

AMADIBA COMMUNITY PETITION TO PARLIAMENT:

RESPONSE TO THE SANRAL SUBMISSION TO THE
TRANSPORT PORTFOLIO COMMITTEE OF 5 NOVEMBER 2025

SANRAL OFFICES GQEBERHA, 17 November 2025

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A. CLARIFICATION ON THE 2018 COURT CHALLENGE OUTCOME

[Ntombovuyo Kopane _ANC] “ Why no application for leave to appeal June 2019 judgement? Do we have power to go against the decision.?”

[Donald Selamolela _ANC Chair] “Important for members of public to ventilate with Parliament rather than go to Court. / Can’t reverse matters that Court has ruled on. “

The 2012 Zukulu case (this was not an ACC case) reviewed the Environmental Authorisation for the entire N2WCTH route , not the alignment in Amadiba. The judgment came in 2019 and any appeal in 2020 or thereafter would have had to ignore the changed circumstances over more than a decade.

This petition process about the route over a small section of the whole project, is completely separate from the environmental review.

B. SANRAL PRESENTATION 4 NOVEMBER 2025: KEY CONCERNS

**CONCERN 1- THE SANRAL
PRESENTATION IS THE SAME AS
PRESENTED TO ACC almost 3 years
ago IN JANUARY 2023**

- Presentation disregards the two meetings of intensive engagement IN RESPONSE TO THE PRESENTATION that took place on:

28 January 2023

[ACC TECHNICAL REPRESENTATIVES MEETING WITH SANRAL 26.pdf](#)

03 March 2023

[ACC TECHNICAL TEAM MEETING WITH SANRAL 2023 draft 2.;](#)

[N2 WILD COAST ROAD ACC RESPONSE 20230303](#)

**CONCERN 2: THE PRESENTATION
COMPLETELY IGNORES THE PETITION
TABLED BY THE AMADIBA
COMMUNITY**



CONCERN 3 : *EFFECTIVENESS OF ENVIRONMENTAL MONITORING*

*SANRAL: "We are dealing with environmental issues without any hesitation. "“We've got a **structure** with environmental folks all over the place that is we've got environmental monitoring committee it sits quarterly .ACC sits there. We've got authorities, coordination committees, environmental auditors and our own project environmental audit just to make sure that the environment is not degraded because we as SANRAL wewe'll go all the way to make sure that the environment is not degraded or deformed.”*

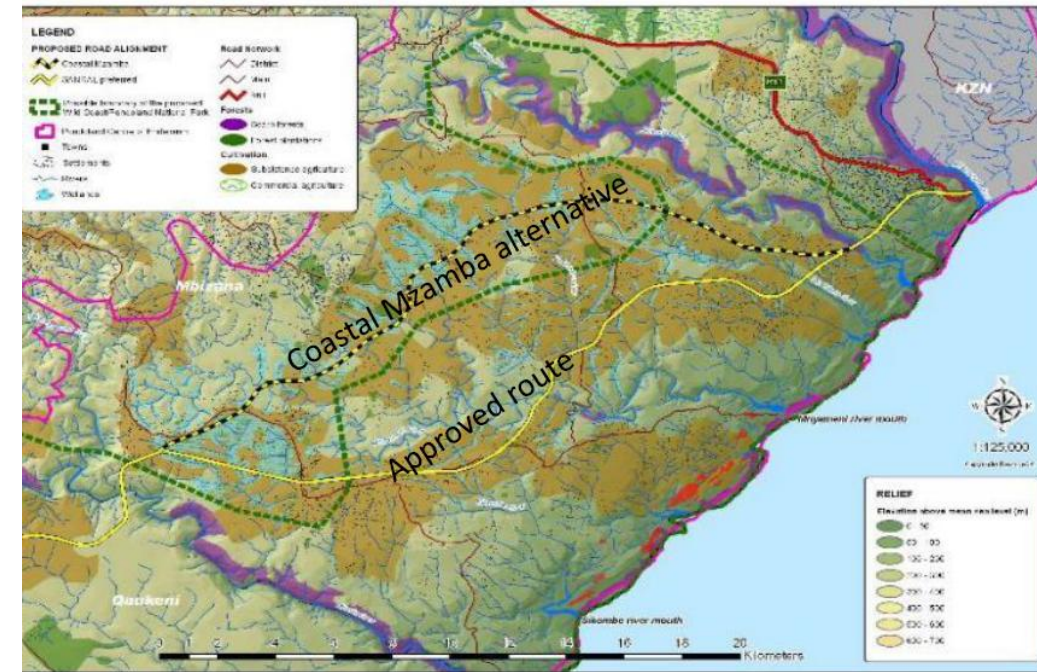
This is factually incorrect. It is not been the case with environmental non-compliance issue experienced elsewhere where the N2WCTH is being implemented.

CONCERN 4: IDENTIFICATION OF SENSITIVITY

E.Cape Biodiversity Conservation plan

SANRAL: "The route that is the approved route is the yellow one as you can see there. The brown patches you would say then is nonsensitive areas and the bluish ones are the wetland, sort of, and environmentally sensitive areas." But this is INCORRECT.

"Critical Biodiversity Areas (CBAs) are those areas that are critical for biodiversity conservation...They are 'no go' areas for development and are basically open spaces where only low-impact ecotourism or recreation can be accommodated." 2023 ES RSDF, p.29



source of map? This is a relief map/land-use map



CONCERN 5: SANRAL NOTED IT'S WILLINGNESS TO ENGAGE WITH STAKEHOLDERS & THAT IT'S DOORS ARE ALWAYS OPEN

*“Ministers approach is to give everyone a hearing. ...And indeed with regards to this particular matter, we have done this over the years. I can say personally right from 2018 up until now”
[Themba Mhambi SANRAL CHAIR]*

This has not been the case with ACC and the Amadiba Community.

CONCERN 5 (cont.): *SANRAL NOTED IT'S WILLINGNESS TO ENGAGE WITH STAKEHOLDERS & THAT IT'S DOORS ARE ALWAYS OPEN*

1. Meeting as agreed on **03 March 2023** to discuss LURHOLWENI route feasibility, not convened by SANRAL despite several requests. SANRAL disappeared.
2. Meeting promised **August 2024** “in due time” by Mr Demana, SANRAL CEO, in response to criticism of ACC’s of a closed meeting at Wild Coast Sun. ACC was put on the agenda identified as “blocking the project”. The meeting was never arranged. The time never became “due”.
3. On **7 July 2025**, SANRAL and WMMLM instructed by MEC of Transport Mr Nqatha to meet “within two weeks”. This has not materialised.
4. In the **12 May 2025** Amadiba Memorandum, the demand on SANRAL since two years was repeated, to appear at Komkhulu to discuss the alignment and a host of issues. SANRAL refuses.

