



COMMENTS AND RESPONSES REPORT

REVISED DRAFT SECTION 24G RECTIFICATION APPLICATION

APPLICATION IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) FOR THE UNLAWFUL COMMENCEMENT OF ACTIVITIES REQUIRING ENVIRONMENTAL AUTHORISATION FOR THE INSTALLATION AND OPERATION OF UNDERGROUND FUEL STORAGE INFRASTRUCTURE

TELKOM PARK CAMPUS

DFFE Reference Number:

14/12/16/3/2/105

JUNE 2026

REVISION STATUS:

Revised Draft for Public Participation Review

DFFE ADDITIONAL INFORMATION COMMENT & RESPONSE MATRIX

DFFE Reference Number: 14/12/16/3/2/105

DFFE Comment	Response / Amendment Undertaken
In our comments letter dated 06 November 2024, you were advised to provide a summary of the findings and recommendations of any specialist report or report on a specialised process considering the receiving environment prior commencement of the illegal activity. Noting that there was no screening tool conducted, it remains unclear as to what was used to define the sensitivity of the current environment in relation to the historical environment during the time of the illegal development. This information must be clear in the final S24G Report.	The DEIA Report has been amended to include a detailed discussion regarding the basis used to determine the historical environmental sensitivity of the site prior to commencement of the unlawful activity. The revised report confirms that the Telkom Park Campus was already an operational and historically transformed telecommunications facility prior to installation of the underground fuel storage infrastructure. Historical aerial imagery, specialist findings, site inspections and the DFFE Screening Tool Report were utilised to determine environmental sensitivities associated with the site. The revised report further confirms that groundwater remains the primary environmentally sensitive receptor associated with the unlawful activity.
The report must give a detailed analysis of the state of the environment when the tanks were installed in 1999 and 2004 versus the current state post tank installation. This information must quantify the cumulative impacts of the illegally commenced development.	The DEIA Report has been amended to include a comparative assessment of the historical and current environmental conditions associated with the site. The revised assessment confirms that the unlawful underground fuel storage infrastructure was installed within an already transformed operational footprint associated with the Telkom Park Campus. The cumulative impact assessment has further been updated to include the findings of the groundwater monitoring programme and associated localised hydrocarbon contamination identified within portions of the groundwater monitoring network.

A detailed description of the scope of the development, including the extent thereof, must be indicated on a map and according to scale.	The extent and location of the unlawful underground fuel storage infrastructure are illustrated in Appendix B1 (Overview of Existing Tankage), which provides a scaled layout of the existing underground fuel storage systems associated with the Core, Nexus and Hub facilities. Appendix B1 identifies the location, quantity and storage capacity of the underground fuel storage infrastructure forming part of the Section 24G rectification application. Reference to Appendix B1 has been strengthened within the DEIA Report to ensure clarity regarding the scope and extent of the unlawful activity.
The recommendations on page 11 of the Ground Water Monitoring Report dated December 2024, states that “ideally sampling should be carried out much earlier in the year and typically during the wetter parts of the year in June to August to enable sampling and adequate water in the monitoring wells.” The results for 2025 sampling during the relevant season must be included in the final S24G Report.	Updated groundwater monitoring results have been incorporated into the DEIA Report. Additional groundwater monitoring was undertaken during March 2026 and reported in April 2026. The findings of the updated monitoring programme, including groundwater quality results, Free Phase Product observations and specialist recommendations, have been incorporated into the revised Final Section 24G Report and the updated Groundwater Monitoring Report has been included as an appendix to the application.
It has been noted on page 2 of 14 of the Baseline Report that “the area is classed as a dolomite area which means all underground piping systems to be sleeved. None of the underground piping adheres to the prescribed dolomite management requirement as agreed with the local authority.” Considering that the existing infrastructure will be removed once the new infrastructure is in	The DEIA Report and EMPr have been amended to include detailed geohydrological and groundwater management measures associated with the unlawful underground fuel storage infrastructure situated within a dolomitic environment. The amendments include ongoing groundwater monitoring requirements, spill response procedures, leak detection and maintenance measures, Free Phase Product

operation, please provide details on how the impacts i.e., geohydrology impacts will be management to prevent continuous contamination of the geology and hydrology of the area.	management, contamination management measures, environmental auditing requirements and decommissioning commitments aimed at minimising ongoing groundwater contamination risk.
The diesel tank placement layout is noted; however, you are required to include a layout map overlain with sensitivity/ies that shows the site and each illegal activity and transgression point.	Environmental sensitivity overlay mapping associated with the unlawful underground fuel storage infrastructure has been included within Appendices B1 to B5 of the DEIA Report. The appended figures illustrate the location and extent of the unlawful fuel storage infrastructure and associated transgression points in relation to the identified environmental sensitivities, including biodiversity features, wetlands, watercourses and aquifer vulnerability classifications.
The EMPr submitted makes reference to the proposed tanks. You are reminded that the information regarding the planned tank will be addressed in a separate application.	The EMPr has been substantially revised to remove references to the proposed future fuel storage infrastructure, which will form part of a separate environmental application process. The revised EMPr specifically addresses the continued operation, monitoring, maintenance, contamination management, decommissioning, rehabilitation and closure of the existing unlawful underground fuel storage infrastructure associated with the Core, Nexus and Hub facilities.
The EMPr must detail the person who prepared the environmental management programme and the expertise of the person who prepared the environmental management programme.	The revised EMPr has been amended to include the details and expertise of the Environmental Assessment Practitioner responsible for preparation of the EMPr, including qualifications, experience and professional affiliations.

