



N2 TOLL ROAD –COMMENTS -DRAFT SCOPING REPORT.

SAVE THE WILD COAST CAMPAIGN–MEMBERS COMMENTS.

In compiling these comments, SWC makes reference to the Independent Review of the Record of Decision issued by the DEAT in 2005 which clearly highlighted the shortcoming of the previous EIA. While the previous EIA was overturned on the basis of lack of independence, the Independent Review listed numerous other shortcomings in the previous EIA process, any of which, individually or collectively, could also have been legitimate reasons for the EIA being turned down. One therefore has to ask, to what extent does the current DSR process provide a basis for the new EIA to overcome the shortcomings inherent in the previous EIA?

Our contention, based on the findings in the Independent Review, the guidelines laid down for Environmental management and processes by NEMA, as well as the rights of communities and individuals as laid down in the Constitution, is that the DSR already gives indications that the new EIA, because of the basis on which it is being built, will contain serious legal and procedural flaws and that, unless these are adequately addressed, the process will be totally inadequate and fall far short of meeting many of the flaws highlighted in the Independent Review. Unless the DSR makes serious attempts to address these shortcomings the new process will be a farce and ought to be stopped by the relevant authorities before any more taxpayers' money is unnecessarily wasted.

1) SWC contention is based on the following:-

a – that because the last EIA was overturned through lack of independence, no information in it can reliably be assumed to be unbiased (i.e. factored to give a particular desired outcome) and therefore accurate, without an independent peer review of such information, and as such cannot be recycled and used as a basis to build a new EIA. The DSR states 'the scoping study is informed to a large degree from information resulting from the previous EIA" (pt 2 DSR executive summary). How does the DSR intend to overcome any inbuilt bias resulting from re -use of information from the last EIA? If it does not mitigate to overcome inbuilt bias, the new EIA will contain the same flaws as the previous EIA.

In numerous instances facts, figures and technical information used to inform the public have been supplied by SANRAL and assumed to be correct (pnt 1.4 DSR), but as SANRAL is a co –applicant in the process and as no independent assessment of the figures has been done, can the information supplied be assumed to be accurate and not be biased in favour of a particular outcome? Instances where SANRAL have supplied figures include costings for the preferred route and alternative routes, traffic projections, diagrams for population densities etc.

Traffic volume figures supplied by USCATA and APCA based on NAAMSA vehicle sales give a very different figure of projected traffic volumes to SANRAL's. In addition, SANRAL's figures appear not to take into consideration local factors that might impact on local traffic flows. For instance, numerous planned developments in the eThekweni area could considerably alter traffic flow around the Amazimtoti, Isispingo, Winklespruit area. By using untested figures (through peer review) in the DSR public consultation process, the public is forced to base decisions pertaining to the road on possibly incorrect information, thus further perpetuating any inbuilt bias carried over from the last EIA..

- Research into traffic destinations and origins ought to be done, for without such research SANRAL's claims that traffic would rather use the N2 over existing routes are spurious, and neither can the impact of loss of traffic to the N2 on bypassed towns be assessed.

- The Independent Review asserts that many of the studies done in the last EIA were inadequate, used limited terms of reference or outdated data or used insufficient data to corroborate findings. These should not be used to 'inform' the new process.

b- that because the effects of Tolling will have major socio-economic effects on the whole of the Eastern Cape and Southern Kwazulu Natal Coastal region, from Ethekeweni to East London, and will affect everything from the price of goods, to the viability of transporting agricultural produce, to daily costs of commuters, to living expenses, taxi fares etc, and because such tolling will affect one of the poorest regions in the country, and may have major implications in urban areas on traffic flow routes, the intent to Toll process cannot be conducted separately from the EIA process without severely impacting on best environmental practices as laid down by NEMA to include social, **economic**, and environmental considerations. The DSR does not indicate how the new EIA will factor in the effects of tolling on affected communities if Intent to Toll process does form part of the EIA. If communities cannot determine how they will be affected by tolls, even in such basic matters as where toll booths will be situated or how much tolls will be, they cannot be said to be 'informed' about effects of the Toll rd. Excluding the effects of tolls creates a bias on the costing and socio-economic effects of the project which, when factored in, may change the economic outlook of the whole project.

