DRAFT SCOPING REPORT
DEA&DP: NOI REF. NO. 16/3/3/2/F4/23/3020/25.

in support of an

ENVIRONMENTAL AUTHORIZATION AND WATER USE AUTHORIZATION

for

THE PROPOSED DEVELOPMENT ENTAILS THE ESTABLISHMENT OF AN INDUSTRIAL DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE INCLUDING A WASTE WATER PACKAGE TREATMENT PLANT ON THE REMAINDER OF PORTION 9 OF FARM NO. 187 AND PORTION 3 OF FARM NO. 189, VREDENBURG.

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Executive Summary

All Billboard Solutions (Pty) Ltd propose development entails the establishment of an industrial development and associated infrastructure including a Waste Water Treatment Works on the Remainder of Portion 9 of Farm No. 187 and Portion 3 of Farm No. 189, Vredenburg. The proposed development of Industrial area on Farm 187 portion 9 and Farm 189 portion 3, Malmesbury, Vredenburg Area. The proposed development will entail the development of 20 Industrial erven (industrial zoning would be general that may include heavy industrial activities), roads and a WWTW. Proposed development area of ±252 ha, will consists of the Industrial Zone III erven of ±84.4609 ha, roads and the high botanical area included in the SOSS core area and as a conservation area in the Greater Saldanha Environmental Management Framework as a conservation area of ±141.3203 as Private Open Space Zone III.

The property is zoned Agriculture and is located outside an urban area. The proposal requires the property to be rezoned to Industrial Zone III and Public Open Space III.

Enviro-EAP is appointed as independent Environmental Assessment Practitioners to undertake the Environmental Impact Assessment Process for the proposed development.

This Environmental Authorization is undertaken in terms of the National Environmental Management Act 107 of 1998 and the EIA regulations 2014 as amended set out in Government Notice (GN R 983, 984 and 985) as well as the National Water Act, 1998 (Act no. 36 of 1998). Listed activities in terms of these regulations have been identified. The National Environmental Management Laws Amendment Act, Act 2 of 2022 (NEMLAA), came into effect on 30 June 2023. This Act added sub-section 24C(11) to the National Environmental Management Act, Act 107 of 1998, as amended (NEMA) which requires that *"a person who requires an environmental authorisation which also involves an activity that requires a licence or permit in terms of any of the specific environmental management Acts (i.e., NWA), must simultaneously submit those applications to the relevant competent authority or licensing authority, as the case may be, indicating in each application all other licences, authorisations and permits applied for"*.

The nature of the activities to be undertaken requires that a Scoping and Environmental Impact Assessment (EIA) process be undertaken.

Below is a summary of some of the main anticipated impacts related to the proposed development:

- Impacts on soil where soil disturbances will occur;
- Increased erosion risk due to the clearing of land for the proposed development leading to increase in storm water flow;
- Biodiversity/ecological impacts on i.e. terrestrial indigenous vegetation and habitat
- Heritage Impact Assessment including notice of intent to develop to Heritage Western Cape.
- Social impacts i.e. temporary and permanent job creation; dust and noise nuisance impacts; changes in health and social wellbeing; impact on demand for services

and amenities; need and desirability and scale of development; sense of place; etc.

The EIA will be evaluated by DEA&DP who will either issue an Environmental Authorization (usually with conditions), or alternatively, refuse the application for authorization.

The nature and extent of this development, as well as potential environmental impacts associated with the construction, operation and decommissioning phases are explored in more detail in the Scoping Report.

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LIST OF APPENDICES

GLOSSARY

"Activity"means an activity identified in any notice published by the Minister or MEC in terms of section 24D (1) (a) of the Act as a listed activity.
"Alternatives", in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to property, activity, design, operation or technology.
"Applicant" means a person who has submitted or intends to submit an application.
"Application" means an application for an Environmental Authorization in terms of the EIA regulations, 2014 as amended.
"Associated Infrastructure," means any building or infrastructure that is necessary for the functioning of a facility or activity or that is used for an ancillary service or use from the facility.
"Biodiversity" The variety of life occurring in an area, including the number of different species, the genetic wealth within each species, and the natural habitat where they are found.
"Cultural significance" This means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance.
"Cumulative impact" in relation to an activity, means the impact of an activity that in itself may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.
"Environmental Impact Assessment" in relation to an application to which scoping must be applied, means the process of collecting, organizing, analysing,

interpreting and communicating information that is relevant to the consideration of that application.
"Environment" The environment has been defined as "The external circumstances, conditions and objects that affect the existence and development of an individual, organism or group". These circumstances include biophysical, social, economic, historical, cultural and political aspects.
"Environmental Assessment Practitioner" Person or company, independent of the applicant (developer), that manages the environmental assessment process of a proposed project on behalf of the applicant.
"Environmental Impact Report" In-depth assessment of impacts associated with a proposed development. This forms the second phase of an Environmental Impact Assessment and follows on from the Scoping Report.
"Environmental Management Programme" means a programme presenting management and mitigation measures in relation to identified or specified activities envisaged in Chapter 5 of the National Environmental Management Act and described in regulation 34.
"Heritage resources" This means any place or object of cultural significance. It also includes archaeological resources.
"Interested and Affected Party" means an interested and affected party contemplated in section 24(4) (d) of the Act, and which in terms of that section includes - (a) Any person, group of persons or organization interested in or affected by an activity; and (b) Any organ of state that may have jurisdiction over any aspect of the activity.
"Public Participation Process" means a process in which potential interested and affected parties are given an opportunity to comment on, or raise issues relevant to, specific matters; *"Registered Interested and Affected Party", in relation to an application, means an interested and affected party whose name is recorded in the register opened for that application in terms of regulation 57.*
"Species of Conservation Concern" All those species included in the categories of endangered, vulnerable or rare, as defined by the International Union for the Conservation of Nature and Natural Resources.
"Significant impact" means an impact that by its magnitude, duration, intensity or probability of occurrence may have a notable effect on one or more aspects of the environment.

ABBREVIATIONS

SBM:	Saldanha Bay Municipality
CBA:	Critical Biodiversity Area
DFFE:	Department of Forestry, Fisheries and Environment
DEA&DP	Department of Environmental Affairs and Development Planning
DWS:	Department of Water and Sanitation
EMF:	Environmental Management Framework
EAP:	Environmental Assessment Practitioner
EMP:	Environmental Management Programme
EIA:	Environmental Impact Assessment
EIR:	Environmental Impact Report
FSR:	Final Scoping Report
HIA:	Heritage Impact Assessment

I&APs: Interested and Affected Parties
IDP: Integrated Development Plan
MAR: Mean Annual Rainfall
NEMA: National Environmental Management Act No. 107 of 1998
NWA: National Water Act No. 36 of 1998
PPP: Public Participation Process
PHRA: Provincial Heritage Resources Agency
SACNASP: South African Council for Natural Scientific Professions
SANBI: South African National Biodiversity Institute
SDF: Spatial Development Framework
ToR: Terms of Reference

SCOPING REPORT

SECTION 1: INTRODUCTION

This report has been prepared in compliance with the requirements of the following legislation:

- The National Environmental Management Act, 1998 (Act No. 107 of 1998) ["NEMA"] as well as the National Water Act, 1998 (Act no. 36 of 1998);
- The Environmental Impact Assessment ("EIA") Regulations contained in Government Notice (GN) No. R983, 984 and 985 of 2014 as promulgated in terms of the NEMA ["EIA Regulations"] as amended on 11 June 2021. The as well as the National Water Act, 1998 (Act no. 36 of 1998) under section 21 list water use for which authorization is required.

The purpose of these Regulations is to regulate procedures and set criteria as contemplated in Chapter 5 of the Act to enable the submission, processing, consideration and decision-making regarding applications for environmental authorization of activities and matters pertaining thereto.

1.1 APPLICATION FOR ENVIRONMENTAL AUTHORIZATION AND PROPOSED PROJECT DESCRIPTION

The proposed development will entail the development of 20 Industrial erven (industrial zoning would be general that may include heavy industrial activities), roads and a WWTW. Proposed development area of ±252 ha, will consists of the Industrial Zone III erven of ±84.4609 ha, roads and the high botanical area included in the SOSS core area and as a conservation area in the Greater Saldanha Environmental Management Framework as a conservation area of ±141.3203 as Private Open Space Zone III.

The property is zoned Agriculture and is located outside an urban area. The proposal requires the property to be rezoned to Industrial Zone III and Public Open Space III.

Table 1: Listed activities identified are as follows:

Activity No(s):	Provide the relevant **Basic Assessment Activities** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity 9: The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water— (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more; excluding where— (a) such infrastructure is for bulk transportation of water or storm water or		Bulk water pipeline connecting to an existing water pipeline next to the development area of longer than 1km with a throughput of more that 120 litres per second will be constructed in road reserves to supply the industrial erven with water connection points.

storm water drainage inside a road reserve or railway line reserve; or (b) where such development will occur within an urban area.	
Activity 24: The development of a road— (i) for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres; but excluding a road— (a) which is identified and included in activity 27 in Listing Notice 2 of 2014; (b) where the entire road falls within an urban area; or (c) which is 1 kilometre or shorter.	A road wider than 8m and longer than 1km will be constructed to give access to the newly established industrial erven.
Activity number 28: Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes	Proposed development area of ±252 ha, will consists of the Industrial Zone III erven of ±118 ha, roads of ±9ha and the high botanical area included in the SOSS core area and as a conservation area in the Greater Saldanha Environmental Management Framework as a conservation area of ±125.6ha as Private Open Space Zone III.
Activity No(s): Provide the relevant **Basic Assessment Activities** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity 4: The development of a road wider than 4 metres with a reserve less than 13,5 metres. (i) Western Cape (i) Areas zoned for use as public open space or equivalent zoning; (ii) Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the	A road wider than 8m on areas consisting of indigenous vegetation will be constructed to give access to the newly established industrial erven.

development setback line or in an estuarine functional zone where no such setback line has been determined; or (iii) Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.		
Activity 12: The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;		The proposed development will result in the clearing of more than 20 ha indigenous vegetation with an endangered ecosystem status.
Activity No(s):	Provide the relevant **Scoping and EIR Activities** as set out in **Listing Notice 2**	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity 15: The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.		The proposed development will result in the clearing of more than 20 ha indigenous vegetation.

Note:

- Only those activities listed which will be applied for shall be considered for authorisation. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. Environmental Authorisation must be obtained prior to commencement with each applicable listed activity. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted.
- The Minister responsible for mineral resources is the Competent Authority to deal with all applications where the listed or specified activity is directly related to-

(a) prospecting or exploration of a mineral or petroleum resource; or
(b) extraction and primary processing of a mineral or petroleum resource.

Coordinates of the proposed site(s) for all alternatives:			
Latitude (S)	32°	57‘	44.22“
Longitude (E)	18°	03‘	36.98“

1.2 BACKGROUND AND PURPOSE OF THE SCOPING REPORT

In accordance with the requirements of Regulation 3 of GN R984 (“The investigation, assessment and communication of the potential impact of activities must follow the procedure as prescribed in regulations 21, 22, 23 and 24 of the Environmental Impact Assessment Regulations published in terms of sections 24(5) of the Act, unless otherwise indicated by the Minister in a government notice”) as amended on 11 June 2021, also having considered the provisions of Section 24(5) of NEMA, it was determined that a scoping process be undertaken.

This report fulfils the requirement of the EIA Regulations for the documentation in the scoping phase. The structure of this report is based on regulation 21 of GN R.982 (“A scoping report must contain all information set out in Appendix 2 to these Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a government notice”), of the EIA Regulations as amended on 11 June 2021, which clearly specifies the required content of a scoping report.

1.3 ENVIRONMENTAL ASSESSMENT PRACTITIONER

1.3.1 Role and Competence of the EAP

The role of the Environmental Assessment Practitioner (“EAP”) is to manage the application for an Environmental Authorization (EA) on behalf of the applicant. The EAP must adhere to all relevant legislation and guidelines, ensuring that the reports contain all the necessary and relevant information required by the competent authority to decide. It is the responsibility of the EAP to perform all work relating to the application in an objective, appropriate and responsible manner. The EAP must comply with Regulation 13 of the EIA Regulations R982 of 2014 as amended, detailing the requirements for an EAP.

Nicolaas Hanekom of Enviro-EAP drafted the scoping report and is the registered EAP on the project.

Enviro EAP (Pty) Ltd is an environmental consultancy practice that is well placed to assist clients with:

- Environmental Management Systems and Programmes (Implementation and Auditing);
- Integrated Waste Management Plans;
- Environmental Compliance Auditing;
- Environmental Impact Assessments;
- Environmental Control Officers;
- On-Site Environmental Management;

- Ecology Specialist Studies (Terrestrial and Fresh Water Ecology)
- Air Quality Monitoring;
- Atmospheric emissions License Applications
- Water Use Authorization administration
- Search and rescue
- Freshwater and Terrestrial Ecology Monitoring
- Training Workshops Incorporating Environmental Compliance Matters.
- Game Farm management and monitoring
- Game introduction programmes

1.3.2 Professional Team

The following are the project team members:

- Nicolaas Hanekom –Environmental Assessment Practitioner
- Town Planning – CK Rumboll and Associates
- Animal, Plant, Aquatic and Terrestrial Biodiversity Specials – Nicolaas Hanekom
- Traffic Impact Assessment – Sturgeon Consulting

Nicolaas Hanekom is a qualified Environmental Assessment Practitioner and a registered Professional Natural Scientist (Ecologist) who holds a M. Tech, Nature Conservation from the CPUT. Nicolaas Hanekom is a registered Professional Natural Scientist in the ecological science field with the South African Council for Natural Scientific Professions ("SACNASP"), Pri Sci Nat (Reg. No. 004415) Ecological Science (Pri.Sci.Nat); Aquatic Science & Conservation Science (Cand.Sci.Nat) and a qualified registered Environmental Assessment Practitioner ("EAP") who holds a Masters Technologiae, Nature Conservation ("Vegetation Ecology and Biodiversity Assessment") degree from the Cape Peninsula University of Technology (Refer to Appendix A, CV). Nicolaas Hanekom is suitably qualified SACNASP registered specialist. He further qualified in Environmental Management Systems ISO 14001:2004 and completed the Internal Auditors Course to ISO 19011:2003 level, at the North-West University, qualifying him to audit to ISO/SANS environmental compliance and EMS standards. As the principal EAP, he is responsible for EIAs, waste licence and atmospheric emission licence and Section 24G applications. He also implements environmental management systems. Nicolaas conducts both fresh water and biodiversity assessments as well as baseline air quality monitoring.

1.3.3 Terms of Reference

Enviro-EAP is appointed as environmental consultant with the following Terms of Reference:

- Undertake an environmental evaluation of the applicable options and sites to get an understanding of biophysical characteristics and natural processes prevailing and to assess the proposed development proposals in terms of environmental characteristics by assessing the constraints and opportunities of the situation;
- Identify any anticipated impacts that might be considered at this early stage of the EIA process to suggest any specialist studies that may be required to provide

additional information on the significance of these impacts and mitigation that may be necessary to reduce negative impacts and enhance positive impacts of the proposed development;

- Co-ordinate the early start of the recommended specialist studies with the view to informing the compilation of the initial Environmental Opportunities and Constraints;
- In association with the specialist consultants, assist the appointed consulting engineers with the development of the optimum Site Development that will have the least impact on the both the biophysical and social environments. It is understood that as more detailed information is provided by the various specialist studies and I&APs, that the Environmental Opportunities and Constraints may need revision, and similarly, the SDP may need to be adapted;
- Undertake the applicable Scoping and EIA Process in terms of the Regulations of the NEMA to provide the relevant information for the DEA&DP and any other government officials, to be able to make informed decisions and to issue an Environmental Authorisation for the proposed development;
- As part of the Scoping and EIA Process, a comprehensive public participation process must be entered into. This process is to provide all the relevant information to the public, NGO's, CBO's and government officials, and to allow for adequate time for the public to respond to such information. The issues as raised by I&AP's must be taken into consideration in assessing the impacts of the proposed development and, making amendments to the proposed development;
- Assess alternative development options for the property in order to reduce any significant impacts that may arise. Prescribe the necessary mitigation to enhance any positive impacts and reduce any negative impacts that may arise as a result of the proposed development must be suggested;
- Facilitate any additional specialist studies that may be required to assist with the planning and future management of the proposed development; and
- Make the necessary environmental management recommendations (mitigation/ enhancement) for the construction and the operational phases of the proposed development, to ensure a sustainable development in the future.

1.4 LEGISLATIVE ASPECTS

1.4.1 Legislation

The following legislation is applicable to this project and has been considered in the preparation of the Scoping Report.

Table 2: Applicable legislation

List any other legislation that is applicable to the proposed activity or development.		
LEGISLATION	**ADMINISTERING AUTHORITY and how it is relevant to this application**	**TYPE Permit/license/authorisation/comment / relevant consideration**
Constitution of the Republic of	General application to individual rights of	Public Participation Process to be conducted

South Africa, 1996	all on and adjacent to the sites.	
National Environmental Management Act, 1998 (Act No. 107 of 1998) [NEMA] and relevant regulations	Western Cape Department of Environmental Affairs and Development Planning	Environmental Authorisation Application
National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) [NEMWA] and relevant regulations	Department of Environmental Affairs	Waste management requirements.
National Environmental Management: Biodiversity Act 10 of 2004 [NEMBA]	Western Cape Department of Environmental Affairs and Development Planning	N/A
National Water Act, 1998 (Act No. 36 of 1998) [NWA] and relevant regulations	Department of Water Affairs	Water Use Authorization required. The preliminary assessment and design of the package plant is to treat wastewater to General Standard limits which will most likely require an General Authorization. This will however finalise in the EIR and through the e-wulaas portal.
Conservation of Agricultural Resources Act, 43 of 1983 [CARA]	National Department of Agriculture, forestry and Fisheries Western Cape Department of Agriculture	N/A
National Health Act, 61of 2003 [NHA]		N/A
National Building Regulations and Building Standards Act 103 of 1977 [NBRBSA] and		N/A

relevant regulations		
National Heritage Resources Act 25 of 1999 [NHRA]	Heritage Western Cape South African Heritage Resource Agency	NID
National Veld and Forest Fire Act 101 of 1998 [NVFFA]		N/A
Western Cape Noise Control Regulations [P.N. 200/2003]		NA

Protocols

The protocol (Published in Government Notice No. 648 GOVERNMENT GAZETTE 4542110 MAY 2019. Published in Government Notice No. 1150 GOVERNMENT GAZETTE 43855 30 October 2020. Published in Government Notice No. Government Notice No. 320, Government Gazette 43110: 20 March 2020. These gazettes are also available free online at www.gpwonline.co.za) provides the criteria for the reporting of requirements for the assessment and reporting of impacts as identified in the DEA Screening tool report. Published in Government Notice No. 320 GOVERNMENT GAZETTE 43110 20 MARCH 2020 GAZETTED FOR IMPLEMENTATION: BIODIVERSITY PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON TERRESTRIAL BIODIVERSITY Published in Government Notice No. 320 GOVERNMENT GAZETTE 43110 20 MARCH 2020 GAZETTED FOR IMPLEMENTATION: BIODIVERSITY PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON AQUATIC BIODIVERSITY Published in Government Notice No. 1150 GOVERNMENT GAZETTE 43855 30 OCTOBER 2020 GAZETTED FOR IMPLEMENTATION: PLANT SPECIES PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON PLANT SPECIES Published in Government Notice No. 1150 GOVERNMENT GAZETTE 43855 30 OCTOBER 2020 GAZETTED FOR IMPLEMENTATION: ANIMAL SPECIES PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON ANIMAL SPECIES

1.4.2 Policies

An environmental policy is derived from the guiding principle whereby an organization first defines the scope of its commitment to the environment. The policy is a public document that communicates the organization's overall approach to managing its

interaction with the environment.

