

WAY FORWARD FOR THE AMADIBA PETITION ON THE N2 WILD COAST TOLL HIGHWAY

Having considered the detailed petition of 79 petitioners from the Amadiba Community (“petitioners”) as well as the responses to the petition by SANRAL, the Portfolio Committee on Transport (“Committee”) resolved, among others, that further engagements between SANRAL and the ACC Technical Team needed to take place to find common ground and report back to the Committee within 15 days of the resolution.

The ACC’s Technical Team (ACC TT) made a written request to the Committee for a facilitator to be appointed to facilitate discussions between the parties. The Committee acceded to this request by appointing Hon Nkopane, MP as the facilitator. Notably, Hon Nkopane’s key role was mainly focused on encouraging objective and constructive engagement rather than to adjudicate the matters under discussion.

Mandated by the Petitioners, ACC’s technical team (ACC TT) held meetings with SANRAL on 17, 24 November and 3 December in Gqeberha & East London, chaired by Hon. Ms. Nkopane of the Portfolio Committee for Transport. The 17 November meeting was very short. The outcome of the meetings was inconclusive. We emphasize that the role of the Chair at the meetings was facilitation. It was not to adjudicate who is right and who is wrong. We therefore expect an objective report to the Portfolio Committee (PC) on Transport from the engagements between the ACC TT and SANRAL.

1. The PC can be confident that this Petition is with Parliament precisely because the Amadiba Community, inland and coastal, have approached local authorities, provincial authorities and relevant departments (as reported in the Petition). Attempts to meaningfully engage with SANRAL have been going on for years. It is because those avenues have been exhausted or not followed through that the petition route was embarked upon. It is a requirement for petitions that all other remedies or routes have been exhausted.
2. The Petitioners’ argument for conducting a Midterm Review of the N2WCTH project has been strengthened during the engagement. SANRAL maintained an intransigent position; both on the issue of the need for a Midterm Review and on the Petitioners’ proposal to meaningfully consider moving the alignment of N2WCTH to the centre of Amadiba. An impasse has been reached with SANRAL. The ACC is therefore seeking the intervention of an authority above SANRAL as the agency and implementer of the N2WCTH project. The ACC would like Parliament to exercise its right to hold the executive branches of the government and SANRAL to account, discuss changes in the project and propose remedies for what is not working.
3. During the engagements, SANRAL avoided engagement with documented facts and figures as presented by the ACC TT. On the 4 November, at the PC of Transport, SANRAL repeated old technical objections against placing the N2WCTH in the centre of Amadiba. This was rebutted by the ACC TT in their presentation.¹ SANRAL abandoned the matter, including the suggested route through Lurholweni township. No explanation has yet been given for the budget increase from R8bn to R20bn in 2017 and why the Department of Transport remained unaware of this till 2019, as evidenced in the Petition. No explanation was given for the recent hike from R20bn stated in the 2024/25 Annual Report to R28bn in a presentation to the PC on Transport on 8 October, despite the fact that the subject matter was that Annual Report. SANRAL stayed clear from queries

¹ Amadiba Petitioners PowerPoint Presentation of 17 November 2025: [ACC RESPONSE TO THE SANRAL SUBMISSION TO THE TRANSPORT PORTFOLIO COMMITTEE](#)

on this anomaly by answering in general, that they report to the Dept of Transport who reports to the National Treasury. Clearly the PC will pursue the budgetary anomalies.