C. MANDATE & EXPECTED OUTCOMES

MANDATE: DIRECTIVE FROM PORTFOLIO COMMITTEE CHAIR:

Three weeks from 4 November 2025 for SANRAL & ACC to engage (by 25 November 2025)

- 1. give a joint report of your engagement to our team and*
- 2. then we then determine ourself what must happen from there*
- 3. so “that we close the petition once and for all”.*

Clarification of (3) required?

EXPECTED OUTCOMES

ACC

1. Support for a MID-TERM REVIEW that addresses things from a wider perspective in support of what is framed in our petition.
2. Complete the engagement on INLAND N2 proposal that was suspended by SANRAL in 2023

SANRAL = ??

D. RECAP OF KEY MOTIVATIONS FROM PETITION

1. *The residents and community members in Amadiba believe that development is important for the area, and that improving road infrastructure is vital, particularly when it is integrated within the community connectivity requirements without losing the core values of a national highway. The question is which route must be followed.*
2. *The environmental and social impact research and assessments of the N2WCH some twenty years ago, are now outdated considering new knowledge and experiences of road building in Eastern Cape.*
3. *the community's rights and voices have been overlooked and the consequences of displacement, loss of livelihood and cultural and heritage degradation will be immense and irreparable if the alignment is not changed.*

4. There has not been meaningful engagement by the respondents about the project for such consultation to comply with the relevant statutory and customary law under the constitution including the principle and process of free prior informed community consent.

5. The N2WCH in its current form is therefore not informed by coordinated development, which is informed by the spatial development planning processes, which emphasize local stakeholder input and inclusiveness.

E. WHY A MID –TERM REVIEW

NECESSITY FOR A MID TERM REVIEW OF THE N2WCTH PROJECT

Our objective is to convince SANRAL/Portfolio Committee/Parliament to agree to a MID -TERM review.

If this logic is accepted, in the context of engineering infrastructure, a mid-term review is an assessment that is undertaken at halfway point of a project's duration or its budget.

It evaluates progress, identifies issues, and ensures the project is on track to meet its objectives. The elements that are typically reviewed include: Progress, budget, quality, risks and stakeholder satisfaction.

All arguments we make are directed at justifying why all these elements need to be reviewed.

In our context, there are also changed circumstances, and new knowledges.

Our arguments are intended to motivate for a review.

SCOPE OF MID TERM REVIEW

Over past 10 years emphasis on local economic development has increased exponentially.

Our view is that the INLAND ROUTE supports this better than the Coastal route.

Connecting more people better. Opening wider access.

But this is only one reason for moving the N2WCTH to the centre of Amadiba after Mtentu bridge

SCOPE OF MID TERM REVIEW (cont.)

1. **Overarching concept**, guiding our understanding of MID TERM REVIEW

A. PROGRESS

B. REVIEW OF BUDGET/COST BENEFIT

C. SCOPE OF WORK

D. QUALITY OF WORK

E. REVIEW OF RISKS

F. SUSTAINABILITY CONSIDERATIONS

G. STAKEHOLDER/AFFECTED COMMUNITY SATISFACTION

H. NEW KNOWLEDGE – CHANGED CIRCUMSTANCES

SCOPE OF MID TERM REVIEW (cont.)

The MID-TERM REVIEW will need to focus specifically on the following technical issues :

- 1. COST BENEFIT REVIEW*
- 2. BALANCING LOCAL ECONOMIC DEVELOPMENT against National/Provincial prerogatives.*
- 3. MITIGATING ENVIRONMENTAL/ LIVELIHOOD DESTRUCTION*
- 4. ADEQUACY & PROGRESS OF BIODIVERSITY OFFSET PROVISIONS*
- 5. MITIGATING UNINTENDED CONSEQUENCES*
- 6. FEASIBILITY OF INLAND ROUTE & ROUTE THROUGH LURHOLWENI.*

SCOPE OF MID TERM REVIEW (cont.)

On technical matters, SANRAL's PRINCIPLE of

Avoidance, minimizing and mitigation '

is strongly supported by ACC and should be key to informing the work of a MID TERM review.

But this principle is definitely better served by N2WCTH being moved from the coast of Amadiba to the centre.

We NOTE that in ACC's 2023 extensive engagements with SANRAL:

- SANRAL had acknowledged the risks to the environment posed by the coastal alignment in Amadiba.
- SANRAL had conceded that there was no guarantee that their proposed mitigation measures would be effective.
- ACC had substantially addressed SANRAL's critique of the INLAND ROUTE, with the only outstanding issue being the section of the route through LURHOLWENI

HOW SHOULD MID-TERM REVIEW PROCEED

An Interdepartmental committee to oversee the MID –TERM REVIEW

Should include Transport /DPWI/ ISA/ Treasury/ DFFE

Should allow for Community Stakeholder representation.

Appoints a multi-disciplinary Technical Task Team to :

- confirm Scope*

- undertake review*

- produce a report with recommendations*

This should not affect progress with Msikaba & Mtentu bridges, but there will be a pause on the rest of the project as it effects the Amadiba area.

F1. THE ECONOMY OF THE N2 ROUTE

VIABILITY CLAIMS

SANRAL: "needed to achieve 8% ROI to be viable, instead we are achieving 12%"

"Even if we say we predict that now cost may escalate or increase by 20%. The return on investment is still 10%."

"So the viability of the road is actually a non-issue"

The Amadiba Petition's proposal for midterm evaluation

- Recent presedence: the Gauteng Freeway Improvement Project (GFIP)
- Parliament's midterm evaluation and short pause of the GFIP project was decided when the planned toll fees were gazetted in 2011.
- "After being introduced [2006] to cabinet at R6.8 million, the GFIP increased to R11.4 billion by 2008, with a further upward adjustment by 2011, shortly before the proposed start date of the e-Tolling system." (Parrock 2015)
- The economic feasibility study was made public in 2010. It had been completely mistaken.
- Suggested toll fees for the 'mix financed' N2WCTH has not been published.
- The 2021 Cost-Benefit Analysis presented to ACC in January 2023 had toll fee information redacted, but toll fee incomes are included in the table.
- In the 2023 discussions, **SANRAL** conceded that the suggested inland route would be less costly, but argued that the difference was negligible.

midterm evaluation, the Petition refers to the cost increases

SANRAL's Chair of the Board, Mr Mhambi, and CEO, Mr Demana, on **8 October 2025** in the Portfolio Committee of Transport, reporting on the 2024/2025 Annual Report (AR):

(...)“These include the **R28 billion** N2 Wild Coast Road, featuring the iconic Msikaba and Mtentu bridges” (...) [PMG's minutes, page 5]

The 2024/2025 AR (March 2025): “**R20 billion.**”

The previous 2023/2024 AR stated “**R23.5 billion**”.

