tributaries and the Orange River – the least risky of the three to water. It was marked down on only two grounds: that it is “difficult to excavate” (geotechnical), and that it has no existing road or electricity (services). Likewise, the preferred site's advantages over the alternatives – existing road and electricity, and room for future expansion – are matters of cost and operational convenience, not of environmental protection. In substance, the site nearest the Orange River was preferred because it is cheaper and more convenient to service and to expand, and a site materially safer for the river was set aside because it would cost more to develop.	therefore considered more likely to affect the aquatic environment than the preferred site. In addition, the proposed landfill cells will be constructed with engineered Class B liner systems, leachate management and monitoring systems to minimise the risk of pollution. A criterion addressing proximity to the Orange River has been added to the site-selection assessment to respond to the concern raised. According to the Aquatic Impact Assessment study (Appendix D1), the following are recorded in terms of the potential impacts to the watercourses “There are no watercourses directly within either of the three alternative landfill sites investigated. There is a small impoundment within the area of the Preferred Site. Option 1 is located on the edge of a natural small stream / drainage line, while Option 2 has a small natural drainage line within it. Option 1 & 2 have the potential to have larger negative impacts on the natural water environment. The main water courses in the region are the perennial Orange River and semi-perennial Melkspruit. The Melkspruit flows north into the Orange River and varies from about 1,7km to 2,4km west of the study site. The Orange

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	3.4 “Difficult to excavate” is not a lawful basis for placing the Orange River at risk. The geotechnical objection to Alternative 2 is, in the applicant's own formulation, one of difficulty, not impossibility. In law, engineering difficulty short of impossibility resolves itself into cost: harder ground is excavated by ripping, blasting and imported material, all of which are priced in rands and incurred once. Against that once-off premium stands a perpetual exposure: the landfill and its contents will remain in place, and remain hazardous, long after the design life of any liner, and contamination of the Orange River, once it occurs, is not remediable at any price. NEMA resolves that comparison decisively. Section 2(4)(b) requires the selection of the best practicable environmental option. Section 1 of NEMA defines that term as “the option that provides the most benefit or causes the least damage to the environment as a whole, at a cost acceptable to society, in the long term as well as in the short term.” The statute thus expressly contemplates that society bears reasonable cost in exchange for long-term environmental protection; it does not permit the inverse, in which a once-off saving in excavation cost is purchased by imposing a permanent risk upon the country's principal water resource and upon downstream users. To prefer the cheaper, riskier site is to externalise the avoided cost onto the river, the downstream agricultural economy and neighbouring landowners – the precise mischief that the polluter-pays principle in section 2(4)(p) (“The costs of remedying pollution, environmental degradation and consequent	River varies in distance between 450m and 500m northwest of the Preferred Site. The landfill site will have no direct impact on any of these two watercourses” As indicated above, site selection depends on varies factors including, the air pollution flow, cumulative impacts and others as outlined in the Draft EIA Report. Additionally, the application reports have been shared with the Department of Water and Sanitation for consideration and guidance. The site-selection process took into consideration the NEMA principles by balancing environmental, social, and economic factors (including development costs). While cost is a relevant consideration, it was not the sole determining factor. The preferred site was selected because it presents the most balanced and practicable option when considering environmental sensitivity, sensitive receptors, cumulative impacts, construction feasibility, service availability, and long-term operational requirements, The preferred site has potential impacts that can be avoided, managed, or mitigated through the proposed recommended mitigation measures. Refer to the amended