Various components of Environmental Management are strongly influenced by the environmental policies in terms of their scope and level of resource allocation. As a rule, objectives and targets are set to achieve compliance with the environmental policy, and overall environmental performance is evaluated against the organization's stated intent reflecting a level of commitment.
Policy must meet the following criteria:

- It must be relevant to the nature of an organization's activities, and the specific environmental aspects associated with those activities;
- It must consider specific local environmental conditions;
- It must consider relevant environmental legislation;
- It must define and formulate the organization's fundamental approach to environmental management; and
- It must set a precedent for communication and liaison with all stakeholders.

Policies considered in the compilation of this document include:

- National Spatial Development Framework;
- Provincial Spatial Development Framework for the Western Cape;
- Framework for a conservation plan for the Cape Floristic Region.

1.4.3 Guidelines

The following guidelines are applicable to this project, and have been considered in the preparation of the Scoping Report:

- Guideline on Public Participation;
- Information of Generic Terms of Reference and Project Schedules;
- Circular EADP 0028/2014: One Environmental Management System;
- Guideline for Involving a Heritage Specialist in an EIA Process (2005);
- Guideline for the Review of Specialist Input in the EIA process (June 2005);
- Guideline for Environmental Management Plans (June 2005);
- Guideline on Alternatives (March 2013); and
- Guideline on Need and Desirability (March 2013).
- The National Biodiversity Offset Guideline (23 June 2023)

1.5 SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

Appendix D, Comments and response table will include detail on competent authority requirements once available.

SECTION 2: DESCRIPTION OF THE PROPERTY

2.1 PROPERTY DESCRIPTION AND LOCATION

The site is situated in the West Coast District Municipality of the Western Cape Province and falls under the jurisdiction of the Saldanha Bay Local Municipality.

Development of Industrial area on Farm 187 portion 9 and Farm 189 portion 3, Malmesbury, Vredenburg Area.

The property is access via an existing access from the gravel road and R 45. Property SG codes are C04600000000018700009 and C04600000000018900003.

2.2 GENERAL CHARACTERISTICS AND LAND USE

The properties are located in Saldanha Bay Industrial corridor. It consist of agricultural zoned land.

The Namakwa Sands processing plant and the Orex rail terminal lie to the west of the site, with a portion of natural vegetation separating the Namakwa Sands site from the study area. Agricultural lands lie to the north and east of the site. There is a fairly large portion of natural vegetation immediately south of the site, just the other side of the road that links Saldanha Steel to the Velddrif road. A significant Eskom servitude runs the length of the site near the western boundary.

Recently worked agricultural lands cover about 50% of the site, and a further 20% or so has been previously cultivated but has lain fallow for well over twenty years, and has hence rehabilitated to some degree. The remainder of the site is still largely pristine, although it is used for grazing (springbok and perhaps other stock), and the landowner has ploughed small patches (<15% of the area) to plant cereals for the game to eat.

The proposed development is in line with the IDP and (SDF) spatial development plan of the municipality. The following is taken from the approval for consent use as received by the municipality:
“ The above approval was supported for the following reasons:

- The proposal is in line with the future development of industries to the south and along the R27;
- It blends with the provisions of the Eenzaamheid Special Management Zone;
- It is in keeping with the current land uses in the vicinity;
- The rights of affected property owners have been and will further be limited;
- Service requirements will be assessed and determined in the EIR phase and the municipal and services provider will be contact to confirm service capacity availability in the final EIR;
- All internal departments, as well as external departments, supported the proposal;
- The proposal is considered desirable in terms of Section 36 of the Land Use Planning Ordinance.”

Taken from the municipality’s IDP:
“ The Saldanha Bay area plays an important role in the broader strategic framework of the South African Government as driven by the National Development Plan and National Growth Plan. Saldanha Bay was identified as a presidential priority development region in 2011 by the National Planning Commission. The National Development Plan 2012 (NDP) identifies the Greater Saldanha region as a special intervention area, attributed to the natural deep water harbour and industrial development prospects that warrant its designation as a national growth management

zone. The Saldanha Bay Industrial Development Zone (IDZ) was officially launched by President Jacob Zuma on 31 October 2013. The establishment of the IDZ serves as an important mechanism to achieve the government's aim of sustainable economic development and job creation in the localized economy, diversification, and transformation of the historically under-developed and under-supported industrial maritime and energy sectors; and broadening of the regional and national economic base through industrialisation. The Western Cape Growth and Development Strategy of 2006 identified Vredenburg and Saldanha as 'Leader towns' and towns with high growth potential where fixed infrastructure investment should be focused. The Western Cape Growth Potential Study of 2014 has indicated towns in the municipal area as having medium to very high growth potential. The Socio-economic Profile of Saldanha Bay Municipality as issued by the Western Cape Government Provincial Treasury in 2015 indicates that the Saldanha Bay economy is amongst the fastest in the province. Iron ore export and crude oil import in the province take place exclusively through the port of Saldanha. The Provincial Treasury's Socio-economic Profile of Saldanha Bay Municipality indicates that Saldanha Bay is the fastest growing municipality in the district. The West Coast District Municipality's SDF (2014) identifies Saldanha Bay as a Major Regional Growth Centre and one three key development areas within the district (WCDM, 2014). Saldanha Bay is assessed as having very high growth potential and high social need in the Growth Potential Study undertaken in 2014 for towns and settlements outside of the Cape Metro. The draft Greater Saldanha Region Spatial Implementation Framework (2016) recognises the area as being the most significant area of spatial development potential within the West Coast district, ascribed to the massing of potential development projects in the area (as represented by the Saldanha Bay IDZ, port upgrades, projected upgrades of the Sishen- Saldanha iron ore programme etc.) and the coastal settlement areas seen as having tourism development potential (e.g. Langebaan, Paternoster, etc.). It further identifies the area as part of the southern portion of the District which has the strongest functional linkages to the Greater Cape Metro region and thus is most open to the movement of people, goods and trade at a scale most likely to have a material developmental impact."

"The Saldanha Bay IDZ (SBIDZ) is located within the Saldanha Bay Municipality. It extends from the Port area in the south up to Regional Route 45 (R45) to the north and includes land both east and west of the Sishen-Saldanha rail line which runs through the central part of the area in a north-south direction. It is the area around the present industrial area, i.e. around ArcelorMittal South Africa (Saldanha Works), Duferco Steel Processing (Pty) Ltd (Duferco), Tronox (Sands Smelter) and other industries."

Urban- and infrastructure development should aim to avoid impacting on the core area of the Besaansklip Industrial area. Private landowners should also be encouraged to join the WCNCB's conservation stewardship programme through an incentive scheme in order to conserve land identified as critical for biodiversity conservation in perpetuity. The implementation of the Strategic Biodiversity Offset Strategy for the Besaansklip Area should be prioritised.

The area falls inside the Besaansklip industrial area in the **Spatial Development Framework**.

The following was recorded in the proposed application area.

Core Landscape Area and Natural Environment

- Many of the industrial NDAs include CBAs. They are considered "trigger" CBAs. Should these CBAs be developed, "off set" CBAs will need to be acquired, either in the proposed industrial CBA corridor or elsewhere in the municipality.
- A corridor of CBAs from Besaansklip abutting Vredenburg across the southern end of the marshalling yard (at which only pedestrian and cycle connections may be achieved) across the access road over rail bridge, along the OP 7644 link road and connecting to the coast is proposed. These comprise the Saldanha Bay Industrial Area Offset Strategy Study (DEA&DP, 2017). Reference should be made to this study when considering development on land falling within these areas.
- This corridor has been carefully designed to maximise the CBAs so that they are also functional and easy to manage. It is important to avoid having too many difficult to maintain island remnants.
- All major routes should be boulevarded with suitable trees.
- In some instances it may be possible to extend the CBAs – e.g. east of SFF.
- Implement recommendations of the Red Dust Study (ERM 2012) to reduce negative effects on the tourist gateway to Saldanha, as well as the general staining of vegetation throughout the area and properties and buildings in the south of Vredenburg.
- A green, landscaped, treed buffer is proposed along the R27 to reduce the industrial visual impact on this route.

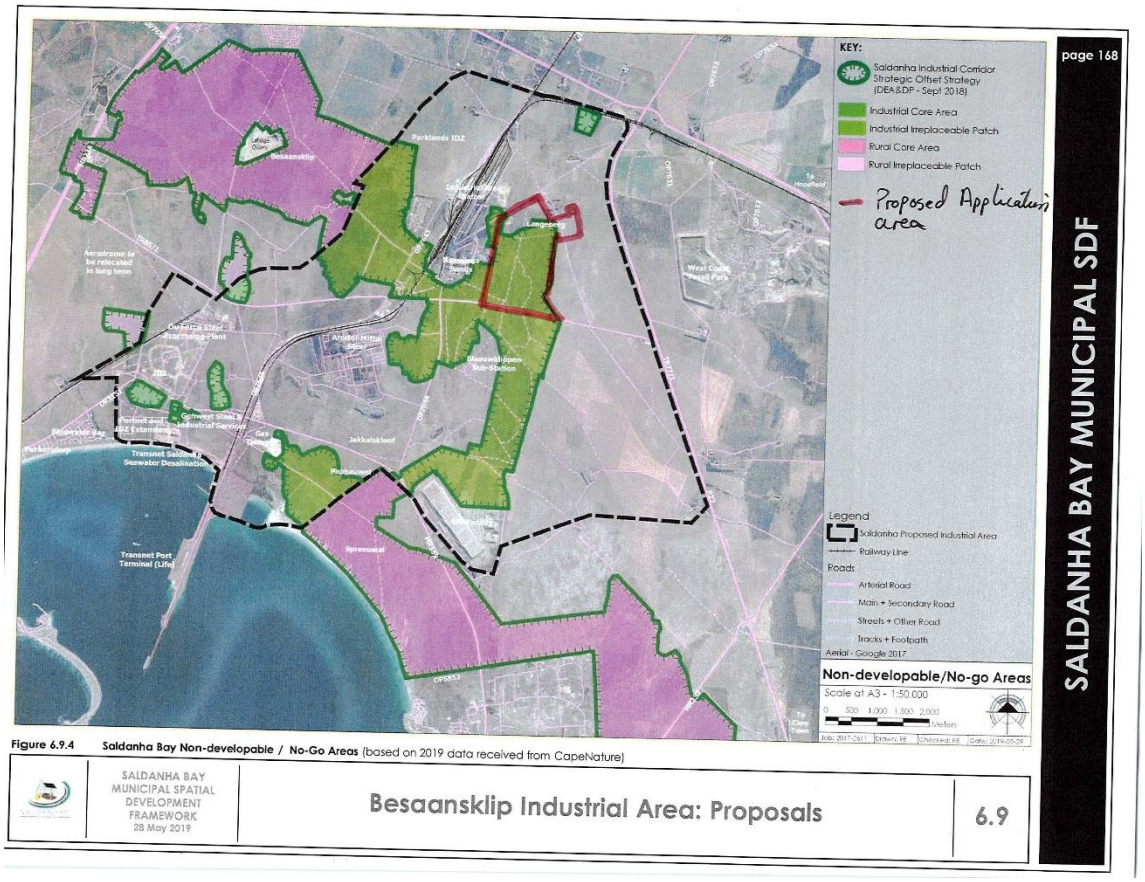
Industrial Development Areas

- A large industrial road grid is proposed based on a 1km x 1km grid (100 ha). This grid can accommodate single massive plants such as Arcelor Mittal Steel or Exarro. It can also accommodate a typical large industrial estate such as Epping One or Two in Cape Town, each of which are approximately 100 hectares. The grid is sufficiently flexible to be subdivided into small industrial parks if need be.
- 12 industrial NDAs are applicable. The development of these NDAs is very dependent on the global and local business prospects for the industrial area as well as the availability of infrastructure.
- Due to the massive scale of these proposals phasing will be necessary. In terms of reducing travel distances and infrastructure roll out, the appropriate 1st phase would appear to be NDA 1.
- The industrial areas should be developed as landscaped industrial estates with building design guidelines.
- Future longer term industrial growth is envisaged in a westerly direction adjoining NDA8.

Urban Restructuring

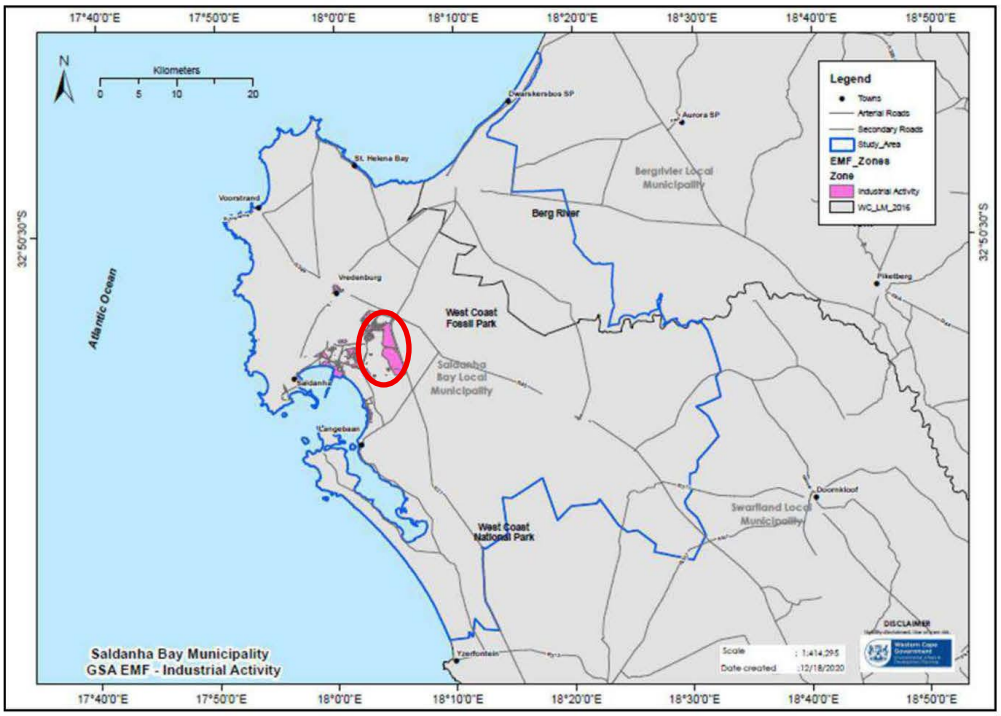
- No residential development is proposed, but a mixed use business center will be required in the future. This is proposed opposite Arcelor Mittal central to the area, see NDA 11.
- Freight road access should be confined to the TR85/1 east from the R27 as much as possible.
- All the roads from the SBM towns should facilitate PT and NMT transport including separate Class I cycle lanes. These should also be installed along the TR85/1.
- Address accident red spots at the TR85/1 /Jacobsbaai and R45/R27 intersections.

- The rail line through Vredenburg and to Saldanha should be removed and a new direct link between Duferco Steel and the marshalling yard constructed.



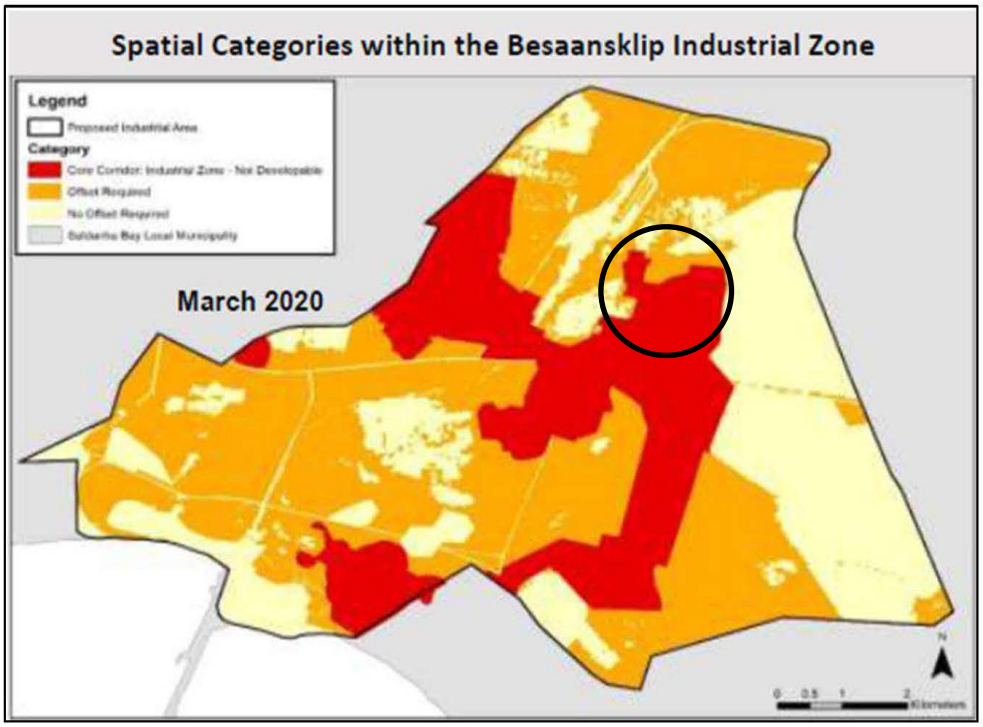
Greater Saldanha Bay EMF established in the area.

The proposed application area is located on portions of the SPC: Urban Development – Industrial Activities.



Map 31. EMZ: Industrial Activity Zone / SPC: Urban Development

A portion of the proposed development is located in the SOSS core area. Other areas are located in the offset areas that would require offsets. The proposed development has a significant core area as identified in the SOSS that will be used as the required offset area.



Map 32. Besaansklip Industrial Area.

