



OLIFANTS MANAGEMENT MODEL PROGRAMME BULK RAW WATER STUDY PHASE

Phase 2F, Defence Compliance Statement

ABSTRACT

This project will construct a 24 km, 1200 mm diameter pipeline from the Steelpoort Pump Station to Mooihoek. Key elements include a new Break Pressure Reservoir on Grootboek 256 KT, under the Pulana Maroga Traditional Authority. This phase will incorporate the existing Lebalelo Scheme pipeline, reversing flow to enhance capacity. Environmental authorizations are required under NEMA for listed activities associated with this development.

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Document Control

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Version History

Version	Date	Description of Changes	Author
Draft	14 November 2024	Initial draft of the document	Hein Reid
V 00	5 December 2024	Incorporation of changes	Hein Reid
V01	4 March 2025	Incorporation of changes	Hein Reid

1 Executive Summary

This report presents an impact assessment framework tailored to the Defence component of Phase 2F of the Olifants Management Model Programme's Bulk Raw Water Study Phase (OMMP-BRWSP) and the associated outcomes.

Phase 2F comprises approximately 44 km of pipeline intended to convey water to the Olifantspoort Water Treatment Works (WTW), thereby augmenting the water supply to Polokwane and surrounding rural areas. For this application, the Lebelelo Water Use Association (LWUA), on behalf of the Department of Water and Sanitation (DWS), seeks authorisation for the approximately 3.35 km (~3,350 m) pipeline realignment, as well as the required access and internal roads necessary for the construction and operation of the entire Phase 2F alignment.

The objective of this assessment is to identify and analyse potential environmental and socio-economic impacts from defence activities during the construction, operational, and decommissioning phases. Findings reveal limited risk to defence, with one noted sensitivity: Military and Defence Site. The project's height restriction of not exceeding 10 meters above ground level has minimal impact on defence activities.

An impact analysis applying intensity, duration, and extent criteria shows negligible risk, with no significant impacts to defence activities. Given these low-risk levels, cumulative impact assessments, mitigation feasibility reviews, and extended monitoring plans were deemed unnecessary. In accordance with Government Notice (GN) No. 320, dated 20 March 2020, a Compliance Statement will be issued.

In conclusion, this report finds no significant defence impacts associated with Phase 2F, affirming its low-risk profile due to restricted project height, strategic alignment, and remote location from critical defence infrastructure.

2 Introduction

2.1 Project Title

The Olifants Management Model Programme Bulk Raw Water Study Phase (OMMP-BRWSP): Proposed phase 2F pipeline re-alignment and associated infrastructure, in the Capricorn and greater Sekhukhune District Municipalities, within the Greater Tubatse and Lepelle Nkumpi Local Municipalities, in the Limpopo province.

2.2 Project Description

The Lebalelo Water Use Association (LWUA), on behalf of the Department of Water and Sanitation (DWS), seeks authorisation for the approximately 3.35 km (~3,350 m) pipeline realignment, as well as the required access and internal roads necessary for the construction and operation of the entire Phase 2F alignment.

2.3 Project Overview

2.3.1 Summary of the OMMP-BRWSP

The Lebalelo Water User Association (LWUA) appointed the Zutari Ndodana Joint Venture (ZNV) to provide professional services for the OMMP-BRWSP, part of the Olifants River Water Resources Development Project (ORWRDP-2).

2.3.2 Background

ORWRDP-2, a project by the DWS, was approved in 2006 following an Environmental Impact Assessment (EIA) process and a revised Record of Decision (RROD). The Lebalelo Water Use Association (LWUA), on behalf of the Department of Water and Sanitation (DWS), seeks authorisation for the approximately 3.35 km (~3,350 m) pipeline

realignment, as well as the required access and internal roads necessary for the construction and operation of the entire Phase 2F alignment.