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	adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects must be paid for by those responsible for harming the environment”), and the risk-averse and cautious approach required by section 2(4)(a)(vii) (“that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions”), exist to prevent. An applicant that selects the riskier of the available sites in order to avoid the engineering cost of the safer one has not adopted the best practicable environmental option; it has cut corners, and it asks the public and its neighbours to carry the risk of saving. 3.5 We accordingly require that the alternatives assessment be redone transparently and defensibly – a deficiency the Competent Authority has itself already raised at Scoping – scoring each site by its actual distance to the Orange River and by contaminant travel time to it, and properly weighting the protection of the river against the once-off engineering cost of the safer alternative. Until that is done, the preference for the site closest to the Orange River is not justified and cannot lawfully be authorised.	Draft EIAR and associated specialist studies for in-depth analysis of the factors discussed herein. Kindly refer to section 4 of the Amended EIA Report, which has expanded on the site selection exercise.
	4. THE ONUS RESTS ON THE APPLICANT, AND THE EIAR ITSELF CONCEDES THAT CONTAINMENT IS NOT ABSOLUTE 4.1 The site drains to a catchment of the Orange River, on which extensive downstream commercial agriculture depends. Where a development places that resource at risk, the precautionary principle in section 2 of NEMA requires a risk-averse and cautious approach, and the onus rests on the applicant to demonstrate that the resource will be protected. It does not rest on affected parties to prove that harm will occur.	As the independent EAP for the proposed development, we are aware of the NEMA principles that guide environmental management. The risk-averse and cautious approach does not require the absence of all risk, but requires that adequate information be available to identify, assess and manage potential risks associated with the proposed

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	4.2 On the applicant's own evidence, that onus is not discharged, because the EIAR does not assert zero risk. The Draft EIAR concedes that the proposed composite liner will leak, predicting a leakage rate of approximately 1.7 litres per day across the landfill cell on an assumed defect density of one defect per hectare, which it characterises as “negligible”. It further concedes that, even where no measurable leakage occurs, dissolved contaminants may migrate through the liner by molecular diffusion, independent of the integrity of the geomembrane. 4.3 We anticipate the response that, in real-world terms, “negligible” means a dose too small to cause harm once diluted. That response does not withstand scrutiny in this setting, for three reasons. First, the relevant load is not a single day but the cumulative discharge over an operating life of some twenty years and an indefinite post-closure period during which the waste remains hazardous far longer than any liner can be guaranteed or monitored. Second, the dilution assumption is unsafe here precisely because the EIAR concedes that groundwater movement in the underlying Beaufort Group mudstones is confined to fractures and weathered zones: fracture-controlled flow does not disperse and dilute uniformly, but can deliver a concentrated plume along a single pathway to a specific borehole or to the river, defeating the very dilution on which “negligible” depends. Third, the steady-state leakage figure excludes the events that actually cause pollution incidents in practice – construction defects beyond the assumed rate, liner degradation over time, accidental spills, and overtopping or failure of the pollution control dam during extreme storm events. The proper question is therefore not whether the modelled steady-state dose is “negligible”, but whether the applicant can	development. We believe that sufficient information has been made available for the Competent Authority to make an informed decision guided by the NEMA principles. The Applicant acknowledges that the precautionary principle requires a cautious approach to the protection of water resources and that the assessment must consider the full operational and post-closure life of the facility. However, the fact that the engineered containment system cannot provide absolute or zero risk does not mean that the Applicant has failed to demonstrate adequate environmental protection. The predicted leakage rate of approximately 1.7 litres per day is a calculated design estimate based on an assumed geomembrane defect density and represents a very low leakage rate through the engineered containment system, rather than an uncontrolled discharge to the Orange River. Cumulative risk cannot be determined simply by multiplying this daily leakage rate by the twenty-year operational period, as the relevant assessment is the cumulative contaminant mass and resulting concentration at the receptor, taking into account contaminant characteristics and concentration, attenuation through the liner

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	give an assurance, approaching certainty, that the Orange River and our water resources will not be contaminated over the full life of the facility. It cannot. Where the facility can simply be located further from the river – indeed, where its own rejected Alternative 2 would achieve precisely that – there is no proper basis to impose that residual risk	and underlying materials, groundwater conditions, travel time, and the distance to the Orange River and other receptors. The composite liner, together with leachate collection and management, stormwater controls, groundwater monitoring and operational controls, is specifically intended to minimise contaminant migration and manage residual risk. The Applicant further recognises that long-term risk extends beyond the operational period and must account for potential liner degradation, construction defects, accidental releases, extreme rainfall events and other credible failure scenarios. These risks are addressed through the proposed containment, inspection, maintenance, monitoring and emergency-response measures, including the ability to detect changes in groundwater quality and implement corrective action. The existence of fracture-controlled groundwater flow does not, in itself, establish that contaminants will reach a specific borehole or the Orange River at harmful concentrations; such a pathway must be evaluated together with the source loading, contaminant behaviour, attenuation, travel distance, groundwater conditions and monitoring data. Importantly,