Original budget 2010/2011: R8 billion.

BUDGET OVERRUNS RELATES TO ECONOMIC & FINANCIAL VIABILITY ASSESSED IN A COST-BENEFIT ANALYSIS

SANRAL responding to the 12 May Amadiba Memorandum: "R20bn budget adopted in 2017" (a +150% revision from R8 billion in 2010 ("R28bn" at the PC meeting 8 October means + 250%).

SANRAL's presentation to Parliament in May 2017 did not include a budget, but 34 separate N2WCTH projects were presented. They summed up to R9.018bn.

The Amadiba Petition to Parliament cites the joint statement of EC Premier and Min of Transport Aug 2017. They announced "R8.5-9 billion". In 2019, the Minister of Transport asked for "R9.5 billion".

During the 2023 talks with SANRAL, a redacted SANRAL 2021 Cost-Benefit Analysis was presented. It used HDM4 software to demonstrate the continued economic viability of the project... In contrast, the Amadiba Petition contends that the N2WCTH project never was financially or economically viable. What is right?

HDM - 4

HIGHWAY DEVELOPMENT & MANAGEMENT

Economic Indicators Summary

Study Name: N2 Wildcoast
Run Date: 03-05-2021
Currency: SA RAND (millions)
Discount Rate: 8.00%

Sensitivity: Base Sensitivity Scenario

Alternative	Present Value of Total Agency Costs (RAC)	Present Value of Agency Capital Costs (CAP)	Increase in Agency Costs (C)	Decrease in User Costs (B)	Net Exogenous Benefits (E)	Net Present Value (NPV = B + E - C)	NPV/Cost Ratio (NPV/RAC)	NPV/Cost Ratio (NPV/CAP)	Internal Rate of Return (IRR)
Base Alternative	2,288.886	1,782.572	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Maintenance and upgrades	6,006.518	5,500.857	3,717.632	2,211.520	0.000	1,506.112	0.261	0.274	04.7 (2)
Alt 1 Non-Toll Prov-RRM	14,270.207	13,722.922	11,961.321	15,183.845	0.000	3,202.524	0.224	0.233	10.1 (1)
Alt 1 Toll Prov-RRM	14,641.382	13,664.289	12,352.495	15,627.032	0.000	3,274.537	0.224	0.240	10.1 (1)
Alt 1 Non-Toll Prov-Full Maint	17,408.855	16,902.583	15,117.968	25,667.817	0.000	10,549.849	0.606	0.624	12.7 (1)
Alt 1 Non-Toll Prov-Prov Maint	17,322.257	16,804.982	15,033.374	25,621.286	0.000	10,587.895	0.611	0.630	12.7 (1)
Alt 2 Non-Toll Prov-Prov Maint	17,443.420	16,926.216	15,154.533	25,743.489	0.000	10,588.956	0.607	0.626	12.7 (1)
Alt 3 Non-Toll Prov-Prov Maint	17,352.272	16,834.997	15,063.386	25,662.161	0.000	10,598.775	0.611	0.630	12.7 (1)
Alt 4 Non-Toll Prov-Prov Maint	17,473.435	16,956.231	15,184.550	25,784.383	0.000	10,599.834	0.607	0.625	12.7 (1)
Alt 5 Non-Toll Prov-Prov Maint	16,165.775	15,653.909	13,876.889	24,686.604	0.000	10,809.716	0.669	0.691	13.1 (1)
Alt 6 Non-Toll Prov-Prov Maint	16,195.750	15,683.924	13,906.903	24,727.499	0.000	10,820.596	0.668	0.690	13.1 (1)

Figure in brackets is number of IRR solutions in range -50 to 1500

Sensitivity: Cost Increase +20%

Alternative	Present Value of Total Agency Costs (RAC)	Present Value of Agency Capital Costs (CAP)	Increase in Agency Costs (C)	Decrease in User Costs (B)	Net Exogenous Benefits (E)	Net Present Value (NPV = B + E - C)	NPV/Cost Ratio (NPV/RAC)	NPV/Cost Ratio (NPV/CAP)	Internal Rate of Return (IRR)
Base Alternative	2,288.886	1,782.572	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Maintenance and upgrades	6,006.518	5,500.857	4,461.289	2,211.520	0.000	-2,249.770	-0.375	-0.409	-0.5 (2)
Alt 1 Non-Toll Prov-RRM	14,270.207	13,722.922	14,369.391	15,183.845	0.000	814.455	0.057	0.059	8.5 (1)
Alt 1 Toll Prov-RRM	14,641.382	13,664.289	14,728.839	15,627.032	0.000	898.192	0.061	0.066	8.5 (1)
Alt 1 Non-Toll Prov-Full Maint	17,408.855	16,902.583	18,141.972	25,667.817	0.000	7,525.845	0.432	0.445	10.9 (1)
Alt 1 Non-Toll Prov-Prov Maint	17,322.257	16,804.982	18,037.854	25,621.286	0.000	7,583.412	0.438	0.451	11.0 (1)
Alt 2 Non-Toll Prov-Prov Maint	17,443.420	16,926.216	18,183.264	25,743.489	0.000	7,560.225	0.433	0.447	11.0 (1)

AS THE PETITION TO PARLIAMENT POINTS OUT, Annexure 2

In a Cost-Benefit Analysis, the desired "rate of return" on investment must be reached in 25-30 years . 25 years is the rule today, and should have been applied in 2021.

With longer building time, fewer years remain before 'dead line': the year society will get back the investment plus a surplus from road use. That estimated net gain must be good enough to compete with other projects the govt always is considering.

The assumption was "3 year to completion" in the 2006 and 2008 Cost Benefit Analyses (C-BA). The traffic growth assumptions in the C-BA from 2021 indicated that it also assumed "3 year to completion", which remains impossible even today.

If the flow of incomes and benefits begins too late, the "Net Present Value" becomes negative: Too few income years remains to dead-line. SANRAL estimates the 2NWCTH will open 2031: **ten years from 2021**.