2.3.3 Key phases of ORWRDP-2

- Phase 2A: De Hoop Dam construction.
- Phase 2B: Flag Boshielo Dam to Pruissen pipeline (72 km).
- Phase 2B+: Pipeline extensions to Sekuruwe Water Treatment Works and other off takes.
- Phase 2C-F: Pipelines connecting various points, including Steelpoort, Mooihoek, and Olifantspoort.
- Phase 2G-I: Additional pipeline infrastructure and changes to the Lebelelo Network.

ORWRDP-2 evolved into the OMMP-BRWSP, with LWUA leading specific phases: Phase 2B, 2B+, 2D2, and 2F.

2.3.4 Strategic Importance

On March 5, 2023, the project was designated a Strategic Integrated Project (SIP 19) under South Africa's Infrastructure Development Act (No. 23 of 2014). This classification mandates prioritizing its planning, approval, and implementation due to its critical economic and social impact on water and sanitation infrastructure. The OMMP-BRWSP aims to meet growing water resource demands while ensuring compliance with environmental and infrastructural development priorities.

2.3.5 General Layout

A general layout of all the project phases and pipeline alignments is shown in Figure 1 below. Phase 2F, is the easterly pipeline alignment indicated by the green line.

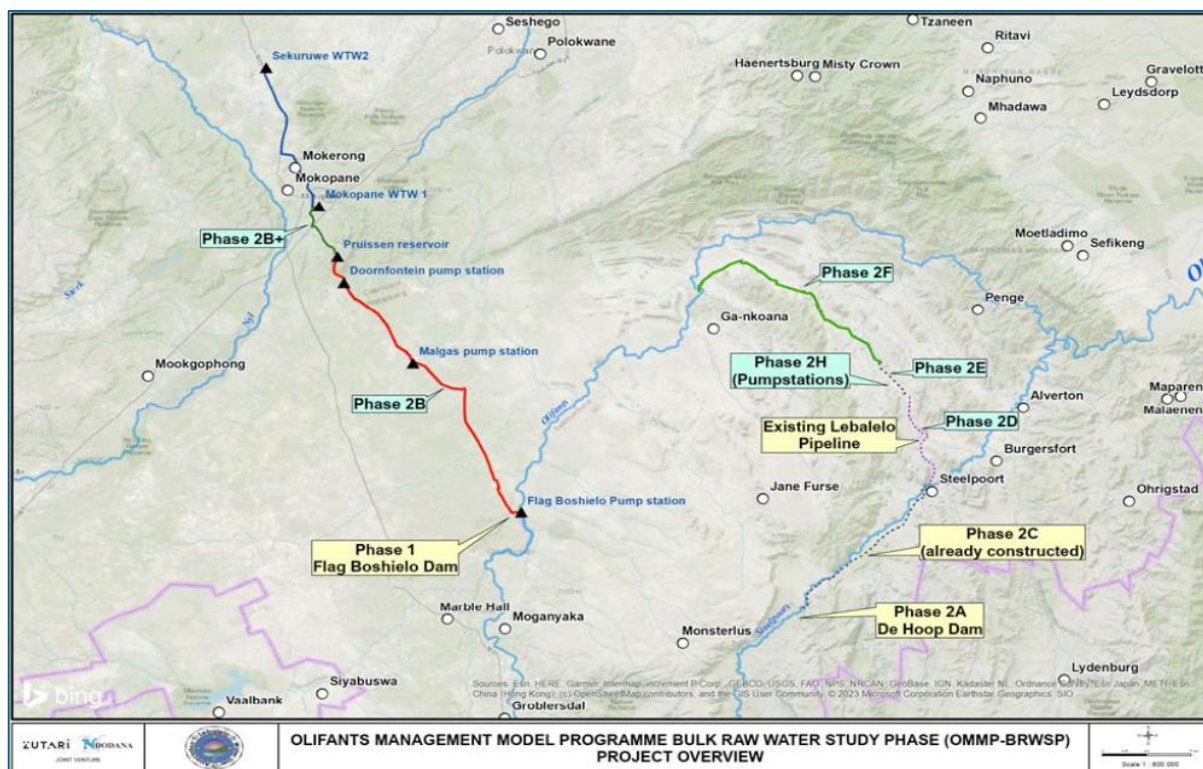


Figure 1: Map indicating the alignment of the different pipelines for the various Phases.

