

LETTER TO THE HONOURABLE SPEAKER ON THE AMADIBA N2 PETITION FOR HER ATTENTION

Dear Honourable Speaker, Ms Thoko Didiza,

In August 2025, the Amadiba community submitted a Petition for consideration by Parliament in terms of Section 55 of the Constitution.

The Petition raises several concerns about the implementation of the N2 Wild Coast Highway project by SANRAL. It is supported by 14 villages in Amadiba, represented by the Amadiba Crisis Committee (ACC). Whilst welcoming the building of the highway, the Petition proposes a Mid Term review of the project, a re-alignment of the route as well as constructive engagement with community structures on several concerning issues.

The petition was first referred to the Portfolio Committee of Transport, who between October and December 2025 requested both SANRAL and the Amadiba Crisis Committee to meet and to make representations. In the deliberations, SANRAL acknowledged the anticipation of unintended consequences of the route alignment but argued that they essentially only have control over what happens inside their own road reserves.

The Petitioners are thus welcoming the recommendation in the final Report that other Portfolio Committees responsible for, amongst other things, environmental, water and sanitation and land acquisition matters be approached and the undertaking by the Transport Portfolio Committee on Transport to assist in facilitating these engagements.

Other important takeaways from the final Report were undertakings to ensure closer monitoring of SANRAL's performance on the N2 Wild Coast highway, which would include the submission to the Committee of detailed quarterly Reports as well as the commissioning of an investigation into the project by the Auditor General's office.

The recommendations of the Portfolio Committee on Transport were tabled at the national Assembly sitting on 5 May 2026. The Petitioners are encouraged by the positive contributions made during the discussion on the report. The problems associated with the implementation of the N2 project were acknowledged, as well as the need for greater parliamentary oversight and that development models incorporate negotiations with affected communities.

The purpose of this submission is to draw your attention to and place on record, firstly, misleading inputs by members of the Transport Portfolio Committee members who spoke to the Report and, secondly, claims within the actual Report which are inaccurate.

1. MISLEADING CLAIMS IN THE PRESENTATION OF THE PORTFOLIO COMMITTEE'S REPORT ON 5 MAY

In tabling the recommendations, the Chair of the Transport Portfolio Committee, Hon. Mr Selamolela in stating that the need for a Mid-term review or the re-alignment of the route was not supported, declared that since "SANRAL and the Department of Transport have followed all the necessary requirements to ensure that the project is a success", This statement ignores evidence to the contrary provided to the Committee which included an

official 11 December letter from the Green Scorpions of the Department of Environment (DFFE) castigating SANRAL and N2 contractors for “serious non-compliance with applicable environmental legislation and authorization conditions (...) namely: Wetland destruction and Pollution of water resources”. This and evidence of other transgressions were submitted two months before the finalisation of the Report on 31 March.¹

Another Transport Portfolio Committee member, Hon. Ms Nkopane, who had been appointed to facilitate discussions between SANRAL and the Petitioners, concluded the discussion on the Portfolio Committee’s Report, by claiming that “we have read the report as presented by SANRAL. We’ve looked at the report and, yeah, it has provided a focused and comprehensive report on the project from its start to the present that was 2025, including informing on budget projections, expenditure and future budgeted amounts, including explanations for deviations from the original budget estimates and till the project’s estimated completion date.”

These claims are neither reflected in the Report nor did they feature in the facilitated deliberations. Section 8.1 of the Report in fact recommends that such reporting happens. We note to the contrary, that all questions from the Petitioners related to the ballooning N2 budget were met with a stoney silence during the deliberations.

2. ERRORS AND MISREPRESENTATIONS IN THE TABLED TRANSPORT PORTFOLIO COMMITTEE REPORT

We also wish to draw your attention to the fact that the 31 MARCH 2026 REPORT ON THE AMADIBA PETITION TO THE NATIONAL ASSEMBLY FROM THE PORTFOLIO COMMITTEE ON TRANSPORT² (PCT) contains a series of serious factual errors and conceptual mistakes.