From 2031 remains 15 years of discounted incomes/benefit to "deadline".

TIMES HAVE CHANGED (but flawed assumptions and method fallacies in C-B Analyses remain)

2. The 8% discount rate (or 'rate of return' benchmark to beat) is in breach of NT's 2021 prescription of a 10% discount rate. Already in 2018, the NT instructed use of a discount rate equal to NT's long term borrowing cost (10.5% today). (*NT Guidelines*)
3. A 'what-if?' test '(sensitivity)' was not done of the traffic growth assumptions (same fallacy as in 2008). It is mandatory to test this key income variable.
4. The 20% cost increase (2021 'what-if?') test has been reached .
5. Even without the 20% cost increase, the 2021 table would show 'non-viable project' (for 6 year building time, traffic growth

Circumstances have changed (but assumptions and method fallacies in C-B Analyses remains)

2. The 8% discount rate (or 'rate of return' benchmark to beat) is in breach of NT's 2021 prescription of a 10% discount rate. Already in 2018, the NT instructed use of a discount rate equal to NT's long term borrowing cost (10.5% today). (*NT Guidelines*)
3. A 'what-if?' test '(sensitivity)' was not done of the traffic growth assumptions (same fallacy as in 2008). It is a mandatory to test this.
4. The 20% cost increase (2021 'what-if?') test has been reached .
5. Even without the 20% cost increase, the 2021 table would show 'non-viable project' (for 6 year building time, traffic growth test +10% discount rate, even with old 30 year 'deadline' leeway

N2WCTH alignment in centre of Amadiba is "to meet in the middle"

The argument that "R147 million" less than "R1.5 billion per year" in benefits to freight traffic and long distance motorists is a "direct cost to the economy" is a **fallacy**.

1. Assumptions behind the calculus in the Jan 2023 presentation were not correct. This was corrected on 3 March 2023 (80km/h in Lurholweni, bends ,grades.. . Discussed below).
2. But disregarding that: Our democratic government overviews all interests in the country. In Public Finance Economics it is called to evaluate *social opportunity costs*:
3. A government chooses between alternatives, balancing interests and priorities.
4. Freight companies and long distance motorists will not make a "loss" from some 15 minutes longer travel EL-Port Edward/Durban. They will gain more than 90% of the "R1.5bn". SANRAL: They will gain R1.353 billion. From the standpoint of the whole of society, they can do without an additional top-up benefit of "R147 million" per year.
5. The local community , developmental prospects and communications as well as the National interests on the Wild Coast, will take care of those "R147 million" , make them worth much more and multiply them.

"Economic" Midterm evaluation argument

The N2WCTH project has been too expensive and difficult not to fail a standard Cost-Benefit Analysis. To recognise it doesn't mean 'stopping the project'. But to continue on more solid political, sustainable and developmental grounds, after some changes. This is why decision makers do midterm reviews.

It is "allowed" for large infrastructure projects , and it applies here.

Whilst continuing to build the two mega bridges, the costs will be audited, the present toll fee estimates **disclosed**, and efforts be done to make the project less costly, more developmentally inclusive, less disturbing to functioning local economies and studied how to avoid irreversible environmental damages.

BALANCING LOCAL ECONOMIC DEVELOPMENT against National/Provincial prerogatives.

SANRAL: “Economic development is stunted linked to that we train the locals both whether they want to do sewing and the hospitality industry all those folks so we are training them there that is in that part of the”

Training materialised, but the local projects are captured: Example the training to sew uniforms for workers at the Mtentu brigde.

SANRAL's response to a petition from Khanyayo community who had women in training for months, just like women from Bekela village, Amadiba: “You did not put in any tender application”.

F2. ENVIRONMENTAL CONSIDERATIONS

ENVIRONMENTAL IMPACT

'SANRAL: "We as SANRAL we have invited ACC and we still invite them let's sit and work on environmental matters we are there to make sure that the protected areas are increased "

... "On this thing of an environment let's work together we've got 375 million to not to construct any road but just to deal with environmental issues raise your issues and see whether we can actually find common ground in terms of of dealing with those uh issues"

It is not clear how much that remains of the R375 million, since start of transfers to ECPTA 7 years ago.

EMC and Authorities Coordination Committee minutes since years back indicate growing chaos on the ground regarding illegal sand mining, including within the planned biodiversity polygons. Recurrent debate at the meetings.

(NB: The inland proposal promotes an avoidance strategy re illegal sand mining)

Key quote in the Dec 2009 EIA ('Volume 1: Main Report', page 30)

"It is estimated that the proposed new road and its potential indirect and/or cumulative impacts (including possible strip/ribbon/nodal development) could lead to sufficient loss of habitat to result in Pondoland-Ugu Coastal Sourveld being re-categorised as an Endangered vegetation type (...). It is likely that **other proposed projects in the area would further exacerbate this loss** of habitat and make it more likely that habitat loss would lead to re-categorisation of the vegetation type."

"On the basis of the above criteria, the proposed new road is considered not ecologically sustainable."

"However, **if** secondary impacts can be controlled and conservation measures can be put in place to effectively protect core components of the PCE **then** the assessment of five of these criteria **may** be reversed/become insignificant and the proposed project **could then** be considered to be ecologically sustainable." [our emphasis].

The AIR aims to address those concerns on the basis of **new data** and **15 years of proved experience** since 2009 .

35

But already the 2009 EIA had no reason to believe that these concerns would be addressed

The disclaimers in the Final 2009 EIA.

Final 2009 stated: The N2WCTR is “not ecologically sustainable”. But “**if**” ribbon development and “other projects” can be stopped, “**then**” it is ecologically sustainable. Evidence show that it was wishful thinking.

The 2023 Eastern Seaboard RSDF notes:

Key Institutional Arrangements and Governance challenges and opportunities

Key Institutional Arrangements and Governance challenges: Eastern Cape

- Inadequate Provincial capacity to facilitate, monitor and co-ordinate development functions
- The Land Administration system collapsed
- Local Government lack of capacity to implement and manage development
- Parts of the Province still affected by different and outdated laws governing development.