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		the Applicant does not rely on dilution alone to demonstrate environmental protection. The assessment is based on a source–pathway–receptor approach in which engineered containment is the primary control and natural attenuation and monitoring provide additional protection. Accordingly, while residual risk cannot reasonably be represented as zero, the identified risks have been recognised and incorporated into the design and management measures, and the Applicant submits that the cumulative and long-term residual risk can be adequately controlled without resulting in an unacceptable impact on the downstream water resource.
	5. WATER RESOURCES, TOPOGRAPHY AND GROUNDWATER 5.1 The site drains towards the river and towards our farm. The preferred site sits at a materially higher elevation than the Orange River, with a net fall of approximately 30 to 40 metres over roughly 550 metres towards the river. While the intervening ground is undulating and the precise profile is not uniform, the net direction of drainage is not in dispute: the EIAR itself records that surface gradients of 1% to 5% direct overland flow towards the drainage channels of the catchment, which discharge to the Orange River. A waste facility placed above, and draining towards, a major river and adjacent farmland carries any escaped leachate, contaminated run-off, ash or litter by gravity towards precisely the resources that must be protected. 5.2A critical omission: distance and travel time to the Orange River. Notwithstanding that the site lies close to the Orange River, the EIAR does	The Geohydrological Impact Assessment has been undertaken for the proposed facility and

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	not state the distance from the landfill cells to the river, nor model contaminant travel time to the river or to our boreholes in the event of leakage or diffusion. For a facility proposed this close to the country's largest water resource, that is a fundamental omission. We require a site-specific hydrogeological model establishing groundwater flow direction and gradient, the location of fracture pathways, and quantified contaminant travel time to the river and to our boreholes. 5.3 Water-use authorisation and duty of care. The development triggers, on the applicant's own admission, water uses under section 21(a) and (g) of the National Water Act, 1998 (Act No. 36 of 1998). The applicant and all responsible people bear the duty under section 19 of that Act to prevent and remedy the pollution of water resources, and the general duty of care under section 28 of NEMA to prevent significant environmental degradation. South African courts enforce these duties against those who pollute rivers: in 2023, the North West High Court (Mahikeng) interdicted a municipality from allowing sewage to flow into the Harts River and its tributary, and ordered it to take remedial steps and rehabilitate the affected areas. Section 28 of NEMA imposes liability on anyone who causes, has caused, or may cause significant pollution to take reasonable measures to prevent it, reinforced by the polluter-pays and public-trust principles. We reserve our right to make full representations and to object to the Department of Water and Sanitation in respect of any Water Use Licence, General Authorisation or Record of Decision sought for this development.	is included as Annexure D9. The assessment considers the site setting, groundwater conditions and potential source–pathway–receptor linkages relevant to the Orange River and nearby receptors. Modeling of the pollution movement has been undertaken and will continue into FEIR. This is to ensure that the distance from the landfill cells to the Orange River, groundwater flow direction, likely preferential pathways and contaminant travel-time considerations are clearly presented, together with the proposed monitoring, containment and response measures. The proposed landfill site requires Water Use Licence for onsite water provision and sewer management as well as ROD for the landfill site in line with the integrated authorisation system.
	6. IMPACTS ON OUR ORCHARDS 6.1 Acute sensitivity of our crop to pollution and disease. Our walnut orchards are highly sensitive to airborne, soil-borne and water-borne pollutants and to pathogens. A general waste landfill is a concentrated source of precisely these hazards – windborne litter and particulates, dust, bioaerosols, leachate, vermin and disease vectors, and scavenging	The concern regarding potential impacts on the walnut orchards is noted. The Air quality Impact Assessment (AQIA) study has identified the adjacent agricultural

