

APPENDIX A

Plan of Study for EIA



PROPOSED N2 WILD COAST TOLL HIGHWAY

PLAN OF STUDY FOR EIA

Prepared for:

National Department of Environmental Affairs and Tourism,
Eastern Cape Department of Economic Affairs, Environment and Tourism, and
KwaZulu-Natal Department of Agriculture and Environmental Affairs

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1. INTRODUCTION

1.1 BACKGROUND

The South African National Roads Agency Limited (SANRAL) proposes to design, construct, operate and maintain a toll road between the Gonubie Interchange (near East London in the Eastern Cape) and the Isipingo Interchange (south of Durban in KwaZulu-Natal). The total extent of the proposed toll road is about 560 km (see Figure 1).

A previous environmental Record of Decision (RoD), issued on 3 December 2003, authorised the South African National Roads Agency Limited (SANRAL) to undertake the proposed N2 Wild Coast Toll Highway, but numerous appeals were subsequently lodged with the Minister of Environmental Affairs and Tourism objecting to the authorisation granted to SANRAL. On 9 December 2004 the Minister upheld the appeals and set aside the authorisation on the grounds that the appointed environmental consultant did not meet the requirement for independence as contemplated in the EIA Regulations (Government Notice R1183 of 5 September 1997, as amended). In addition to a number of other items, the Minister's decision also indicated that this did not preclude a new application for environmental authorisation from being submitted, as the authorisation was not set aside on environmental grounds.

Following a proposal call by SANRAL in January 2005, SANRAL subsequently appointed CCA Environmental (Pty) Ltd (CCA), in association with Nomi Muthialu & Associates (Pty) Ltd (NMA), as independent environmental consultant to submit a new application for environmental authorisation and to undertake the required EIA of the proposed project.

1.2 STUDY PROCESS TO DATE

CCA duly submitted the required Application for Authorisation forms and a Plan of Study for Scoping (April 2005), on behalf of SANRAL, to the Department of Environmental Affairs and Tourism (DEAT; the lead environmental authority) and the Eastern Cape Department of Economic Affairs, Environment and Tourism and the KwaZulu-Natal Department of Agriculture and Environmental Affairs. DEAT accepted the Plan of Study for Scoping on 20 June 2005.

A Scoping Study was undertaken in accordance with the requirements of the EIA Regulations (Government Notice R1183 of 5 September 1997, as amended) promulgated in terms of the Environment Conservation Act (ECA, No. 73 of 1989). The findings of the Scoping Study are presented in the Final Scoping Report (FSR), which was submitted to the relevant environmental authorities for consideration during March 2007.

It is anticipated that the environmental authorities would request further investigations on the potential impacts of the proposed project in order to facilitate decision-making on the environmental application. This Plan of Study for EIA is thus being submitted in accordance with the requirements of Regulation 7 of the ECA EIA Regulations and is based on the guidelines provided in DEAT's Guideline Document: EIA Regulations (1998).

2. ENVIRONMENTAL ISSUES IDENTIFIED DURING SCOPING

2.1 GENERAL

As mentioned in Chapter 7 of the FSR, numerous issues and concerns were raised by Interested and Affected Parties (I&APs) and identified by the EIA project team during the Scoping Study. These were categorised into 12 main categories, as follows:

- EIA process and legal issues;
- Public consultation process;
- Specialist studies;
- Planning and policy issues;
- Motivation/need for the project;
- Scope of work and construction issues;
- Road, traffic and transportation issues;
- Alternative routes;
- Tolling issues;
- Economic issues;
- Social issues; and
- Biophysical issues.

A number of issues and concerns were identified as “key” issues in the FSR since they were deemed to have significant implications in terms of consideration of the adequacy of the Scoping Study and/or way forward in the EIA process. The following key issues and concerns were identified:

1. Legality and adequacy of the EIA process;
2. Validity of the use of information from the previous EIA process;
3. Adequacy of the consideration of alternatives;
4. Adequacy of the consideration of alternative alignments;
5. Adequacy of the public consultation process;
6. Adequacy of the motivation/need for the proposed project;
7. Potential biophysical, social and economic impacts;
8. General support for the proposed project in the Eastern Cape and general opposition in KwaZulu-Natal;
9. Reliance on information provided by SANRAL;
10. Cross-subsidisation; and
11. Bypasses to Butterworth, Dutywa and Mthatha.