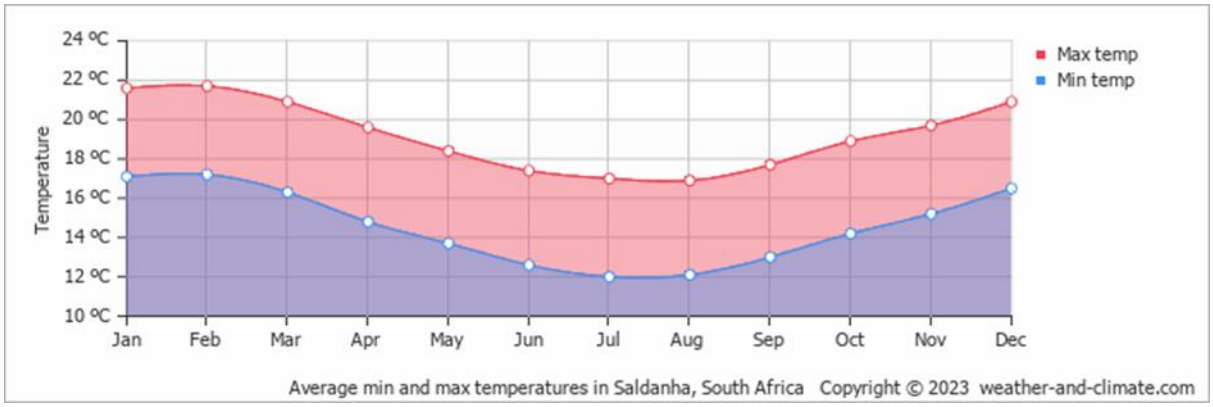
2.3 SPECIFIC CHARACTERISTICS

2.3.1. Biophysical Elements

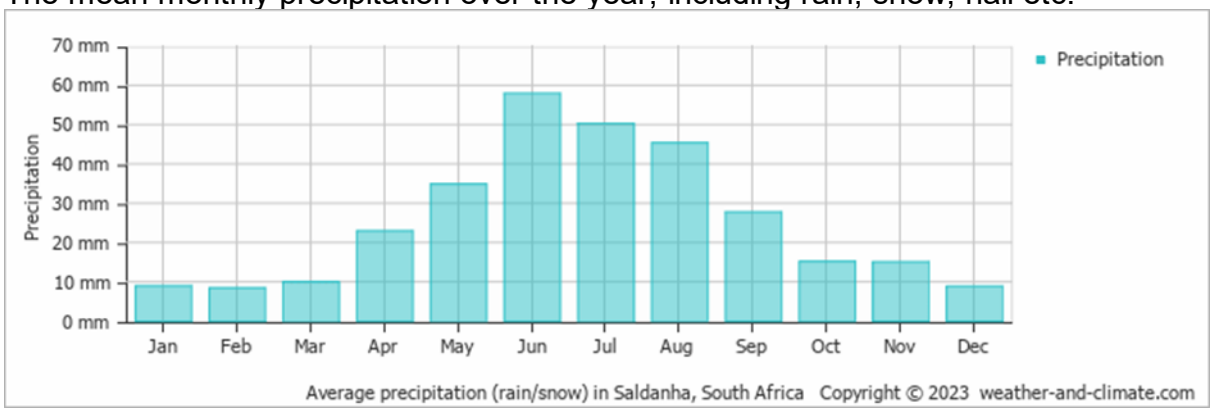
2.3.1.1 Climate

The graphs below show the monthly weather averages over the year.

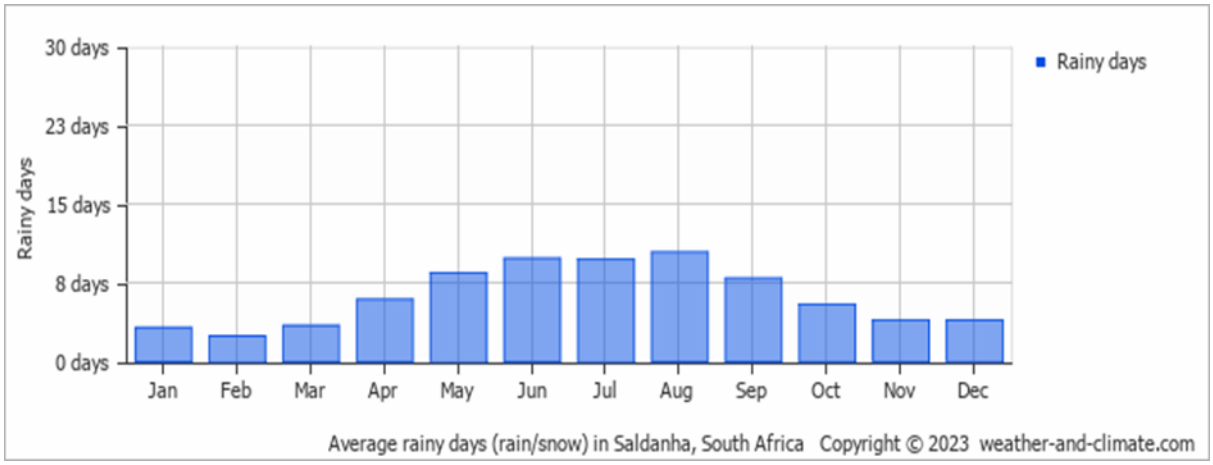
Average day and night temperature
The mean minimum and maximum temperatures over the year.



Monthly precipitation
The mean monthly precipitation over the year, including rain, snow, hail etc.



Monthly rainy days
The average number of days each month with rain, snow, hail etc.



2.3.1.2 Topography

The site is flat with the highest elevation in the north at 26m above mean sea level and in the southern section it is 23 meters above mean sea level.

2.3.1.3 Geology and Geohydrology

Soils are deep to shallow loamy sands (partly derived from granites), with occasional lenses of shallow limestone (calcrete). The deeper soils have largely been ploughed. In the far western portion of the site is a low limestone ridge, which has been heavily impacted by grazing and trampling in its northern extent. This ridge extends west into the neighbouring properties, where parts of it have been quarried. There is thus an edaphic (soil) interface on the western parts of the site, which is an important element of ecological spatial processes (De Villiers et al 2005), but this has been largely destroyed by agriculture in the northwest parts of the site, but is still intact in the southwest. The site is relatively flat and there are no altitudinal gradients. No permanent or seasonal wetlands are found on the site.

The area is underlain near entirely by limestone and hardpan calcrete (calcified dune sand) of the Langebaan Formation, Quaternary Age. Isolated occurrences of granite of the Cape Granite Suite consists of core stones, which are visible at the surface in places, but were also encountered at depths of up to 1.4 m below surface. The granite boulders are covered by loose silty sand with fine gravel (soils and pedogenic (calcrete) materials) which were most probably deposited directly onto the granite.

Geohydrology

Aquifer Type and Yield
Classification: Intergranular and fractured 0.0 - 0.1 l/s
Depth to Groundwater
Depth (mbgl): 8.58
Groundwater Recharge
Recharge (mm/a): 14.04
Groundwater Quality
EC (mS/m): > 520
Aquifer Classification
Classification: Poor

Aquifer Susceptibility
Susceptibility: Least
Aquifer Vulnerability
Vulnerability: Least
Source: CapeFarmMapper, dated 1 February 2024

2.3.1.4 Surface Water Features

There is no non-perennial river, water courses or wetlands inside the development area or in close proximity to it.

2.3.1.5 Flora

The Saldanha – Vredenburg Peninsula (Langebaan – St Helena) supports at least four threatened vegetation types, according to the vegetation map of South Africa (Mucina & Rutherford 2003), one of which (Saldanha Flats Strandveld) would originally have covered most of the study area. Three of these vegetation types (the other two are Saldanha Limestone Strandveld and Saldanha Granite Strandveld) are listed as Endangered vegetation types in the new South African National Spatial Biodiversity Assessment (Rouget *et al* 2004), which is an indication of the high degree of threat to the remaining natural vegetation in the area. The ongoing industrial and residential expansion in the area has increased the pressure on the remaining natural vegetation, which has potentially severe consequences for some of the thirty five or so plant species which are found only in this area, ie. the Saldanha - Vredenburg endemics (Helme - unpub. data). The concentration of rare plant species in the area, and the increasing threats to all three vegetation types have resulted in the identification of the entire Vredenburg Peninsula as a priority for a fine-scale conservation plan, and the compilation of this is currently underway (SA National Biodiversity Institute and CapeNature). A fine-scale conservation plan is a nationally recognised conservation plan, and would identify key areas and habitats for conservation action.

The study was conducted in early October, and thus many of the bulb and annual species were over, and not always identifiable. However, a habitat-based approach was used in order to compensate, and extensive recent experience in the general area allows me to have a high confidence level in my findings.

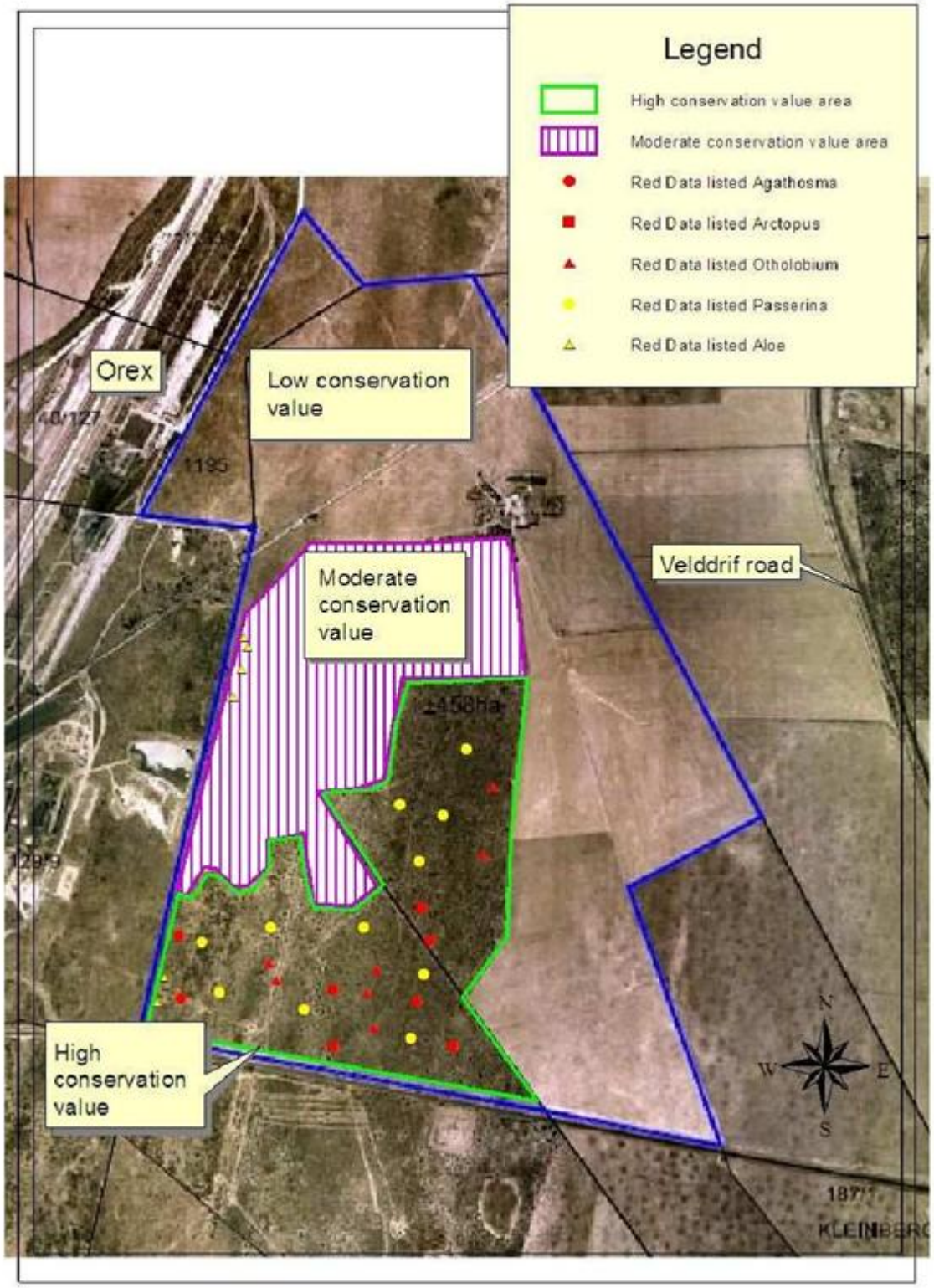


Figure 1: Botanical Conservation Value map of the site. High conservation value areas are not suitable for development, and moderate conservation value areas will rehabilitate over time.

2.3.1.6 Fauna

The environmental screen tool report listed - *Circus ranivorus*, *Circus maurus, Falco biarmicus* and *Afrotis afra* (high sensitivity), and *Hydroprogne caspia* and *Bullacris*

obliqua (medium sensitivity). None of the above species were recorded or observed at the time of the field surveys. No Threatened or Protected Species were recorded on site.

Description of the Animal (Fauna) Species

Fauna occurring on site include assemblages within the ecosystem and these could include mammals, birds, reptiles, amphibians, fish and invertebrates.

Identify The SCC Which Were Found, Observed Or Are Likely To Occur Within The Study Area

The proposed development, although it can possibly impact on animal species, will not result in the loss or significant impacts on the population size of any species and change the conservation status of these species nor lead to its extension. This is because the impacted area and habitat loss is very small in terms of the total available habitat for these species.

***Bullacris obliqua* – Vulnerable**
http://speciesstatus.sanbi.org/assessment/last-assessment/4376/

Rationale

Bullacris obliqua is endemic to the south-western regions of South Africa, where it has an estimated area of occupancy (AOO) of between 100 and 3,000 km². This has likely resulted from habitat destruction due to extensive urban development and farming across the geographic range of the species. The number of subpopulations and individuals is also inferred to be declining based on the species being relatively uncommon in the field, and undetected in certain areas of the Western Cape where it was historically recorded. The population is severely fragmented. The AOO is here assumed to be higher than 500 km² and lower than 2,000 km² and, therefore, it is classified as Vulnerable (VU).

Distribution

Bullacris obliqua is endemic to the west coast of South Africa, where it occurs in both the Western Cape and Northern Cape Provinces. It has a more patchy distribution than other Pneumoridae species inhabiting these areas. Its extent of occurrence (EOO) is ca 33,500 km² and its area of occupancy (AOO) is estimated to be between 100 and 3,000 km².

Terrestrial

Bullacris obliqua inhabits the Fynbos biome. Eriocephalus africanus is currently the only confirmed host plant for this species.

Population trend

Bullacris obliqua emerges seasonally, and has been observed from August to November. The species is not commonly encountered in the field, despite fairly

extensive surveys within its geographical range. It also appears to be absent from some areas where it was historically recorded to occur. Therefore, a continuing decline in the number of subpopulations and the number of mature individuals is inferred. The species has a discontinuous distribution with very small subpopulations, and there is unlikely to be much gene flow between geographically separated subpopulations as females are flightless. Therefore, the population is considered severely fragmented.

Threats

Potential threats to Bullacris obliqua include climate change resulting in a loss of habitat due to less rainfall and land use change as a result of urban development and agriculture.

Uses and trade
This species is not utilised.

Conservation

There are no conservation actions for the species, but it occurs in protected areas. Colour variation exists within the species, with some subpopulations having a distinctive and striking pattern of whitish stripes on a grey-green background, while other subpopulations are uniformly green without any stripes. It is morphologically somewhat similar to Bullacris discolor (Dirsh 1965), but easily distinguished by its very distinctive advertisement call. Research into its ecology, threats and population trend is required. Remaining habitats need to be protected to avoid future declines.

Invertebrates

Observations and Findings
The area will not have a rich and diverse invertebrate life as a result of the disturbed nature of the ecology, habitat and vegetation on the investigated area. The development will not have significant detrimental impact on invertebrate species.

Birds (Avifauna)

212 species are known to occur in the bigger area (Hockey et al 2006).

Observations and Findings:

No sensitive breeding or roosting sites were observed on site during the survey.

It is expected that the proposed development will not impact on any listed bird species. Bird species known to occur on the property will be impacted upon by the proposed development, but they could simply fly away to adjacent indigenous vegetation areas.

The following sensitive species were recorded in the environmental screen report:

(Aves) Black Harrier *Circus maurus*
Black Harriers are southern Africa's rarest endemic raptor and have been uplisted from Vulnerable to Endangered in South Africa and Namibia in 2015. These top predators

are a rare endemic to the southern African sub region with fewer than 1000 mature breeding birds left in the population. Studies have shown that there is little genetic variation across the population, indicating that this species is not in good shape and needs some serious conservation assistance going forward. Black Harriers breed in the montane fynbos, renosterveld and strandveld habitats of the Western Cape and many individuals disperse into the karoo and grassland habitats during the autumn and winter months. The breeding success of Black Harriers is largely driven by winter rainfall in the Western Cape according to PhD student Marie-Sophie Garcia-Heras' work at the Fitzpatrick Institute of African Ornithology at the University of Cape Town. Through the analysis of 400 nests over 15 years, her work has shown that the amount of rainfall which falls between April to September has a direct relationship with clutch size – more rain equals more eggs. Geographic location also influenced breeding behaviour with inland birds breeding over a shorter period than coastal birds. Inland harriers have a small window in which to breed and will thus lay larger clutches earlier in the season, however, this subpopulation has shown declines over time. Coastal birds, however, exploit the more benign weather conditions and feed on larger proportions of mice which allow them to produce more young over a longer period. The coastal population is believed to contribute the most number of new individuals to the overall population. The inland populations of Black Harriers have become increasingly fragmented through habitat loss and population declines and it is vital that conservation efforts invest in preventing fragmentation of coastal populations[1].

No Black Harriers were recorded at the time of the survey. However, they were previously observed foraging in the surveyed area. However, due to the small area to be impacted and the extended habitat in the area, the proposed mining activity will not result in a loss or decline in the conservation status of this species.

(Aves) Southern Black Korhaan *Afrotis afra* – High Sensitivity

Rationale
The population of the endemic Southern Black Korhaan *Afrotis afra* is suspected to have undergone a greater than 30% decline over the past three generations, qualifying it as regionally Vulnerable.

Distribution
The species is endemic to the region, being confined to the winter- and mixed winter-summer rainfall areas of the Albany Thicket, Fynbos and Succulent Karoo biomes, and the southern extreme of the Nama Karoo Biome, in South Africa's Western, Northern and Eastern Cape provinces (Crowe et al. 1994, Allan 2005). Records in Limpopo, Gauteng, Free State and northern extremities of Northern Cape are attributable to misidentifications of the Northern Black Korhaan. A comparison of SABAP1 and SABAP2 reporting rates indicates a decrease in 226 of the 284 QDSs in which the species was reported in either project (Hofmeyr 2012). The species has been recorded in 20 IBAs in the region.

Population
The global population size has not been quantified and requires urgent investigation.