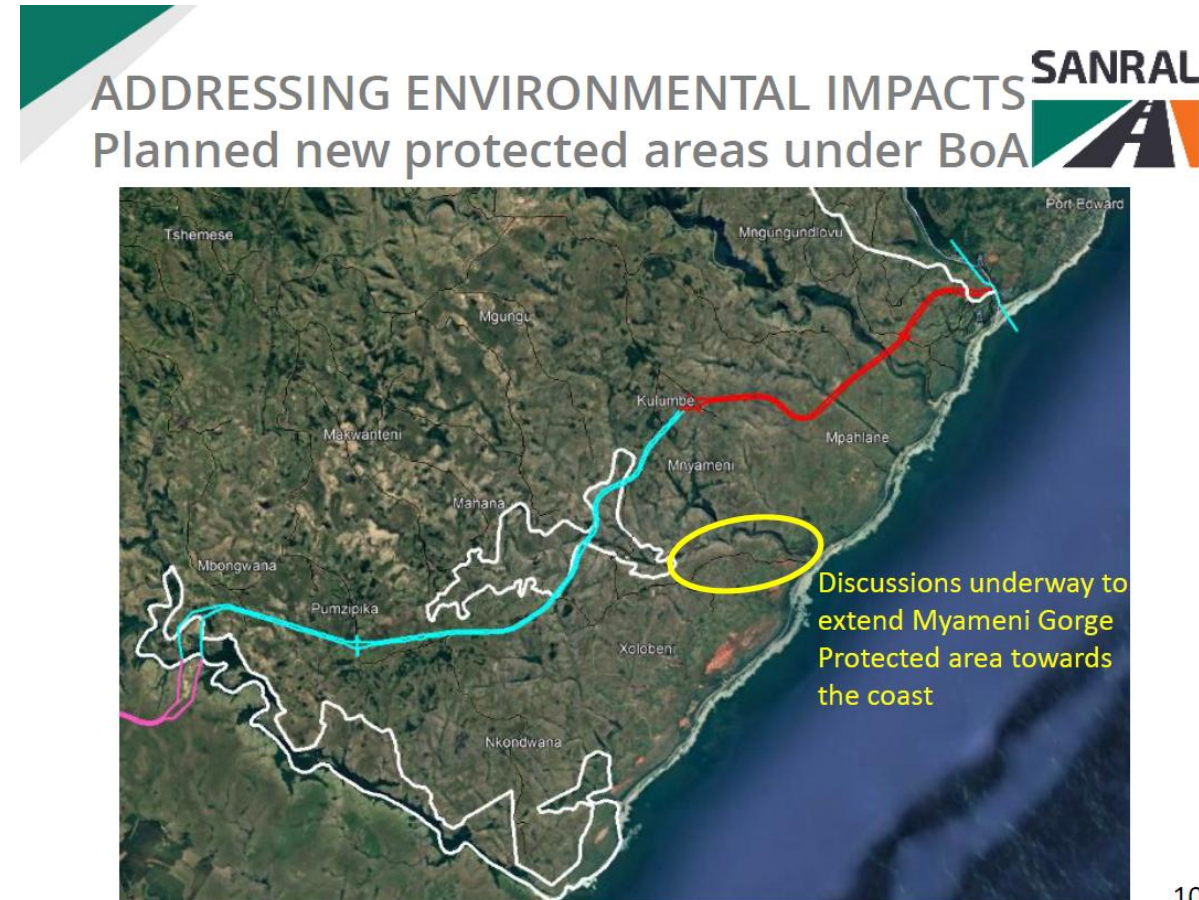
Re ‘outdated laws’ (last point above): ACC argues that customary law governance of land on the Amadiba coast comprises a final bulwark of protection against illegal projects, mal-development and “the anarchy of the rich”. (2) The 2023 EC Environmental Management Bill suggests abolishing the 1km protective zone along the Wild Cost (“the Decree 9”) – the ACC argues that it is still a necessary protection of the coast.

F3. THE R375M BIODIVERSITY OFFSET PROVISION

SANRAL CLAIMS & EXTENSION OF PROTECTED AREAS

SANRAL: “For the loss of range lands ECPTA is currently actually restoring that is range lands that we sort of no longer because of grazing all over the place. We are actually will be having restoring those areas and fencing some of these areas to make sure that the environment is not degraded unnecessarily”

Reference to the “Discussions” in SANRAL’s 2023 reply:
ECPTA declined the extension of the protected area to the coast with ref to the Xolobeni mining issue.



INADEQUACY OF PROVISIONS/IRREPLACEABLE LOSS OF RANGELANDS

Most visible indications of use of money of R375m is for staff, a facilitator, offices , vehicles and Consultants. No transparency around how money has been spent. EMC discussing in 2024-2025 how to fill the purse.

Tourism infrastructure needs of communities, in particular the legacy projects. ECPTA not able to fund this. ECPTA undertook to provide a 'consultant to help with a Business Plan to serve as basis for fund-raising efforts by communities'....

Most visible activity = Clearing of Alien Vegetation is one of 3 programs. ECPTA focus is for next 3 years (alien vegetation can re-establish itself within 6 months, then clearing must be repeated. Can go on like this for 3 years. Not sure if this is budgeted for? People have been doing such work since before ECPTA involvement. There was a budget at DEDEAT for the alien plants. Now it has been moved to BOA program.

Why cannot ECPTA manage this within their ordinary budget? No funding.

Sufficiency of budget: To cover implementation of broader offset sites.

INADEQUACY OF PROVISIONS/IRREPLACEABLE LOSS OF RANGELANDS (cont.)

Mkambati Nature Reserve: Is the only offset site definitely earmarked for implementation in the Amadiba Area. In the understanding of the community, Mtentu River Gorge has always been part of a Nature Reserve.

Management of existing Reserves: ECPTA does not have a good track record of doing this and claim they have no money to do this. Offset money is all they have, which now is running out.

Management of sites within Communal Land areas: ECPTA will declare and leave it to communities to manage. Up to now, communities not being trained to support this.

No Offsets for Rangelands: THE ENTIRE XOLOBENI IS A RANGELAND AREA. ECTPA has refused offset for this. With Mdatya and Sigidi, ECPTA first agreed and then reneged. ECPTA should have gone to Treasury if funding was insufficient?

All the above can be subject matters in a Midterm Review.

INADEQUACY OF PROVISIONS/IRREPLACEABLE LOSS OF RANGELANDS

Sentiment in the Amadiba Community:

THE WHOLE BOA IS MISLEADING. IT DOESN'T PROTECT THE WEALTH OF PEOPLE; THE LIVELIHOOD OF PEOPLE.

ALIEN PLANTS REMOVALS IS ALWAYS NEEDED, BUT IT DON'T ASSIST THE PEOPLE.