Section 7.6 and Appendix 14 (Comments and Responses Report) of the FSR provide the EIA project team’s and proponent’s responses to the above key issues and concerns, as appropriate. Issues and concerns relating to the legality, validity and adequacy of various aspects of the Scoping Study are adequately addressed in the FSR and, while these issues and concerns have been identified as “key” in terms of consideration of the adequacy of the Scoping Study and/or way forward in the EIA process, they do not require further investigation and assessment in the EIA phase of the study.

2.2 ISSUES AND CONCERNS TO BE ADDRESSED IN THE EIA PHASE

Issues and concerns to be addressed in the EIA phase of the study are comprehensively described in Chapter 8 of the FSR. These relate to potential biophysical, social and economic impacts which could result from the construction and operation of the proposed project. The identification of potential impacts was informed by the EIA project team’s comprehensive audit of the existing information as contained in

I&AP comments (including appeal comments), independent specialist reports submitted as part of the previous EIA process, the Strategic Environmental Assessment and Conservation Assessment of the Wild Coast as well as specialist input obtained during the Scoping Study, I&AP comments received on the DSR and observations made during field trips through the study area.

Examples of potential impacts relating to the proposed project are provided below under the following categories: Biophysical impacts; Social impacts; and Economic impacts.

2.2.1 Biophysical impacts

- *Vegetation and flora*
Loss of "species of special concern", loss of sensitive habitats; loss and changes in ecosystem functions; impacts on forests; secondary and cumulative impacts; and consideration of the ecological sustainability of the proposed project.
- *Fauna*
Loss of sensitive faunal habitats; invasion by alien fauna; increased animal mortalities; impacts from increased noise and light pollution; and impacts of bridges on breeding grounds of birds of prey.
- *Aquatic ecosystems*
Potential impact on sensitive aquatic habitats; effects of changes in river channel structure and condition; effects of increased sedimentation; loss of wetland areas; and secondary impacts of improved accessibility of aquatic resources.
- *Soils, land use and agriculture*
Loss of productive/potentially productive land; loss of soil; impacts on subsistence farming activities; impacts in terms of loss (or changes) of access to land; and impacts in terms of likely improved regional access.

2.2.2 Social impacts

- *Social structures, functions and processes*
Resettlement of affected households; severance effects; social effects of potential improved local employment and regional economic development; social effects linked to potential impacts on sites of cultural, spiritual or religious significance; and effects on the way of life of affected communities.
- *Tourism*
Potential impact in terms of perceived increased cost to reach a destination; increase in growth and number of tourist products; consideration of apparently conflicting tourism development philosophies; and consideration of relevant local and regional tourism initiatives.
- *Cultural and historical heritage*
Potential impact on historical heritage and cultural landscapes or viewsapes; loss or disturbance to archaeological or palaeontological sites; impacts on burial grounds and graves; and impacts on sites of spiritual and religious importance.
- *Noise*
Potential impacts associated with the construction phase; elevated noise levels of road traffic noise along the proposed route; elevated noise along alternative routes; noise at toll plazas; and possible health effects of potential noise impacts.

- *Air quality*
Potential impacts during the construction phase; impacts on local air quality in sensitive areas; cumulative effects in South Durban Industrial Basin; impacts on local air quality along alternative routes; and possible health effects of potential air quality impacts.
- *Visual*
Potential impacts of the proposed road, high-level bridges, interchanges and toll plazas on the sense of place, especially in the greenfields sections; impacts on landscape character; impacts during construction; and impacts in terms of critical views from the surrounding areas.
- *Traffic*
Potential impacts on macro-transportation issues, particularly in the KwaZulu-Natal South Coast area; impact of traffic diversion around toll plazas; impacts relating to public transport/taxi industry; impacts relating to the construction phase; and consideration of relevant planning initiatives relating to national, regional and municipal transport infrastructure.
- *Planning/development*
Potential impacts on regional strategic development initiatives; impacts on regional and local planning initiatives; impacts associated with the land claims process; and compatibility of the proposed project with relevant Wild Coast planning and policy initiatives.

