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**Ref: P17102\_CORR\_SENT\_LETTER\_LEDET EXTENSION SECTION 3(7) 43\_REV 00**

27 October 2020

Department of Economic Development, Environment and Tourism (LEDET)  
20 Hans van Rensburg Street  
Polokwane Central  
Polokwane  
0700

Your reference: LIM/EIA/0000793/2019

**Attention: Mr. Victor Mongwe / Mr. Mafu Nkosi**

Dear Sir,

**PROPOSED METALLURGICAL CLUSTER FOR THE MUSINA-MAKHADO SEZ WITHIN MUSINA AND MAKHADO LOCAL MUNICIPALITY OF VHEMBE DISTRICT**

Based on the Environmental Impact Assessment and the appointment of Delta BEC by the Limpopo Economic Development Agency (LEDA), LEDET granted extension of time due to the Covid-19 pandemic and State of Disaster in South Africa until 31 October 2020. We requested for a further extension of time due to exceptional circumstances (Regulation 3(7)) as outlined in the motivation below on Friday, 16 October 2020.

Based on the telephonic conversation between the EAP and the Case Officer on Monday, 26 October 2020, we herewith submit a revised request with additional motivation as well as the intended high-level work program for your kind consideration.

The draft EIA report was released for public review for a period of 50-days as from the 1 September 2020 up to 22 October 2020 whilst acknowledging in engagement with the LEDA who is the Applicant, that there are certain limitations and gaps pertaining to some of the salient environmental aspects that could not be addressed inter alia due to the COVID pandemic and procurement aspects outside of the control of the EAP. Public notice was duly given in the local media and all registered interested and affected parties (I&APs) were notified of the release of the draft EIA report and public meetings. Public meetings were held on 14 September 2020 in Musina and at the Mulambwane CPA, on 15 September 2020 at Waterpoort School and in Makhado, and on 16 September 2020 in Pretoria at Delta BEC. Further public meetings were held on 13 October 2020 in Musina and a focus group meeting with farmers at Forever Resorts Tshipese on 13 October on 14 October 2020 in Louis Trichardt at the Show Grounds and a focus group meeting with the Vhembe District King in Dzanani, and on 15 October 2020 in Polokwane a focus group meeting with regulatory authorities (DWS, etc. while the LEDET Biodiversity, did not attend), NGOs and the public. Unfortunately, the strict time requirements of the press did not allow for sufficient time to publish public advertisements for the meetings of 13 to 15 October 2020.

## 1. REQUEST FOR AN EXTENSION IN TERMS OF REGULATION 3(7) DUE TO EXCEPTIONAL CIRCUMSTANCES

The present request for a further extension of time for the submission of the final EIR submission to LEDET is based on the following reasons:

- 1.1 After the public meetings in Musina, Makhado and Waterpoort, further public meetings were requested by the communities and farmer organisations in the Musina area and the Makhado (Louis Trichardt) area, respectively. These Interested and Affected Parties (I&APs) indicated that the 50 day period for public comment is too short due to the magnitude of the project, the timing due to the COVID-19 pandemic and the extensive nature of the EIA report, specialists reports, and supporting documents (approximately 8000 pages) that have to be studied to provide substantive comments and inputs.
- 1.2 A further focus group meeting with all the tribal authorities in the area was requested at the Waterpoort meeting.
- 1.3 A further focus group meeting with the farmers' association was requested by the local farmers for the entire Vhembe area i.e. all farming unions to have one consolidated meeting at Nuwelus.
- 1.4 In March 2020 South Africa was placed on a State of Disaster, due to the Global Covid 19 Pandemic and. South Africa is still under Level 1 of the lockdown process and the general public don't feel at ease yet to attend public meetings and there are still limitations in the number of people attending meetings.
- 1.5 In anticipation of the comments by interested and affected parties, enquiries have been made with some of the key I&AP's representatives (i.e. Centre for Environmental Rights (CER), the Wildlife and Environmental Society of South Africa (WESSA), Centre for Applied Legal Studies (CALS) at the University of the Witwatersrand, Christo Reeders Attorneys, Deshika Kathararoo and Dr. Pieter du Toit from Limpopo Eco-Industrial Park (LEiP), Adv. Julian Dreyer (Pretoria Bar at Circle Law Chambers)) on their anticipated comments and inputs. Wessa, Christo Reeders and the Farmers affected by the project and LEiP indicated their need for additional time due to the scale of the project's vast amount of information in the draft EIA report, nature of the impacts to be considered and the effect of the COVID -19 pandemic impacting on their ability to respond timeously.
- 1.6 The EAP had already received some concerns, and indications are that it will further receive numerous objections against the Musina-Makhado (M-M) SEZ development by the end of the current public comment period on 22 October 2020. (It must be noted that more than 2500 objections comments and or submissions have been received thus far. Several comments relate to statements that pertain to potential flaws in the draft EIA Report and/or EIA procedure. Some of the concerns have merit and require further investigation, assessment and a response before the final EIA Report can be submitted to LEDET for a decision of the listed activity. This refers for example to communications from Christo Reeders Attorneys on 13 October 2020 as attached hereto. **Thus, many commentators requested extension of the 50-day public comment period to submit their comments.**
- 1.7 Under the current exceptional circumstances the requests made by the I&APs and affected parties are considered as reasonable, also given the limited time available to provide adequate notice and time for a response and to incorporate and address all comments in the relevant documents, following such meetings, before the final EIA report is to be made to LEDET. It is not in the public interest and is considered procedurally unfair to the I&AP's (contrary to regulation 41(6)(b) that requires a reasonable opportunity to comment), to only allow the public 50 days to comment on the voluminous draft EIA Report and specialists reports, given the extent of the SEZ development, its far reaching environmental impacts, the potential material information gaps identified, and the