Additional experiences and ACC TT notes from the engagement

4. SANRAL maintained the position that the historic socio-economic and environmental considerations regarding the selected alignment remains determinative, including in Amadiba.² ACC's TT argues that much has changed and needs to be taken into account in any review, as reflected in the 2023 regional SDF under SPLUMA.
5. Today, early concerns about the alignment are even more relevant. The Final 2009 Environmental Report warned of a lack of land development control, possible ribbon development along the N2WCTH, and that additional projects would lead to the route being "ecologically not sustainable". The 2023 Eastern Seaboard RSDF³ found that land administration in Eastern Cape has "collapsed". ACC TT has presented glaring evidence that these trends, the absence of land administration and land development management, remain a very clear reality in EC.
6. Of course, nonfunctioning land administration will also affect an inland alignment but be of less significance. This is not an environmentally classified area.
7. SANRAL has acknowledged these problems but pointed out that SANRAL takes responsibility for the road reserve and will defend it from intrusions. The response to this by ACC TT was that it is an argument for a Midterm Review and lifting the matter of unintended consequence outside SANRAL's mandate to other Portfolio Committees and Departments.
8. SANRAL held that a midterm review is "not legislated" and that its function is performed by a range of executive and oversight state bodies. However, in 2011, Parliament called for a midterm review of the Gauteng Freeway Improvement Project (GFIP) and at the time, imposed changes on the GFIP project. Thus, there is a precedent for a midterm review. In this case, it is obvious that a midterm review is called for.
9. SANRAL's system of communication is not working. Nonhle Mbuthuma pointed out that a MEC Mr Nqatha, Chair of the Political Oversight Committee on 7 July 2025, directed the WMMLM and SANRAL to sit down and discuss the demands in the 12 May Amadiba Memorandum within 14 days. The WMMLM is avoiding the meeting as prescribed by the MEC. SANRAL has taken no initiative to facilitate this discussion.
10. The Political Oversight Committee in October 2023 published a video.⁴ In the video, the ACC was criticized for "challenging" the N2WCTH project "and Xolobeni mining". To resolve this matter, the MEC of COGTA requested that there be a meeting between ACC and the POC. ACC immediately availed itself to meet with the POC and the traditional leaders. Unfortunately there was no response to the letter requesting a meeting.

² ACC TT also explained in the discussions that alone the irrational assumption of a 3-year construction period to completion trashes the calculations of economic viability in the old Cost-Benefit Analysis, as pointed out in the Petition. SANRAL did not engage further on this.

³ URL: [DRAFT-EASTERN-SEABOARD-RSDF-2023.pdf](#), page 14.

⁴ The video is on link in the Petition to Parliament: [SANRAL propaganda video](#)

11. The building of the two mega bridges, Msikaba and Mtentu, should continue, but the alignment in Amadiba should be paused and reconsidered. The Petition should be discussed by all relevant Portfolio Committees who can call the counterpart departments to discussions.
12. As for the costs for a Midterm review and work to change the route, SANRAL objected to this based on money already spent on preparations for the coastal alignment, saying that it would be Fruitless and Wasteful Expenditure. But the costs for the proposed changes would be less than one percent of the recent budget hike of R8bn. ACC's TT's view is that it is an invalid argument and that a N2 in the centre of Amadiba would be less costly to build. The proposed N2 will be with us for 100 years to come. Costs for not realigning the route will be immense and local developmental gains will be sidelined.
13. Issues of convergence emerged that needs to be taken into account by the PC in its consideration of the scope of a midterm review and the participation of the executive authorities that supervise SANRAL:
 - The focus should not be on from destination-to-destination developmental impacts, but factor in recognition of local economic development in the long term, increasingly and much more so had emphasis on the route been established in at least 2006.
 - Agreement on the importance of development and improved road infrastructure, including secondary road networks.
 - Shared recognition of the need to mitigate environmental harm and address biodiversity impacts.
 - Acknowledgement of the value in technical discussions on offsets, secondary roads, and sand mining.
 - Agreement in 2023 engagements that Lurholweni route viability requires joint assessment.
 - SANRAL recognizes the right of the Amadiba petitioners to have made the requests via the petition.
 - SANRAL agrees that questions can be asked of its conduct even if the consequences of questions and recommendations may involve that certain (unstated) expenses may become wasted.
 - The parties are in agreement that meaningful and constructive engagements may happen through the Political Oversight Committee established by the provincial government, the EMC and other structures.
 - The parties agree that the Portfolio Committee for Transport can invite further input on next steps from other stakeholders including the other relevant portfolio committees, other departments, the Presidential Infrastructure Coordinating Committee, Infrastructure SA and others.
14. It is clearly the oversight responsibility of Parliament to address the very serious concerns raised by the Petitioners.

2025-12-05

FOR THE PETITIONERS: Nonhle Mbuthuma

COORDINATOR OF THE ACC TECHNICAL TEAM: Malcolm Campbell