2.4 Summary of Phase 2F

Phase 2F comprises approximately 44 km of pipeline intended to convey water to the Olifantspoort Water Treatment Works (WTW), thereby augmenting the water supply to Polokwane and surrounding rural areas. For this application, the Lebalale Water Use Association (LWUA), on behalf of the Department of Water and Sanitation (DWS), seeks authorisation for the approximately 3.35 km (~3,350 m) pipeline realignment, as well as the required access and internal roads necessary for the construction and operation of the entire Phase 2F alignment.

2.4.1 Key Features

a. Pipeline Specifications

- 1,200 mm diameter for 18.5 km, tapering to 1,000 mm for 25.6 km.
- Follows gravel roads and avoids the R37 for a direct route to Olifantspoort WTW.

b. Biodiversity Considerations

Located within a Critical Biodiversity Area (CBA) and the Sekhukhuneland Centre of Floristic Endemism, known for unique flora and endemic species.

c. Environmental Authorisation (EA)

- Initially obtained in May 2017 (ref: 14/12/16/3/3/1/1626) for Phase 2E and 2F.
- Amended in May 2017 to allow project initiation until May 2, 2027.

d. Height Restriction

All infrastructure, including the pipeline and associated facilities, will not extend more than 10 meters above ground level, ensuring minimal visual and structural impact.

2.4.2 Regulatory Compliance

Construction activities trigger listed actions under the National Environmental Management Act (NEMA) and require authorisation via a Basic Assessment (BA) process as per the 2014 EIA Regulations. This includes approvals for access and internal roads necessary for Phase 2F.

The project's alignment and activities have undergone public participation and will require continued adherence to environmental and regulatory frameworks.

2.5 Project Area

The project is in the Greater Sekhukhune District Municipality, within the Greater Tubatse Local Municipality, in Limpopo Province. Figure 2 below shows the position of the planned Phase 2F Pipeline in the Limpopo Province.