limitations for work and moving of people brought about by the COVID-19 pandemic that constrain I&APs' ability to comment.

- 1.8 Due to the COVID-19 pandemic restrictions and procurement challenges from the applicant, specialists in several fields of practice were not able to move on site and in some cases are still not in a position to respond timeously to address the specialist studies content in a final specialist report format in a manner for the EAP to make a final informed assessment of the impacts. For these same reasons, the envisaged appointment of independent reviewers of the specialist reports, could not materialise before publication of the draft EIA report and must still take place to also address the public concerns.
- 1.9 Due to the requirements of public procurement LEDA will have to further appoint specialists and independent reviewers, as certain specialist studies have to be updated with information to address the comments made by I&AP's along with other aspects that have to be addressed more substantively. **Significant time and effort will be required to achieve this and without which the final report will be completely lacking (i.e. biodiversity assessment, potential biodiversity offset strategy and plan, protected trees study, climate change assessment, air quality, heritage, waste, energy study (currently only representing an information document), water study assessment (that is highly speculative and hydrological assessment information pertaining to the recently launched dam pre-feasibility study).**
- 1.10 Given the feedback from I&APs thus far, significant effort is required in order to attend to the overwhelming comments in a substantial way and to meet the EIA requirements for final submission of the EIA report. There is simply not sufficient time left for the EAP to attend to these matters with due regard to the requirements in the EIA regulations for the preparation of the final EIA report and the procurement challenges of the applicant.
- 1.11 At the public meetings that have been held I&APs requested that the amended draft EIA report be circulated for another round of public participation to enable them to comment on how matters raised have been addressed and to address any potential new material that could not be made available previously due to the above reasons. As indicated previously this request is considered reasonable.
- 1.12 The advertisements for a further round of public meetings on 13 to 15 October 2020 could not have been placed timeously to allow the public a reasonable time of at least 14-days before such public / focus group meetings is held and with sufficient time afterwards to provide their comments.
- 1.13 The potential development of a hazardous waste facility was identified in the masterplan of the draft EIA report and which is also the cause for considerable comments by the public that requires further specialist input concerning the site that have been identified for such a purpose on a preliminary basis. This will enable consideration of the cumulative impacts of the proposed development, resulting in new information and hence the need for a further 30-days of public review on the draft amended EIA report.
- 1.14 This also applies to the investigation concerning the potential for creating an offset if viable for the development that requires further input. In addition, a water specialist report concerning the possible construction of a dam recently launched by LEDA in the past two weeks is required. It also applies to the energy specialist report that requires further additions to alternative energy supply and resources, to name but a few examples.
- 1.15 The water specialist also has to incorporate the climate change considerations into their report. One of the stakeholders at the focus group meeting in Polokwane on 15 October 2020 indicated that the transport of hazardous waste from one province (Limpopo) to another (Gauteng at Holfontein), may result in the application needing to be assessed by the national Department of

Environmental Affairs, Forestry and Fisheries (DEFF) and that this EIA process under LEDET's authority may not be the correct procedure.