2.2.3 Economic impacts

Potential impact on businesses both along the route and in the region; net economic impact on road users; impact on towns along the existing N2 and R61 that would be bypassed; impacts on towns that would be linked by the proposed new route; economic benefits of the construction and operation phases; and impact on prices of goods and services.

3. FEASIBLE ALTERNATIVES

The Scoping Study included consideration of the “do nothing” alternative, alternative route alignments and alternative positions of toll plazas and indicates which would be carried forward for further investigation in this phase of the EIA process (refer to Chapter 5 of the FSR for further detail in this regard).

Specialist botanical, social and economic input was obtained in order to provide key information for a comparative analysis of alternative alignments. The following alternative alignments were considered in the Scoping Study (see Figures 2 and 3):

- Upgrade the existing N2 between Mthatha and Port Shepstone in relation to the “do nothing” alternative;
- Upgrade the existing R61 between Mthatha and Port Shepstone in relation to the “do nothing” alternative;
- Gallagher route between Mthatha and Port Shepstone in relation to the “do nothing” alternative;
- Alternative greenfields alignments between Lusikisiki and the Mthamvuna River.

As mentioned in Section 5.4 of the FSR, the following alternatives are considered “feasible” and are proposed to be assessed in this phase of the EIA process:

- The “do nothing” alternative;
- SANRAL's preferred alignment between Lusikisiki and the Mthamvuna River;

- Site-specific alternative route alignments in the greenfields sections of the proposed project, i.e. in the sections between Ndwalane and Ntafufu and between Lusikisiki and the Mthamvuna River, as follows:
 - for the proposed alignment between Ndwalane and the Mzimvubu River;
 - for the proposed alignment in the vicinity of Ntafufu village and the Ntafufu River;
 - for the proposed alignment of the approach to the Msikaba bridge crossing site;
 - for the proposed alignment across the Mthentu River; and
 - for the proposed alignment across the Mnyameni River.
- The Coastal Mzamba route between Lusikisiki and the Mthamvuna River; and
- Alternative mainline toll plaza positions to SANRAL's preferred Ndwalane and Mthentu mainline toll plazas.

4. SPECIALIST STUDIES

The FSR recommends that specialist studies be undertaken to adequately address the potential biophysical, social and economic impacts which could result from the construction and operation of the proposed project.

4.1 ADDITIONAL INFORMATION REQUIRED

A substantial amount of information on the potential impacts has already been collected by way of the previous specialist studies. The specialist reports compiled as part of the previous EIA process are considered to reflect independent specialist studies suitable for use in the current EIA, except in three cases. The specialist Eastern Cape planning study, the visual study and the traffic study would need to be re-done in light of the deemed lack of independence of the previous environmental consultant.

Information considered accurate and adequate in the independent specialist reports compiled as part of the previous EIA process would not be re-done as part of this EIA. However, I&APs, authorities, an independent review of the previous EIA process (commissioned by the Minister of Environmental Affairs and Tourism) and the review by the EIA project team have identified a number of shortcomings and/or gaps in these studies.

General and specific Terms of Reference for updated and/or new independent specialist studies have thus been formulated (refer to Sections 9.2 and 9.3 of the FSR) in order to ensure that all relevant potential impacts are adequately addressed in the current EIA. In particular, the specialist studies are aimed at:

- Reviewing previous independent specialist reports, where applicable, in order to determine the continued relevance thereof;
- Updating existing information, where applicable, in light of any relevant new information and current project details (e.g. inclusion of proposed Ndwalane and alternative Mthentu toll plazas);
- Ensuring that all relevant issues/potential impacts and key shortcomings and/or gaps are adequately addressed; and
- Including the results of new investigations (e.g. assessment of the potential impacts of the Coastal Mzamba alternative alignment).

