



NMA Effective Social Strategists,
P.O. Box 32097,
BRAAMFONTEIN, 2017

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ATTENTION: Theo Hansford

3rd December, 2008

Dear Theo,

We thank you for the draft EIR of the proposed N2 Wild Coast Toll Highway.

Sustaining the Wild Coast (SWC) would like to draw your attention to a number concerns which we feel severely obstruct the rights and abilities of members of the public to give fair comment on the N2 'Wild Coast' Toll Highway EIR.

Our concerns are as follows:-

1 -SWC is extremely dismayed that, once again, in a repeat of the 2003 debacle, the public comment period for the EIR coincides with the December/ January holiday period, a commonly acknowledged leave period for a vast number of public organizations and members of the general public.

Given that the last Public Open Day, to which members of the public are invited to attend specialist exhibitions outlining the proposal, falls on Wednesday 10 December, and given the large number of public holidays that occur over the December/ January festive season, it is SWC opinion that a comment due date for written comments by Friday 9 January 2008 is insufficient in terms of meeting satisfactory consultation obligations in terms of public participation processes.

2 -SWC is gravely concerned at the lack of public participation workshops outside the Provinces of Eastern Cape and Kwa-zulu Natal. The EIR claims that the N2 Toll road is an infrastructure proposal with National significance. As such, it is likely to have repercussions outside of the Kwa-Zulu Natal/ Eastern Cape region.

The complete dearth of public participation workshops outside of the two stated provinces raises questions about the inclusiveness of the process, particularly as there are close commercial and tourism links between Kwa-Zulu Natal and Eastern Cape and neighbouring provinces such as Gauteng, Mpumalanga and Free State which could possibly be impacted upon by the N2 development.

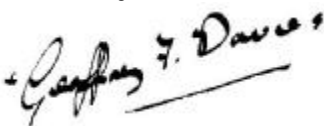
3 -SWC is of the opinion that the format of the information displays and presentations at the Public Open Days is not suitable as means of conveying adequate and understandable information to the many illiterate and poorly educated rural communities residing in Eastern Cape who will be affected by the road.

It is SWC observation that the manner and presentation of information at the Public Open Days is neither culturally nor educationally suitable as a format that would enable disempowered, largely illiterate, orally based communities to gain an adequate understanding of the full implications of the road, in accordance with the requirements of NEMA Section 4(2)(f) that requires the state to ensure participation by vulnerable and disadvantaged persons in environmental governance, and Section 2(4)(h) of NEMA that prescribes the following additional measures to ensure the protection of the environment : 'community well-being and empowerment must be promoted through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means'.

Consequently, SWC calls for an extension of the Public Comment Period , an extension of workshops and public comment days to other Provinces, and a relook at the presentation format in rural communal areas which would allow for an 'community education' process that would empower rural communities with the means to become informed decision makers with regard to the proposal.

With thanks for your attention to this matter.

Yours sincerely,

A handwritten signature in black ink that reads "Geoffrey F. Davies". The signature is written in a cursive style and is positioned above a horizontal line.

The Right Reverend Geoffrey F Davies
Chair, Sustaining the Wild Coast

CC. Marthinus van Schalkwyk - Minister of Environmental Affairs and Tourism
Jonathan Crowther - CCA Environmental