1.16 Attending to the above stated work may require further field investigations and modelling of information and depends on the availability of the specialists and the capability of the applicant to urgently assist in procuring the necessary services to execute the work. The EAP inquired with the specialists on their availability on attending to the outstanding issues and the indication from all the specialists are that they would require at least eight (8) weeks to undertake the additions and inclusions into the draft amended report from the date of appointment by the Applicant (LEDA).

1.17 Based on the public participation comments received up to 26 October 2020 (the comment period ended on 22 October 2020), Delta BEC have received a considerable volume of comments and objections. Furthermore, the submissions received are technical, scientific specialists' reviews, legal comments from attorneys, from the World Wildlife Fund (WWF), EWT, WESSA, Centre for Environmental Rights did they actually comment they have not, just to name a few. These comments alone received will take approximately 1-month to address by the EAP and a further month to be addressed by the respective specialists who undertook their respective specialist studies. The following table shows the status of procurement by LEDA, variation orders requested and status of LEDA on appointment and the independent review approvals by LEDA:

**Table 1: Specialist Studies availability**

Specialist study	Engineer / Consultant	Report status	Variation Order (VO) by LEDA requested	Work to be addressed	Timeframe for completion	Independent review of specialist study
Air Quality	Airshed	Draft	Yes, VO was submitted to LEDA in August 2020  Pending	<ul style="list-style-type: none"> <li>• Acid Rain which is critical for the farmers</li> <li>• New actual stack data which is critical that was not previously available.</li> <li>• Additional Site visit</li> <li>• Report writing</li> </ul>	4 weeks	To be appointed

Specialist study	Engineer / Consultant	Report status	Variation Order (VO) by LEDA requested	Work to be addressed	Timeframe for completion	Independent review of specialist study
Biodiversity	Digby Wells	Draft	Yes, VO was submitted to LEDA in August 2020  Pending	<ul style="list-style-type: none"> <li>• Concept super waste dump to be added to the specialist study</li> <li>• Specialist comments received indicated that two sensitive bat species occur at the site and needs to be further investigated</li> <li>• Raptor and avifauna assessment should be incorporated into the biodiversity assessment</li> <li>• Site visit</li> <li>• Reporting</li> </ul>	4 weeks	To be appointed
Climate Change	Promethium Carbon	Draft	Yes, VO was submitted to LEDA in early October 2020  Pending	<ul style="list-style-type: none"> <li>• Concept waste dump</li> <li>• Site visit</li> <li>• Reporting</li> <li>• Please note the specialist has indicated there is still outstanding payment by LEDA and procurement has not resolved this</li> </ul>	3 weeks	To be appointed
Aquatics	Digby Wells	Draft	Yes, VO was submitted to LEDA in August 2020	<ul style="list-style-type: none"> <li>• Concept waste dump</li> <li>• Site visit</li> <li>• Reporting</li> <li>• Informing the biodiversity aspects for the biodiversity offset strategy</li> </ul>	4 weeks	To be appointed

Specialist study	Engineer / Consultant	Report status	Variation Order (VO) by LEDA requested	Work to be addressed	Timeframe for completion	Independent review of specialist study
Phase 1 Heritage	Digby Wells	Draft	Yes, VO was submitted to LEDA in October 2020  Pending	<ul style="list-style-type: none"> <li>• Concept super waste dump</li> <li>• Site visit</li> <li>• Reporting</li> <li>• The Heritage specialist submitted the draft EIR to the heritage authority for comments that are outstanding</li> </ul>	4 weeks	To be appointed
Phase 1 Palaeontological	Marion Bamford	Draft	Yes, VO was submitted to LEDA in October 2020	<ul style="list-style-type: none"> <li>• Concept waste dump</li> <li>• Site visit</li> <li>• Reporting</li> </ul>	4 weeks	To be appointed

Specialist study	Engineer / Consultant	Report status	Variation Order (VO) by LEDA requested	Work to be addressed	Timeframe for completion	Independent review of specialist study
Socio-economic	Demacon	Draft	Yes, VO was submitted to LEDA in August 2020	<ul style="list-style-type: none"> <li>• Concept waste dump</li> <li>• Site visit</li> <li>• Reporting</li> <li>• Comments received during the comment period indicated that a value chain assessment of the available coal and smelting operations in South Africa needs to be performed.</li> <li>• Comments received from important I&amp;As have indicated that a separate economic and separate social impact assessment should rather be undertaken.</li> <li>• Quantify, clarify and discuss in a Labour assessment study the actual percentage regional and South African employment opportunities, Separate specialist study required.</li> </ul>	8 weeks	To be appointed
Visual	Newtown Landscaping Architects	Draft	Yes, VO was submitted to LEDA in October 2020	<ul style="list-style-type: none"> <li>• Concept super waste dump</li> <li>• Site visit</li> <li>• Reporting</li> <li>• Visualization</li> </ul>	8 weeks	