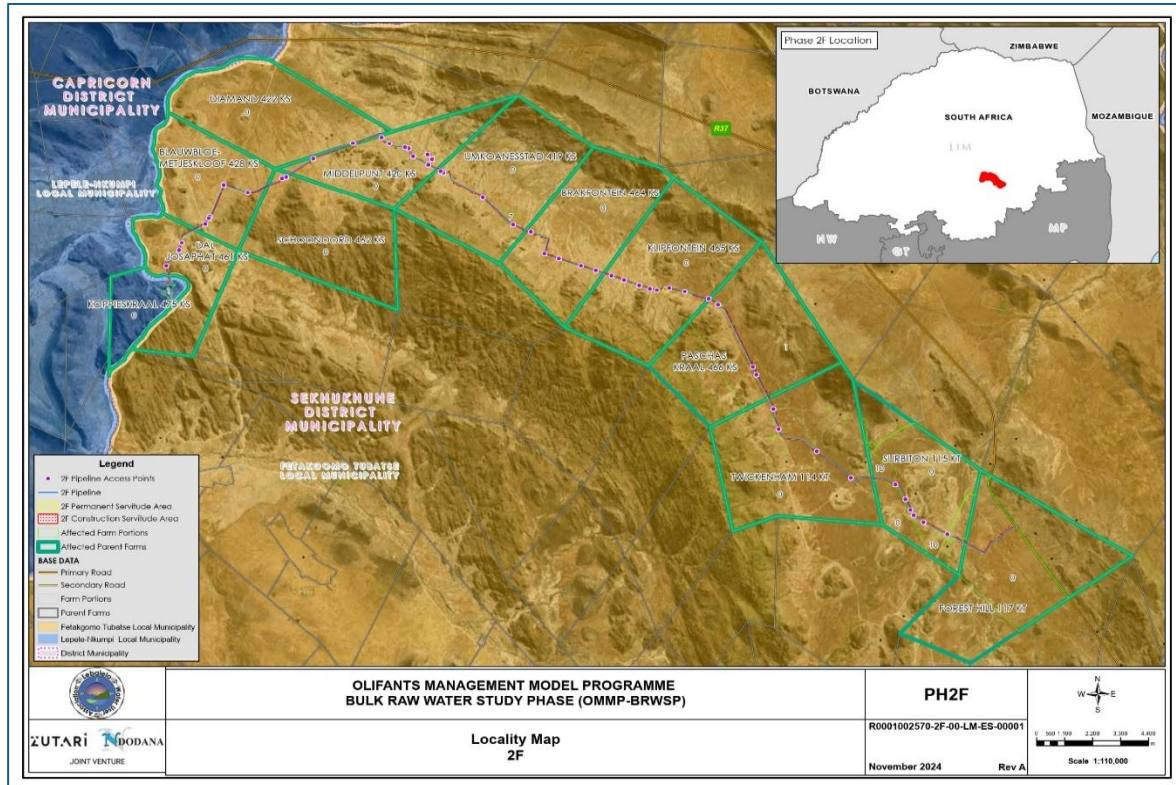


Figure 2: Overview of Phase 2F Pipeline

Figure 3 below shows a map indicating the location and alignment of the previously authorised Phase 2F (2016) vs the new proposed alignment.



Figure 3: Phase 2F location and alignment of the previously authorised Phase 2F

2.6 Specialist Assessment Protocol

This assessment follows the requirements outlined in the Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts where No Specific Protocols Are Described, as published in the South African Government Gazette No. 43110 on 20 March 2020.

This protocol provides guidance on assessing environmental impacts in cases where no dedicated protocols exist, establishing standards for content and methodology to ensure thorough and compliant assessments.

The assessment methodology provided by the environmental assessment practitioner is fully aligned with the standards and principles set forth in this general protocol, and this methodology will also be used to assess impacts specifically related to Defence installations. This ensures that all aspects of the evaluation meet regulatory expectations and best practices across all affected areas, including sensitive Defence infrastructure.

3 Methodology

To develop an impact assessment framework for the defence component of Phase 2D of the OMMP-BRWSP, this report will adapt the methodology outlined in the provided framework¹; as tailored for Defence. The framework builds on the provided methodology by emphasising criteria and approaches specific to the defence component, aligning the impact assessment with the overall goals of the OMMP-BRWSP.

3.1 Impact Identification

3.1.1 Objective

To identify the potential environmental and socio-economic impacts of defence activities or installations associated with the OMMP-BRWSP.

3.1.2 Approach

Due to the **Very Low significance of pre-mitigation impacts**, a full assessment for Defence Impact is unnecessary. However, to meet regulatory and oversight requirements, we will prepare a Compliance Statement for each category. These statements will confirm minimal impact and document the mitigation measures implemented.

3.1.3 DFFE Screening

The Department of Forestry, Fisheries and the Environment (DFFE) Screening Report for Environmental Authorization, as required by the 2014 Environmental Impact Assessment (EIA) Regulations, shows a medium sensitivity due to a Military and Defence Site. It is important to note that the key focus area is of medium sensitivity, whereas most of the access roads are situated in areas of low sensitivity. Figure 4 below shows the medium defence sensitivity area for the proposed development footprint.

¹ ZNJV – Impact Assessment Methodology, DD 18 October 2024



Figure 4: Defence Theme Sensitivity Area

3.1.4 Findings

a. Specialist Study Impact Assessment

The vertical component of the spatial dimensions for the proposed infrastructure will not exceed 10 m above ground level and the proposed development will therefore have no adverse effect on defence activities within the vicinity.

b. Protocol Requirements

Under the "Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Defence Installations" (GN 320 of 20 March 2020), a confirmation from the SANDF and a specialist compliance statement is needed.

4 Compliance Statement

Defence Compliance Statement for OMMP-BRWSP Phase 2F

Based on the requirements outlined in the **Defence Protocol for The Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Defence Installations**, published in Government Notice No. 320 Government Gazette 43110 DD 20 March 2020.

Project Overview

This compliance statement pertains to the Olifants Management Model Programme bulk raw water study phase proposed Phase 2F.

