

Comment as requested on the Draft Report by the Portfolio Committee on Transport relating to the Amadiba N2WCTH Petition to Parliament– ACC’s Technical Team 2026-02-27

1. The non-engagement with the Petition and with the results of meetings with SANRAL

The Draft Report in its introduction captures the Petitioners key arguments for a Midterm Review, and a review of the coastal alignment of the 32km section of the route as it passes through Amadiba between the Mtentu & Mtamvuna bridges. This includes referencing the negative impact on this pristine and classified section of the environment in Amadiba, the loss of agricultural and rangelands and the high risks of unintended consequences such as further environmental damage due to uncontrolled ribbon development and illegal sand mining. An inland route alignment is championed which will have substantially more developmental benefit for the whole of the Amadiba area, including the impoverished Lurholweni township.

The Report then captures the SANRAL response, which is a rehash of what was tabled at extensive engagements with the ACC Technical Team in January 2023. All the SANRAL claims were countered then. It is of concern that in rehashing SANRAL’s 2023 stance, no acknowledgment is given to what transpired during the negotiations now in November and December. But what transpired was that SANRAL, just like in 2023, abandoned all its technical objections.

Thus, it is notable that in the engagements with SANRAL, as directed by the Portfolio Committee on Transport, during November & December 2025, SANRAL did not challenge the alternative inland route alignment technically. Nor did SANRAL challenge the detailed proposal demonstrating the viability of the route passing through the densely populated settlement of Lurholweni. SANRAL’s default position was instead that too much had already been invested in the coastal route.

Thus: All the technical arguments against the inland alternative were abandoned during the engagement. Now, however, they are again repeated in the Draft Report, as if the engagement did not happen. The erroneous economic reasoning by SANRAL regarding “cost to the economy” was of course also debunked in the engagement in November and December. This is in our 17 November presentation. There is a limit to how many times we can come back full circle.

SANRAL also observed a stoic silence when it came to the issue of the strident escalation of the budget for the N2WCTH, from R8bn in 2011 to R28bn in 2025, with the latest hike of R8bn taking place in 2025. How this affects the continued financing of the project remains a big question.

The Petitioners are concerned that the recommendations from the Portfolio Committee as contained within the Draft overwhelmingly favour the position of SANRAL. It is as if the concerns and arguments of the Petitioners, supported by detailed technical studies, have fallen into deaf ears.

A MID TERM Review, which constitutes best practice internationally when it comes to mega infrastructural projects and already has been applied to such projects in South Africa, is rejected based on claims that routine inter-governmental review mechanisms fulfil this task.

Consideration of changing the coastal route alignment to inland is rejected in the Draft Report because of precipitating charges of fruitless and wasteful expenditure. This ignores the substantial developmental, economic, social and sustainability benefits that would accrue from the alternative alignment and the argument that a coastal alignment will come with huge costs. This was evidenced with satellite photos over EC highways in the Petitioners’ 17 November presentation, and by simply quoting from the 2023 Eastern Seaboard RSDF: that land administration in Eastern s “collapsed”.

With respect to the specific recommendations by the Portfolio Committee, we note the following:

1. First, that the new N2 road surely can be moved from the coast. The building of the road in Amadiba has not started and there is much more to gain than to lose from a change.
2. Second, the budget for this project is certainly an issue. Oversight is failing and the anecdotal evidence is piling up regarding rampant corruption. Locals involved in the Lusikisiki area are reporting that the building of the Msikaba mega bridge has been halted for many months, allegedly for the lack of funds. Where these problems are picked up and attended to is not clear.
3. Third, a Mid-Term Review should also be on the agenda because of the lack of control of what contractors are doing. SANRAL now has a pre-compliance notice from the DFFE. A compliance notice will stop Package 5. ACC got the letter on 11 December stating **“serious non-compliance with applicable environmental legislation and authorisation conditions (...) namely: Wetland destruction and Pollution of water resources”**. Why this has happened in the Khanyayo area must be clarified before road works start in Amadiba, no matter of the chosen alignment.

The recent scandal in Amadiba where endangered plants are being cut down by SANRAL’s contractors in Biodiversity Off Set Areas shows that the control over subcontracting is not working.¹ SANRAL is today unable to ensure strict environmental compliance. Why that is must be understood.

4. It is a misunderstanding of the issues, to put upon SANRAL the responsibility to stop ribbon development along the new N2. This problem is not about “encroachment” inside the road reserve.
5. In the experience of ACC, SANRAL must be held accountable by Parliament to attend community grievances and issues, as for example was promised on 7 July last year. We conclude from experience that SANRAL and the local government will not come by themselves, not without being persuaded or simply told by our Parliament.
6. The advice to meet with local, regional and provincial structures is something that ACC have been aware of and practised for years, for example, re the IDPs. The problem is to get the authorities to seriously study alternatives, for example the detail spatial planning suggestion presented to WMMLM in March 2025. Then again, and as Parliament is aware, the N2 project is a national project. Any changes or serious rethinking of it takes place at the national level.
7. The advice to report murder threats and suspected extortion is welcomed. This was reported to SAPS and SANRAL in May, to SANRAL and the Province government in July 2025, and again on 7 December to SANRAL and Hon. Ms Nkopane, but without acknowledgement of receipt or follow-up. It is an indication of how seriously these reports are being taken.
8. We humbly ask the Committee to cleanse their Report from side issues and irrelevant political attacks. It gives a bad faith impression. Nobody is prohibited by ACC from working at the Mtentu bridge. The Petition instead has ref to the problem that local employment is blocked by corruption.

Conclusion

Since SANRAL can only take responsibility for what occurs within its road reserve, we respectfully request that in the Report, as a way forward, the Petitioners be granted an opportunity to present to the Portfolio Committees for Environment, Infrastructure, Land Reform & Rural Development, as well as to SCOPA.

¹ [N2 contractor destroys endangered Wild Coast plants, igniting Amadiba community dispute](#)