Specialist study	Engineer / Consultant	Report status	Variation Order (VO) by LEDA requested	Work to be addressed	Timeframe for completion	Independent review of specialist study
Land & Soil	Digby Wells	Draft	Yes, VO was submitted to LEDA in October 2020	<ul style="list-style-type: none"> <li>• Concept super waste dump</li> <li>• Site visit</li> <li>• Reporting</li> </ul>	6 weeks	
Wetland	Digby Wells	Draft	Yes, VO was submitted to LEDA in October 2020	<ul style="list-style-type: none"> <li>• Concept super waste dump</li> <li>• Site visit</li> <li>• Reporting</li> </ul>	6 weeks	To be appointed
Noise	Gudani Consulting	Draft	No, VO was submitted to LEDA by the specialist	<ul style="list-style-type: none"> <li>• Concept super waste dump</li> <li>• Site visit</li> <li>• Reporting</li> </ul>	6 weeks	
Geotechnical	Delta BEC	Draft	No	-	-	
Traffic Impact	Delta BEC	Draft	No	-	-	
Bulk Services Internal	iX Engineering	Final	No	-	-	
External Master Plan Report <b>(For information purposes only)</b>	Delta BEC	Draft	No	<ul style="list-style-type: none"> <li>• Awaiting comments from stakeholders due to Covid-19 restrictions</li> <li>• The comments received indicated that the site is more suited for agro-development. Merrs Christo Reeders suggests a agro-processing area, with renewable resources utilised</li> </ul>	-	

Specialist study	Engineer / Consultant	Report status	Variation Order (VO) by LEDA requested	Work to be addressed	Timeframe for completion	Independent review of specialist study
Health / Occupational	Niara Consulting	Draft	Yes, VO was submitted to LEDA in October 2020	<ul style="list-style-type: none"> <li>• Concept waste dump</li> <li>• Site visit</li> <li>• Reporting</li> <li>• Comments received during the public review indicated that the health specialist study is flawed due to health impacts on the people in Mopani, etc.</li> <li>• <b>Major Hazardous assessment was also requested by comments received during the public participation.</b></li> </ul>	6 weeks	

Specialist study	Engineer / Consultant	Report status	Variation Order (VO) by LEDA requested	Work to be addressed	Timeframe for completion	Independent review of specialist study
Biodiversity Offset Specialist Report	The Biodiversity Company	Draft	No	<ul style="list-style-type: none"> <li>Comments received indicated <b>that the offset study is fatally flawed.</b></li> <li><b>The offset needs to be identified,</b> and its viability be tested.</li> <li>Huge critique on the offset and no such site available in Limpopo Province.</li> <li>Based on the biodiversity offset guideline, no site for an offset was identified thus far. If not applied, alternatives should be determined. If not viable - the process will be severely impacted upon.</li> </ul>	6 weeks	To be appointed
Energy specialist Report <b>(For information purposes only)</b>	Global Hands	Final	No	<ul style="list-style-type: none"> <li>Material and content issues due to the report not being a specialist impact assesment as requested by the EAP, Report is only for information purposes</li> </ul>	Uncertain since significant update is required – will be determined upon appointment	To be appointed

Specialist study	Engineer / Consultant	Report status	Variation Order (VO) by LEDA requested	Work to be addressed	Timeframe for completion	Independent review of specialist study
Integrated Water Specialist Report	Matukane & Associates	Final	No	<ul style="list-style-type: none"> <li>Comments received have indicated that the water specialist study is significantly lacking and no water is secured.</li> <li>The lack of a sustainable water resource is a fatal flaw for the whole development proposal.</li> <li>The proposed transnational water supply is far fetched.</li> <li>Comments indicated that there is no hydrological impact assessment and needs to be included.</li> </ul>		Requested as part of initial specialist reports. Report conducted initially was a desk top study. To be appointed
Economic Analysis (Site Selection)	Mintek	Final	No	<ul style="list-style-type: none"> <li>Comments confirm fatal flaw as no environmental assessment of alternative locations were reported for site selection.</li> <li>Only refer to economic justification of site selection</li> </ul>	Uncertain since significant report is required	To be appointed
Groundwater (Geo-hydrological) Specialist	Matukane & Associates	Final	No		-	
Wetland / Aquatic Offset	Mamadi Company & Associates	Final	No	-	-	