[1] https://www.birdlife.org.za/what-we-do/landscape-conservation/what-we-do/raptors/black-harrier/

Population trend
Historically described by Stark and Sclater (1906) as very common and certainly the most abundant of all game birds throughout the Cape Colony; by Uys and Macleod (1967) as one of the dominant species of Coastal Fynbos; by Clancey (1973) as locally common to common; and by Hockey et al. (1989) as a common resident. Although the Southern Black Korhaan still occurs at relatively high densities in small patches of optimal habitat, it is now generally scarce and localised, and the population is undergoing a decline. Comparing reporting rates from SABAP1 and SABAP2, populations in Western Cape showed the most widespread reduction in reporting rates (86% of QDSs), followed by Northern Cape (73%), and Eastern Cape (71%). It is unlikely that these declines were an artefact of the change in atlasing protocol (Hofmeyr 2012), as the species is conspicuous.

Coordinated Avifaunal Roadcounts (CAR) data suggest that the Overberg and Swartland populations declined between 1998 and 2010, while a small portion of the Eastern Cape population showed an increase in numbers after a period of initial decline during a similar period (Hofmeyr 2012). These data showed a higher density in Eastern Cape, which may be explained by the smaller extent of habitat transformation in the Karoo, or may be an artefact of greater detectability in Karoo vegetation compared to Fynbos. Overall, based on data from both SABAP and CAR, the population is thought to have declined by greater than 30% since SABAP1 (1987-1993). The confidence in this estimate is medium.

Threats
The primary threat to the species is probably habitat loss and degradation due to cultivation (Hofmeyr 2012). Further research is required to understand the reasons for the decline of this species; however, climate change, human disturbance and increased nest predation by corvids may have also played a role (Hofmeyr 2012)[2].

None were recorded at the time of the survey. Due to the small area to be impacted and the extended habitat in the area, the proposed mining activity will not result in a loss or decline in the conservation status of this species.

(Aves) African marsh harrier *Circus ranivorus* – High Sensitivity

Rationale
The decrease in the regional population of African Marsh Harrier *Circus ranivorus* is believed to be sufficiently rapid to satisfy the thresholds for regionally Endangered under the population trend criterion A2 (greater than 50 % decline over a 24 year period (three generations)). The population size is believed to fulfil the requirements for regionally Endangered under the population size criterion C1 (less than 2 500 mature individuals with a continuing decline estimated to be greater than 20% in the next five years or two generations, or with a specified population structure).

Distribution
The African Marsh Harrier is sparsely distributed across wetlands throughout central and east Africa, and southwards to southern Africa (Ferguson-Lees and Christie 2001). It is absent from areas with less than 300 mm of annual rainfall (Simmons

[2] http://speciesstatus.sanbi.org/assessment/last-assessment/2965/

1997). The Okavango Delta in northern Botswana is considered to be a stronghold (Simmons 1997), with the species also occurring in neighbouring Zimbabwe and Mozambique (Ferguson-Lees and Christie 2001). Within the region, it occurs in high densities in higher rainfall coastal regions from Zululand down to Western Cape, as well as in Mpumalanga, Gauteng, Limpopo and North West provinces (Simmons 2005). It is absent from the drier parts of Northern Cape and inland areas parts of Western Cape. In Swaziland, the species is patchily distributed across the Highveld in the west of the country and is a non-breeding visitor to the eastern Lowveld (Parker 1994).

The EoO estimates indicate that the species' overall range has not contracted between the atlas periods, but the AoO estimates show an alarming 46.51% decline at sites within its original range. It is unlikely that short-term fluctuations due to rodent populations and rainfall can explain the decrease in AoO as SABAP2 data gathering has been running for more than five years (RE Simmons pers comm.). In addition, the species is easily identifiable and highly conspicuous when foraging. The African Marsh Harrier is well represented within the Important Bird Area network in the region, although the decrease in AoO outside of these sites is a cause for concern.

Population

The global population has not been quantified (BirdLife International 2014). Cohen (2000) estimated there to be 6 000-10 000 mature individuals in the region. The number of mature individuals present in Swaziland is not known (Monadjem et al. 2003), but is estimated to be less than 100. Tarboton and Allan (1984) estimated that a pair of African Marsh Harriers require a minimum of 100 ha of wetland as a breeding territory. The current regional AoO is approximately 3 000 km2 or 300 000 ha which could, conceivably, hold up to 6 000 mature individuals. The uncertainty as to how many wetlands of greater than 100 ha within the region are occupied, the relative densities at which this species occurs in different habitat types, and the area outside of wetlands that is required for foraging, make estimating a regional population problematic. The rapid decline in AoO indicated by SABAP2 suggests that the 20% decline in the regional population predicted by Cohen (2000) has indeed occurred, and in all likelihood has occurred more rapidly than predicted. It is estimated that the current regional population is 3 500-4 500 mature individuals. The confidence in this regional population estimate is low.

Population trend

The global population is in decline (BirdLife International 2014). Provided the estimate of 6 000-10 000 mature individuals in the region by Cohen (2000) is accurate, then the decrease in the regional population over the past three generations is estimated to be *c.* 85%. This would mean that in 1988 (3 generations ago) the estimated population would have been approximately 20 000 mature individuals, which may be an overestimate based on the amount of available habitat within the region. Accordingly, the decrease in the regional population is believed to be closer to 60% over the past three generations. The confidence in this estimate is low and requires verification.

Threats

The primary threat faced by this species is loss and degradation of its sensitive wetland habitats, brought about by drainage or damming for development and agriculture (Monadjem et al. 2003), as well as pollution. Changes in the extent of moist wetland

edges and surrounding grassland (i.e. prey habitat) could be more significant than changes in the extent of permanently inundated wetland and reedbeds (CA Whittington-Jones pers. comm.) although the species may partly be able to adapt to constructed wetlands, e.g. dams and sewage works. Inappropriate burning regimes and intense grazing have also negatively affected marsh harriers (Cohen 2000). With increases in development as well as agriculture, many wetlands and other potential habitat will be drained and so this species is likely to continue to decline. Direct disturbance, especially during the breeding season when harriers are intolerant of humans, may also be a threat[3].

Lanner Falcon *Falco biarmicus* Near Threatened - High sensitivity
http://www.biodiversityexplorer.info/birds/falconidae/falco_biarmicus.htm
Hockey PAR, Dean WRJ and Ryan PG 2005. Roberts - irBds of southern Africa, VIIth ed. The Trustees of the John Voelcker Bird Book Fund, Cape Town.

Distribution and habitat

Occurs in southern and south-eastern Europe, the Middle East, south-western Asia and much of sub-Saharan Africa, excluding the lowland forests of the DRC and West Africa. In southern Africa it is fairly common across the region, largely excluding Mozambique. It generally favours open grassland, cleared or open woodland and agricultural land. While breeding it is most common around cliffs used as nesting and roost sites, although it may also use buildings, electricity pylons and trees.

Distribution of Lanner falcon in southern Africa, based on statistical smoothing of the records from first SA Bird Atlas Project (© Animal Demography unit, University of Cape Town; smoothing by Birgit Erni and Francesca Little). Colours range from dark blue (most common) through to yellow (least common). See here for the latest distribution from the SABAP2.

Predators and parasites

It has been recorded as prey of Bubo capensis (Cape eagle-owl).

Movements and migrations

Partial migrant in southern Africa, as many juveniles depart from their breeding grounds around December-January in the eastern grasslands of South Africa, heading west and south-west to the Kalahari, Karoo and the Western Cape.

Food

It eats mainly birds, especially doves, pigeons and chickens, hunting using extreme speed to surprise its prey. It often hunts from a high perch or while soaring high up in the air, making a steep and rapid dive to intercept a bird either aerially or on the ground. It often hunts in pairs (see photo below), enabling them to catch large or highly illusive prey. The following food items have been recorded in its diet:

[3] http://speciesstatus.sanbi.org/assessment/last-assessment/3026/

Monogamous territorial solitary nester, probably with a long pair bond, although a nest was once recorded to have two males and one female attending it, suggesting polyandry. The nest is typically a simple scrape in sand or soil on a cliff ledge or is placed in another structure such as a building or nest box. It may also use the stick nest of another bird such as a White-necked raven, Verreaux's eagle or Bateleur, sometimes displacing them while they are breeding and possibly killing their chicks in the process. As these stick nests are often on utility pylons and poles, Lanner falcons have been able to colonise treeless areas where they have not previously occurred. Egg-laying season is from late May to early September. It lays 1-5 eggs, which are incubated mainly by the female for about 32 days, starting with the egg laid last or second last. The chicks are brooded constantly by the female for the first few days of their lives, after which they are brooded intermittently for about 1-2 weeks. Even then the female still remains close to the nest, relying on the male to do most of the hunting. The young eventually leave the nest at 42-45 days old, becoming fully independent about 1-3 months later.

Threats

Not threatened globally but Near-threatened in South Africa, due to local extinctions possibly caused by a vulnerability to agrochemicals. It has however benefited from the clearing of savanna and the increasing availability of free-range poultry.

None were recorded at the time of the survey. Due to the small area to be impacted and the extended habitat in the area, the proposed development will not result in a loss or decline in the conservation status of this species.

Caspian Turn *Hydroprogne caspia* Vulerable
http://speciesstatus.sanbi.org/assessment/last-assessment/03181/

Rationale

The regional population of Caspian Tern Sterna caspia is estimated to be less than 1 000 mature individuals. In addition, the species has a restricted number of breeding locations leaving it prone to the effects of human activities or stochastic events within a short time period. Accordingly, the species is assessed as regionally Vulnerable.

Distribution

Despite being distributed globally, the species is thinly spread throughout the Holarctic, Australasian, Oriental and Afrotropical regions (Voous 1960). Within the region, it is concentrated at estuaries and sheltered bays along the coastline and at large, permanent inland waterbodies (Brooke 1984). Twenty-eight historical breeding localities are known although the species currently breeds at only ten sites, two of which are Important Bird Areas, namely iSimangaliso Wetland Park (IBA SA058) and West Coast National Park and Saldanha Bay Islands (IBA SA105). The movement of a ringed bird from Algoa Bay, Eastern Cape to Lake St Lucia suggests that the southern African breeding populations may not be isolated from each other (Martin 1991).

Population

The global population is estimated to number c. 240 000-420 000 mature individuals (Dodman and Diagana 2006). The regional population is a small portion of this. In 2011 in Western Cape, 69 pairs bred on private property near Velddrif; eight pairs bred at Caspian Island in the southern portion of Langebaan Lagoon; one pair bred on each of Jutten, Meeuw and Schaapen islands in Saldanha Bay; and one pair bred on Robben Island offshore from Cape Town (Crawford et al. 2012). Further east, several pairs breed at De Mond Nature Reserve near Aniston. Crawford et al. (2009) reported c. 50 pairs at the Swartkops River estuary in Eastern Cape and c. 170 pairs at False Bay in Lake St Lucia, KwaZulu-Natal. The regional breeding population is in the order of 300-316 pairs (Kemper et al. 2007, Crawford et al. 2012). The confidence in this population estimate is high.

Population trend

The global population trend is increasing, although some populations are decreasing, stable, or have unknown trends (Dodman and Diagana 2006). Between 1980-1991, Cooper et al. (1992) estimated the regional population to be in the order of 1 500 birds with about 1 000 of those being mature individuals. It must be noted that there is sometimes extreme fluctuations in the number of birds breeding at a locality; for example, counts at Lake St Lucia, KwaZulu-Natal between 1975 and 1985 ranged from as low as six to a maximum of 833 birds (Ryan et al. 1986). The current population estimate of 600-650 mature individuals represents a reduction of 30-35% over three generations. Confidence in this regional trend estimate is medium.

Threats

The primary threats to this species are during the breeding period when it is highly susceptible to human disturbance including through egg collecting and predation by domestic dogs (Martin and Randall 1987), and even potentially through avitourism. Extreme weather events such as heavy rainfall, droughts and heat waves can also impact on the breeding success of this species (du Toit et al. 2003). Underhill (2000) pointed out that rising water levels may flood nests, while falling water levels grant access to terrestrial predators. Kelp Gulls Larus dominicanus are also notable nest predators. Lesser threats which deserve more investigation include the bio-accumulation of heavy metals, pesticides, and other chemical pollutants (to which this species may be particularly prone because it eats relatively large fish); this may lead to eggshell thinning and other impacts on breeding success (Underhill 2000).

Conservation Underway

Jutten, Schaapen, Meeuw and Caspian islands are all accorded Ramsar site status and, together with West Coast National Park, fall within the National Park network. Lake St Lucia is included under the iSimangaliso Wetland Park, a World Heritage Site as well as a Ramsar site. The species is listed on Appendix II of the Convention on the Conservation of Migratory Species of Wild Animals and under the African Eurasian Waterbird Agreement. The species is included in CWAC surveys undertaken under the auspices of the Animal Demography Unit of the University of Cape Town. There are no other current species-specific conservation measures underway.

- **Amphibians and Reptiles (Herpetofauna)**

With respect to amphibians, Minter et al (2004) state that "habitat loss or modification as a result of agriculture and other forms of human activity remains the most important single threat to the survival of amphibian populations. The scale of these changes are, and their relative permanence being the major cause. At greatest risk are species that have limited distributions."

As reported in Alexander *et al* (2007) 50 reptile species are likely to inhabit the area.

Observations:

No amphibian or reptile activities were observed on site during the survey.

Findings:

The proposed development will not have significant impact on reptiles or amphibians. No Red Listed amphibian specie is known to occur at the site and occurrence of amphibian species will be limited.

Mammals:

As reported in Smithers (1983) small buck e.g. common duiker, steenbok and grysbok, rodents such as mole rats, field mice and hares, as well as carnivores such as genets and mongoose are likely to inhabit the area.

Some 62 species are known to occur in the bigger area (Smithers 1983).

Observations and Findings:

The species observed during the survey were recorded above in this report.

Red Data Listed or species listed under TOPS regulation (Mammals)

The following table lists the Red Data mammal species (including their status) which are predicted, or confirmed to occur in the general area and possibly within the study area:

RED DATA SPECIES			
COMMON NAME	**SCIENTIFIC NAME**	**RED DATA CATEGORY**	**PREDICTED OCCURRENCE**
Forest shrew	*Myosorex varius*	Data deficient	Unlikely
Lesueur's Wing-gland Bat	*Cistugo lesueuri*	Near threatened	Possible
Cape golden mole	*Chrysochloris asiatica*	Data deficient	Unlikely
Schreibers' Long-fingered Bat	*Miniopterus schreibersii*	Near Threatened	Possible

Temminck's Hairy Bat	*Myotis tricolor*	Near Threatened	Possible
Cape Serotine Bat	*Neoromicia capensis*	Least Concern	Possible
Egyptian Free-tailed Bat	*Tadarida aegyptiaca*	Least Concern	Possible
Cape Clawless Otter	*Aonyx capensis*	Least Concern	Unlikely
Geoffroy's horseshoe bat	*Rhinolophus clivosus*	Near threatened	Possible
Water Mongoose	*Atilax paludinosus*	Least Concern	Unlikely
Long-tailed Serotine Bat	*Eptesicus hottentotus*	Least Concern	Unlikely
Honey badger	*Mellivora capensis*	Near threatened	Likely
Cape Spiny Mouse	*Acomys subspinosus*	Least Threatened	Possible
African Weasel	*Poecilogale albinucha*	Data deficient	Unlikely
Water Rat	*Dasymys incomtus*	Near Threatened	Unlikely
Grey Climbing Mouse	*Dendromus melanotis*	Least Concern	Possible
Brant's Climbing Mouse	*Dendromus mesomelas*	Least Concern	Possible
Cape Mole Rat	*Georychus capensis*	Least Concern	Definitive
Cape Dune Mole Rat	*Bathyergus suillus*	Least Concern	Likely
Common Mole Rat	*Cryptomys hottentotus*	Least Concern	Likely
Hairy Footed Gerbil	*Gerbillurus paeba*	Least Concern	Likely
Spectacled Dormouse	*Graphiurus ocularis*	Least Concern	Possible
Porcupine	*Hystrix africaeaustralis*	Least Concern	Likely
Pygmy Mouse	*Mus minutoides*	Least Concern	Unlikely
Verreaux's Mouse	*Myomyscus verreauxi*	Least Concern	Unlikely
Namaqua Rock Mouse	*Aethomys namaquensis*	Least Concern	Unlikely
White-Tailed Rat	*Mystromys albicaudatus*	Endangered	Unlikely
Vlei Rat	*Otomys irroratus*	Least Concern	Unlikely
Saunders Vlei Rat	*Otomys saundersiae*	Least Concern	Unlikely
Karoo Bush Rat	*Otomys unisulcatus*	Least Concern	Unlikely
Striped Mouse	*Rhabdomys pumilio*	Least Concern	Likely
Pouched Mouse	*Saccostomus campestris*	Least Concern	Unlikely
Krebs Fat Mouse	*Steatomys krebsii*	Least Concern	Likely
Cape Gerbil	*Tatera afra*	Least Concern	Definitive
Cape Rock Elephant-shrew	*Elephantulus edwardii*	Least Concern	Unlikely
Aardvark	*Orycteropus afer*	Least Concern	Possible
Chacma Baboon	*Papio ursinus*	Least Concern	Unlikely
Cape Hare	*Lepus capensis*	Least Concern	Unlikely
Scrub Hare	*Lepus saxatilis*	Least Concern	Possible
Reddish-grey Musk Shrew	*Crocidura cyanea*	Data Deficient	Possible
Greater Musk Shrew	*Crocidura flavescens*	Data Deficient	Possible
Lesser Dwarf Shrew	*Suncus varilla*	Data Deficient	Possible
Black-backed Jackal	*Canis mesomelas*	Least Concern	Unlikely
Caracal	*Caracal caracal*	Least Concern	Likely
Yellow Mongoose	*Cynictis penicillata*	Least Concern	Possible
African Wild Cat	*Felis silvestris*	Least Concern	Likely
Small-spotted Genet	*Genetta genetta*	Least Concern	Likely
Large-spotted Genet	*Genetta tigrina*	Least Concern	Likely

Large Grey Mongoose	*Herpestes ichneumon*	Least Concern	Likely
Small Grey Mongoose	*Galerella pulverulenta*	Least Concern	Likely
Striped Polecat	*Ictonyx striatus*	Least Concern	Possible
Egyptian Fruit Bat	*Rousettus aegyptiacus*	Least Concern	Possible
Laminate Vlei Rat	*Otomys laminatus*	Least Concern	Unlikely
Rock Hyrax	*Procavia capensis*	Least Concern	Unlikely
Red Hartebeest	*Alcelaphus buselaphus*	Least Concern	Unlikely
Steenbok	*Raphicerus campestris*	Least Concern	Likely
Cape Grysbok	*Raphicerus melanotis*	Least Concern	Likely
Common Duiker	*Sylvicapra grimmia*	Least Concern	Likely
Leopard	*Panthera pardus*	Least Concern	Unlikely
Klipspringer	*Oreotragus oreotragus*	Least Concern	Unlikely
Springbok	*Antidorcas marsupialis*	Least Concern	Unlikely
Grey Rhebok	*Palea capreolus*	Least Concern	Unlikely
Cape horseshoe bat	*Rhinolophus capensis*	Near threatened	Possible

2.3.2. Historical and Archaeological Characteristics

Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), is applicable to the proposed development. No archaeologically significant resources were found during the foot survey. The development will not impact on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 or impact on any building or structure older than 60 years in any way. A HWC NID will be submitted to request comment confirm HWC if a Heritage Impact Assessment is required.