The EMPr must include information on proposed management and mitigation measures relating to planning and design, operation, rehabilitation and closure.	The revised EMPr has been amended to include detailed operational management measures, groundwater monitoring measures, spill response procedures, contamination management measures, decommissioning measures, rehabilitation measures and closure objectives associated with the unlawful underground fuel storage infrastructure.
The EMPr must identify the persons responsible for implementation of mitigation measures.	The revised EMPr identifies the responsibilities of the Applicant, Environmental Control Officer (“ECO”), Contractors and relevant personnel associated with implementation, monitoring and auditing of the environmental management measures.
The EMPr must include a detailed description of the aspects of the activity covered by the EMPr.	The revised EMPr includes a dedicated “Scope of the EMPr” section describing the aspects addressed by the EMPr, including operation, groundwater management, contamination management, monitoring, decommissioning, rehabilitation and closure.
The EMPr must include proposed mechanisms for monitoring compliance and performance assessment against the EMPr and reporting thereon.	The revised EMPr includes detailed monitoring, auditing and reporting requirements, including ongoing groundwater monitoring, environmental auditing, incident reporting, environmental registers and ECO auditing requirements.
The EMPr must include measures to rehabilitate the environment affected by the activity.	The revised EMPr includes rehabilitation measures associated with decommissioning of the underground fuel storage infrastructure, including management of contaminated material, rehabilitation of disturbed areas and ongoing groundwater monitoring where required.

The EMPr must describe the manner in which pollution and environmental degradation will be remedied, controlled or stopped.	The revised EMPr includes detailed contamination management measures, spill response procedures, leak detection systems, groundwater monitoring measures, incident response procedures and remediation commitments aimed at preventing and minimising environmental degradation.
The EMPr must include time periods within which mitigation measures must be implemented.	The revised EMPr includes operational and decommissioning phase implementation requirements together with ongoing monitoring and management commitments applicable throughout the operational lifespan of the underground fuel storage infrastructure and associated decommissioning activities.
The EMPr must include processes for managing environmental damage, pollution and ecological degradation.	The revised EMPr includes procedures relating to environmental incidents, contamination management, spill response, groundwater monitoring, incident reporting and remediation measures associated with operational and decommissioning activities.
The EMPr must include an environmental awareness plan.	The revised EMPr includes environmental awareness and training requirements relating to spill response, hazardous substance handling, groundwater sensitivity, environmental compliance and emergency procedures.
The EMPr must include closure plans, including closure objectives.	The revised EMPr includes a dedicated “Decommissioning, Rehabilitation and Closure” section detailing closure objectives, decommissioning procedures, contamination management

	requirements and rehabilitation commitments associated with the unlawful underground fuel storage infrastructure.
The revised draft S24G report must be subject to another public participation process of at least 30 days.	The revised Draft Section 24G Report and associated EMP _r will be subjected to an additional thirty (30) day public participation review period due to the inclusion of materially new information not previously included within the initial public participation process.
Please ensure that all issues raised and comments received during circulation of the revised draft S24G report are adequately addressed and included in the revised final S24G report.	All comments received during the revised public participation process will be recorded verbatim and responded to in detail within the updated Comments and Responses Report appended to the revised Final Section 24G Report.
Proof of correspondence with stakeholders must be included in the revised final S24G report.	Proof of stakeholder notification, authority consultation and correspondence associated with the revised public participation process will be appended to the revised Final Section 24G Report.
Please refrain from summarising comments made by I&APs. All comments must be copied verbatim and responded to clearly.	The updated Comments and Responses Report will include all comments copied verbatim together with detailed responses. Generic responses such as “noted” will not be utilised.
Minutes and attendance registers of meetings must be included where applicable.	Minutes and attendance registers associated with any meetings held during the revised public participation process will be appended to the revised Final Section 24G Report where applicable.

The EAP must ensure that comments of interested and affected parties are recorded and attached to the report.	All written comments, authority correspondence, records of meetings and associated public participation documentation will be appended to the revised Final Section 24G Report.
A motivation must be provided explaining why the Section 24G application should be considered favourably.	The DEIA Report has been amended to include a dedicated motivation section addressing the historically transformed nature of the site, operational necessity of the infrastructure, groundwater mitigation measures, environmental management commitments, decommissioning measures, rehabilitation commitments, lack of significant terrestrial ecological impacts and ongoing groundwater monitoring programme associated with the unlawful activity.