We highlight these errors not only for the sake of putting the record straight, which is of value to the Petitioners, but also because of the Report recommends (in its final section 8) that the Amadiba Petition³ should be discussed in other portfolio committees and even in government departments, like the DFFE. The errors should therefore not pass unnoticed.

Section 5 of the Committee Report contains a joint response by SANRAL and the Department of Transport (DoT) to the Amadiba Petitioners (although it is noted that DoT was largely absent from these engagements.) The response is, in the main, extracts from a 26 January 2023 PowerPoint⁴ that SANRAL elected to present again to the Committee on 4 November 2025. No reference is made to the Petition in this response.

We note that SANRAL’s claims in the two-year-old PowerPoint when opposing the proposed alternative inland alignment through Amadiba were refuted by the multi-disciplinary technical team representing the Amadiba Crisis Committee (ACC) at lengthy engagements

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

² [260402pctransportreport.pdf](#)

³

[2025_08_28_Petition_to_Parliament_National_Highway_plus_3annexures_33_pp_by_79_petitioners_plus_1_redacted.pdf](#)

⁴ [SANRAL-PRESENTATION-20230126.pdf](#)

with SANRAL, on 28 January and 3 March 2023. The only outstanding issue was a demonstration of the feasibility of the alternative alignment using the provincial artery R61 when passing through the densely populated township of Lurholweni. Several attempts by the ACC to conclude these discussions have been completely ignored.

Details of these engagements were shared with the Committee. The history is also reflected in the Letter to the Presidency published in a booklet annexed to the Petition.⁵ It is also in the PowerPoint of 17 November 2026 and contained in our written inputs during the facilitated engagements with SANRAL.⁶ There is however no references made to the Petitioner's PowerPoints in the Report.

Errors and mistakes in order of appearance in section 5

1. FALSE CLAIMS OF ENVIRONMENTAL COMPLIANCE: In section 5.1, the Report speaks of "the strict Environmental management plans that are or will be in place for all construction contracts". As highlighted earlier, these claims had already been disproved by the findings of the Green Scorpions against SANRAL and N2 contractors for "serious non-compliance with applicable environmental legislation and authorization conditions" (...).
2. SILTATION CONCERNS RELEVANCE: In section 5.2 "Siltation Concerns", the old 2023 SANRAL PowerPoint spoke of community concerns back in 2022 after heavy rains in Amadiba. Section 5.2. has nothing to do with the Amadiba Petition of today. The Report here deviates from the Petition by focusing on an outdated discussion.
3. RISK OF ILLEGAL SAND MINING CLOSE TO THE COAST: Section 5.3 doesn't answer the concerns in the Amadiba Petition that, with the coastal alignment of the N2, illegal sand mining also will move to the Amadiba coast, impacting on highly sensitive Pondoland Centre of Endemism. The outdated 2023 SANRAL speculation in 5.3 that the N2 project will "reduce the attraction or the need" for illegal sandmining is contestable, evidenced by ongoing concerns in the meetings of the N2 project's Environmental Monitoring Committee (EMC) about the increase of illegal sandmining, even occurring in the projects' planned 'biodiversity offset areas'.⁷
4. NEGATIVE IMPACT ON AGRICULTURAL & GRAZING LAND: In section 5.4, the Report repeats SANRAL and the DoT's claim that the coastal N2 will lose less agricultural and grazing land to the community than the Petitioners' proposed alternative route. This was refuted in detail in our 17 November 2025 PowerPoint presentation: The alternative inland route uses the R61 and gravel roads for 28 km out of 44.5km. The 32.8 km of SANRAL 's preferred coastal route is a 100% green fields route.