Compliance Statement Details

Prepared by: Hein Reid

Contact Details: 31 Villa Bianca, 72 Venus Street, Goedeburg, Benoni, 1501

Qualifications and Expertise: With over 40 years of experience in air traffic control, air navigation, surveillance, and communication systems—including 12 years in the defence force—I have developed specialized knowledge in managing high-security environments and sensitive defence installations. Over the course of my career, I have held air traffic control (ATC) licenses in every ATC discipline, demonstrating my comprehensive expertise across all areas of air traffic management.

In addition to my technical background, I hold an MBA, which enhances my strategic approach to complex projects involving defence and high-sensitivity areas. I have conducted numerous environmental impact assessments, particularly for projects with defence implications. My thorough understanding of defence protocols and environmental requirements allows me to effectively integrate defence considerations into environmental management plans, ensuring that project developments meet both security and environmental standards while balancing developmental needs with national security priorities.

Independence Statement: I, Hein Reid, confirm that I am independent and have no vested interest in the project.

Site Sensitivity Verification

Based on the national environmental screening tool and a site sensitivity verification conducted through desktop analysis, and other relevant information, the sensitivity rating for the site is confirmed to be Medium as per the Defence Protocol. The vertical component of the spatial dimensions for the proposed infrastructure will not exceed 10 meters above ground level. Furthermore, based on an impact assessment, it has been determined that the proposed development will have no adverse effect on defence activities within the vicinity.

This compliance statement confirms that the project aligns with the defence protocols for environmental standards and, ensuring that the development will proceed in a manner that respects local operational sensitivities and contributes to regional development without interfering with existing defence functions.

Defence Installation Impact Assessment

Following the Defence Protocol's guidelines, this statement confirms:

- a. Defence Sensitivity Rating: The site is designated as medium sensitivity concerning defence installations.
- b. Department of Defence Statement: The Department of Defence is expected to issue a no unacceptable impact on military areas of interest statement.
- c. Potential Impact: After thorough assessment, the proposed development of Phase 2F is anticipated to have very low impact on nearby defence installations.

Signature

.....
 Hein Reid
 Specialist

.....
 Date



forestry, fisheries & the environment

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SPECIALIST DECLARATION FORM – AUGUST 2023

Specialist Declaration form for assessments undertaken for application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

REPORT TITLE

Defence Impact for Olifants Management Model Programme Bulk Water Study Phase 2 F

Kindly note the following:

1. This form must always be used for assessment that are in support of applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting, where this Department is the Competent Authority.
2. This form is current as of August 2023. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.dffe.gov.za/documents/forms>.
3. An electronic copy of the signed declaration form must be appended to all Draft and Final Reports submitted to the department for consideration.
4. The specialist must be aware of and comply with 'the Procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the act, when applying for environmental authorisation - GN 320/2020', where applicable.

1. SPECIALIST INFORMATION

Title of Specialist Assessment	Defence Impact for Olifants Management Model Programme Bulk Water Study Phase 2 F
Specialist Company Name	Parivision
Specialist Name	Hein Reid
Specialist Identity Number	6303205126081
Specialist Qualifications:	MBA
Professional affiliation/registration:	Nil
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SPECIALIST DECLARATION FORM – AUGUST 2023

2. DECLARATION BY THE SPECIALIST

I, Hein Reid declare that –

- I act as the independent specialist in this application;
- I am aware of the procedures and requirements for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the National Environmental Management Act (NEMA), 1998, as amended, when applying for environmental authorisation which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”) and in Government Notice No. 1150 of 30 October 2020.
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing –
 - any decision to be taken with respect to the application by the competent authority; and;
 - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of Regulation 48 and is punishable in terms of section 24F of the NEMA Act.

Signature of the Specialist

Parivision

Name of Company:

15 Nov 2024

Date

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, _ Hein Reid_____, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

Signature of the Specialist

Parivision

Name of Company

15 November 2024

Date

Click or tap here to enter text.

Signature of the Commissioner of Oaths

Click or tap to enter a date.

Date