4.2 METHOD OF DETERMINING IMPACTS

Specialists would be required to determine potential environmental impacts through appropriate study approaches, e.g. site visits, interviews, computer-aided models, Geographical Information Systems (GIS), professional experience, etc.

The following specialist studies and potential specialists have been identified:

SPECIALIST STUDY	SPECIALIST	COMPANY/AFFILIATION
Vegetation and flora	David Hoare	David Hoare Consulting
Fauna	Dr Bill Branch	Coastal and Environmental Services
Aquatic ecosystems	Dr Patsy Scherman	Coastal and Environmental Services
Soils, land use and agriculture	Frank Merryweather	Merryweather Environmental
Social	Liezl Coetzee	Liezl Coetzee Consulting
Tourism	Martin Janse van Vuuren	Grant Thornton
Cultural and historical heritage	Len van Schalkwyk	Ethembeni Cultural Heritage
Noise	Adrian Jongens	Jongens Keet Associates
Air quality	Mark Zunckel	CSIR
Visual	Menno Klapwijk	Cave Klapwijk and Associates
Traffic*	Dr Christoff Krogscheepers/Willie Pienaar	Innovative Traffic Solutions/Tolplan
Planning/development	Kreason Naidoo	Tshani Consulting
Economic	Prof Wessel Pienaar	University of Stellenbosch

* It should be noted that all competent traffic engineers able to undertake the required specialist traffic study derive a large proportion of their income from SANRAL – this affects their status as “independent” consultants as per DEAT’s EIA Guideline Document (1998)

4.3 METHOD OF ASSESSING THE SIGNIFICANCE OF IMPACTS

Potential impacts would be assessed according to the following criteria and rating scales:

CRITERIA	RATING SCALES
Intensity (The expected magnitude or size of the impact)	<ul style="list-style-type: none"> • Negligible • Low - where the impact affects the environment in such a way that natural, cultural and social functions and processes are minimally affected • Medium - where the affected environment is altered but natural, cultural and social functions and processes continue albeit in a modified way; and valued, important, sensitive or vulnerable systems or communities are negatively affected • High - where natural, cultural or social functions and processes are altered to the extent that it would temporarily or permanently cease; and valued, important, sensitive or vulnerable systems or communities are substantially affected
Extent (The predicted scale of the impact)	<ul style="list-style-type: none"> • Site-specific • Local (immediate surrounding areas) • Regional (Eastern Cape or KwaZulu-Natal) • National
Duration (The predicted lifetime of the impact)	<ul style="list-style-type: none"> • Short-term (0 to 5 years) • Medium term (6 to 15 years) • Long term (16 to 30 years) - where the impact would cease after the operational life of the activity either because of natural processes or by human intervention • Permanent - where mitigation either by natural process or by human intervention would not occur in such a way or in such a time span that the impact can be considered transient

CRITERIA	RATING SCALES
Probability (The likelihood of the impact occurring)	<ul style="list-style-type: none"> • Improbable – where the possibility of the impact materialising is very low • Probable – where there is a good possibility (<50% chance) that the impact would occur • Highly probable – where it is most likely (50-90% chance) that the impact would occur • Definite – where the impact would occur regardless of any prevention measures (>90% chance of occurring)
Status of the impact	Here it is stated whether the impact is positive (a "benefit"), negative (a "cost") or neutral
Degree of confidence (The specialist's degree of confidence in the predictions and/or the information on which it is based)	<ul style="list-style-type: none"> • Low • Medium • High

Due to the inherent difficulties involved in attaching values to potential impacts, the significance of the potential impacts would be determined according to the core criteria for determining significance ratings, namely the extent, duration and intensity of the impacts to an affected party or the affected environment. In order to ensure consistency between specialist studies, specialists would be required to assign significance ratings to potential impacts before and after mitigation as per the convention for assigning significance ratings provided in the following table.