The Independent Review states 'the decision to excise the impacts of one aspect of the proposed activity, i.e., the tolling of the road, from the EIA process in order for them to be considered under a separate process, governed by a different statute, was incorrect'. Yet the DSR still asserts that the intent to Toll process does not form part of the terms of reference for the new EIA.

c- The Independent Review maintained that, as the project was initiated by a private consortium as an unsolicited bid, onus falls on the developer to provide a sound argument that the toll meets an established need. The DSR does not appear to come close to meeting this criteria, and without the framework of a spatial development plan for the Wild Coast region as a whole, it is difficult to see how the project can be justified other than as a commercial venture. Questions relating to the ways in which the Toll rd will benefit the region remain decidedly vague and are along the lines of 'jobs will be created', 'it will open up the region for eco-tourism', 'it will provide faster transport between East London and Durban for commerce' without any clear indication (except for the last) as to how exactly these objectives will be achieved, or whether there is a proven need for a Toll road that an upgrading of existing roads would not meet. Without the back up of well-conducted research into the social, community and economic needs of the region, and an analysis of traffic origins, routes and destinations, which are then projected onto a regional developmental plan, these claims are nothing more than speculation and cannot be used to 'justify' the need for a toll road or the necessity of the preferred route. Without this proof, the sole reason for SANRAL's preferred

route seems to remain based on economic expediency for road builders rather than any real proven regional need and thus, as stated in the Independent Review ‘the application has to be seen primarily as a business venture, rather than the provision of developmental infrastructure’.

SWC would go so far as to claim that, given the fierce debate raging around the road and the many still unanswered questions, the project also falls within the category of ‘putting the cart before the horse’ i.e. the need to find justification for the road came after the decision to build a toll road along the preferred route, as a direct response to public questions and debate and negativity about many of the consequences thereof, which also explains why the road has caused such public controversy. For if proper consultation and needs assessment procedures with all relevant stakeholders had been carried out satisfactorily prior to the decision to build a toll road and to determine its route, it is difficult to see how such immense public opposition to the project could have arisen.

d – that because SANRAL is an applicant in the process, unless an independent peer review assessment is carried out as to the viability of SANRAL and the Toll Rd consortiums claims about the current route being the most economically viable/ desirable route, and because in the event of tolling a member of the public would have no leave to Appeal to anyone but SANRAL, this would constitute monopolistic practices and would be a violation of the Notice of Intent –Agreement on Toll Tariffs pt 3.1.2.1 (DSR) and be an infringement of individual rights as embodied by the Constitution. In other words, on the issue of tolling and the preferred route, SANRAL have currently set themselves up as judge, jury and defendant.

The DSR does not seem to provide any means to overcome this conundrum for terms of reference to the project exclude the Intent to Toll process and are still based on narrow terms of reference.

- Alternatives alignments for the road, alternatives to a toll road, and alternative forms of transport in the region, such as improved rail, should be given much greater attention than in the previous EIA. The DSR, by limiting its terms of reference to SANRAL’s preferred route and alternatives within a narrow corridor, rather than discerning what infrastructure is in the best interests of the region as a whole, is perpetuating the cycle that made the first EIA so controversial.

e –that it is not sufficient to have terms of reference limited to the immediate proximity of the project with regards the environmental specialist studies, considering the sensitive ecological nature of the Pond land Wild Coast and the fact that it is considered an internationally recognised hotspot of plant diversity and endemism. The very nature of an integrated eco -system is that all parts are interlinked and co –dependent so that any disturbance or disruption to any one particular aspect of an environment can lead to the deterioration of other aspects of an eco –system not in the proximity of a development. Besides limiting terms of reference to a limited area, the DSR acknowledges that its terms of reference do not include the environmental effects of secondary projects that would occur as a direct result of the road construction, such as quarrying.

SWC maintains that unless all environmental impacts associated with the construction of the road (including secondary projects such as those that might result from quarrying, staff housing, diversionary roads, power supplies etc, are considered) a true picture of the environmental cost of the project cannot be obtained.