LIVES OF PEOPLE DEPEND ON FIELDS AND RANGELANDS. ECPTA HAVE FAILED TO CONSIDER THE DEMANDS OF PEOPLE WHO ARE BEING IMPACTED. THIS CONSTITUTES SERIOUS CONTRAVENTION OF BIO-DIVERSITY INTENTIONS.

F4. UNINTENDED CONSEQUENCES

Inevitability of uncontrolled ribbon development

SANRAL: "We are aware that a road anywhere you build it must necessarily have that economic spin-off because you can't build a road for nothing. It is for people to make use of the road and but indeed where we agreed with them all over South Africa ...the collapse of those governance where people build anywhere and everywhere it is of concern that is to us as well but we are saying that in the wild coast once you see the secondary road network that SANRAL is constructing there will maybe come to that you will see then because People want access. You can't just have this road and next and they don't have access that is to where they got to stay. So naturally then they come nearer to the road and we are saying that to facilitate development we will give that is start road so to speak whereby development can take place not along the N2 but on the adjacent road network that will be created by SANRAL."

WHO will direct ribbon development to the secondary road network? Remember the 2023 Eastern Seaboard RSDF: Eastern Cape land administration "has collapsed". The inland route represents an avoidance and mitigation strategy.

The escalation of illegal sand mining on the Wild Coast

SANRAL: “Illegal mining going on for years (as old as Transkei). SANRAL will not be buying sand mined illegally. Said to ACC, where Sanral we can do that is train guys and try to get them legal licensing.”

Reference EMC meeting minutes and the long debate about illegal sand mining and how to coordinate departments to curb it. It has escalated massively since the start of the N2WCTH project. The debate is whether this is a general rise or triggered by the N2 project, or a contributing factor. At any rate: A coastal route in Amadiba will bring illegal sand mining to the coast. To move the N2 to the centre of Amadiba represents an avoidance and mitigation strategy.

F5. THE ALTERNATIVE INLAND ROUTE

SANRAL's PRESENTATION TO THE PORTFOLIO COMMITTEE OF TRANSPORT:

- 1. "Alternative Route not economically viable. Sanral's Preferred Route needed to achieve 8% ROI to be viable, instead are achieving 12%.*
- 2. Worst towards Bulela/Each household will all have direct access*
- 3. "Road will be flooded with people" (referring to Lurholweni).*
- 4. Over 500 people must be relocated, whereas hardly 50 on SPR (ref to Lurholweni)*
- 5. Less sensitive from an environmental point of view than the SANRAL route*
- 6. From elevation grades of 9% evident, whereas max, permissible is 5%*
- 7. Grey areas through which AIR passes are sensitive areas, plan is to resuscitate wetlands there from the R325m*
- 8. From safety and travel = not a viable option."*

ACC's RESPONSE TO SANRAL's CRITIQUE

SANRAL: ... “the middle road is not viable. We have tested it. Lurholweni/deep gorges/wetlands/ financial viability. If we can find each other, route may not be viable to change, but other options remain open-R325m remains, not for the road. ” [Lawrence Mthembu]

- SANRAL concerns about gradients and bends were addressed in March 2023
- It was agreed that the ACC test the viability of the route through LURHOLWENI (even with some assistance from SANRAL) and that this would form the subject of a follow up meeting.

Despite numerous attempts by ACC to conclude this meeting, SANRAL failed to respond.

SANRAL repeats 'facts' to the PC of Transport that ACC corrected on 3 March 2023. Such technical issues were settled, which is why it was agreed to hold the next meeting about N2 through Lurholweni. *Example: "Grades and bends"*

RESPONSES TO SANRAL CRITIQUE OF AIR

Passing Ntlakhwe and Mzamba rivers. Sanral's concern (slide 55):

"Maximum grades ranging from 8% to 10%"

ALL grades in the AIR high level study are below 8%. The AIR abides by national road standards, vertically and horizontally.

- Picture shows crossing over Ntlakhwe (a 3m high and 220m long bridge).
- It is the steepest slope on the whole AIR: "7.87%". (picture from the high level study).
- The next steep slope is after the Mzamba River crossing (7.00%).

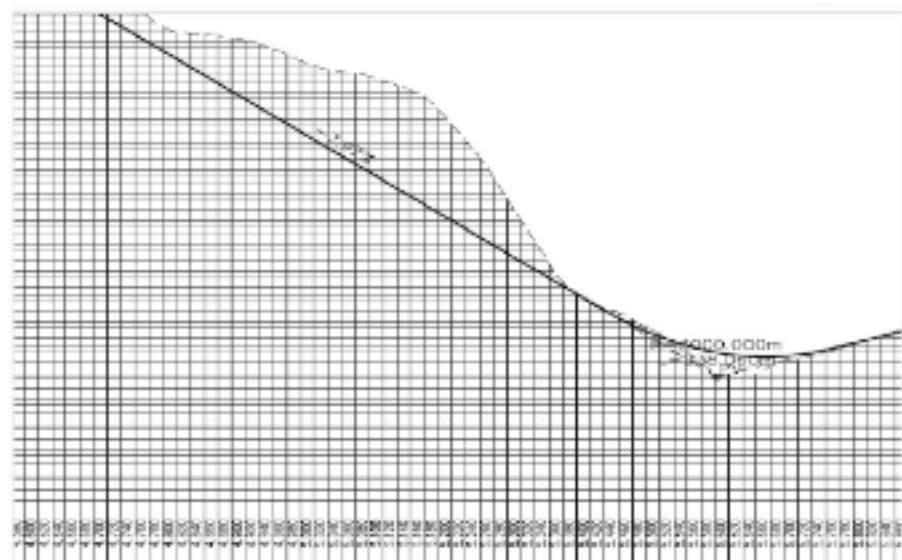
Sanral accepts grades above 8% on other sections of the N2WC road, south of Mtentu.

(As for the north: alone from Mtamvuna to after McBanana centre north of Munster on the R61 there are four to five steep slopes. But R61 will not be changed.)

"Two passes back to back is totalling 8.8km"

The distance from before the turn-off at KwaBulala to where the AIR straightens after the Mzamba crossing is 5800m.

Please note that the AIR doesn't have the same alignment as the old Inland Mzamba Route.



The decision on 3 March 2023 was to hold a new meeting about **Lurholweni** passing within a month: The grades would not be "ranging up to 9%" as Mr Peterson and SANRAL repeats to the PC of Transport. There will be no slopes/grades above 6%.

