 <p>EnviroSci (Pty) Ltd Reg Number 2018/462716/07</p>	<p>Dr Brian Colloty Ecologist (Pr Sci Nat 400268/07) Member of the South African Wetland Society</p>	
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13 January 2025

To Whom It May Concern:

RE: AQUATIC SPECIALIST COMPLIANCE STATEMENT REGARD THE PROPOSED WATER SUPPLY AUGMENTATION BOREHOLES FOR THE PROPOSED MALABAR SITE WITHIN THE NELSON MANDELA BAY MUNICIPALITY, EASTERN CAPE

Background to the Project

- The Coega Development Corporation (CDC) on behalf of the NMBM (Nelson Mandela Bay Municipality) is seeking to drill exploratory boreholes (Phase 1) as part of its plan to augment the NMBM's water supply.
- Phase 1 is aimed at the exploratory activities only and some of the proposed exploratory boreholes could be located within 100 meters of watercourses or within 500m of a wetland boundary within the Malabar site (Figure 1).
- No drilling was however anticipated to be located within watercourses.
- Part of the rationale for drilling within 100 meters of watercourses was due to the high possibility of obtaining viable groundwater resources.
- The positioning of the boreholes was determined using desktop tools and analysis, including the geohydrology of the greater NMBM area.
- The borehole exploration portion of the project is only to ascertain the availability of water and perform water yield and quality tests.
- The outcome of the exploratory phase would then inform the siting, drilling, and equipping of production boreholes, which would then only include in the installation of pump houses, electrical supply, and access roads etc.
- The CDC and the NMBM will however ensure preventative measures will be in place to prevent environmental damage, including but not limited to environmental specifications that the contractor would be obligated to comply with, method statements for during exploration, an appointed SHE agent for site monitoring in respect to compliance and enforcement, and an Environmental Management Programme for this Phase 1 of the project.