- In addition, that terms of reference need to be expanded to look at cumulative effects of the various projects related to road construction on the whole ecology of the Wild Coast (including any domino effects such as possible ribbon development) and not merely be limited to studies of effects in the immediate proximity of the preferred route.

f- that the consultation process, in particular the presentation shown as public meetings, is still biased in favour of persuading members of the public to support SANRAL’s preferred route, rather

than being an unbiased 'needs based' programme which allows for debate of the effects of the pro's and cons of the road on the various communities. Besides giving a very rosy picture of the benefits of the Toll road, with very little mention made of any possible negative effects, the presentation also gives sweeping 'propaganda' style statements. One wonders to what extent these are backed by hard evidence? The presentation also contains certain statements that could be construed as being deliberately misleading, namely it emphasises that the previous EIA had not been rejected on environmental grounds but had been overturned through lack of Independence. It makes no mention that there were numerous other flaws with the EIA, including environmental, which could mislead viewers to assume that environmental condition were all in order.

- The DSR proposes that a condensed scoping study be undertaken, in light of the numerous issues highlighted in the last EIA. However, as one of the main public objections to the last EIA was that the public participation process was inadequate and biased, the new process should widen, not reduce, the opportunity for public participation. It is difficult to see how the new public participation process can be built upon data from the old, if the old was deemed hopelessly inadequate.

IN conclusion, SWC are fully aware of the need for a decent road through the Transkei as expressed in the following comment 'My comment is that I fully support the road, and this should be noted, that some are in favour of development.' SWC supports ecologically sustainable development in the region, and asserts that there is no proven justifiable reason to take the Toll road through the Pondoland Centre of Endemism, considering the adverse effects it might have, nor is there any proven need for a Toll road.

Plastering over cracks in a wall cannot fix the wall if it is the foundations that are faulty. As the foundations of the last EIA were so fatally flawed (through lack of independence) 'papering over cracks' will do little to mitigate or fix the process. Unless the narrow terms of reference in the DSR are considerably expanded to take due account of public concerns, the new EIA will merely be a repeat of the last EIA fiasco.

SWC reiterate that if the relevant authorities had taken proper heed of the views of all relevant stakeholders in decision making through extensive community consultation, prior to making decisions about the route and whether to Toll or not, and to properly address public concerns about the road instead of brushing these off as irrelevant and trying to push through their preferred route, the current controversy about the project would not have arisen.

It is of concern that the DSR still gives indications that the new EIA will be an attempt to justify SANRAL's preferred route, rather than an attempt to find the best solution in the best interests of the region.

PART 2

SUMMARY OF MEMBERS COMMENTS PERTAINING TO DSR

Note –the following is a summary of public comments pertaining to the DSR which SWC invited as part of the SWC response, and which form the basis of the above contentions. These comments were collated as an indication of public views, opinions and concerns about the project, and do not reflect in any way the views of any one particular individual or organisation As such, the below may contain seemingly contradictory statements. Comments are included in no particular order of reference or importance.

SOCIAL AND ECONOMIC

- The draft EMP is inadequate and assumes compliance in an area devoid of the necessary capacity to enforce it.
- Of the 3 stated objectives to justify the project, namely, 1 the upliftment of poor residents, 2 the conservation of the biodiversity of the core area of the PC, 3 -the creation of a shorter inter –regional route, only objective 3 will be achieved. The project will lead to the failure of objective 2 and will only partially contribute to objective 1.
- The money could be better spent on other initiatives in the area.
- If the road is fenced then it cannot bring economic benefit to local residents as they will have no access to it.
- Without adequate access to the N2 by local communities in Pondoland there can be no advantage to locals, and if the road is tolled, there can only be negative impacts.
- The quickest route from the south to Amanzimtoti hospital is via the N2 and the Moss Kolnick interchange, yet this access route is to be tolled. No access route to an emergency facility should be tolled.
- If there is a toll at Adams road I will not shop in Amanzimtoti again.
- A safe reliable public transport system would do much to reduce the impact of projected traffic flows and should be considered seriously as a solution.
- No impacts on towns that will be bypassed have been assessed
- How much will it cost and who will pay for it? The published ROD states that costs will be recovered inter alia from new toll plazas along the South Coast. South Coast commuters travelling to Durban seen no benefit from the new N2 Toll rd but will incur a material increase in Transport costs. It is unacceptable to say this is an issue that will be considered later. By comparing the congested traffic of the old Marine Drive from Port Shepstone to Margate with the sparse traffic on the N2 toll it is clear that motorists are already rejecting the current Toll fees.
- The socio –economic effects of traffic diversion resulting both from tolls and from bypassing towns must be investigated.
- Benefits to local communities have not been proven
- Page x states ‘the proposed project aims to provide.... while reducing road user costs.’ How can road user costs to the South coast be reduced when it will cost more for people to commute? This section also claims there will be ‘provision of a well maintained road reserve’ is cutting the grass twice a year regarded as good maintenance?
- Where is the needs analysis for the Toll rd –within a strategic development plan –surely this is a precursor to such a project.
- The financial screening report is limited only to direct costs and benefits and does not consider other important issues such as social costs and benefits.
- There must be investigation of the impact on existing communities if the SANRAL preferred route is followed.
- The benefits of upgrading existing roads must be investigated and weighed against taking SANRAL’s option.
- ‘high speed, limited access through route’ is not designed to benefit local communities.
- The Wild Coast presents an amazing opportunity to demonstrate that economic, social and environmental concerns can be complementary and this opportunity should not be abused.