2.3.3. Terrestrial Biodiversity

According to the South African National Biodiversity Institute's (SANBI) biodiversity geographic information system (BGIS) mapping tool – national threatened ecosystem layer, Saldanha Flats Strandveld is classified as an endangered ecosystem.

Biodiversity Priorities	Hectares Lost	Is the proposed development aligned with the land management objectives	Proximity to Biodiversity Priority Area

CBA1	182.61	Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.	Located inside CBA area
CBA2	NA		
ESA1	20.29	Maintain in a natural or near-natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land-uses are appropriate.	Located inside area
ESA2	5.5	Maintain in a functional, near- natural state. Some habitat loss is acceptable, provided the underlying biodiversity objectives and ecological functioning are not compromised.	Located inside CBA area
PA	NA		
Forest	NA		
River NFEPA including 32m buffer	NA		
River NFEPA including 32m buffer	NA		
Strategic water source area	NA		
Threatened species and Red Data listed species	NA		

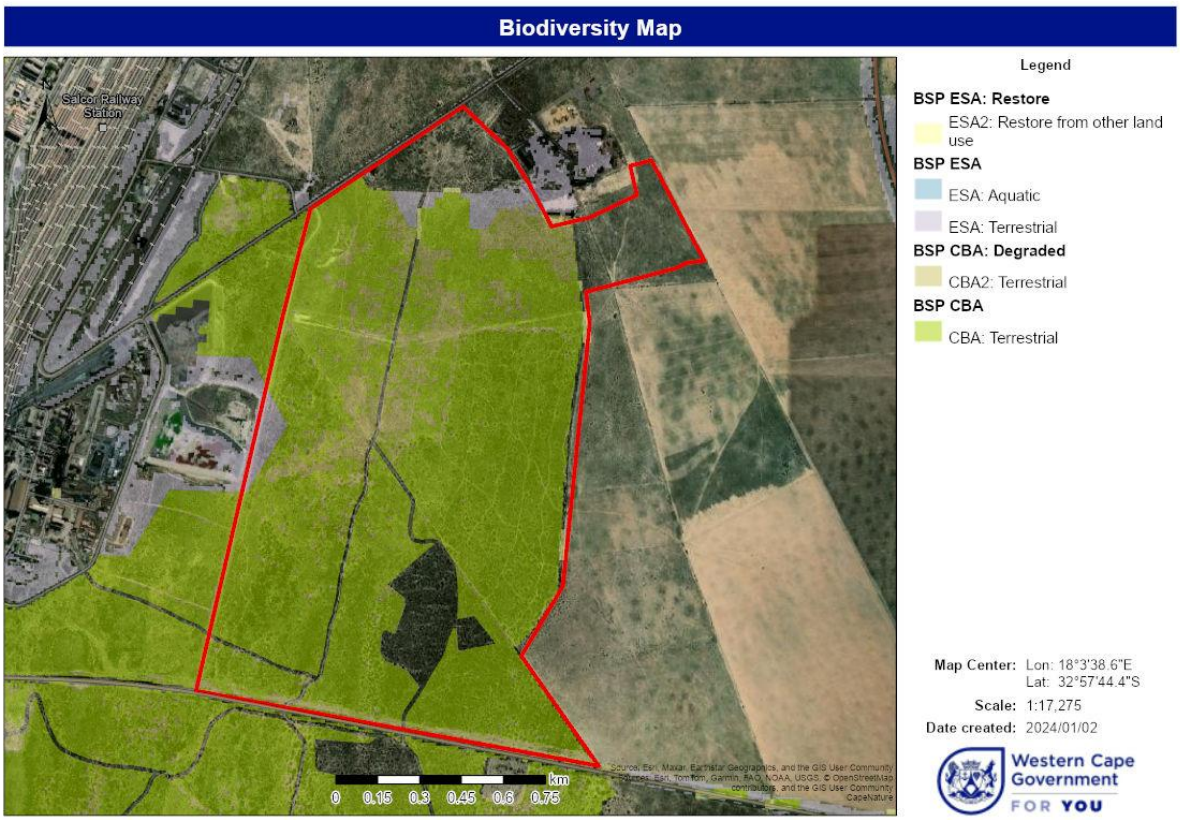


Figure 2: Biodiversity Map

2.3.4. Socio-Economic Elements

Historically Vredenburg developed from a farming community, with the town of Vredenburg being founded in 1862 when a church was built at a water spring. During 1880, the first government school was built followed by the post office in 1886. A shortage of fresh water slowed the growth of Vredenburg with the town gaining Municipal Status in 1932.
Source: Saldanha Bay Municipality Integrated Development Plan.

Introduction
Saldanha Bay Municipality (WC014) is a local municipality located on the West Coast of South Africa, approximately 140 kilometers north of Cape Town. It forms part of the West Coast District Municipality (DC1), situated in the Western Cape Province. The Swartland Municipality borders the municipality in the west by the Atlantic Ocean, in the north by the Bergrivier Municipality and the east.

The Saldanha Bay Municipality covers an area of 2 015 km² (approximately 166 565,48 hectares) and has a coastline of 238km. In total 6.5% of the geographical land are urban land and 93.5% rural land. Overall Saldanha Bay municipality constitutes 6.4% of the entire West Coast geographical land making it the smallest municipal area in the district. The area includes the towns of Hopefield; Langebaan, Saldanha, Jacobsbaai, Vredenburg, Paternoster and St Helenabaai. The administrative office of SBM is located in Vredenburg, with satellite offices in Hopefield, St Helena Bay, Paternoster, Saldanha and Langebaan.

The 2016 Community Survey statistics:

Population and Age

SBM has the second largest population at 111 173 (2011 Stats: 99 193) in the West Coast District which, according to the 2016 Community Survey conducted by Statistics South Africa. The forecasts of the Western Cape Department of Social Development is that this total will gradually increase across the 5-year planning cycle and is expected to reach 122 265 by 2023. This equates to an approximate 9.8 % growth off the 2017 base estimate.

The 2016 community results revealed a strong concentration of persons within the age category of 15-34 years at 40 696 in comparison to the 2011 Statistics which reflected a total of 36 264. Whilst the percentage increase remained at 36.6% the in-and-out migration of persons seeking employment and business opportunities will have a significant impact on the municipal services with the realisation of the economic growth and development projects forecasted.

The Western Cape Department of Social Development reflected in the 2016 Socio-Economic Profile that there is an increasing dependency ratio of 44.0, 46.3 and 46.9 for the respective years of 2011, 2017 and 2023. As higher dependency ratios imply greater strain on the working age to support their economic dependents (children and aged), this increase will have far reaching social, economic and labour market implications.

From a national perspective, the relative decrease in the working age population will result in lower tax revenues, pension shortfalls and overall inequality as citizens struggle to tend to the needs of their dependents amidst increased economic hardship. At the municipal level, this decrease will also result in a smaller base from which local authorities can collect revenue for basic services rendered and will necessitate the prioritisation of spending on social services such as education, health and welfare.

Education

Education remains one of the key avenues through which the state is involved in the economy. In preparing individuals for future engagement in the labour market, policy choices and decisions in the sphere of education play a critical role in determining the extent to which future economic and poverty reduction plans can be realised. Saldanha Bay's matric outcomes peaked at 90.5 per in 2013 and levelled out to 87.9 per cent in 2014 and 2015 respectively as per the Western Cape Education Department, 2016; Annual Survey of Public and Independent Schools (ASS), 2015 Learner enrolment in Saldanha Bay increased at an average annual growth rate of 2.7 per cent between 2013 and 2015, which is an indication that access to education has improved in the Saldanha Bay area and should translate into opportunities for an inclusive society.

The learner teacher ratio within Saldanha Bay was at its lowest in 2012 and deteriorated in 2013 and 2014 to more than 30 learners per teacher. The learner to teacher ratio was at its highest in 2015 at 47.7 learners per teacher which is well above the national standard of 30.3 learners per teacher. Factors influencing the learner teacher ratio is the ability of schools to employ more educators when needed as well as schools struggling to collect fees from their learners are more likely to have high learner teacher ratios.

The drop-out rate for learners within Saldanha Bay that enrolled from grade 10 in 2014

to grade 12 in 2016 was recorded at 29.5 per cent, which is slightly higher than the average drop-out rate for the District (29.2 per cent) over the same period. This might be due to the fact that Saldanha Bay has a very high percentage of no-fee schools in the District, as research indicates that learners often drop-out of school due to lack of money.

Households

The household indicators according to the 2016 Community Survey results reflect as follow:

The annual income for households living within the Saldanha Bay municipal area divided into three categories i.e. the proportion of people that fall within the low, middle and high income brackets. Poor households fall under the low income bracket, which ranges from no income to just of R50000 annually (R4166 per month). An increase in living standards can be evidenced by a rising number of households entering the middle and high income brackets.

Approximately 48.6 per cent of households in Saldanha Bay fall within the low income bracket, of which 14.1 per cent have no income. A sustained increase in economic growth within the Saldanha Bay municipal area is needed if the 2030NDP income target of R110000 per person, per annum is to be achieved.

The Non-Financial Census of Municipalities released by Statistics South Africa in 2016 indicates increases or decreases of indigent households per municipal area between 2014 and 2015.

The Saldanha Bay municipal area experienced an increase in the number of indigents between 2014 and 2015, which implies an increased burden on municipal resources.

Poverty Indicators

The intensity of poverty as well as the poverty headcount is analyzed in this section. The intensity of poverty is measured by calculating the Poverty Gap Index, which is the average poverty gap in the population as a proportion of the poverty line. The Poverty Gap Index estimates the depth of poverty by considering how far, on the average, the poor are from that poverty line. The Poverty Gap Index is a percentage between 0 and 100 per cent. A theoretical value of zero implies that no one in the population is below the poverty line. Individuals whose income is above the poverty line have a gap of zero while individuals whose income is below the poverty line would have a gap ranging from 1 per cent to 100 per cent, with a theoretical value of 100 per cent implying that everyone in the population has an income that is below the poverty line or zero. A higher poverty gap index means that poverty is more severe.

This section also provides information on annual household income for residents living within the Saldanha Bay municipal area. Poverty tends to be prevalent in areas where the majority of households fall within the low income bracket.

The higher poverty headcount shows that the number of poor people within the Saldanha Bay municipal area has increased significantly from 2.2 per cent of Saldanha Bay's population in 2011 to 6.7 per cent of the population in 2016. The increasing poverty headcount is a concern as it may strain municipal financial resources as more households demand free basic services.

The intensity of poverty, i.e., the proportion of poor people that are below the poverty line within the Saldanha Bay municipal area, increased from 41.0 per cent in 2011to 45.4per cent in 2016. This percentage is high and should be dropping towards zero as income of more households within the Saldanha Bay municipal area moves away from the poverty line.

The Economy

Economic growth at the municipal level is essential for the attainment of economic development, the reduction of poverty and improved accessibility. Fostering this growth requires an in-depth understanding of the economic landscape within which each respective municipality operates.

Saldanha Bay comprised R5.86 billion (or 30.56 per cent) of the District's total R19.16 billion GDPR as at the end of 2015. GDP growth averaged 2.95 per cent per annum over the period 2005–2015. This is below the District average of 3.42 per cent. Average annual growth of 2.67per cent in the post-recessionary period remains below the long-term trend but is on par with the District average of 2.75per cent.

Saldanha Bay employed 28 per cent (46330 labourers) of the West Coast District's labour force in in 2015, and employment grew at a moderate rate of 1.7 per cent per annum on average since 2005, which was above the overall district employment growth rate of1.1 per cent per annum. Employment growth has nevertheless picked up significantly in the post–recessionary period (2010-2015) averaging 2.5 per cent per annum-this is on par with the district's employment growth rate of 2.7 per cent per annum over this period. Saldanha Bay has experienced job losses prior to and during the recession, but these jobs have been recovered and approximately 5720(net) additional jobs have been created since 2005(the majority of which has been created post-2010).

The majority of the workforce in Saldanha Bay operates within the semi-skilled (32.50 per cent) and low-skilled sector (32.14 per cent). The semi-skilled sector was the only sector to experience a contraction in employment over the long term (-0.1 per cent per annum over the period 2005 –2015). Low-skilled employment remained fairly stagnant over the long term, whilst skilled employment (which makes up 13.35 per cent of the municipality's workforce) grew at a moderate rate of 1.9 per cent per annum since 2005. The informal sector (which employs 22 per cent of the municipality's workforce) experienced robust growth of 7.8per cent per annum over the past decade.

Primary Sector - Agriculture, Forestry and Fishing - This sector comprised R887.21 million (or 15.15 per cent) of the Municipality's GDP in 2015. It displayed steady growth of 2.85 per cent for the period 2005 – 2015; growth has nevertheless shown significant improvement in the post- recessionary period (the sector experienced a growth rate of 4.49 per cent per annum over the period 2010 – 2015).

Agriculture, Forestry and Fishing employed 31.77 per cent of the area's workforce. Employment over the period 2005 – 2015 has grown by 0.9 per cent per annum on average. Employment growth nevertheless improved significantly in the late half of the decade (growing at a rate of 4.5 per cent per annum on average since 2010). This growth has however been insufficient with regard to recovering all the jobs lost prior to- and during the recession, and as such, 500 jobs have been lost on net since 2005.

The labour force in the primary sector is characterised by a relatively large proportion of unskilled labour. The majority (43.32 per cent or 6 376 workers) of the workforce in Agriculture, Forestry and Fishing operate within the low-skill sector, which has experienced growth of 4.6 per cent per annum since 2010. The semi-skilled sector employs 32.59 per cent of the industry's workforce and has grown at a rate of 4.4 per cent per annum since 2010. The skilled sector employs the smallest proportion of the municipality's workforce (5.20 per cent or 765 workers). This segment has shown robust growth post-recession (4.7 per cent per annum).

Despite the fast growth since 2010, employment in these three categories has stagnated over the long term (2005 – 2015) and all the jobs lost between 2005 – 2010 have not yet been recovered. The informal sector makes up 18.89 per cent of the industry's workforce and experienced robust long term growth as employment grew by 4.6 per cent per annum over the period 2005 – 2015. Informal employment growth within the Agriculture, Forestry and Fishing industry remained consistent throughout the last 10 years and the informal sector may have absorbed some of the job losses from the other sectors.

The Secondary Sector – Manufacturing - The manufacturing sector comprised R1.305 billion (or 22.3 per cent) of the Municipality's GDP in 2015, making it the second largest sector in the Saldanha Bay region. The sector has experienced moderate growth of 1.25 per cent per annum on average over the period 2010 – 2015, and fared slightly better over the long term with growth averaging 1.49 per cent per annum since 2005. GDP growth in the manufacturing sector is consistently below the long term overall GDP trend for the region as the sector struggles to fully recover after the recession.

The manufacturing sector employed 10.65 per cent of the area's workforce (making it the 4th largest employer in Saldanha Bay). Employment growth has nevertheless remained constrained over the past decade with a contraction of 0.7 per cent recorded for the period 2005 – 2015. Approximately 778 jobs have been lost on net in Saldanha Bay's manufacturing industry since 2005.

A large number of workers employed in the manufacturing sector are classified as semi-skilled (39.6 per cent) and low-skilled (31.8 per cent). Semi-skilled employment within the manufacturing sector contracted over the last decade, whilst employment within the low- skilled sector contracted by 0.3 per cent per annum since 2005. Only 11.8 per cent of those employed in the manufacturing sector are categorised as skilled workers, and employment growth within this category has remained relatively stagnant since 2005. The informal sector makes up 16.8 per cent of the industry's workforce and experienced robust long term growth as employment grew by 7.2 per cent per annum over the period 2005 – 2015. Informal employment within the manufacturing industry furthermore experienced robust growth of 6.6 per cent per annum post-recession.

Construction - The construction sector comprised R 239.3 million (or 4.08 per cent) of the municipality's GDP in 2015. Construction has nevertheless been the fastest growing industry since 2005, with growth averaging 5.94 per cent per annum. GDP growth has nevertheless slowed since the recession and averaged 1.80 per cent over the period 2010 – 2015 as the sector struggles to fully recover after the recession.

The construction sector employed only 4.96 per cent of the area's workforce in 2015. Employment in the municipality's construction sector has grown by 2.4 per cent per

annum since 2005. Approximately 209 jobs have been created on net since 2005, the majority of which were created over the period 2010 – 2015 (where employment growth averaged 1.2 per cent per annum).

The majority (42.4 per cent) of the workers employed in the construction industry operate within the informal sector. Employment growth within this sector has been consistently high since 2005. Low-skilled employment makes up 17.5 per cent and semi-skilled employment makes up 33.1 per cent of the workforce in the construction industry, and employment within both these sectors has contracted over the past decade (with employment contracting the fastest in the latter half of the decade). Workers employed in these sectors who have lost their jobs may have found employment in the informal sector. Skilled employment makes up only 7.1 per cent of the construction industry's workforce, and has grown at a moderate rate of 2.2 per cent per annum over the period 2005 – 2015 (with growth nevertheless stagnating in the post-recessionary period as employment in the sector struggles to recover).

Commercial Services - Commercial services encompass the wholesale & retail trade, catering & accommodation, transport, storage & communication and finance, insurance, real estate & business services industries. This sector comprised R2.404 billion (or 41.0 per cent) of the Municipality's GDP in 2015 (the largest sector in the region). The industry grew at a faster rate than the overall municipality over the period 2005 – 2015 (3.59 per cent compared to the municipal average of 2.95 per cent); growth tapered downward to 2.87 per cent per annum in the post-recessionary (which is above the municipal average over this period).

This sector employed 32.1 per cent of the areas workforce (making it the largest employer). Employment has shown consistent growth throughout the past decade recording a 3.4 per cent growth rate per annum on average. Employment growth dropped to 2.1 per cent per annum over the period 2010 – 2015 which is below the overall municipal employment growth in the post-recessionary period. On net, 4 027 jobs have been created within the commercial services industry in Saldanha Bay since 2005.

More than a third (35.2 per cent) of the industry's workforce is classified as semi-skilled, while 18.6 per cent is classified as low-skilled and 15.5 per cent is classified as skilled. Employment within the skilled and low-skilled sectors grew at moderate rates of 2.1 per cent and 2.4 per cent per annum since 2005, whilst the semi-skilled sector experienced relatively slower rates of 0.8 per cent over the period 2005 – 2015. Low-skilled employment growth tapered down to 2.0 per cent in the post-recessionary period, whilst skilled employment increased marginally to 1.9 per cent per annum over this period (2010 – 2015). Informal employment within the Commercial services industry makes up a significant portion (30.6 per cent) of the industries workforce and has experienced robust growth of 10.8 per cent per annum since 2005, and lower (but still strong) growth of 4.5 per cent per annum over the last 5 years. The informal sector is responsible for the majority of the new jobs created in the industry.