Specialist Assessment

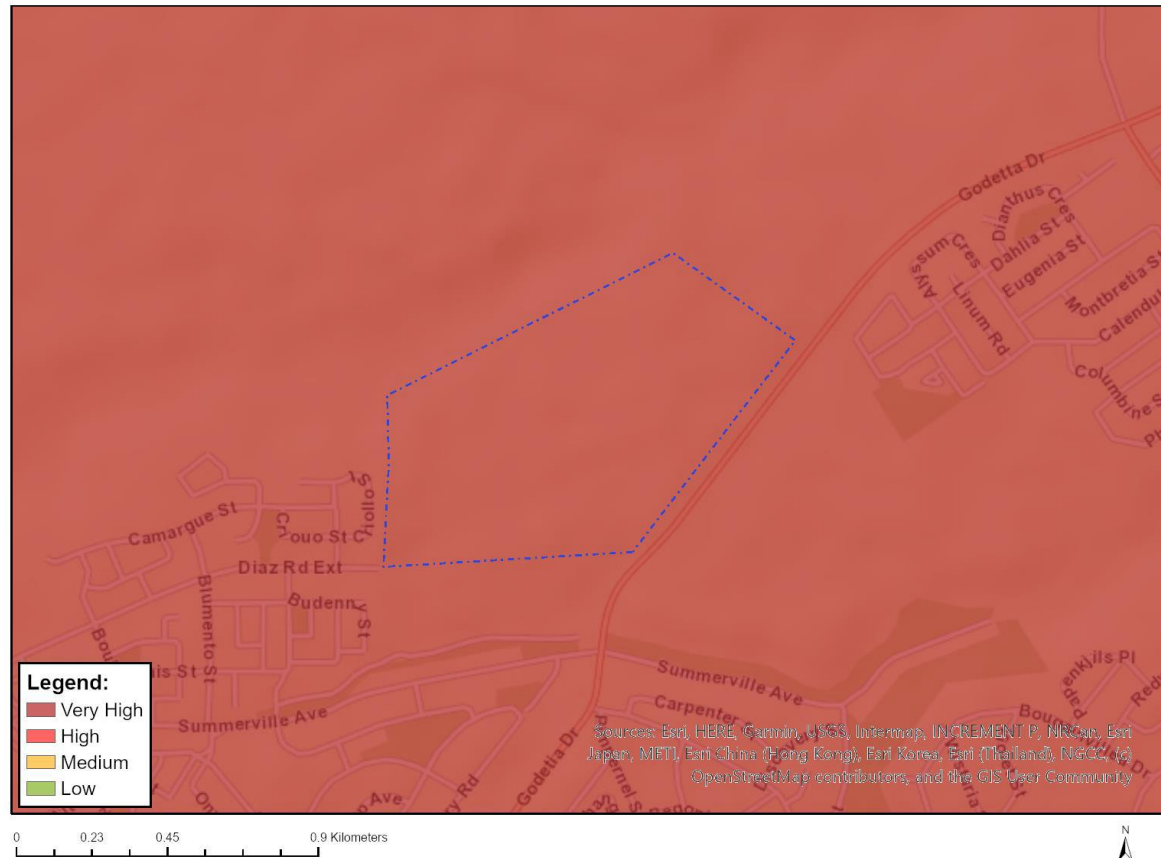
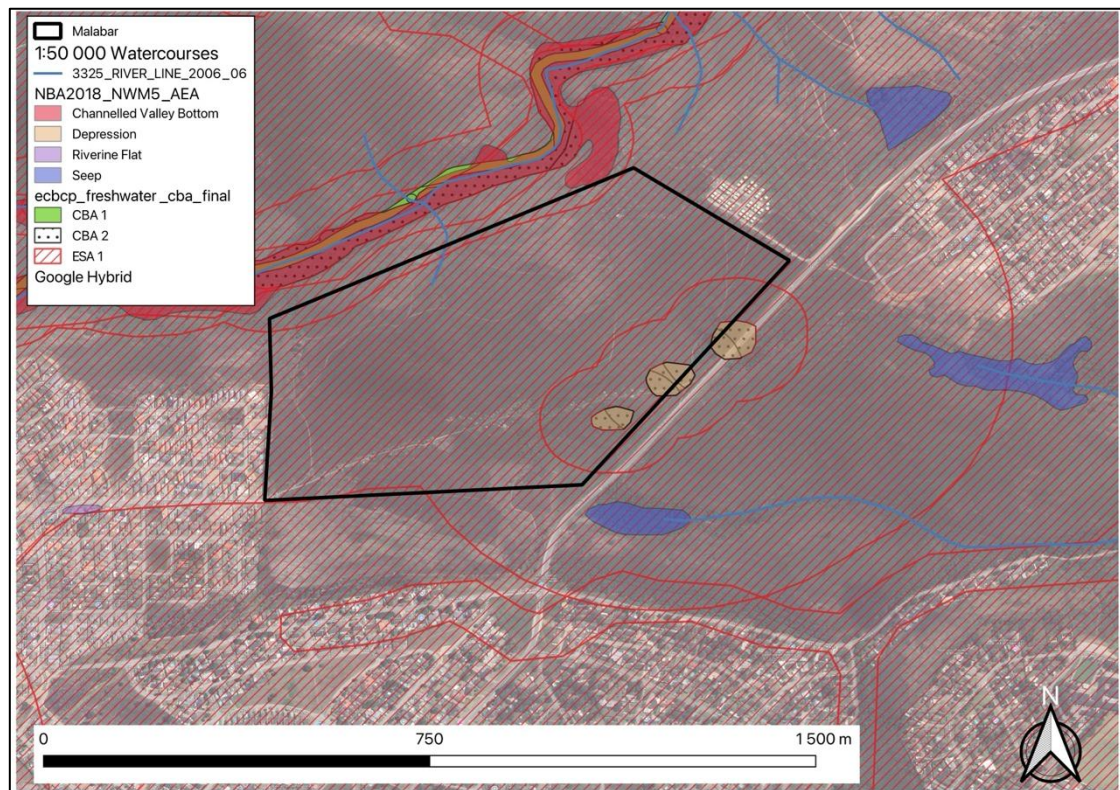
The undersigned specialist conducted an on-site assessment in October and November 2024 (Total of 2 days), within the peak spring season and the onset of summer. The assessment was initiated with and assessment of the potential watercourse and wetlands areas, shown in various National Spatial Datasets as shown in Table 1 and Figure 1.