SIGNIFICANCE RATING	DESCRIPTION (in terms of intensity, extent and duration)
VERY HIGH Significance	Impacts could be: EITHER of high intensity at a regional level and endure in the long term ; OR of high intensity at a national level in the medium term ; OR of medium intensity at a national level in the long term .
HIGH Significance	Impacts could be: EITHER of high intensity at a regional level and endure in the medium term ; OR of high intensity at a national level in the short term ; OR of medium intensity at a national level in the medium term ; OR of low intensity at a national level in the long term ; OR of high intensity at a local level in the long term ; OR of medium intensity at a regional level in the long term .
MEDIUM Significance	Impacts could be: EITHER of high intensity at a local level and endure in the medium term ; OR of medium intensity at a regional level in the medium term ; OR of high intensity at a regional level in the short term ; OR of medium intensity at a national level in the short term ; OR of medium intensity at a local level in the long term ; OR of low intensity at a national level in the medium term ; OR of low intensity at a regional level in the long term .
LOW Significance	Impacts could be: EITHER of low intensity at a regional level and endure in the medium term ; OR of low intensity at a national level in the short term ; OR of high intensity at a local level and endure in the short term ; OR of medium intensity at a regional level in the short term ; OR of low intensity at a local level in the long term ;

SIGNIFICANCE RATING	DESCRIPTION (in terms of intensity, extent and duration)
	OR of medium intensity at a local level and endure in the medium term.
VERY LOW Significance	Impacts could be: EITHER of low intensity at a local level and endure in the medium term; OR of low intensity at a regional level and endure in the short term; OR of low to medium intensity at a local level and endure in the short term.
NOT APPLICABLE	No impact.

Additional criteria to be considered which could increase the significance rating of the potential impact, if deemed justified by the specialist, are the following:

- Permanent/irreversible impacts (as distinct from long term, reversible impacts);
- Potentially substantial cumulative effects; and
- High level of risk or uncertainty, with potentially substantial negative consequences.

Criteria to be considered which could decrease the significance rating if deemed justified by the specialist, with motivation, include:

- Improbable impacts, where the confidence level in the prediction is high.

The following procedure would be followed for assigning significance ratings to residual (after mitigation) impacts:

- Firstly, probable changes in intensity, extent and duration of the impact after mitigation would be considered, assuming effective implementation of mitigation measures, leading to a revised significance rating;
- Secondly, the significance rating would be moderated after taking into account the likelihood of proposed mitigation measures being effectively implemented. The following would be considered in this regard:
 - Any potentially significant risks or uncertainties associated with the effectiveness of the mitigation measures;
 - The technical and financial ability of the proponent to implement the measure; and
 - The commitment of the proponent to implementing the measure, or guarantee over time that the measures would be implemented.

The significance ratings are based on largely objective criteria and inform decision-making at a project level as opposed to a community level. In some instances, therefore, whilst the significance rating of potential negative impacts might be “low” or “very low”, the importance of these impacts to local communities or individuals might be extremely high. Recommendations should be made as to ways of avoiding or minimising these negative impacts through appropriate project design, selection of appropriate alternatives and/or management.

The relationship between the residual significance ratings (for potential positive or negative impacts) and decision-making can be broadly defined as follows:

SIGNIFICANCE RATING	EFFECT ON DECISION-MAKING
Very Low; Low;	Would not have an influence on the decision to proceed with the proposed project, provided that recommended measures to mitigate negative impacts are

Low to Medium	implemented, where possible.
Medium; Medium to High	Should influence the decision to proceed with the proposed project, provided that recommended measures to mitigate negative impacts are implemented, where possible.
High; High to Very High Very High	Would strongly influence the decision to proceed with the proposed project.

4.4 PROJECT PHASES TO BE CONSIDERED

Specialists would be required to determine and assess potential impacts associated with the construction (including initial site preparation) and operation (including maintenance) phases of the proposed project.