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	birds. The siting of such a facility approximately 650 metres from our orchards presents an unacceptable and potentially irreversible risk of crop contamination, the introduction and spread of disease, and consequent loss of production. 6.2 The “prevailing wind” does not answer the risk. We anticipate reliance on our property being upwind of the prevailing wind. Prevailing-wind data describes the most frequent condition, not the worst case. Dust, odour, bioaerosols, windborne litter and, critically, smoke and fire embers travel on whatever wind is blowing at the time, and wind reversals, gusting fronts and seasonal berg-wind conditions routinely carry emissions in the opposite direction. The EIAR must assess worst-case and reverse-wind conditions, not merely the modal condition. 6.3 Smoke and particulate impacts on production. Smoke and airborne particulate matter that drift onto our property, even episodically, settle on leaf surfaces and reduce light interception, thereby impairing photosynthesis and, in turn, tree health, nut development and yield. This is a recognised agricultural harm, not a mere aesthetic nuisance, and must be assessed. 6.4 Fire risk to our orchards. Although open burning is prohibited at a licensed landfill, landfill fires – whether deliberately set during informal salvaging or arising spontaneously from landfill gas and the heat of decomposition – are a well-documented operational reality at general waste sites in South Africa. In <i>Kenton on Sea Ratepayers' Association and Others v Ndlambe Local Municipality and Others</i> [2016] ZAECHC 45 (reported as 2017 (2) SA 86 (ECG)), the Eastern Cape High Court considered a municipal waste dumpsite situated approximately 1.2 kilometres from the relevant river estuary, and found that it was nonetheless prone to fires, causing pollution and a fire hazard across nearby areas, with uncontrolled waste blown over neighbouring land; the Court granted a structural interdict compelling the municipality to extinguish and prevent burning, to contain the waste, and to remediate. We do not suggest the proposed	farm as one of the sensitive receptors that can be affected by deposition of dust on vegetation and exposure of farm workers or occupants. However, the study further indicates that presence of these receptors does not constitute an air quality fatal flaw but reinforces the requirement for effective dust suppression, waste covering, landfill-gas management, odour control and complaints management throughout the operational life of the proposed facility. According to the AQIA (Appendix D3), the Preferred Site is situated within a landscape that provides comparatively greater natural containment than the two alternative sites. Field observations indicate the presence of surrounding elevated terrain/hills together with established vegetation that can provide partial physical screening from near-surface winds. Such features are advantageous because they limit immediate transport of dust nuisance and windblown litter from the disturbed surfaces. Mitigation and monitoring measures have been recommended to prevent and manage potential impacts to the sensitive receptors. These include, amongst others, regular dust suppression on unpaved roads, appropriate vehicle speed limits, minimisation of

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	engineered facility is identical to that legacy dumpsite. The point is one of distance and risk: even a facility more than twice as far from its watercourse as the proposed preferred site was found to generate fire, smoke and waste-migration impacts of legal significance to its neighbours. The EIAR must specifically and rigorously assess fire risk, landfill-gas management, and the risk of veld-fire and smoke propagation to adjacent agricultural land, having regard to the National Veld and Forest Fire Act, 1998 (Act No. 101 of 1998), which the applicant's own draft EMPr lists as applicable legislation.	exposed surfaces, rapid waste compaction and covering, maintaining the smallest practicable active working face, landfill-gas management, effective leachate management, prohibition of uncontrolled waste burning and containment and retrieval of windblown litter. Fire risk has been recognised as a key operational risk. The EMPr includes mitigation measures intended to prevent veld-fire spread, smoke generation and damage to neighbouring agricultural land, including emergency response procedures, availability of firefighting equipment, maintenance of firebreaks, landfill-gas management and the prohibition of veld and waste burning. The Orange River may also provide a degree of separation in certain directions; however, fire-risk management will rely on the operational controls and emergency-response measures set out in the EMPr.
	7. THREAT TO EXPORT PRODUCTION AND CERTIFICATION 7.1 Our produce is destined for the export market and is subject to stringent food-safety, phytosanitary and certification requirements (including GlobalGAP and applicable export protocols), which address contamination risk, hygiene, and the proximity of sources of contamination to the growing and handling of the crop. A general waste landfill in close proximity to our orchards – with its associated pests,	The concern regarding potential impacts on the walnut orchards is noted. The Air quality Impact Assessment (AQIA) study has identified the adjacent agricultural