RESPONSES TO SANRAL CRITIQUE OF AIR

SANRAL's concerns, slide 55 (the AIR through Lurholweni)

"Of the 19km along the current R61 alignment 11 km passes through the Lurholweni informal settlement @ 60km/h. Incl. approx 10km of steep grades ranging up to 9% with limited existing climbing passing lanes and no descending passing lanes." In the AIR high level study long section maps, the engineers had indeed wanted to take this into account: If adding cuts and fills to the existing R61, there are 5-5.83% grades on 2.4km of the first 3.2km out of the 11km through Lurholweni, where above 5% is regarded as "steep". Such slopes are recurrent north of Mtamvuna, and Sanral is leaving that stretch of R61 as it is.

Distance from Mtamvuna river	Grade ('slope')	Distance from Mtamvuna river	Grade ('slope')	Distance from Mtamvuna river	Grade ('slope')
0-620m	5.00%	4000-4620m	4.87%	10220-10750m	1.28%
620-1420m	3.89%	4620-5500m	4.44%	10750-11200m	4.31%
1420-1800m	5.29%	5500-7500m	4.90%	11200-11480m	-1.83%
1820-2520m	5.83%	7500-8400m	1.16%	And so on, with grades below 3% to KwaBulala junction.	
2520-3200m	5.00%	8400-9460m	2.96%		
3200-4000m	1.25%	9460-10220m	2.12%		

The passing of N2WCTH for 10km on provincial road R61 through Lurholweni

- SANRAL inexplicably disappeared from the engagement after the 3 March 2023 meeting: No "open doors". The door closed.
- With this SANRAL abandoned the decision to meet again in a month to discuss the passing of N2WCTH through Lurholweni. ACC's technical team would then present a more detailed study.
- We take this opportunity to give the PC of Transport and Parliament the key results from the study in what follows.
- This and more was presented to the NT on 17 November 2023, and to the ISA program of Dept of PW and Infrastructure on 12 December 2023 (and to the Dept of Logistics at SU, Sept 2023).

INLAND ROUTE THROUGH LURHOLWENI

+8km section passing through Lusikisiki peri-urban and urban area



+9km section south of Lusikisiki where proposed N2 follow R61



Route through LURHOLWENI

Engineers confirmed that it is indeed possible to, with a widened road reserve and interventions to introduce a secondary road network, controlled access / intersections and safe pedestrian linkages, achieve an 80km/h design speed along the R61 section through Lurholweni.



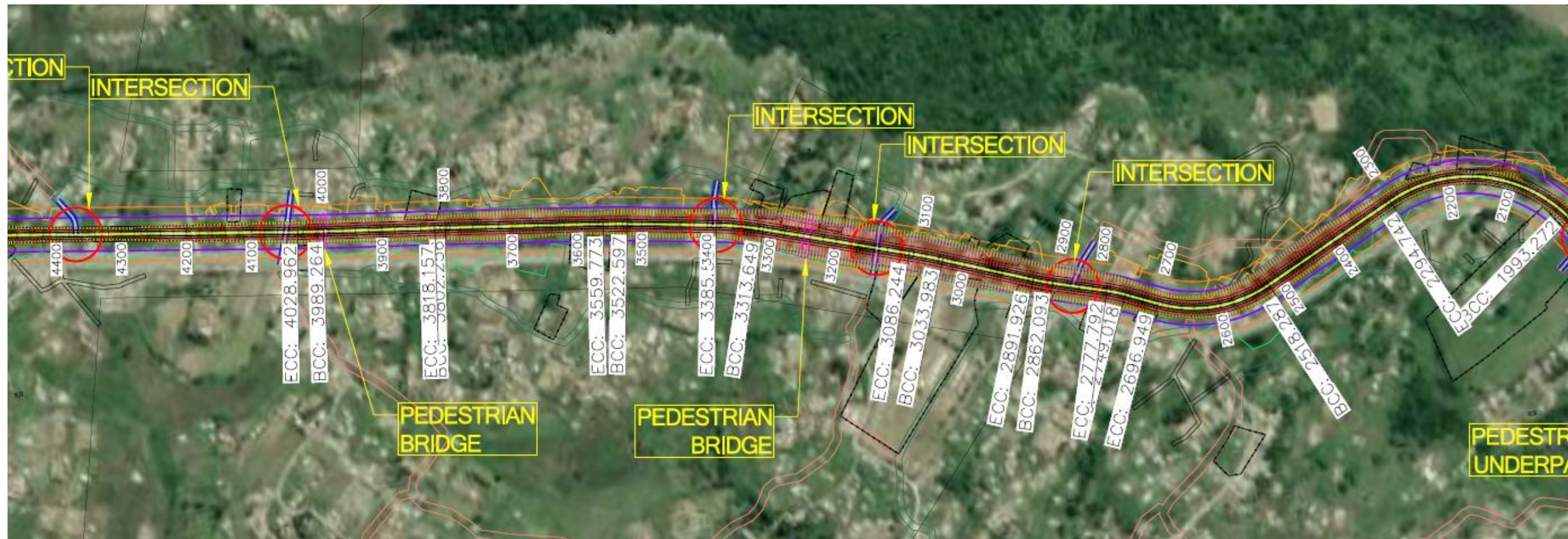


Lurholweni: Structures Impacted by 40m and 50m – wide road reserve

	40m Road Reserve		50m Road Reserve	
	Can relocate within existing site	Structure and site need to be relocated	Can relocate within existing site	Structure and site need to be relocated
North	32	4	36	25
South	23	3	50	5
TOTAL	55	7	86	30

E. RESPONSES TO SANRAL CRITIQUE OF AIR : Route through LURHOLWENI

Engineers confirmed that it is indeed possible to achieve an 80km/h design speed along the R61 section through Lurholweni. A 40 or 50m wide road reserve in Lurholweni is **anticipated to affect far less structures than the reference by SANRAL of ‘hundreds’**.



E. RESPONSES TO SANRAL CRITIQUE OF AIR: Mitigation The Amadiba / WMMLM Section in the context of the overall N2 project

SANRAL has applied innovative solutions to mitigate impacts and risks associated with a number of built-up areas along many sections of the N2.



An example along the N2 on outskirts of Knysna, with road reserve in places below 40m (road surface taking up 21m)



F6. SOCIAL IMPACTS

RELOCATIONS in LURHOLWENI TOWNSHIP – estimates

Building the new N2 for 18km on the provincial road R61:

With a 40m (80km/h) road reserve in the township; **7 houses or structures** will be relocated. **55 can be moved within the same site.**

- SANRAL's solution for N2 for 10km outside Port Shepstone on the way to Kokstad is well known: Two lanes in both directions, elevated middle or fence between them and walkways on both sides, protected by steel fences. The whole width from edges of the walkways is 25 meter.