Government and Community, Social and Personal Services - The general government & community, social and personal services is moderately sized (comprising only 16.1 per cent or R943.63 million of the municipality's overall GDPR in 2015). The industry experienced GDPR growth of 3.61 per cent over the period 2005 – 2015 (and a marginally decreased rate of 3.21 per cent per annum since 2010) making it the third

largest contributor to the overall municipal GDP figure within Saldanha Bay. The industry similarly employs a noteworthy share (20.27 per cent) of the area's workforce and its employment growth over the period 2005 – 2015 averaged 3.4 per cent per annum. Employment growth has slowed since the recession (to 2.8 per cent per annum over the period 2010 - 2015).

A large proportion (39.9 per cent) of the industry's formally employed workforce are classified as low-skilled, while 23.9 per cent fall within the semi-skilled and 24.9 per cent are classified as skilled. Employment in the skilled category grew at 3.0 per cent per annum over the period 2005 - 2015 overall, and has decelerated slightly since the recession (with growth averaging 2.5 per cent per annum over the period 2010 – 2015). Low-skilled employment grew at 2.8 per cent per annum since 2005, with growth tapering off at 2.2 per cent in the post-recessionary period. Semi-skilled employment similarly grew at a rate of 1.9 per cent per annum since 2005, with growth tapering off at 1.6 per cent per annum in the post-recessionary period. The informal sector employed only 11.2 per cent of the industries workforce, but grew at a rate of 17.6 per cent per annum over the period 2005 – 2015 (this growth nevertheless stemming from a small base).

The health conditions of people living within the WCDM are analysed in this section by reviewing mortality, the prevalence of tuberculosis (TB), human immunodeficiency virus (HIV), infant mortality rates, maternal death rates and teenage pregnancies (MERO, 2020).

Mortality: The main natural causes of death of the WCDM in 2017 include chronic lower respiratory diseases (8.6% of deaths), diabetes mellitus (7.5%) and tuberculosis (7.4%). Chronic lower respiratory diseases include diseases such as bronchitis, emphysema and asthma. The WCDM has proportionally more people dying of chronic lower respiratory diseases compared with the Province (5.5%), as well as tuberculosis (4.8%). Fewer people in the WCDM die of non-natural causes (11.6%) compared with the Province (12.9%). (MERO, 2020)

HIV/AIDS and TB: The number of people who are known to have tested positive for HIV in the WCDM increased by 1 054, from 19 155 in 2016/17 to 20 209 in 2017/18, and by 519 people in 2018/19 (MERO, 2020). In 2019/20, the number of known people who tested positive for HIV in the WCDM declined to 19 919. The trend in the percentage of people who started antiretroviral treatment (ART) but are no longer on therapy has been increasing year on year, from 31.6% in 2015/16 to 59.8% in 2019/20. This suggests that a significant amount of people are opting out of ART after starting and this may result in numerous adverse impacts, such as an increased risk of drug resistance and increased viral load. However, the proportion of people who are on ART increased by 7.7 percentage points in 2017/18 and by 6.0 percentage points in 2018/19, before a substantial decline of 30.9 percentage points in 2019/20. This could be attributed to the decrease in the number of people who tested positive for HIV in 2019/20. (MERO, 2020)

The TB programme success rate in the WCDM has stayed relatively constant over the reference period. In 2019/20, the TB programme success rate was 83.2%, which is significantly higher than the provincial success rate of 77.3%. The multidrug-resistant (MDR) TB treatment success rate has also increased from 50.9% in 2018/19 to 53.4% in 2019/20, while the TB client death rates have declined from 3.8% in 2018/19 to 3.3% in 2019/20. Despite TB being the third leading cause of death in the WCDM, the TB client

death rate in the WCDM is lower than that of the Province (3.8%). (MERO, 2020)

Infant, child and maternal health: Overall, infant mortality has been on a downward trend in the Western Cape and WCDM over the period under review. Between 2008 and 2014, the infant mortality rate was higher in the WCDM compared with the Province. The WCDM experienced a significant increase in infant mortalities between 2009 and 2010, but was on a declining trend from 2010 until 2016, when an increase in infant mortality was recorded, from 13.3 infant deaths per 1 000 live births in 2016 to 18.2 infant deaths per 1 000 live births in 2017. In 2017, the WCDM recorded a marginally higher infant mortality rate than the Western Cape. However, the number of infant deaths was significantly lower (18.2 deaths per 1 000 live births) compared with 2008. (MERO, 2020)

The establishment of the IDZ serves as an important mechanism to achieve the government's aim of sustainable economic development and job creation in the localized economy, diversification, and transformation of the historically under-developed and under-supported industrial maritime and energy sectors; and broadening of the regional and national economic base through industrialisation. The Western Cape Growth and Development Strategy of 2006 identified Vredenburg and Saldanha as 'Leader towns' and towns with high growth potential where fixed infrastructure investment should be focused. The Western Cape Growth Potential Study of 2014 has indicated towns in the municipal area as having medium to very high growth potential. The Socio-economic Profile of Saldanha Bay Municipality as issued by the Western Cape Government Provincial Treasury in 2015 indicates that the Saldanha Bay economy is amongst the fastest in the province. Iron ore export and crude oil import in the province take place exclusively through the port of Saldanha. The Provincial Treasury's Socio-economic Profile of Saldanha Bay Municipality indicates that Saldanha Bay is the fastest growing municipality in the district. The West Coast District Municipality's SDF (2014) identifies Saldanha Bay as a Major Regional Growth Centre and one three key development areas within the district (WCDM, 2014). Saldanha Bay is assessed as having very high growth potential and high social need in the Growth Potential Study undertaken in 2014 for towns and settlements outside of the Cape Metro. The draft Greater Saldanha Region Spatial Implementation Framework (2016) recognises the area as being the most significant area of spatial development potential within the West Coast district, ascribed to the massing of potential development projects in the area (as represented by the Saldanha Bay IDZ, port upgrades, projected upgrades of the Sishen- Saldanha iron ore programme etc.) and the coastal settlement areas seen as having tourism development potential (e.g. Langebaan, Paternoster, etc.). It further identifies the area as part of the southern portion of the District which has the strongest functional linkages to the Greater Cape Metro region and thus is most open to the movement of people, goods and trade at a scale most likely to have a material developmental impact."

"The Saldanha Bay IDZ (SBIDZ) is located within the Saldanha Bay Municipality. It extends from the Port area in the south up to Regional Route 45 (R45) to the north and includes land both east and west of the Sishen-Saldanha rail line which runs through the central part of the area in a north-south direction. It is the area around the present industrial area, i.e. around ArcelorMittal South Africa (Saldanha Works), Duferco Steel Processing (Pty) Ltd (Duferco), Tronox (Sands Smelter) and other industries."

SECTION 3: NEED AND DESIRABILITY

3.1 NEED AND DESIRABILITY

MOTIVATION FOR APPLICATION:

The establishment of the IDZ serves as an important mechanism to achieve the government's aim of sustainable economic development and job creation in the localized economy, diversification, and transformation of the historically under-developed and under-supported industrial maritime and energy sectors; and broadening of the regional and national economic base through industrialisation. The Western Cape Growth and Development Strategy of 2006 identified Vredenburg and Saldanha as 'Leader towns' and towns with high growth potential where fixed infrastructure investment should be focused. The Western Cape Growth Potential Study of 2014 has indicated towns in the municipal area as having medium to very high growth potential. The Socio-economic Profile of Saldanha Bay Municipality as issued by the Western Cape Government Provincial Treasury in 2015 indicates that the Saldanha Bay economy is amongst the fastest in the province. Iron ore export and crude oil import in the province take place exclusively through the port of Saldanha. The Provincial Treasury's Socio-economic Profile of Saldanha Bay Municipality indicates that Saldanha Bay is the fastest growing municipality in the district. The West Coast District Municipality's SDF (2014) identifies Saldanha Bay as a Major Regional Growth Centre and one three key development areas within the district (WCDM, 2014). Saldanha Bay is assessed as having very high growth potential and high social need in the Growth Potential Study undertaken in 2014 for towns and settlements outside of the Cape Metro. The draft Greater Saldanha Region Spatial Implementation Framework (2016) recognises the area as being the most significant area of spatial development potential within the West Coast district, ascribed to the massing of potential development projects in the area (as represented by the Saldanha Bay IDZ, port upgrades, projected upgrades of the Sishen- Saldanha iron ore programme etc.) and the coastal settlement areas seen as having tourism development potential (e.g. Langebaan, Paternoster, etc.). It further identifies the area as part of the southern portion of the District which has the strongest functional linkages to the Greater Cape Metro region and thus is most open to the movement of people, goods and trade at a scale most likely to have a material developmental impact."

"The Saldanha Bay IDZ (SBIDZ) is located within the Saldanha Bay Municipality. It extends from the Port area in the south up to Regional Route 45 (R45) to the north and includes land both east and west of the Sishen-Saldanha rail line which runs through the central part of the area in a north-south direction. It is the area around the present industrial area, i.e. around ArcelorMittal South Africa (Saldanha Works), Duferco Steel Processing (Pty) Ltd (Duferco), Tronox (Sands Smelter) and other industries." This industrial development is located in the identified IDZ area and is to create industrial properties to link to the IDZ proposed industrial activities.

SECTION 4: ALTERNATIVES ASSESSMENT

Regulation 21(3) of EIA Regulations, 2014 as amended requires that the Scoping Report include a description of any feasible and reasonable alternatives that have been identified. Regulation 1 of EIA Regulations, 2014 as amended defines

alternatives as follows:

"alternatives", in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to the—
(a) property on which or location where the activity is proposed to be undertaken,
(b) type of activity to be undertaken,
(c) design or layout of the activity,
(d) technology to be used in the activity, or
(e) operational aspects of the activity,
and includes the option of not implementing the activity.

The alternatives considered for this project are described below.

4.1 PROPERTY AND LOCATION/SITE ALTERNATIVES

DETAILS OF ALTERNATIVES
LOCATION / SITE / PROPERTY ALTERNATIVE

The proposed development will entail the development of 20 Industrial erven (industrial zoning would be general that may include heavy industrial activities), roads and a WWTW. Proposed development area of ±252 ha, will consists of the Industrial Zone III erven of ±84.4609 ha, roads and the high botanical area included in the SOSS core area and as a conservation area in the Greater Saldanha Environmental Management Framework as a conservation area of ±141.3203 as Private Open Space Zone III.

The property is zoned Agriculture and is located outside an urban area. The proposal requires the property to be rezoned to Industrial Zone III and Public Open Space III.

Location and property alternatives were not considered as they are not feasible or reasonable. The properties belong to the applicant and due to its location in the established IDZ area, erven with landuses in line with the IDZ principles must be established. The SOSS core area identified on site also impacts on layout alternatives.

The property is access via an existing access from the gravel road and R 45.

4.2 ACTIVITY ALTERNATIVES

The only activity alternative is for the establishment of industrial erven and the WWTW. There is no other feasible or reasonable activity alternatives. The location of the site and properties inside the IDZ area dictates landuse requirements. The SOSS core area on site also has impacts on the proposed layout and activity alternatives.

4.3 DESIGN OR LAYOUT ALTERNATIVES

Two design alternatives were developed for the proposed development. The alternative layout development will entail the development of 19 Industrial erven, roads and a WWTW. Proposed development area of ±252 ha, will consists of the Industrial Zone III erven of ±118 ha, roads of ±9ha and the high botanical area included in the

SOSS core area and as a conservation area in the Greater Saldanha Environmental Management Framework as a conservation area of
±125.6ha as Private Open Space Zone III.

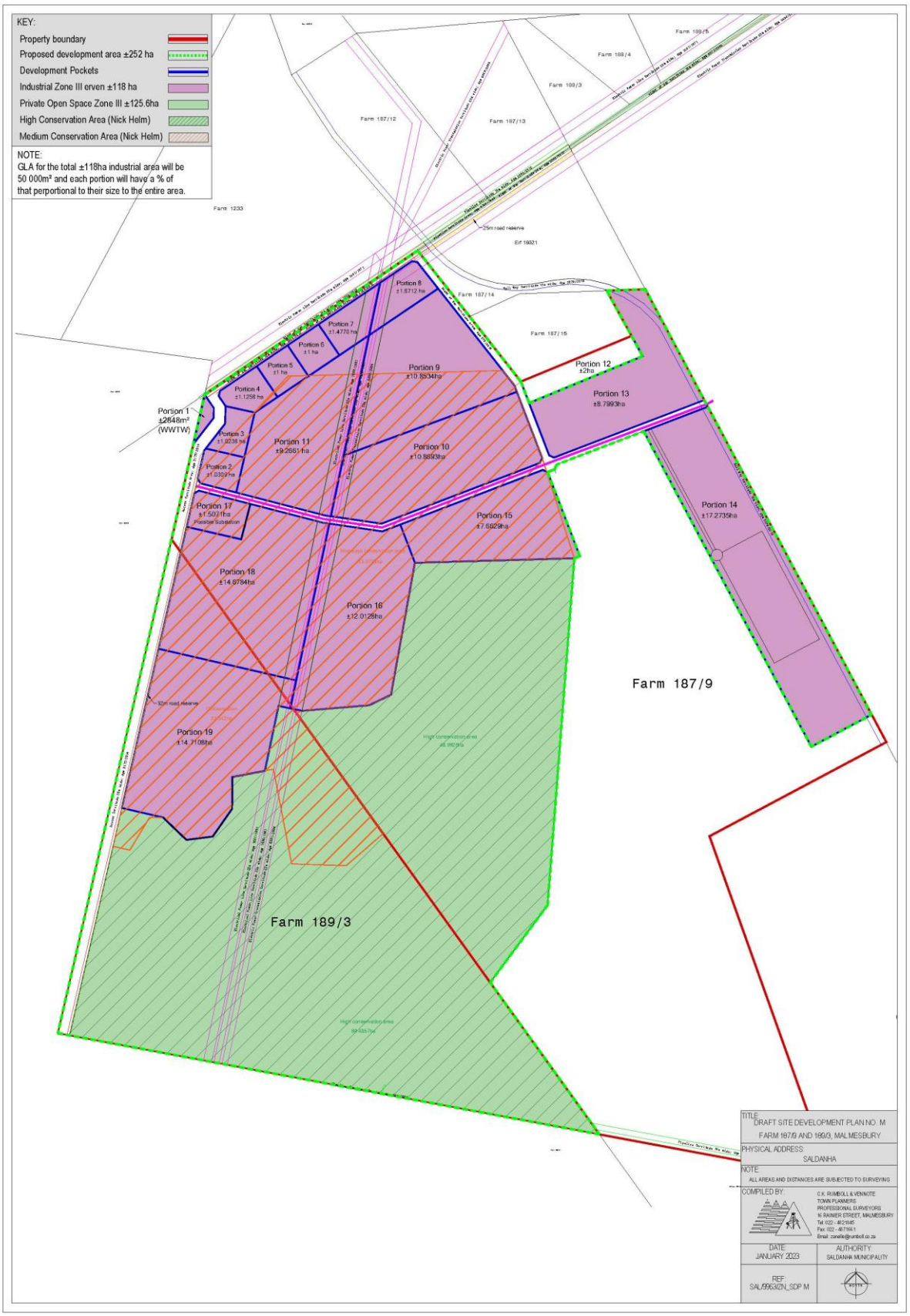


Figure 3: Alternative layout.

Preferred alternative will entail the development of 20 Industrial erven (industrial zoning would be general that may include heavy industrial activities), roads and a

WWTW. Proposed development area of ±252 ha, will consists of the Industrial Zone III erven of ±84.4609 ha, roads and the high botanical area included in the SOSS core area and as a conservation area in the Greater Saldanha Environmental Management Framework as a conservation area of ±141.3203 as Private Open Space Zone III.

The property is zoned Agriculture and is located outside an urban area. The proposal requires the property to be rezoned to Industrial Zone III and Public Open Space III.

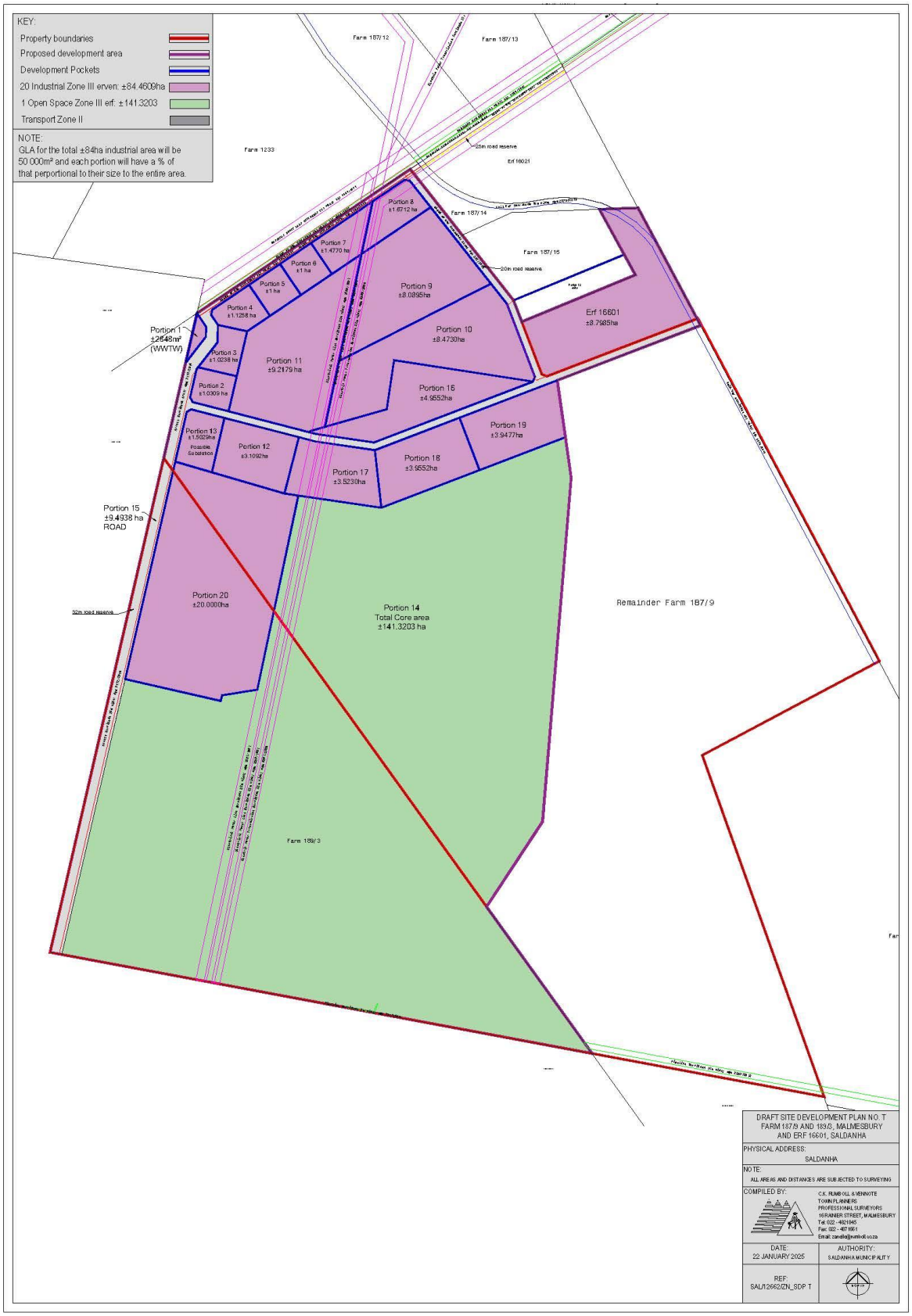


Figure 4: Preferred layout.