⁵ [The Amadiba and the N2: The struggle for people's development](#)

⁶ [ACC RESPONSE TO THE SANRAL SUBMISSION TO THE TRANSPORT PORTFOLIO COMMITTEE](#)

⁷ EMC Minutes. February 2025. URL: [ae4b822041d7ab95fa4ed786c4179c358a225da8.pdf](#)

5. UNCONTROLLED RIBBON DEVELOPMENT THREAT: Section 5.5 on ribbon development from the now rehashed 2023 presentation disregards the fact that settlements along new surfaced main roads are not controlled anywhere else in Eastern Cape. Our presentations used satellite photos to show evidence ribbon development along all main tarred roads in the region, confirming the “collapse” of land administration in Eastern Cape as reported in Eastern Seaboard RSDF of 2023.⁸
6. LURHOLWENI TOWNSHIP IGNORED: Section 5.6 of the Report does not respond to the Petition’s concerns that Lurholweni township is bypassed by the new N2 “as did apartheid planning” and disregards the 2020 Eastern Cape Biodiversity Conservation Plan.⁹
7. ERRONEOUS VIABILITY ASSESSMENTS: Section 5.7 of the Report also quotes from the old SANRAL 2023 presentation and disregards annexure 2 in the Petition as well as the refutation in our 17 November 2025 PowerPoint of SANRAL’s and consultants’ economic and financial viability calculations. The cost increase since 2021 was reported in Parliament at 40% by SANRAL in October 2025 and February 2026, not “20%”. The discount rate prescribed by the Treasury in 2021 was 10%, not “8%” erroneously used by the consultant.

The most clearcut proof that the new N2 highway never was financially or economically viable is however the irrational assumption in all project calculations, that it would take 3 years to build the whole N2WCTH to completion and opening of traffic. This inexplicable flaw is implicit in the 2021 report and explicit in both the original 2002 and the final 2008 socioeconomic report cited in the favourable 2009 EIA. The remedy, as posed in Annexure 2 of our Petition, should be to make the new N2 as beneficial as possible to as many as possible.

8. PUBLIC PARTICIPATION MISINFORMATION: The sections 5.8, and 5.8.1 – 5.8.7 on Public Participation disregard the Petition’s key argument that new knowledge and changed circumstances should be considered and elects to focus on how many meetings that were held in 2006-2007. The 17 November PowerPoint, not quoted in the Report, also gives evidence of SANRAL repeatedly misinforming the public about the N2 alignment in Amadiba, placing it up to 15km from the coast.¹⁰ The late headman Ndabazakhe of Sigidi indeed wrote a 2006 support letter referred to in 5.8. But he had been misinformed, as was the Hon. Judge Pretorius who quoted from this letter in the 2019 judgment referred to in 5.8.7 of the Report: “Moreover, this road is far from the sea as it runs about 10km inland. There is no threat to the beauty of the environment near the coast.”¹¹

⁸ misa.gov.za/wp-content/uploads/2023/02/DRAFT-EASTERN-SEABOARD-RSDF-2023.pdf

⁹ The October 2020 EC Provincial Gazette. No 4460; URL: [96.pdf \(saflii.org\)](https://www.saflii.org/za/other/eca/gazette/2020/10/4460.pdf)

¹⁰ [ACC RESPONSE TO THE SANRAL SUBMISSION TO THE TRANSPORT PORTFOLIO COMMITTEE](#)

¹¹ [Zukulu and Others v Minister of Water and Environmental Affairs and Others \(18553/2012\) \[2019\] ZAGPPHC 1111 \(7 March 2019\)](#) ; paragraph 80.