5. INTEGRATION AND SYNTHESIS

The following key steps would be undertaken as part of Integration and Synthesis:

- **Compilation of a Draft EIR**

The results of the specialist studies and other relevant, available information would be integrated and synthesised into a Draft EIR by the EIA project team, with due consideration of the report requirements stipulated in the ECA EIA Regulations. Information would be presented in a logical, simple format in order to produce a document which is easy to comment on, and which would aid decision-making. The Draft EIR would include an overall evaluation of the potential residual impacts of the proposed project and identified feasible alternatives. The independent specialist reports and other relevant information would be included in the Draft EIR as appendices.

- **Public comment on the Draft EIR**

The Draft EIR would be placed in public libraries and other public venues used earlier in the process, and on CCA's and SANRAL's websites, in order to facilitate public review and comment. An Executive Summary would be sent to all I&APs on the project database.

The publication of the Draft EIR would also be announced in the media used earlier in the process. I&APs would be given an eight-week period within which to submit comment on the report.

- **Compile Comments and Responses Report and Final EIR**

Comments received on the Draft EIR would be collated in a Comments and Responses Report. The Final EIR would then be compiled, with due consideration of comments received and responses provided by the EIA project team and Applicant, and submitted to DEAT (and the relevant provincial environmental authorities) for consideration and decision-making.

It is envisaged that a Draft Environmental Management Plan (EMP) would be submitted simultaneously with the submission of the Final EIR, as requested by DEAT. The Draft EMP would set out actions, responsibilities and schedules for the implementation of the mitigation measures prescribed in the EIR. The EMP would also include monitoring and review methods to measure the degree of success of the mitigation measures.

- **Record of Decision**

DEAT's decision on the proposed project would be published in a RoD. All registered I&APs would be notified of the RoD to be issued to SANRAL. I&APs (including the Applicant) would also be informed of the statutory 30-day period in which to appeal the decision.

6. PUBLIC CONSULTATION PROCESS

It should be noted that a number of opportunities for public review would be provided during this phase of the EIA process. These include the following:

- I&APs would be notified that the EIA process is commencing in accordance with an approved PoS for EIA;
- Specialists would interact with relevant communities and other stakeholders, where appropriate, in order to facilitate assessment of potential impacts;
- The Draft EIR would be released for an eight-week review and comment period;
- Hardcopies of the full Draft EIR would be made available at the same libraries and other public venues used during the Scoping Study;
- Adverts would be placed in national, regional and local newspapers used during the Scoping Study to announce the availability of the Draft EIR for review;
- An electronic copy of the full report would be made available on the websites www.ccaenvironmental.co.za and www.nra.co.za;
- All registered I&APs would be notified by post of the availability of the Draft EIR for review;
- I&APs would be notified of the submission of the Final EIR, DEAT's RoD and the statutory 30-day appeal period; and
- I&APs would be notified of the outcome of the Appeals period.

7. CONSULTATION WITH ENVIRONMENTAL AUTHORITIES

It is envisaged that the relevant environmental authorities would be consulted for input and guidance and kept informed of the proposed project on an ongoing basis, and particularly at the following stages:

- Submission and acceptance of the Plan of Study for EIA (this document);
- Submission of the Draft EIR for review; and
- Submission of the Final EIR for consideration and decision-making, as appropriate.

It is understood that DEAT would be the final decision-making authority, with the Eastern Cape Department of Economic Affairs, Environment and Tourism and the KwaZulu-Natal Department of Agriculture and Environmental Affairs being commenting authorities.

8. ANTICIPATED TIME-TABLE FOR KEY TASKS

The envisaged time-frame for key tasks associated with this phase of the EIA process is set out in the table below. It should be noted that these time-frames are tentative and might change due to unforeseen circumstances. If CCA is not able to meet the time-frames as presented below, the relevant environmental authorities would be advised accordingly and an alternative time-frame would be presented.