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	vermin, scavenging birds, bioaerosols, dust, smoke and litter – directly threatens our ability to obtain and retain export certification, and therefore our market access. 7.2 There is a specific and aggravating feature of our crop. Walnuts are extremely high in oil, and oils readily absorb odours and volatile organic compounds from the surrounding environment – a property known as taint or odour uptake. Landfill odour and landfill-gas emissions in proximity to a high-oil-content nut crop therefore present a real risk of taint that compromises the quality and saleability of the product, quite apart from microbiological contamination, and that can cause product to fail quality and food-safety requirements at export. The consequences are not confined to our enterprise: a contamination or taint incident traced to product of South African origin can affect the standing and market access of the country's export sector more broadly. The loss or suspension of certification, or a taint-related rejection, would be catastrophic and, in practical terms, potentially irreversible for an established perennial-crop enterprise. The EIAR must assess this socio-economic impact specifically, including by reference to the certification standards to which export producers in our position are subject. 7.3 The harm extends directly to employment in the region. Our enterprise is one of the largest employers in the region, employing over 600 people during the season. Irreversible damage to our orchards, or the loss or suspension of our export certification, would have an immediate and severe impact on that workforce and on the livelihoods that depend on it, with knock-on consequences for the local economy. The NEMA principles in section 2 require that environmental management place people and their needs at the forefront, and that the social and economic interests affected by a decision be taken into account. A waste facility that imperils the region's largest or second-largest employer, in order to secure a cheaper and more convenient landfill site, does not serve those interests. The EIAR must assess this employment and socio-economic impact	farm as one of the sensitive receptors that can be affected by deposition of dust on vegetation and exposure of farm workers or occupants. However, the study further indicates that the presence of these receptors does not constitute an air quality fatal flaw but reinforces the requirement for effective dust suppression, waste covering, landfill-gas management, odour control and complaints management throughout the operational life of the proposed facility. additionally, the amended EIAR have clearly explain how air-quality, odour, dust, litter, pest, fire and operational controls reduce the risk of contamination or nuisance to a level that is acceptable for nearby agricultural activities, including export-oriented production. According to the AQIA (Appendix D3), the Preferred Site is situated within a landscape that provides comparatively greater natural containment than the two alternative sites. Field observations indicate the presence of surrounding elevated terrain/hills together with established vegetation that can provide partial physical screening from near-surface winds. Such features are advantageous because they limit immediate transport of dust nuisance and windblown litter from the disturbed surfaces.

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	specifically, and weigh it against the limited cost savings that the preferred site represents.	Potential ambient air pollutants were measured at the existing landfill site, representative of potential landfill conditions (albeit in different engineering designs), and while minor elevated results were observed for CH₄, CO₂, and H₂S, these results were localised to the existing landfill site. Mitigation and monitoring measures have been recommended to prevent and manage potential impacts to the sensitive receptors. These include, amongst others, regular dust suppression on unpaved roads, appropriate vehicle speed limits, minimisation of exposed surfaces, rapid waste compaction and covering, maintaining the smallest practicable active working face, landfill-gas management, effective leachate management, prohibition of uncontrolled waste burning and containment and retrieval of windblown litter.
	8. FURTHER GROUNDS 8.1 Incompatible land use and loss of agricultural resources. Locating a waste facility in proximity to established, high-value, productive agricultural land is fundamentally incompatible land use and undermines the conservation of agricultural resources. We reserve our right to refer this matter to the national and provincial departments responsible for agriculture and the protection of agricultural land.	As per the above, the site selection was based on various factors including agricultural potential and air quality management. Based on the assessment, the preferred site was selected for the proposed development. The Agricultural Impact Assessment was reviewed to address the shortcomings.

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	8.2 Inadequate assessment of alternatives, and the availability of a better location. For the reasons set out in Section 3 above, the alternatives assessment is not defensible and must be redone, scoring each site by actual distance to the Orange River, gradient and contaminant travel time, and properly weighting environmental protection against once-off engineering cost. Where the same waste-management objective can be achieved at a site located materially further from the Orange River and from sensitive agricultural land, the imposition of risk on the country's largest water resource at the preferred location cannot be justified. The facility can be moved; the river cannot. 8.3 Inadequacy of the assessment to date. The Competent Authority has itself, at the Scoping stage, identified material gaps – including the substantiation of waste volumes, airspace and landfill lifespan, the layout and sensitivity mapping, the delineation of aquatic features and buffer zones, and alignment with the Integrated Waste Management Plan. Until these are fully and transparently resolved and made available for our scrutiny, an informed assessment of the impact on our property is not possible.	The site selection assessment has been amended; please refer to Section 4 of the amended EIA Report. The concerns raised by the CA were addressed as part of the EIA Report. Additionally, the Draft Detailed Engineering Report is attached to the submission, while only a concept engineering report was made available during the scoping phase.
	9. SPECIALIST STUDIES REQUIRED 9.1 We require that the EIAR include, and that we be given the opportunity to interrogate, site-specific specialist studies addressing at least: (a) a hydrogeological and groundwater contamination study stating the distance from the cells to the Orange River, establishing groundwater flow direction and gradient, identifying fracture and weathered-zone pathways, and quantifying contaminant travel time to the river and to our boreholes under both leakage and diffusion scenarios; (b) an independent review of the liner leakage and diffusion assessment,	Geohydrological Impact Assessment Study was undertaken for the facility. Please refer to Annexure D9. Additionally, several specialist studies have been updated to address comments received to date, with a new agricultural impact assessment study and air quality impact assessment study to be prepared for the proposed development.