Environmental Opportunities and Constraints associated with the site to be taken in consideration when the specialist assess the layout and Site Development Plan

Location
The properties belong to the applicant and due to its location in the established IDZ area, erven with landuses in line with the IDZ principles will be established. The SOSS core area identified on site also impacts on layout alternatives.

4.4 TECHNOLOGY ALTERNATIVES

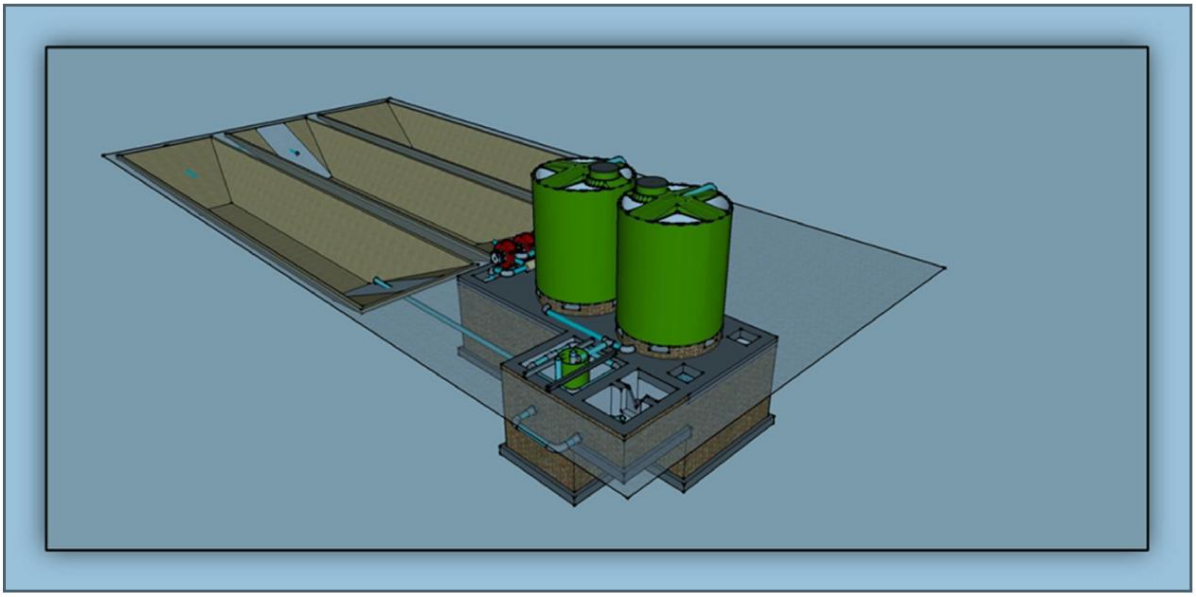
The only technological alternatives assessed and considered, were the use of electricity and water conservation.

Electricity:
Use of energy efficient equipment;
CFL's must be used to save energy cost where possible;
Fluorescent lighting must be used in communal spaces where possible.
The only technological alternatives assessed and considered, were the use of water conservation:
Ensure that toilet systems are duel flush and 6 litre water holding capacity.

The sewage contribution during normal day to day operation of the development will be no more than 4 m^3/day.
The following options were considered during both the mentioned periods to deal with the sewage effluent:

- The planned industrial node to provide a sewer reticulation network that will be linked to the municipal wastewater treatment works (or to a private wastewater treatment works that must be installed). An internal sewer network will then be provided for the development and will be connected to the said reticulation network.
- To provide a centralized conservancy tank to collect the sewage effluent form where the municipality (or a private company) will cart the effluent away to the municipal wastewater treatment works.
- A private wastewater treatment works to be designed and installed on site for the development. The treated effluent will then be available as industrial and/or irrigation water.

Considering the relative remoteness of the Site, the last option was considered as the most prudent. Figure below shows a typical small sewage treatment plant capably of treating up to 12 m^3/day of domestic sewage to the Government Gazetted “General Limits” effluent standard.



Alternative technologies will be assessed in the EIR phase, and it might be assessed to use any of the above effluent management systems.

4.5 OPERATIONAL ALTERNATIVES

Operational alternatives will be applicable to the disposal and reuse of the treated effluent and the management of the Open Space areas, should the WWTW plant on site be assessed to be the feasible option. Management of the WWTW and the reuse of the treated effluent must be insured and be in line with a water use authorization issued. The management of the Open Space areas will be in terms of a conservation agreement for the SOSS core areas between CapeNature and the property owner.

4.6 THE OPTION OF NOT IMPLEMENTING THE ACTIVITY (THE NO-GO OPTION)

The No-Go option will result in the site remaining as it is presently. This will result in land located in the IDZ are not be rezoned in order to promote the IDZ and its objectives.

4.7. "(G) A FULL DESCRIPTION OF THE PROCESS FOLLOWED TO REACH THE PROPOSED PREFERRED ACTIVITY, SITE AND LOCATION OF THE DEVELOPMENT FOOTPRINT WITHIN THE SITE, INCLUDING—
(V) THE IMPACTS AND RISKS WHICH HAVE INFORMED THE IDENTIFICATION OF EACH ALTERNATIVE, INCLUDING THE NATURE, SIGNIFICANCE, CONSEQUENCE, EXTENT, DURATION AND PROBABILITY OF SUCH IDENTIFIED IMPACTS, INCLUDING THE DEGREE TO WHICH THESE IMPACTS—
(AA) CAN BE REVERSED;
(BB) MAY CAUSE IRREPLACEABLE LOSS OF RESOURCES; AND
(CC) CAN BE AVOIDED, MANAGED OR MITIGATED;
(VIII) THE POSSIBLE MITIGATION THAT COULD BE APPLIED AND LEVEL OF RESIDUAL RISK;
(IX) THE OUTCOME OF THE SITE SELECTION MATRIX."

4.7.1. IMPACTS AND RISKS ASSOCIATED WITH EACH ALTERNATIVE

The potential impacts and risks as identified by the EAP has been summarised for the alternative and preferred alternative described above.

4.7.2. POSITIVE AND NEGATIVE IMPACTS ASSOCIATED WITH EACH ALTERNATIVE

Refer to the assessment of alternatives in section 6.1. of the report which assesses the positive and negative impacts associated with all alternatives assessed.

4.7.3. MITIGATION MEASURES

The mitigation measures to reduce negative impacts will be informed by the specialist investigations (where required) as well as standard EMPr conditions as set out by applicable legislation, guidelines, policy and through consultation with stakeholders and I&APs to reduce negative impacts where such impacts could not be avoided. This will be detailed in the EIR phase report.

4.7.4. OUTCOME OF SITE SELECTION MATRIX

Greater Saldanha Bay EMF established in the area. A portion of the proposed development is located in the SOSS core area. Other areas are located in the offset areas that would require offsets. The proposed development has a significant core area as identified in the SOSS that will be used as the required offset area.

4.7.4.1. MITIGATION HIERARCHY ASSESSMENT

Introduction to the Mitigation Hierarchy

Best-practice dictates that offset investigations include a 'Mitigation Hierarchy Assessment' to determine what additional steps can be put in place before resorting to biodiversity offsets. An overview of the mitigation hierarchy is outlined here, followed by recommendations to strengthen existing mitigation measures to reduce negative impacts on biodiversity.

The protection of ecosystems and biodiversity generally begins with avoiding adverse impacts and, where such avoidance is not feasible, applying appropriate mitigation in the form of reactive practical actions that minimises or reduces impacts. Mitigation requires proactive planning that follows the mitigation hierarchy. The mitigation

hierarchy's application is intended to avoid disturbance and/or loss of ecosystems, and where this cannot be avoided, to minimise, rehabilitate, and then finally offset any remaining significant residual impacts (Figure 5). The mitigation hierarchy is inherently proactive, requiring the ongoing and iterative consideration of alternatives in terms of project location, siting, scale, layout, technology, and phasing until the proposed development can best be accommodated without significant negative impacts on the receiving environment. In the case of sensitive ecosystems, where ecological impacts can be severe, the guiding principle should generally be “anticipate and prevent” rather than “assess and repair”.

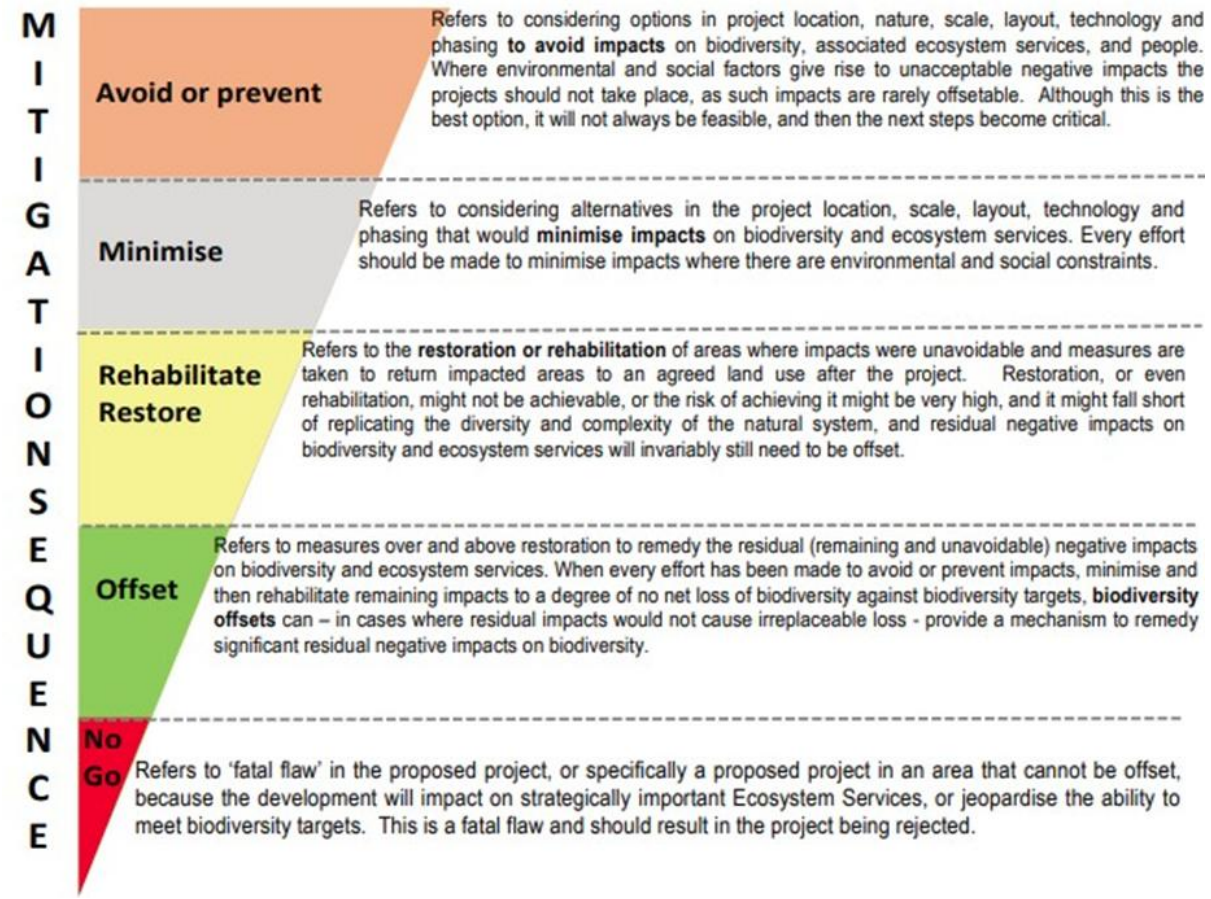


Figure 5: Mitigation hierarchy's application

The SOSS area is mapped a core area and offset is not possible. The preferred layout impact on a portion of the core area and therefore cannot be offset, but will be assessed in the EIR and after assessed will have to be excluded from the development impact area. Once the layout was assessed and finalised by all specialist, the development area will be available and the offset requirements as set out in the SOSS and biodiversity guidelines can be determined.

4.7.5. MOTIVATION FOR NOT CONSIDERING ALTERNATIVES

Layout alternatives will be considered and assessed as described above.

IMPACTS AND RISKS ASSOCIATED WITH EACH ALTERNATIVE
The potential impacts and risks as identified by the EAP has been summarised for the following alternatives:

Impact Summary Construction phase:
Soil erosion and dust - (Low impact before mitigation and low impact with mitigation measures);
Impact of construction activities on surface and underground water pollution - (Low impact before mitigation and low impact with mitigation measures);
Impact of construction activities on surface and underground water pollution - (Medium impact before mitigation and low impact with mitigation measures);
Construction activities can affect the underlying geological layers on site to some extent pollution - (Low impact before mitigation and low impact with mitigation measures);
Increased jobs - (No impact before mitigation and positive impact with mitigation measures);
Increased traffic due to the construction activities requiring various vehicles to come onto and leave the site - (Low impact before mitigation and low impact with mitigation measures);
Waste Impacts - (Low impact before mitigation and low impact with mitigation measures);
Noise due to construction machinery - (Low impact before mitigation and low impact with mitigation measures);
Animal Species Impacts - (Medium impact before mitigation and low impact with mitigation measures);
Plant Species Impacts - (high impact before mitigation and low impact with mitigation measures);
Terrestrial Biodiversity Impacts - (High impact before mitigation and medium impact with mitigation measures);

Operational phase:
Soil erosion and dust - (Low impact before mitigation and low impact with mitigation measures);
Increased jobs - (No impact before mitigation and positive impact with mitigation measures);
Pollution as a result of reuse of treated effluent - (High impact before mitigation and low impact with mitigation measures);

Decommissioning phase:
Similar to impacts associated with construction phase.

No Go or No Development option:
The No-Go option will result in the site remaining as is presently.

SECTION 5: PUBLIC PARTICIPATION PROCESS

5.1 INTRODUCTION

Public participation is an integral part of the environmental assessment process and affords potentially interested and affected parties (I&APs) an opportunity to participate

in the EIA process, or to comment on any aspect of the development proposals. The public participation process to be undertaken for this project complies with the requirements of the EIA Regulations. The description of the public participation process as included below specifies the steps and actions undertaken to date and as appropriate at this stage of the project.

5.2 IDENTIFICATION AND REGISTRATION OF KEY DEPARTMENTS AND OTHER I&APS

Liaison with the relevant authorities plays a crucial role in the successful completion of any environmental assessment process. In addition to the DEA&DP, the key departments such as the provincial departments having jurisdiction in respect of any aspect of the project, the local municipality and municipal councillor as well as other potentially affected I&APs, including adjacent property owners and dwellers, were identified.

The parties listed in the table below were identified as potential I&APs to date as per the requirements of the Regulation 42 of R982 of 2014 as amended. A list with complete details of the I&APs is kept by the EAP and will be updated as the project progresses. Refer to Appendix D.

Key Departments identified to date
DEA&DP: Development Management
CapeNature
DEA&DP: Pollution & Chemicals Management
DEA&DP: Waste Management
Department of Agriculture, Western Cape
Heritage Western Cape
West Coast District Municipality
Department of Water and Sanitation
Saldanha Bay Municipality
Department: Transport and Public Works, Western Cape Government
Department of Health
DEA&DP: Air Quality Management
ESKOM
DEA&DP: Biodiversity Management

5.3 NOTIFICATION OF I&APS

Potential I&AP's were notified about the project. The notification took place in the following manner (this is in compliance with Regulation 41 of the EIA Regulations, 2014).

- Fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of the site where the activity to which the application relates is or is to be undertaken and any alternative site;
- Written notifications sent to potential I&APs inviting them to register and give comments on the proposed development. These notifications were in line with the requirements of Regulation 41 of GN R982 of 2014 as amended; and
- Placing an advertisement in the local newspaper in compliance with Regulation

41(2)(c)(i) of GN R982 of 2014 as amended.

All potential I&APs are afforded the opportunity to register for the project. All registered I&APs will be informed of further activities regarding the project.

5.4 PUBLIC MEETINGS AND WORKSHOPS

No public meetings have been held yet.

5.5 AVAILABILITY OF THE SCOPING REPORT

As per the requirements of Regulation 43 of GN R982 of 2014 as amended, the draft Scoping Report was made available for a 30-day commenting period. A copy of the draft scoping report and EIR will be made available in the municipal offices.

The report will be included for statutory comment with the written notice as sent to the commenting organs of state.

Electronic copies (CDs) will be made available to any I&AP on request. Proof of delivery and document placement will be attached to the final Scoping Report. Additionally, the report will be made available to any I&AP upon request, as advised on the notice boards, notices and advertisements referred to in Section 5.3 above.

5.6 COMMENTS AND REPONSES DURING THE SCOPING PHASE

Comments received will be responded to as per the requirements of Regulation 44 of GN R982 of 2014 as amended. The comments and response report as well as all comments received will be attached to the Scoping Report.

5.7 PUBLIC PARTICIPATION DURING THE EIA PHASE

Public participation during the EIA phase involves submitting the draft EIR to the registered I&AP's and Key Departments for a 30-day period to discuss the findings of the report. Once all comments have been received, the EIR will be finalised considering the comments.

The final EIR will then be submitted to the DEA&DP for approval. As per the requirements of GN R982 of 2014 as amended, should any additional comments be received during this stage, these will be submitted to DEA&DP.

5.8 DECISION AND APPEAL PERIOD

Once DEA&DP has reviewed the final EIR and are satisfied that it contains sufficient information to make an informed decision, they will use the information contained within the EIR to determine the environmental acceptability of the applicant's preferred options. A decision on the applications and associated reports will be made by the DEA&DP based on the findings of the EIR.

Following the issuing of the decision, I&APS will be notified. All I&APs will be provided with the opportunity to appeal the decision to the Minister in terms of the NEMA.

SECTION 6: ENVIRONMENTAL ISSUES IDENTIFIED TO DATE

The potentially significant impacts associated with the proposed development have been identified by the EAP. Issues identified by Key Departments and I&APs will be considered in the determination of impacts. A detailed impact assessment and environmental impact statement will be provided in the EIA. The assessment will be based on the criteria as set out below in the Plan of Study (PoS).