KEY TASKS	ANTICIPATED TIME-FRAME FOR COMPLETION
Specialist studies and compilation of draft reports	end July 2007
Review and finalisation of specialist reports	mid August 2007
Finalise Draft EIR, print and distribute to public venues	mid October 2007
Comment period on Draft EIR, including Public Consultation Process	mid December 2007
Submit Final EIR, including Comments and Responses Report and Draft EMP	mid February 2008

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APRIL 2007

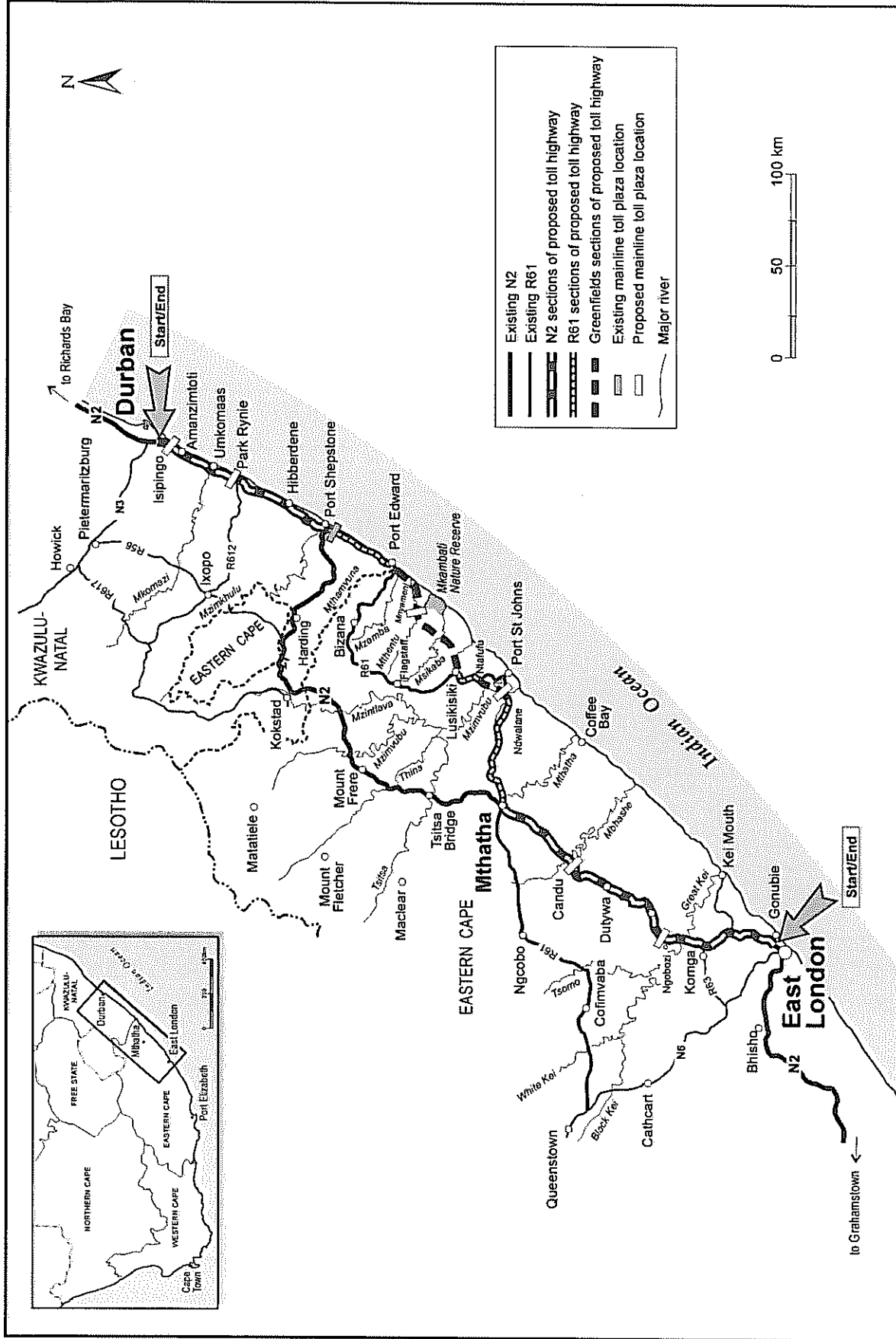


Figure 1 The proposed N2 Wild Coast Toll Highway route between the Gonubie Interchange (Eastern Cape) and the Isipingo Interchange (KwaZulu-Natal)