- Why are SANRAL suddenly concerned about traffic congestion on the N2 at Isipingo, but not the far more serious congestion at other sections of the N2 around eThekweni e.g. at Spaghetti junction?
- The decision to use National GDP to decide on the percentage growth in vehicle traffic is unsound and could be regarded as misleading, as it does not take into account local factors that could influence traffic flows.
- Traffic engineers from Ethikweni council must be given the opportunity to comment on proposals.
- The unspoilt secluded beauty of the wild coast is its main attraction.
- Most tourists to the Wild Coast come from either the Cape or Gauteng. They use routes R61 and R617 and if these are upgraded most tourists will be happy. Eco –tourism on the Wild Coast does not want or need the N2 toll road.
- I am opposed to the construction of any toll plazas within a Municipal boundary and particularly the construction of toll plazas close to residential areas.
- The creation of a Toll corridor along the KZN coast will have disastrous economic consequences for the residents.
- Many South Coast commuters live in inland rural areas and are forced to commute daily to places like Durban and Port Shepstone for work. To expect commuters to pay tolls for the ‘privilege’ of going to work is iniquitous. This is not in keeping with the governments much vaunted social and economic development programmes to eradicate poverty.
- The tolls will increase the price of goods.
- Point 3.6 on page ix states ‘the SED strategy is aimed at the empowerment of local and previously disadvantaged communities within the project area’. This is pure political claptrap. A toll road offers few employment opportunities once construction is complete.
- Has any survey been done to gauge the attitudes of tourists to toll fees? Already the high cost of travelling from the interior to the coast affects the amount of money holiday makers can afford to spend.
- As usual the poorest of the poor will be the most to suffer from tolls.
- Will poorer communities be provided with alternative routes or will they be forced to use the toll road?
- Tolling the financially burdened motorist is a lazy way of securing income.
- Why are toll fees to be collected within the confines of municipalities in KZN, but not in Eastern Cape?
- The section Isipingo to Winklespruit is a suburban road used thus far for conducting daily business and cannot be allowed to become a major cargo carrying highway.
- According to table 10 on page XV exco summary, a new interchange will be built at Adams road. This is essential but why was it declined in the previous investigation but now presented as a carrot to entice us?
- It is noticed that is the intention to provide under and overpasses along the road development in the Eastern Cape to assist people that will be affected by the road, Could under passes be provided between Adams road and Tote River.
- It is understood that at least 20 000 vehicles a day should use a toll road to make it economically viable but in the Eastern Cape between Mthathat and South Broom there are only 1000 vehicles per day and 3600 between Butterworth and Mahatma. It therefore appears the proposed road cannot be viable without a substantial increase in vehicles. Please tell us how vehicle usage will be increased to make the road viable?
- SANRAL promises toll concessions but experience of toll concessions is that they are no real concessions. Normal daily users don’t qualify.