Specialist study	Engineer / Consultant	Report status	Variation Order (VO) by LEDA requested	Work to be addressed	Timeframe for completion	Independent review of specialist study
Town Planning Report	Delta BEC	Final	No	<ul style="list-style-type: none"> <li>• Comments pointed to the absence of –</li> <li>• a proper consideration of spatial environmental information,</li> <li>• the absence of a regional EIA committed to by the Limpopo Government during the past; and</li> <li>• a Strategic Environmental Impact Assessment (SEA).</li> </ul>	-	
Waste Specialist	Delta BEC	Final	No	-	-	
Tourism & Agricultural Potential	Urban-Econ	Draft	No	<ul style="list-style-type: none"> <li>• Various comments confirm the SEZ is incompatible with agriculture and tourism and will have a dire effects. Comments indicate that the SEZ site is located within a private nature reserve and will negatively impact on the vested rights of land owners. -</li> </ul>	-	

1.18 Site alternatives and design alternatives should be a condition and assessed before the draft amended EIA report can be set out for another round of public review.

2. Taking the above into account this request for further extension for completion of the EIA process may if, enabled by the applicant, result in:

- 2.1 Enable the completion of all of the specialist studies which have not been fully concluded as indicated above.
- 2.2 Provide the public with a reasonable timeframe to review all the documentation/comments and endeavour to issue the completed final EIA report for public review, especially with the request for another round of public review and additional new information.
- 2.3 The extension is sought until 31 March 2021 since the EAP at the time of submitting this request still did not have time to review the volume of comments and objections received thus far and to engage with the applicant and specialists about further additional work that may be required. The extension is needed to ensure that all outstanding specialist studies and inputs have been obtained, the EIA report has been exposed to at least a 30-days public review period of the draft amended EIA report and the EAP had the opportunity to address all the comments and hence to allow for the Environmental Impact Statement to be formulated and provided. The potential further lockdown and its impact must also be considered to make provision for circumstances where the lockdown may be extended or a second wave of the Covid-19 pandemic.
- 2.4 Therefore, with reference to the National Environmental Management Act, 1998 (Act No. 107 of 1998), regulation 3(7) of the EIA Regulations, 2014 (as amended) states: *“In the event where the scope of work must be expanded based on the outcome of an assessment done in accordance with these Regulations, which outcome could not be anticipated prior to the undertaking of the assessment, or in the event where exceptional circumstances can be demonstrated, the competent authority may, prior to the lapsing of the relevant prescribed timeframe, in writing, extend the relevant prescribed timeframe and agree with the applicant on the length of such extension.”*, the EAP applies for this extension under exceptional circumstances as this is outside of the EAPs and applicants control.
3. On 14 October 2020 the applicant advised the EAP that in order to manage investor risk and the increasing public reaction against and for the SEZ, it has resolved not to apply to (LEDET for further extension of the time period to submit the final EIA report in terms of regulation 3(7) of the EIA Regulations, 2014. The applicant instructed the EAP to file the EIA report, specialist studies and EMPr (that was published on 1 September 2020 for public comment) with LEDET on 31 October 2020 as originally planned. The EAP advised that it will not be enough time to address the need for further public participation and time to comment as requested by the I&APs and to address some of the important changes required and will have to be attended to by some of the specialists and independent reviewers.
4. Objectively evaluated against the requirements of the EIA regulations, 2014 (as amended) and provisions of NEMA, read with sections 24 and 33 of the Constitution, the EAP is of the opinion that it is premature to close the EIA process on 31 October 2020 as there are material aspects that must be addressed in the draft EIA report to enable a fair, rational, informed, lawful and reasonable (proportional) decision by LEDET whether to grant environmental authorisation for the M-M SEZ.
5. The EAP recognises the severe pressure that the Applicant is subjected too and the need for bringing the EIA process to finality but the long duration to date was not caused by the public participation process which formally will have totalled only 80 days (30 days during scoping and 50 days during the EIA – although the EAP was flexible and allowed longer time). Thus, the public should not be deprived of their fundamental right to a fair EIA procedure for reasons not of their doing. The Applicant (and EAP) must in terms of Regulation 41(6)(a) and (b) ensure that during public participation information about all relevant facts regarding the SEZ is made available to the I&APs (except protected information) and that they have a reasonable opportunity to comment on the EIA. This is what the I&APs presently request. It will not be possible for the EAP to achieve this by 31 October 2020 due to the circumstances outlined above.

