



# LIMPOPO

PROVINCIAL GOVERNMENT  
REPUBLIC OF SOUTH AFRICA

DEPARTMENT OF  
ECONOMIC DEVELOPMENT, ENVIRONMENT & TOURISM

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NEAS Ref No.: LIM/EIA/0000793/2019

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DEPARTMENT OF ECONOMIC DEVELOPMENT,  
ENVIRONMENT AND TOURISM

04 MAR 2021

PRIVATE BAG 9484  
POLOKWANE, 0700

LIMPOPO PROVINCE

**RE: COMMENTS ON THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED OF METALLURGICAL CLUSTER FOR THE MUSINA-MAKHADO SEZ WITHIN MUSINA AND MAKHADO LOCAL MUNICIPALITY OF VHEMBE DISTRICT**

1. The Department of Economic Development, Environment and Tourism ("the Department") acknowledges receipt of the Environmental Impact Assessment Report (EIAR) for the above-mentioned development, on 01 February 2021.
2. The Department hereby provides comments for the EIAR for the above mentioned proposed development:
  - 2.1 The Public Participation Process (PPP) conducted as part of the EIA process is deemed insufficient /or incomplete. The meetings held as part of the PPP were facilitated in English, and not in any of the local language (i.e., Sepedi, Xitsonga and Tshivhenda), thus denying the Interested and Affected Parties to meaningfully participate during the proceedings.
  - 2.2 The EAP acknowledged that it was not possible to address all of the comments received during the PPP before the submission deadline of 31 January 2021.
  - 2.3 The Department hereby proposes that Focus Groups be established amongst others, but not limited to landowners, traditional authorities, etc.
  - 2.4 The EIAR does not have the summary of the issues raised by the Interested and Affected Parties (issues and Response Report).
  - 2.5 As part of the identified alternatives, the EIAR makes mention of Lephalale, Tubatse and Antonvilla as potential alternatives. The identified alternatives are deemed irrelevant, due to the site location and the designation of the proposed MMSEZ project. The EIA process for the Antonvilla site has already been completed.

**HEAD OFFICE**

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2.6 The Department request for consideration of viable alternatives which minimize negative environmental impacts and optimize positive consequences as per the requirement of EIA Regulations 2014, National Environmental Management Act 107 of 1998. Please note the following guideline documents may be consulted for assistance.

- DEAT (2004), **Criteria for determining Alternatives in EIA**, Integrated Environmental Management, Information Series 11, Department of Environmental Affairs and Tourism (DEAT), Pretoria.

2.7 Sources of water and energy supply have not been explicitly outlined in the EIAR.

2.8 Ranking of impacts in the EIAR must be revised. The following guideline documents may be consulted for assistance.

- DEAT (2005), **Guideline 3: General Guide to the Environmental Impact Assessment Regulations, 2005**, Integrated Environmental Management Guideline Series, Department of Environmental Affairs and Tourism (DEAT), Pretoria.

2.9 The EAP did not recommend a decision on the project.

### 3. CONCLUSION

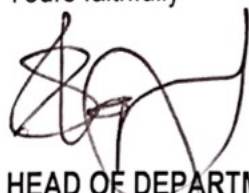
3.1 The submitted EIAR is incomplete, thus more information is required to enable the Department to make an informed decision; and

3.2 The EAP is requested to provide an Action Plan accompanied by clear timelines on how the outstanding issues will be addressed.

Kindly bring to the attention of the applicant the fact that this development must not commence prior to the Department deciding on the application.

Please do not hesitate to contact the Department should you have any queries in this respect.

Yours faithfully



HEAD OF DEPARTMENT  
DEPARTMENT OF ECONOMIC DEVELOPMENT, ENVIRONMENT AND TOURISM

DATE: 04/03/2021

Cc: Limpopo Economic Development Agency (LEDA)

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