- The Greenfield section appears to be no more than a cheap shortcut for SANRAL. The proposed route does not go through the infrastructure hungry towns of Flagstaff, Bizana, Redoubt area but cuts through a very low population area. The population density maps by SANRAL are misleading. Compared with satellite images and 1:50 000 and 1:250 000 maps and aerial photographs the true population density is easily discerned. Why move the road away from high population density rural area if the objective is to bring upliftment? It makes no socio political sense, unless SANRAL are only hoping to save money on road building with no other benefits.
- The R61 is an artery bringing economic life to Pondoland. It is in desperate need of repair. The N2 will bypass some of the largest communities in Pondoland thus depriving them of the lifeblood of traffic.
- No measure of mitigation will reduce the cost of travel for people using the proposed toll.
- No measure of mitigation will improve the socio-economic effects of the toll for bypassed communities established on the existing route.
- No alternative means of sustaining the livelihood of communities living on the current route where soils are more productive have been considered
- No alternative forms of land use have been considered that will improve the socio-economic future of the people of Pondoland.

ENVIRONMENTAL

- There is a lack of alternative routes assessed, including the No Toll option.
- No alternative route away from the fragile Msikaba Sandstone floral region has been thoroughly considered.
- Economics cannot be the main determining factor of the route, but must be considered in relation to environmental and social effects.
- SANRAL's preferred route diagonally bisects the core area of the PC. SANRAL assures us that it is constrained by the same conventions as the national government, however the clear intention by SANRAL to place a highway through the core area of the PC indicates little other than lip service to those conventions.
- How will ribbon development be constrained? There appear to be no concrete plans in place to limit this?
- Tolling is going to have an effect on most people of the region's 'human health and well-being' so why is the effects of tolling being excluded from the process?
- No measure of mitigation will reduce the bio-physical and aesthetic impacts on one of the country's potentially most valuable natural assets.
- There has been inadequate consideration at the Strategic Environmental Assessment level for economic, social and environmental views
- The screening process has been severely restrictive as terms of reference were very narrow and did not consider issues beyond a narrow corridor and possible downstream activities.
- The project is only one of a number of projects being considered of the region. Each of these projects should not be considered in isolation but should rather be considered in terms of the cumulative effect on the receiving environment that has been analysed in terms of its ability to cater for projects.
- It makes no sense to call for more detailed botanical information in the next phase of the assessment if that requirement is restricted to a narrow corridor of an already dubiously selected 'preferred route'.

- The lack of aesthetics associated with toll plazas and the increase in noise, air and light pollution are of concern.
- DEAT, DWAF should have a plan in place as to how to conserve important sites outside the formal protected area (Pondo Park)
- The proposed toll plaza at Isipingo is doomed to failure within a very short time –a bumper to bumper chaotic traffic situation would have been created. (taking into account projected traffic volumes)
- I am opposed to any new construction taking place in environmentally sensitive areas such as the Pondoland centre of endemism. The constitution states ‘Every one has the right.... To have the environment protected, for the benefit of present and future generations...’ (section 24)
- How is a Toll plaza going to fit at Adams road? It boggles the mind. There is no space for such a building
- The scope of the project is too big. To include large areas outside of the Wild Coast within the ambit of the project creates a psychological block in members of the public. The project should be broken down into smaller sections with reference made to concerns of the public in each section.

LEGAL

- the Precautionary Principle has not been applied where insufficient data is unavailable
- there is a need to test constitutionally the 3 acts that were passed prior to 2000 namely – take any road and declare it a toll road, toll any national road, not provide an alternative route.
- The DSR is largely a rehash of the discredited first EIA and fails to address many of the issues raised by the Independent review panel.
- It makes no sense to include the proposed coastal route and SDI route in the present process as they had already been rejected.
- Little value has been added to the first EIA
- The tolling of road without providing viable alternatives is an infringement of the rights of citizens.
- The consultants need to be impartial so how came they are taking SANRAL hype as true?

CONSULTATIVE

- Terms of reference goes against NEMA as it only states the distribution of information and

Opportunity to comment and not the ‘taking into account of interests, needs values’

The correct community processes must be adopted with community representatives reporting

Back to constituents after and ‘awareness’ workshop where all the pros and cons are discussed.

Since when can a small advert in any newspaper ensure public participation from the bulk of affected parties who never read a newspaper?

-IAP’s should be given opportunity to make recommendations in terms of appointing independent specialists to review specialist reports.

- The new EIA should widen, not reduce, the opportunity for IAP’s to participate in the Scoping Study.
- This should be an unbiased campaign with no SANRAL rep present.