6. Some of the I&APs have already in writing accused the EAP of being biased towards the SEZ EIA application (which he denies) and that he does not comply with the EIA Regulations (which is also denied). They also reported that he committed a criminal offence under the EIA Regulations. These serious (but untruthful) allegations place the EAP under severe pressure and require him to act strictly independently at all times and in compliance with the law and the professional code of ethics for EAPs and professional scientists.
7. The EAP is therefore faced with opposing views between the decision from the Applicant, the reasonable request from I&APs and the EAP's obligations to all parties concerned to submit an EIA report that addresses all the facts needed to inform a decision and hence the EAP's request for further extension of time.
8. Various specialist studies are lacking and needs to be updated, independently reviewed. These include (as indicated above in Table 1) the biodiversity specialist study, the offset strategy, protected tree specialist study, water specialist study, energy study, health assessment, waste specialist study, labour assessment, and the separation of the economic and social impact assessments.
9. This presents a dilemma to the EAP of the opposing views of the applicant against further extension to secure finality of the EIA application, vis-a-vis I&APs' request for further extension of the public participation period. For examples of the present context of this conflict, kindly refer to the attached I&AP requests for extension and the Applicant's objection against further extension.
10. In light of the above information and the additional information provided, the EAP hereby respectfully request in terms of Regulations 3(7) and 8(a) or (b) of the EIA Regulations –
  - 10.1 extension to submit to LEDET the amended Report and specialists' reports and the draft amended EMPr on 31 March 2021 (due to the prohibition of public participation between 15 December 2020 and 5 January 2021 per Regulation 3(3) of the EIA Regulations).
  - 10.2 that on 15 November 2020 or as soon as is possible thereafter the different reports in paragraph 10.1 to independent specialist review.
  - 10.3 that LEDET provide guidance to the EAP and Applicant based on the findings of the external reviews in paragraph 10.2 of how to further proceed with the EIA process; and
  - 10.4 the EAP herewith request LEDET's urgent guidance, advice and decision.

#### 11. TIMEFRAMES:

The proposed timeframes endeavours to take into account the updating of the specialist studies, independent specialist review, and allow for further public participation as required by national environmental laws.

**Table 2: Proposed timeframes**

Activity	Date
<b>Specialist variation orders requested by EAP to LEDA</b>	August 2020
<b>Variation orders submitted by specialists to LEDA</b>	October 2020
<b>Public Participation ends</b> <i>EAP suggests that the EIA PPP be extended until 15 December 2020</i>	22 October 2020 (extended until 15 December 2020)

Activity	Date
<b>Appointment of specialists from LEDA to conduct further work.</b>	15 November 2020
<b>Specialists undertake respective work as indicated and any other work that may emanate from the comments received that requires attention.</b>	03 November 2020 to 5 January 2021
<b>December festive period, no work or PPP</b>	15 December 2020 to 5 January 2021
<b>Update draft EIR and incorporate comments received on draft EIA report (ending 22 Oct 2020)</b>	22 October to 5 February 2021
<b>Receipt of updated specialist reports based on variation orders</b>	15 January 2021
<b>Applicant appointment of independent reviewers</b>	15 to 30 November 2020
<b>Independent review of specialist studies.</b>	15 November 2020 to 1 February 2021
<b>Update draft amended EIR and incorporate specialist studies</b>	1 January 2021 to 05 February 2021
<b>Draft Amended EIR out for public review of 30-days</b>	20 January 2021 to 19 February 2021
<b>Public meetings and public participation</b>	Public meetings and focus group meetings Continuous from 22 October 2020 to 19 February 2021.
<b>Address and update amended EIR to final EIR</b>	20 February 2021 to 30 March 2021
<b>Submit to LEDET</b>	31 March 2021

12. Please note that the above projected work schedule is indicative and subject to change and must still be agreed to with the applicant.

13. As per the EAP's previous request we confirm that the EAP's request for a meeting was considered by LEDET as being unnecessary.

Your assistance with this matter and response to this request at your earliest convenience will be highly appreciated.

Yours sincerely,



Ronaldo Retief Pr.Sci.Nat.  
*Pr. Environmental Scientist*  
EAP

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