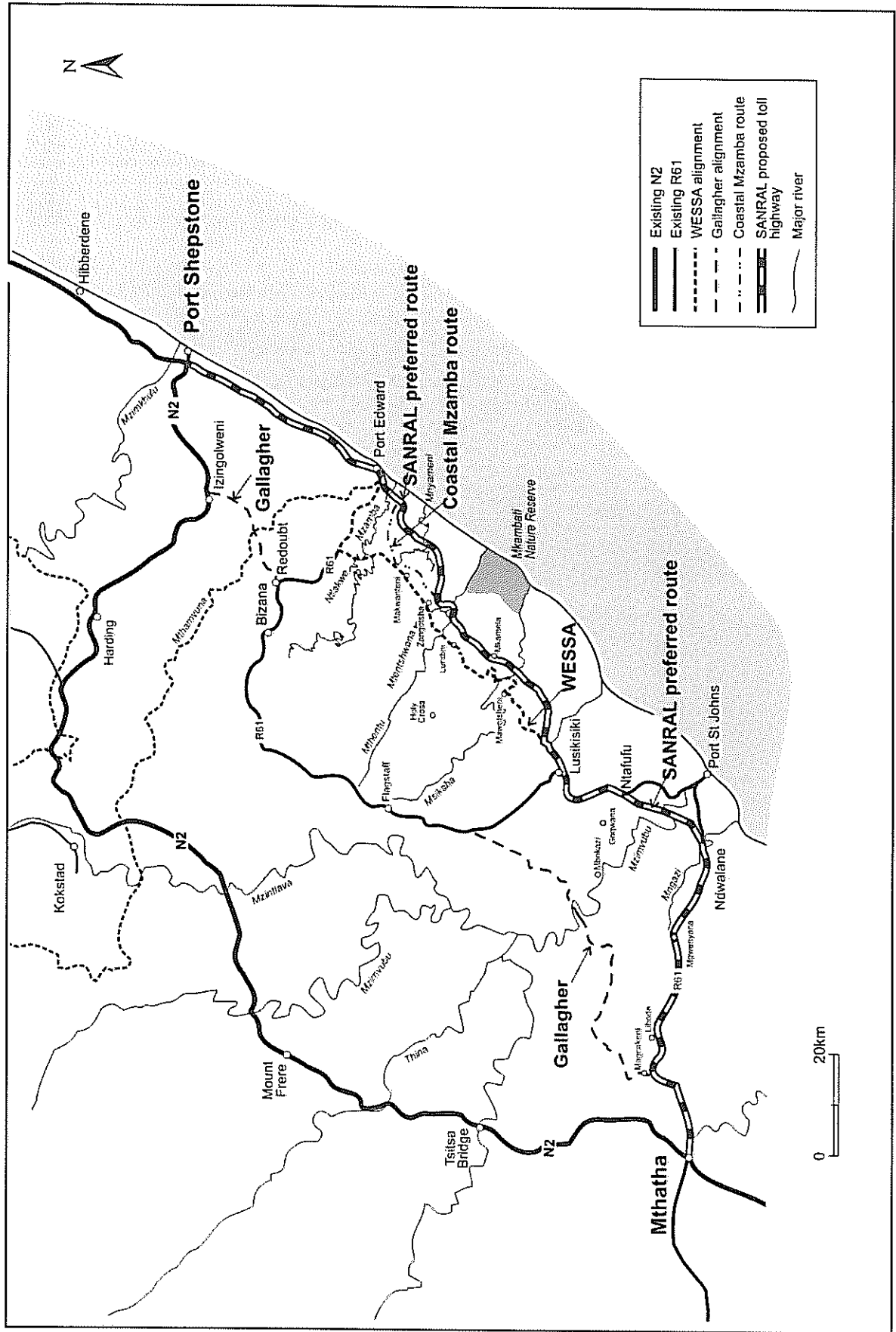


Figure 3 Additional alternative alignments analysed in the FSR