Comments:

- Construction and refurbishment in Lurholweni will create **more local jobs** than when R61 was repaired 2015-2017 (but which didn't do enough to increase safety).
- SANRAL's coastal route bypasses Lurholweni: No long-term economic effects. As for Lurholweni, a coastal solution for N2 in Amadiba repeats apartheid spatial planning .

RELOCATIONS and IMPACTS IN COMPARISON

- **A - 23 homesteads** if the N2 is in the centre of Amadiba, but up to **83 homesteads** if N2 is on the coast: directly affected and relocated with graves an all .

Reservation for 'Mzamba area' where SANRAL reportedly have changed the gazetted road reserve to avoid some 8 houses in Mzamba and a late discovered water fall. (The coastal N2 here runs through a Critical Biodiversity Area 1 & 2.)

- **B - 25 homesteads** will be close to the new N2 in the centre of Amadiba, but **51 homesteads** with N2 on the coast will be close to the road reserve and will be affected.

Note the additional huge problem: SANRAL doesn't work with a relocation plan in breach of the Environmental Authorisation.

COMPARING IMPACTS ON AGRICULTURE IN AMADIBA

- **A - 22 arable fields** with N2 in the centre of Amadiba compared to **102 arable fields** by SANRAL's route between Mtentu and Mzamba rivers. The y are in the road reserve.
- **B - 48 arable fields** in the centre of Amadiba, versus **23 arable fields** on the coast are located directly adjacent to, and in some cases partially within, the road reserve.

Effect on rangelands not quantified, but the impact of N2 running through will be much stronger on the coast: More healthy grass, much more water, green grass the whole year.

People come all the way from Bizana town to have their livestock in the coastal range lands.

F7. PRONOUNCEMENTS BY SANRAL ON 'MOVING THE ROAD TO THE MIDDLE'

PUBLIC PARTICIPATION

The position 'Move the road from the coast'

- On 6 April 2017, Sanral for the first time visits the Umgungundlovu Traditional Court (*Komkhulu*) on the coast. The delegation was led by the new CEO Skhombuzo Macozoma. It was prompted by Sanral's contractors being denied access to the coast.
- The heated meeting demanded the N2 to be moved to "where the people want it". It is documented in 'IHLAZO' published on YouTube; a 1h10m long amateur documentary. All of Mr Macozoma's replies are in the video recording. All interventions have been translated to English in subtitles.
- Mr Macozoma declared it is not his decision to move the road. He would come back after consulting with superiors in government and Sanral's board. But Mr Macozoma did not come back.
- In June 2017, **Mr Mxhosa** of Sanral's Head Office requested an informal meeting with Nonhle Mbuthuma at WCS. Nonhle explained in a friendly conversation why N2 must run in inland Amadiba. The conversation also concerned how relocations can be properly managed when the road is moved. Ten days later, two ladies from Sanral's Head Office again requested a meeting at WCS. Late Sbu Mqadi, Siyabonga Ndovela and Nonhle Mbuthuma met them. The long meeting is recorded. It was again explained why the ACC and the coastal villages want the N2 to be moved from the coast.
- **This only serves to correct Sanral's perception that the ACC requested the N2 to be moved to the inland "in 2021". Sanral has been aware of ACC's position since 2017.**

Former Lead Project Manager **Craig McLachlan** in SABC TV, 2017: *“So the route has been located quite far inland, about 15 kilometer inland, at its furthest route, and not along the coast which is the most sensitive from an environmental point of view. The route also goes predominantly along already degraded areas, so to minimise the impact on high potential areas. We have a very strong environmental plan in place ...”* [Proposed N2 Wild Coast toll highway will affect 7 communities - study – YouTube](#)

Communication Manager **Vusi Mona** in Daily Maverick 19 March 2019. *“By the way, the N2 Wild Coast road is something of a misnomer – it’s not a coastal route as the highway is 10 to 15 kilometres inland to avoid the most sensitive part of Pondoland’s biodiversity. This biodiversity must be protected as the Wild Coast in the Eastern Cape is one of the most beautiful parts of our country.”*

Regional Manager **Mbulelo Petersen** on 2 March 2021, quoted in Daily Dispatch: *“The route is often, incorrectly, called a ‘coastal road’, Peterson said. “A coastal route was not feasible because of environmental issues.”* [Wild Coast toll road project closer to lift-off \(dispatchlive.co.za\)](#)

G. CONCLUSION

Why a Mid-Term Review Is Necessary

- The Amadiba Petition submission does **not** assume entitlement to a review; rather, a mid-term review is standard good practice for complex mega-projects.
- A review opens the process beyond areas where Amadiba Submission and SANRAL differ, enabling a broader assessment of project-wide issues that affect multiple stakeholders.
- While ACC and SANRAL agree on some matters, they inevitably diverge on others—underscoring the value of an impartial, structured review.
- Persistent gaps in meaningful engagement: key agreed meetings (e.g., Lurholweni route assessment) were not convened, and Petition issues remain unaddressed whilst most of SANRAL’s responses are questionable.
- Environmental impacts remain unresolved: conditions set in the 2009 EIA have not been met; cumulative ecological risks are escalating.
- Biodiversity offsets and ecological safeguards remain under-resourced and insufficient to mitigate loss of sensitive habitats.
- Socioeconomic risks—including displacement, ribbon development, and governance strain—outweigh benefits of the current coastal alignment.
- The alternative inland/Lurholweni option, strongly supported by the Petition, has not been properly tested, despite its stronger alignment with local development priorities.

What Parliament Can Achieve Through the Review

- Establish a transparent, evidence-based process led by an interdepartmental committee with community representation.
- Update the project's technical and environmental foundations to reflect new knowledge, spatial planning requirements, and changed circumstances.
- Ensure ecological safeguards are enforceable, adequately funded, and appropriate for a highly sensitive coastal landscape.
- Align national investment with inclusive and sustainable local economic development pathways rather than imposing long-term risks.
- Provide a structured forum that moves beyond bilateral disagreements between Amadiba Petitioners and SANRAL to address systemic issues affecting the entire project.
- Support road development that enhances connectivity **without** causing irreversible environmental and social harm.
- Maintain ongoing progress on the major bridge works while pausing the sections affecting the Amadiba area to prevent irreversible impacts.