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	including the sensitivity of the predicted leakage to higher defect densities, to liner degradation over the post-closure period, and to accidental and storm-related failure of containment and the pollution control dam; (c) a revised and transparent alternatives assessment as set out in Section 3, scoring each site by actual distance to the Orange River and contaminant travel time, and costing the excavation of Alternative 2 so that the true price of the safer option is before the decision-maker; (d) an agricultural impact assessment addressing risk to perennial tree crops, the effect of dust and smoke deposition on photosynthesis and yield, the risk of odour taint to a high-oil-content nut crop, and the impact on export and phytosanitary certification; (e) an air quality, dust and odour assessment addressing worst-case and reverse-wind conditions; (f) a fire-risk and landfill-gas assessment addressing veld-fire and smoke propagation to neighbouring agricultural land; and (g) a stormwater and surface run-off assessment having regard to the downslope gradient towards the river and our property. Where any such study is absent or inadequate, the application is not ripe for authorisation.	
	10. RESERVATION OF RIGHTS 10.1 This objection is submitted without prejudice to, and in full reservation of, all our rights. In particular, and without limitation, we expressly reserve our rights: (a) to instruct independent environmental advisors, hydrogeologists, agricultural specialists and attorneys to investigate and interrogate the application and all reports and specialist studies, and to submit further detailed expert comment within the comment period and thereafter; (b) to supplement, amend and expand upon this objection, including once our specialist input is available; (c) to object to and appeal any Environmental Authorisation, Waste Management Licence, Water Use Licence or other authorisation granted, in terms of section 43 of NEMA and the National Appeal Regulations, 2014;	The objection is noted and recorded.

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	(d)to apply for the judicial review of any decision in terms of the Promotion of Administrative Justice Act, 2000 (Act No. 3 of 2000); (e)to seek interdictory relief, and to invoke our rights under section 24 of the Constitution and section 32 of NEMA (legal standing to enforce environmental laws); and (f) to pursue all civil and common-law remedies available to us, including in respect of nuisance, the pollution of our water and soil, fire and smoke damage, harm to our crop, odour taint, loss of export certification, and the diminution in the value, use and enjoyment of our property. 10.2 Nothing in this objection, and no participation by us in this process, constitutes consent to, acquiescence in, or condonation of the proposed development.	
	11. REQUESTS 11.1 We require written confirmation of receipt of this objection and of our registration as a registered I&AP. 11.2 We require that this objection be recorded in full in the Comments and Response Report and placed before the Competent Authority. 11.3 We require that the complete Draft EIAR and all specialist studies be furnished to us directly by email (we previously experienced difficulty accessing the documents via the download link provided), and that we be furnished with all further notices, reports and decisions directly and timeously by email. For the reasons set out above, the application in its current form cannot lawfully be authorised at the preferred site or at Alternative Site 1. We present we have no objection to Alternative Site 2 but reserve our rights based on the outcome of further information of this alternative. We require that this objection and the studies it calls for be fully addressed before any decision	Receipt of the objection was acknowledged on 12 June 2026. The objection has been recorded in full in this Comments and Response Register and will be placed before the Competent Authority as part of the FEIR submission. The Draft EIAR and available specialist studies were provided to Rotondo Walnuts (Pty) Ltd on 17 June 2026, and further notices, reports and decisions will be communicated directly and timeously to all registered I&APs.

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	is taken, and we look forward to the Competent Authority's response in due course.	