



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, PRETORIA

EDMS Reference: 271107
Inquiries: Mr. Xolani Myanga
Telephone: 021493 7060
E-mail: OCEIA@dffe.gov.za

Mr Michael Bennett
Sharples Environmental Services
PO Box 9087,
George,
6530.

Telephone Number: +27 44 873 4923
Email Address : imichael@sesscc.net

Dear Mr Bennet

COMMENTS ON DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADING OF THE BULK SEWERAGE LINE FROM AMY SEARLE STREET / GREENHAVEN TO THE CRICKET FIELD SEWERAGE PUMPSTATION, ON ERVEN 4808, 4809, 4807, 770, 733, 83 AND REMAINDER OF FARM 4812, STREET PARCEL RE/131 AND STREET PARCEL RE/4893, GROOT BRAKRIVIER, MOSSEL BAY MUNICIPALITY, WESTERN CAPE PROVINCE.

The Department of Forestry, Fisheries, and the Environment (DFFE), Branch Oceans & Coasts (O&C) appreciates the opportunity granted to provide comments and recommendations on the Draft Basic Assessment Report (DBAR) in the subject of this letter. This Branch will provide comments based on the provisions of the National Environmental Management Act 107 of 1998 ("NEMA") and the National Environmental Management: Integrated Coastal Management Act 24 of 2008 ("ICM Act").

The Branch O&C has the mandate to ensure the holistic management of the coast, estuarine areas and maintenance of the coastal landscapes to realise that the development and use of natural resources are sustainable. The Branch further ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of the coastal zone are maintained to protect people, properties, and economic activities against the impacts of dynamic coastal processes.

The Branch notes that from the Draft Basic Assessment Report and the Estuarine Impact Assessment that a significant portion of the proposed pipeline upgrade route falls within the Estuarine Functional Zone (EFZ). Given the close proximity of Zone C to the estuary, the applicant is strongly advised to implement all necessary measures as per the proposed mitigation measures to prevent any effluent leakage, as such incidents could compromise the natural functioning and ecological integrity of the estuary.

The applicant is reminded of the Duty of Care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: “...*Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment...*” together with Section 58 of the NEM: ICMA which refers to one’s duty to avoid causing adverse effects on the coastal environment.

The Branch does not object to the granting of an Environmental Authorisation for the proposed upgrade of the bulk sewerage line from Amy Searle Street / Greenhaven to the Cricket Field Sewerage Pump Station. This position is primarily based on the fact that the proposed upgrade will occur within an existing pipeline servitude and is intended to improve overall water quality. Furthermore, all areas where vegetation is removed will be rehabilitated and revegetated using indigenous plant species.

Kindly note that the Branch O&C reserves the right to revise its comments based on new or additional information received. All correspondence, documentation, and/or requests (hard copy and an electronic copy) should be submitted to our office via email to OCEIA@dfpe.gov.za / or **Physical Address: Department of Forestry, Fisheries & the Environment (DFPE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001**

Yours sincerely,



Mr. Ryan Peter
Director: Coastal Development & Coordination
Department of Forestry, Fisheries, and the Environment
Date: 27/3/2026