- Adverts about public meetings were not designed to catch the eye of newspaper readers. They were totally inadequate.
- Public participation was in terms of 10 or 20 people. Sometimes the presentations were late and there was no dialogue.
- Presentations were 'show and tell', with the clear perception that 'this is what we are going to do. There was no dialogue or discussion about alternatives.
- Too many questions were not answered and were brushed off with the comment 'we will refer it to the relevant party'.
- 'Road user would prefer to use the existing N2 rather than an upgraded R61' does this come from a research base?
- The public participation process comes nowhere close to standards set by ILO 169. Adequacy cannot be measured by numbers of meetings held but by quality of meetings judged through minutes of these meetings.
- The meetings tell people what is going to happen and do not ascertain the interests, needs and values of rural people.
- A major criticism of the previous EIA was lack of correct public participation yet this has still being accepted and the core for the completion of the DSR.
- Many sweeping statements in the DSR seem to have no empirical evidence to back them.
- The proper structures for informing people have not been followed. They need to follow traditional customs or protocol for informing people.
- The consultants have been selective as to who they consult with.
- Inadequate attempts at obtaining public participation will shut out the voice of thousands who will have to pay toll fees at no apparent benefit to them
- Why do the consultants follow the principle of running the meeting to their set agenda instead of together deciding on an agenda?
- -Why do KZN public have to listen to a 30 minute presentation of justifications for a road in Eastern Cape? Our concerns are for the effects it will have on us.
- Why are 3 700 responses during the last EIA considered adequate given the scope of the project?
- There has been a failure to address serious issues raised by numerous appellants to the original ROD.
- Why is SANRAL proposing the same project and the same single preferred route?
- Why are various alternatives proposed by various individuals and interest groups not being taken up?
- The screen presentation shown at various public meetings indicates that the SANRAL 'preferred route' is the only viable option, other options deemed not optimal. Seemingly, the terms of reference for the new EIA are such that the proposed route, established during the previous –and since discredited study –is the only viable option. Justification given by SANRAL for the development of the N2 through the Green fields section are that the road will bring much needed economic and social development to the poor people who are resident in the area. Yet quite obviously the greatest numbers of poor people are resident in areas served by the R61 and there are relatively few people living along the coastal belt or along SANRAL's preferred Greenfield's route.
- The reluctance of SANRAL to look beyond the Greenfield's alternative cannot be defended and should be rejected with the contempt that such a blinkered view deserves.
- It is hoped that a satisfactory route can be selected that will not be considered quite so offensive to the concerned populace and that the abrasive 'like it or not' attitude of the authorities will become a thing of the past'

- To date I have not seen an advert (about public participation meetings) in the main local paper. It is not enough to place adverts in dailies like The Mercury that residents of smaller towns do not always read.
- The cost of Toll fees is a major concern. SANRAL suggest that the public might only be consulted on tolls once the road is built. Where is the gov's assurance that all issues affecting the general public should be transparent and open to scrutiny?
- Mr Tolmies (of SANRAL) attitude is arrogant and smacks of a hidden agenda.
- I noted with concern the lack of black participation at consultation meetings. Are meetings being planned for black community areas in the eThekweni area?
- The viable options presented by SANRAL i.e. between the 'preferred route' and the do nothing alternative make nonsense of the EIA process.
- There are many questions that remain unanswered by SANRAL. Either they don't know the answers or they are hiding something. If they don't know, they might make disastrous mistakes. If they have something to hide it must be because such aspects of the project are negative in nature and may put their plans at risk.
- Most disturbing is that people living in rural area and informal settlements are totally oblivious regarding the planned N2 toll road.

ALTERNATIVES

The following alternatives must be considered:

- 1 -Continue the N2 through Mzimkulu, Ixopo, Richmond to meet with the N3 , thus allowing access for both Gauteng and Durban traffic.
- 2 - Turn off at Pakadi and meeting the R61 at Magusheni and take the road to Port Edward from Magusheni.
- 3 - From Lusikisiki go through Quakeni, Holy Cross, Bizana and then south to Port Edward.
- 4 - Turn off the current N2 at Izingloweni, cross the Mthamvuna River at Phunzi drift to rejoin the R61 at Bizana. Between Bukazi and Zalu branch off to follow existing roadways into Mzimvubu valley, cross Mzimvubu below Tsitsa/Tina confluence with Mzimvubu. Rejoin R61 at Libode –to Mthatha.

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