Table 1: Utilised data and associated source relevant to the proposed project

Data / Information	Source	Date	Type	Description
National Biodiversity Assessment	South African National Biodiversity Institute	2018	Report and Spatial	Latest assessment of South African biodiversity and ecosystems, including, vegetation types, wetlands and rivers.
Review of available data for a South African Inventory of Inland Aquatic Ecosystems (SAIIAE). Water SA 44 (2) 184-199	van Deventer H., Smith-Adao, L. Petersen C., Mbona N., Skowno A., Nel, J.L.	2018	Report	Assessment of available spatial data regards aquatic ecosystems
Technical Report for the National Freshwater Ecosystem Priority Areas project. WRC Report No. K5/1801.	Nel, J.L., Murray, K.M., Maherry, A.M., Petersen, C.P., Roux, D.J., Driver, A., Hill, L., Van Deventer, H., Funke, N., Swartz, E.R., Smith-Adao, L.B., Mbona, N., Downsborough, L. and Nienaber, S.	2011	Report	NFEPA
FrogMAP. 2019.	Animal Demography Unit. Accessed from http://frogmap.adu.org.za/?sp=400 ; on 2020-10-09	2024	Spatial databases	Frog distribution map
Eastern Cape Biodiversity Conservation Plan (ECBCP, 2019)	ECBCP (2019) Eastern Cape Biodiversity Conservation Plan Handbook. Department of Economic Development and Environmental Affairs (King Williams Town). Compiled by G. Hawley, P. Desmet and D. Berliner.	2019	Spatial	Spatial conservation planning units and associated management recommendations for the province
Freshwater Biodiversity Information System (FBIS)	https://freshwaterbiodiversity.org/	Accessed 15 June 2024	Spatial species locality database	A spatial data inventory on species observations, that includes various other sources such as FishBase INaturalist

With the above as reference, a site visit was conducted in the appropriate months (summer), to delineate the observed aquatic features and then rate the respective sensitivity of these systems.

This then to confirm or refute the sensitivity ratings shown in the Department of Forestry Fisheries and Environment (DFFE) Screening Tool (Figure 2), as well any new or additional systems not shown in the Screening Tool Report.



Noting the above considerations, based on the site inspections, I the undersigned hereby confirm that the following from an aquatic specialist perspective:

That although there is a close similarity in the delineation of the DFFE-rated systems when compared to the actual extent of the observed systems, there is however, due to their current state (dense alien vegetation, grazing, illegal dumping, or vehicle tracks and roads). As shown in Figure 3, the systems were rated with a Very High sensitivity (Figure 3).

These systems which were mostly wetlands (as shown in the Screening Tool), must therefore be avoided by any drilling activities inclusive of access. Access along existing tracks/roads (e.g. Godetia Drive) within these systems is allowable assuming that no additional road upgrades will be required.