9. MISREPRESENTATION OF ALTERNATIVE ROUTE: Section 5.9.1 and 5.9.2 repeats the old technical critique of the ACC's alternative route by SANRAL that was refuted on 3 March 2023. It is noteworthy that SANRAL did not defend this critique in the facilitated deliberations about the Amadiba N2 Petition. We pointed it out to the Committee on 27 February 2026 when asked to comment on the draft Report, but it was disregarded.¹²
- The alternative route does not plan for “two 500m+ long bridges across the Mzamba and Nthlakwe rivers”, but one bridge 500m long and 43m high bridge over Mzamba (compared to the 351m and 93m high bridge over Mzamba on SANRAL's coastal route). The coastal alternative will run over three additional deep river gorges by means of 55-60m high bridges, but the inland route bridges are in a landscape without steep and deep gorges.
 - As SANRAL conceded on 3 March 2023, that N2 through Lurholweni doesn't need “relocation of several hundred families”. It would only be the case where an 80m road reserve is required to achieve speeds of 120km/hour, whereas in similar situations, SANRAL works with road reserves of 40m and reduces speed limits to 80km/hour. SANRAL did not defend their critique when challenged again on 24 November. Still, it is now in the Report.
 - There is no “major additional cost” in the N2 project for upgrading R61. In 2022, SANRAL took over responsibility for this provincial artery that needs refurbishments and repairs.¹³ That budget disappears for 18km when R61 becomes N2 in the inland alternative. It is one of the reasons why the alternative route is cheaper to build.
 - The statements in the Report about too steep grades and too sharp bends on the proposed inland route are incorrect. SANRAL conceded this on 3 March 2023 when we handed over longitudinal and layout maps by our road engineers but repeated it now before the Committee when rehashing the old PowerPoint. In the 17 November PowerPoint, we detailed again the rebuttal. SANRAL had nothing to say.

An important error in the Report regarding Amadiba environmental classification

In the paragraph before section 5.9.2 in the Report it is claimed that “the SANBI map is missing information on several km”, that the grey area on the environmental classification map in the Petition is “not 16km of ‘other’ but 16km of ‘no information provided’ by SANBI”, and that “the sensitivity comparison made to the SANRAL route is therefore incomplete”. This also comes from the rehashed 2023 SANRAL PowerPoint.

¹² We attach the 27 February 2026 letter to the Portfolio Committee on Transport.

¹³ SANEWS.gov.za, Monday, February 28, 2022: [R61 reopened to the public | SAnews](#)

Already on 28 in January 2023, SANRAL accepted that this was blatantly wrong and retracted it. We had to rebut it again on 24 November 2025, but it is back in the adopted Report to the National Assembly. For the record: SANBI classified all EC areas in 2019. Everything became included in the gazetted 2020 Eastern Cape Biodiversity Conservation Plan.¹⁴ “Other” is short for “Other Natural Areas”. These are areas that have lost their conservational value. The map in the Petition is correct.

10. Section 5.9.2 has the headline “Effect of compromised alignments on the AIR”. We explained this in 2023, in November 2025 and we do it now again, that there are no “compromised alignments on the AIR”. The section also repeats an important conceptual mistake in SANRAL’s 2023 PowerPoint. The National Assembly should be cognisant of it, because it concerns all investment decisions in infrastructure.

- The section quotes from the old PowerPoint that the inland route is “requiring passing lanes for almost entire lengths of uphill and downhill”, and 8km of two passing lanes causing a “major additional cost”. But this and complaints of “large speed differentials” between heavy and light traffic were based in the belief that the proposed inland route have too steep bends and too sharp bends. The critique relating to too much of and too long passing lanes is also a red herring. Passing lanes are needed for both alternatives. Both must run upwards from Mtamvuna to the same point by Mtentu bridge over rock formations. Consequently, SANRAL reported to the Environmental Monitoring Committee in 2021: “120km/h 2 lane plus climbing lanes for most of the length with dual carriage way from R61/N2 Interchange to Mtamvuna River”.¹⁵ “Most of the length” refers to SANRAL’s 32.8 km coastal route.
- That it would be “professionally and ethically negligent” to route N2 through Lurholweni was retracted by SANRAL on 3 March 2023. Instead, the parties agreed to meet again and study that passage. As indicated earlier, SANRAL has reneged on this agreement.
- In section 5.9.2, the Report lets SANRAL erroneously repeat the 2023 argument that putting N2 in the centre of Amadiba “would add” R102m plus R42m per annum, i.e. R144 million, in “direct additional cost to the economy”. Because: there would not any longer be “a time-cost saving to motorists and freight operators of approximately R1.5 billion per annum” for freight companies and long-distance motorists.¹⁶ No, they would “only” win R1.356 billion per year from the new N2.

There is no “loss to the economy”. In Public Finance Economics the 13km difference between a 423km and a 410km highway short cut in Eastern Cape is a *social opportunity cost*: A top-up gain of R144 million to freight companies and motorists (as SANRAL’s calculates it) is moved from them to serve local community and regional development interests, and national interests, and even international interests, as described in the Petition and in the 17 November PowerPoint reply to

¹⁴ The October 2020 EC Provincial Gazette. No 4460; URL: [96.pdf \(saflii.org\)](https://www.saflii.org/za/other/cape-province/gazettes/2020/october/4460.pdf)

¹⁵ [Microsoft PowerPoint - N2WCR update 18Nov2021 SARF](#).

¹⁶ URL: [Progress on the N2 Wild Coast Road - SANRAL Stop Over \(stop-over.co.za\)](https://stop-over.co.za/progress-on-the-n2-wild-coast-road-sanral-stop-over/) or URL: [Despite community rumblings, multi-billion rand N2 Wild Coast Road Project steams ahead](#)

SANRAL.¹⁷ Unfortunately, the Report to Parliament ignores this rebuttal in the PowerPoint presentations to SANRAL. The Petitioners argue that we know better today than 15 years ago, than putting all development eggs in one basket.

The Facilitator's additions in the Report

11. During the engagement, we as representatives of the Petitioners found it necessary to point out in writing to the Committee that Hon. Ms. Nkopane had chosen to play a biased role during the bilateral meetings between the parties. We attach it here for the interested.¹⁸
12. Her prejudice against the Petitioners continues to shine through in her recommendations that are included in the Report.
 - In section 6.3.2, Hon. Ms Nkopane writes that some community members “who used to be part of the ACC are currently benefitting from the N2CWR as sub-contractors”. It is not true, and there is no prohibition in ACC against being hired for the Mtentu bridge project. Nonhle Mbuthuma explained this to Hon. Ms Nkopane during the engagement. The Petition instead has reference to the problem that local employment is blocked by corruption.¹⁹
 - In section 6.3.3 Hon. Ms Nkopane says that “a dim view” was taken regarding an opinion piece in Mail and Guardian that had angered her. We attach the comment that Hon. Ms Nkopane insisted Nonhle Mbuthuma must write to her.²⁰
 - SANRAL concedes in section 5.9.2 of the Report that it is less costly to build N2 in the centre of Amadiba. Hon. Ms Nkopane's contention in 6.3.8 that “there are no funds for the proposed inland route” disregards the large funds needed for building N2 on the coast.
 - On that note, 6.1.12 in the Report also quotes from the Petitioners 3 December submission that says “The proposed N2 will be with us for 100 years to come. Costs for not realigning the route will be immense and local development gains will be sidelined.”

2026-06-01

Respectfully Yours, and for your deliberations,

Nonhle Mbuthuma

for the Amadiba Petitioners

Malcom Campbell

Coordinator of ACC's technical team

¹⁷ [ACC RESPONSE TO THE SANRAL SUBMISSION TO THE TRANSPORT PORTFOLIO COMMITTEE](#)

¹⁸ The Letter to the Chair of the Portfolio Committee on Transport is attached separately.

¹⁹ [Amadiba answer SANRAL replying to the 12 May 2025 Amadiba Memorandum](#) was annexed to the Petition.

²⁰ The comment on the opinion piece is attached separately.