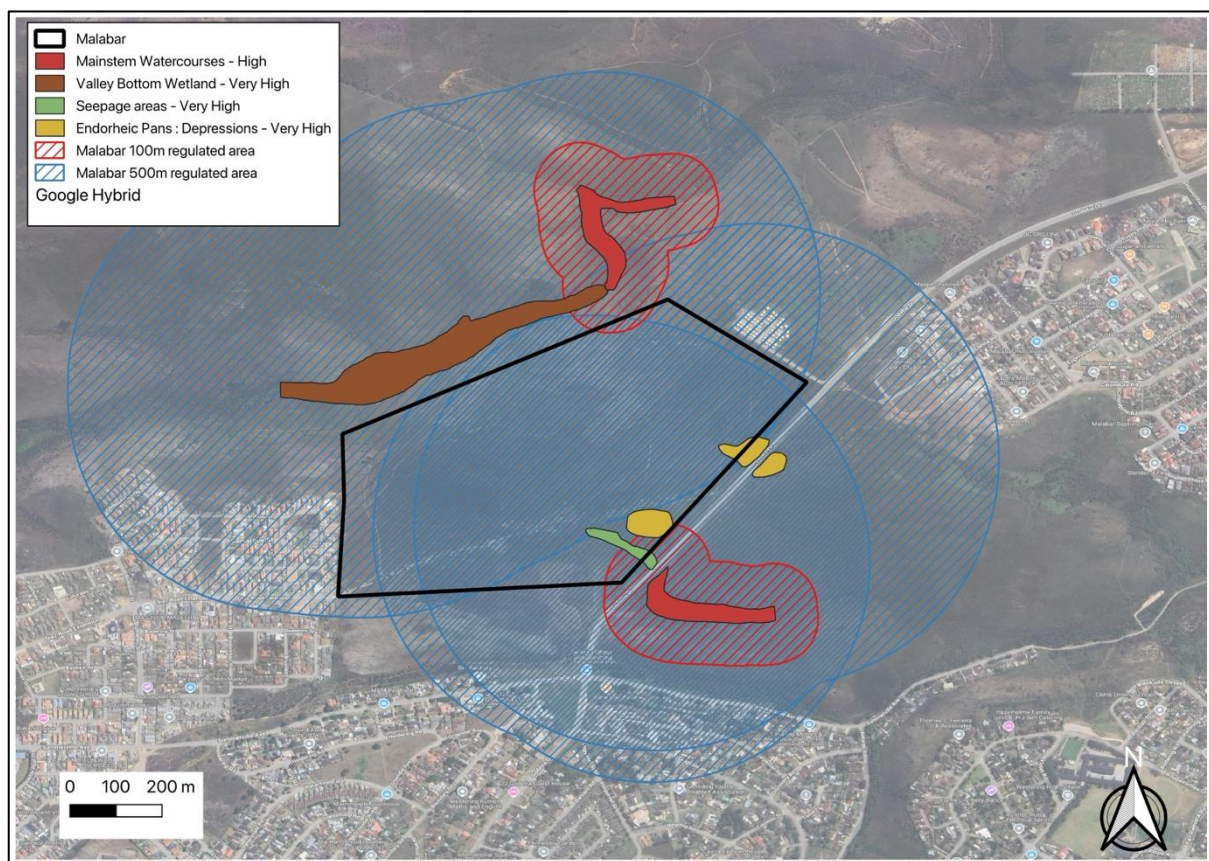


Figure 3: Results of the specialist assessment and the confirmed sensitivity of the observed aquatic systems within the site

This statement thereby serves to confirm that from an aquatic perspective, the proposed activities and the associated impacts (including nature, significance, and mitigation measures) on the aquatic environment would be Low to None, assuming that all the observed aquatic features will be avoided (with the obvious exception of those systems that already have roads and track spanning them).

The proposed project (Phase 1) is therefore supported in terms of aquatic biodiversity considerations, on the condition that all of the proposed infrastructure:

- i. Will remain outside of the delineated freshwater feature footprints, especially where no impacts or previous disturbances occur)
- ii. All works within the regulated area of a watercourse are suitably authorised under the National Water Act (No. 36 of 1998), as relevant and applicable, prior to the commencement of explorations (Applications are in process)

Please don't hesitate to contact me should you require any additional information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Brian Colloty', with a stylized flourish at the end.

Dr Brian Colloty
Cell: 083 498 3299

PHOTO RECORD



Photo Plate 1: A view of the typical mainstem rivers within the western half of the site, with the high degree of alien vegetation and consequently erosion that limits the overall importance of these systems but not the sensitivity



Photo Plate 2: A typical seepage area, commonly found within the greater catchment, but should be avoided by any tracks or drilling activities



Photo Plate 3: One of the largest pans in the area, but is bisected by Godetia Drive



Photo Plate 4: One of the near-natural Pans along Godetia Drive, that is only impacted by stormwater runoff from the road and grazing.