6.1 CONSTRUCTION PHASE IMPACTS

- Possible impacts on soil where soil disturbances will occur;
- Increased erosion risk due to the clearing of land for the proposed development leading to increase in storm water flow;
- Fauna and flora may be affected by the development.
- Water quality of the downstream water bodies may be affected due to storm water flow from construction site;
- Temporary job creation
- Noise Impacts
- Heritage Impacts
- Biodiversity Impacts such as clearing of or impacts on indigenous vegetation habitat

6.2 OPERATIONAL PHASE IMPACTS

- Erosion risk or surrounding areas due to hardened developed areas
- Biodiversity/ecological impacts on habitat
- Social impacts i.e. permanent job creation; impact on income, sales and GGP; noise nuisance impacts; changes in health and social wellbeing; impact on demand for services and amenities etc.

6.3 CLOSURE AND DECOMMISSIONING PHASE IMPACTS

It is not anticipated that decommissioning will occur in the near future. Should decommissioning occur, the expected impacts are similar to those listed in the construction phase above with the additional positive impact of rehabilitating the decommissioned area to a near natural/indigenous state and negative impact of destroying houses and services infrastructure.

SECTION 7: PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT

7.1 TASKS TO BE UNDERTAKEN

The EIA report is informed by the scoping phase. Should the need for specialist studies be identified, input from specialists will be obtained to further advise on the potential impacts that may occur due to the proposed activities. The specialists will identify opportunities and constraints as associated with the site and the proposed development and provide their input to the concept design.

The following steps will be undertaken as part of the EIA phase:

- Alternatives will be further investigated, in a re-iterative manner, so as to avoid or minimize negative impacts and maximize potential benefits;
- The entire project team, including the specialist consultants, will be involved in the evaluation of alternatives;
- Statements regarding the potential significance of residual impacts, taking into account proposed mitigation measures will be provided in the EIA; and
- An Environmental Management Programme (EMP) covering construction, operational and decommissioning phases of the proposed development will be prepared after input from specialists, incorporating recommendations for mitigation, monitoring and evaluation are received.

7.2 CONSULTATION WITH COMPETENT AUTHORITY

DEA&DP as the Competent Authority regarding the Environmental Authorization application will be consulted throughout the application process.

All documentation (Draft and Final) will be sent to DEA&DP. Communication with DEA&DP will be attached to the documents to be submitted.

7.3 ASSESSMENT OF ENVIRONMENTAL ISSUES AND ALTERNATIVES

The objective of an impact assessment is to find the alternative having the least negative environmental impact, and which best benefits society. The assessment and evaluation of potential impacts associated with the development would thus be undertaken in a re-iterative manner, to optimally inform pro-actively the development proposal. The following methodology for assessing alternatives has been developed and will be used during the application process. GN R982 of 2014 as amended requires, in part, that the Scoping and EIA Reports include a description of any feasible and reasonable alternatives that have been identified. Regulation 1 of GN R982 of 2014 as amended defines alternatives as follows:

"alternatives", in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to –
(a) the property on which or location where it is proposed to undertake the activity (alternative properties as well as alternative sites on the same property);
(b) the type of activity to be undertaken
(c) the design or layout of the activity;
(d) the technology to be used in the activity (consideration of such alternatives is to include the option of achieving the same goal by using a different method or process); and
(e) the operational aspects of the activity;

The following additional alternative types (as applicable to this project) have also been suggested for inclusion, where applicable, by both the Department of Environmental Affairs (DEA) and the Department of Environmental Affairs and Development Planning (DEA&DP) in their EIA guidelines and information documents on alternatives. These alternatives are discussed where applicable.

Demand - when a demand for a certain product or service can be met by some alternative means;
Input - applicable to applications that may use different raw materials or energy sources in their process;
Scheduling and Timing - a number of measures might play a part in an overall programme, but the order in which they are scheduled will contribute to the overall effectiveness of the end result; and
Scale and Magnitude - activities that can be broken down into smaller units and can be undertaken on different scales, each may have a different impact.

These were considered as well.

All the above alternative types, including the no-go option (i.e. the option of not implementing the activity) have been investigated according to the methodology described below.

7.3.1 Alternative determination methodology

Alternatives are described in terms of the various types of alternatives ("alternative types") as listed above, as well as the proposed and alternative project activity(ies) ("project alternatives") which includes a combination of all the separate factors. Both the identification, investigation, and assessment of alternatives, and the generation and consideration of modifications and changes to activities must be well documented. A reasoned explanation as to why an alternative was or was not found to be reasonable and feasible has been provided for each alternative type. The criteria in 6 was used during the identification and assessment of alternatives.

7.3.2 Role of the various parties in the consideration of alternatives

7.3.2.1 The role of the Applicant

- Consider the strategic planning and environmental context within which the development and alternatives are to be considered;
- Consider all feasible and reasonable alternatives (not only the preferred option); and Provide the EAP with access to all information at the disposal of the applicant regarding the application.

7.3.2.2 The role of the EAP

- Consider the strategic planning and environmental context within which the development and alternatives are to be considered;
- Identify, investigate and assess alternatives;
- Afford opportunities for interested and affected parties to provide input into the identification, investigation and assessment of alternatives;
- Disclose all information relevant to the consideration of alternatives to the applicant and competent authority;
- Document the process of identification, investigation and assessment of alternatives (including providing the methodology and criteria used, and how the level of investigation applied to each alternative was established); and

Provide a comprehensive consideration of the impacts of each of the alternatives assessed.

7.3.2.3 The role of specialists

Assess impacts, especially the direct footprint as well as indirect and potential cumulative impacts of the development;
Take into account the context and the intensity of the impact as related to their specific field of expertise;
Highlight any impacts that could be irreversible or result in an irreplaceable loss of resource;
Evaluate the significance of residual impacts associated with the proposed development, taking into account scientific information, local community and societal values attached to the environment as being impacted upon;
Use accepted or formal standards, thresholds or targets for environmental quality, where available, as a key indicator of potential significance, since these measures reflect societal values. Where these benchmarks are absent, specialists should draw on a combination of criteria used to assess potential impacts, to indicate their potential significance, as well as feedback from key stakeholders; and
Assess and respond to all comments made by Key Departments and Registered I&APs.

7.3.2.4 The role of I&APs

Declare their interests;
Assist in the identification, investigation and assessment of alternatives, particularly where local knowledge is required;
Within the specified timeframes, provide comment on the consideration of alternatives.

Table 3: Alternatives assessment methodology

Criteria	General description / methodology for alternatives assessment	Project specific action taken for alternatives assessment
Identification of alternatives	Alternatives have been identified as early as possible in the process (planning and design phase). Alternatives will further be considered and assessed throughout the project life as amendments to the alternatives are made. Assessment of the alternatives will only cease once final alternatives have been decided upon. These will be the final alternatives for which Environmental Authorisation will be applied for. The identification of alternatives should be broad, objectively done and well documented.	Due to the nature of the project, not all alternative types as listed above could be assessed as some of the activities have only one option for implementation. Where possible, alternatives were considered.
Comparative assessment	The project alternatives will be determined according to the alternative types identified as feasible and	

Criteria	General description / methodology for alternatives assessment	Project specific action taken for alternatives assessment
	reasonable and assessed comparatively.	
Reasonability and feasibility	All alternatives were considered in terms of reasonability, feasibility, practicability, relevancy and viability. As determined throughout the process, not all alternatives will be reasonable or feasible. These will in subsequent reports be mentioned as being considered but will not be described in detail.	Only alternatives considered reasonable and feasible at the scoping phase have been included in this report. Alternatives discarded prior to this phase have not been included and will not be considered further.
Sustainability considerations and effectiveness of alternatives	The alternatives identified have taken into account the triple bottom-line of sustainability i.e. meeting the socio-economic and ecological needs of the public. The alternatives aim to maximise the benefits and avoid or minimise the negative impacts. The primary objective has been to avoid all negative impacts (where possible), rather than to minimise them. The alternatives further took into consideration the need to maximise resource use efficiency.	Alternatives with regards to the proposed development considered the best practical environmental option in terms of timeframes and implementation methods/ designs.
Discrete vs. incremental alternatives	Initial alternatives identified, also known as discrete alternatives were identified during the early stages of a project (pre-feasibility and feasibility) and comparatively assessed during the assessment phases. During subsequent consideration, as the project progresses, incremental modifications and changes to activities will occur. These incremental changes will be considered during the amendment to the project activities during project progression. Impacts and issues of these changes will also be considered, as and when they are identified	
Advantages and disadvantages	For each alternative, the related advantages and disadvantages have been considered for each alternative type. These have not been discussed in terms of the project alternatives.	
Impacts and aspects	Impacts and aspects related to the implementation of each alternative are listed with the alternative type descriptions. Detailed impacts are	Main impacts identified to be considered in determining

Criteria	General description / methodology for alternatives assessment	Project specific action taken for alternatives assessment
	described in Section 7 for each project alternative. The aim is to address the key impacts of the proposed alternative by maximising benefits and avoiding or minimising the negative impacts. The primary objective must be to avoid all negative impacts, rather than to minimise them.	alternatives are as follows: • fauna and flora • Surface water quality • Health and safety • Social aspects
Other considerations	The "feasibility" and "reasonability" of and the need for alternatives should be determined by considering, amongst others: (a) the general purpose and requirements of the activity; (b) need and desirability; (c) opportunity costs; (d) the need to avoid negative impact altogether; (e) the need to minimise unavoidable negative impacts; (f) the need to maximise benefits;, and (g) the need for equitable distributional consequences. Also refer to Section 4 for a detailed description of the need and desirability of the project.	The need and desirability of the project took into account various strategic planning documents applicable to the area as well as socio-economic priorities. This determined the feasibility and reasonability of the project. The need and desirability influenced the timeframes and design specifications considered for the project.
I&APs	I&APs have to be notified of both the preferred and alternative activities. They should also be allowed to comment on both.	Public participation will be undertaken in line with the requirements of Regulations 39 to 44 of GN R982 of 2014 as amended.
No-go option	The option of not implementing the activity has been to the same level of detail as the other feasible and reasonable alternatives.	The option of not proceeding with the activity (no-go option) provides a reliable baseline against which to compare and evaluate feasible and reasonable alternatives.

7.4 CRITERIA FOR ASSESSMENT OF IMPACTS

Below is the assessment methodology utilized in determining the significance of the construction, operational and decommission impacts of the proposed activities, and where applicable the possible alternatives, on the biophysical and socio-economic environment. The methodology is broadly consistent to that described in Integrated Environmental Management Series.

For each impact, the significance is determined by various factors. Significance is described prior to mitigation as well as with the most effective mitigation measure(s) in place.

The mitigation described in the Environmental Management Programme (EMP) document, to be attached to the EIA, represents the full range of plausible and pragmatic measures *but does not necessarily imply that they all should or will be implemented*. The decision as to which mitigation measures to implement lies with the applicant and ultimately with the competent authority. To facilitate informed decision-making, EIAs must endeavour to come to terms with the significance of the potential environmental impacts associated with particular development activities. Despite the attempts at providing a completely objective and impartial assessment of the environmental implications of development activities, EIA processes can never completely escape the subjectivity inherent in attempting to define significance. Recognising this, potential subjectivity in the EIA process will be addressed as follows:

- Be clear about the difficulty of being completely objective in the determination of significance;
- Develop an explicit methodology for assigning significance to impacts and outlining this methodology in detail. Having an explicit methodology not only forces the assessor to come to terms with the various facets contributing toward determination of significance, thereby avoiding arbitrary assignment, but also provides the reader of the EIA Report with a clear summary of how the assessor derived the assigned significance; and
- Wherever possible, differentiating between the likely significance of potential environmental impacts as experienced by the various affected parties.

Although these measures may not totally eliminate subjectivity, they do provide an explicit context within which to review the assessment of impacts.

Table 4: Assessment criteria for the evaluation of impacts

Criteria	Description		
Nature	A description of what causes the effect, what will be affected, and how it will be affected.		
	Type	**Score**	**Description**
Extent (E)	None (No)	1	Footprint
	Site (S)	2	On site or within 100 m of the site
	Local (L)	3	Within a 20 km radius of the centre of the site
	Regional (R)	4	Beyond a 20 km radius of the site
	National (Na)	5	Crossing provincial boundaries or on a national / land wide scale

Criteria	Description		
Duration (D)	Short term (S)	1	0 – 1 years
	Short to medium (S-M)	2	2 – 5 years
	Medium term (M)	3	5 – 15 years
	Long term (L)	4	> 15 years
	Permanent(P)	5	Will not cease
Magnitude (M)	Small (S)	0	will have no effect on the environment
	Minor (Mi)	2	will not result in an impact on processes
	Low (L)	4	will cause a slight impact on processes
	Moderate (Mo)	6	processes continuing but in a modified way
	High (H)	8	processes are altered to the extent that they temporarily cease
	Very high (VH)	10	results in complete destruction of patterns and permanent cessation of processes.
Probability (P) the likelihood of the impact actually occurring. Probability is estimated on a scale, and a score assigned	Very improbable (VP)	1	probably will not happen
	Improbable (I)	2	some possibility, but low likelihood
	Probable (P)	3	distinct possibility
	Highly probable (HP)	4	most likely
	Definite (D)	5	impact will occur regardless of any prevention measures
Significance (S)	Determined through a synthesis of the characteristics described above: **S = (E+D+M) x P** Significance can be assessed as low, medium or high		
Low: < 30 points:	The impact would not have a direct influence on the decision to develop in the area		
Medium: 30 - 60 points:	The impact could influence the decision to develop in the area unless it is effectively mitigated		
High: < 60 points:	The impact must have an influence on the decision process to develop in the area		
No significance	When no impact will occur or the impact will not affect the environment		
Status	Positive (+)		Negative (-)
The degree to which the impact can be reversed	Completely reversible (R)	90-100%	The impact can be mostly to completely reversed with the implementation of the correct mitigation and rehabilitation measures.
	Partly reversible (PR)	6-89%	The impact can be partly reversed providing that mitigation measures as stipulated in the EMP are implemented and rehabilitation measures are undertaken

Criteria	Description		
	Irreversible (IR)	0-5%	The impact cannot be reversed, regardless of the mitigation or rehabilitation measures taking place
The degree to which the impact may cause irreplaceable loss of resources	Resource will not be lost (R)	1	The resource will not be lost or destroyed provided that mitigation and rehabilitation measures as stipulated in the EMP are implemented
	Resource may be partly destroyed (PR)	2	Partial loss or destruction of the resources will occur even though all management and mitigation measures as stipulated in the EMP are implemented
	Resource cannot be replaced (IR)	3	The resource cannot be replaced no matter which management or mitigation measures are implemented.
The degree to which the impact can be mitigated	Completely mitigatible (CM)	1	The impact can be completely mitigated providing that all management and mitigation measures as stipulated in the EMP are implemented
	Partly mitigatible (PM)	2	The impact cannot be completely mitigated even though all management and mitigation measures as stipulated in the EMP are implemented. Implementation of these measures will provide a measure of mitigatibility
	Un-mitigatible (UM)	3	The impact cannot be mitigated no matter which management or mitigation measures are implemented.

Cumulative impact: Consideration must be given to the extent of any accumulative impact that may occur due to the proposed development. Such impacts must be evaluated with an assessment of similar developments already on the environment. Such impacts will be either positive or negative, and will be graded as being of negligible, low, medium or high impact.

Degree of confidence in predictions: The specialist should state what degree of confidence (low, medium or high) is there in the predictions based on the available information and level of knowledge and expertise.

7.5 PUBLIC PARTICIPATION PROCESS

Public participation processes was undertaken as follows:

- The public and adjacent neighbours will be further advised as to the application process underway;
- Responding members of the public and neighbours (I&APs) are registered to the application data base and will be informed throughout the Scoping – EIA process;
- Registered I&APs will be appraised of the draft and final Scoping Reports and Plan of Study for EIA; and
- During the EIA phase, the draft EIA Report will be open for comment and input

from registered I&APs.

The project team will evaluate any comment and input as may be forthcoming and will respond as appropriate to issues and concerns as raised by I&APs.

Should amendments to any Draft Reports be substantive, or should the Final Report contain substantive information that was not included in the Draft Report, registered I&APs will be afforded an opportunity to again comment on the Final Report before it is submitted to the competent authority as provided for by Regulation. Once all comments have been addressed, the Final EIA Report will be submitted to the competent authority for evaluation.

7.6 TERMS OF REFERENCE (TOR) FOR SPECIALIST STUDIES TO BE UNDERTAKEN IN THE EIA PHASE

The specialists will be provided with set criteria for undertaking their assessments, to allow for comparative assessment of all issues, inclusive of input as received from IA&Ps. These criteria are inclusive of the need to consider the no go option as the base line option. These criteria are defined in the EIA Regulations: Guideline and Information Document Series: Generic Terms of Reference for Environmental Assessment Practitioners: For Basic Assessment and Scoping-EIA. Specialists will also comply with Regulation 23 of the EIA Regulations. The "Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), when applying for Environmental Authorisation" ("the Protocols") (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020) came into effect on 9 May 2020 and will be used.
The following specialist studies are proposed to be undertaken during the EIA phase:

Specialist Report Identified	**Reason/s for the Assessment to be Conducted or Not to be Conducted (as provided by the EAP)**
Terrestrial Biodiversity Impact Assessment	Terrestrial Biodiversity Impact Assessment will be conducted.
Plant Species Assessment	Conducted by Nick Helme.
Animal Species Assessment	An animal species impact assessment will be conducted by Nicolaas Hanekom.
Socio-economic impact	No separate socio-economic impact assessment will be conducted. assessment The EAP will assessed the socio-economic impacts directly into the EIR.
Traffic Impact Assessment	Will be conducted by Sturgeon Consulting

SECTION 8: ASSUMPTIONS AND LIMITATIONS

8.1 ASSUMPTIONS

The assumption is that the information on which the report is based (such as base line

studies and project information, as well as existing information) is correct. The baseline information provided is preliminary and may need more detailed investigation, which will form part of the subsequent stages of the Scoping - EIA process. Statements or indicators of significance must be considered in the light of uncertainty regarding the extent and significance of such resources on the site.

8.2 LIMITATIONS

This report is based on currently available information and, as a result, the following limitations are implicit:

- The report is based on a project description taken from design specifications for the proposed development that have not yet been finalised, and which may undergo a number of iterations and refinements before they can be regarded as definitive;
- A project description based on the final design will be provided in the EIA Phase; and
- Descriptions of the natural and social environments are based on limited fieldwork and local knowledge as well as available literature.

More information will be provided in the EIA phase based on the outcomes of the specialist studies.

SECTION 9: CONCLUSION

The EIA phase will determine the most feasible alternatives according to the results of the specialist studies as well as the input from all I&Aps and key departments. Detail impacts will be determined accordingly and appropriate management and mitigation measures provided.

SECTION 10: REFERENCES:

Cape Farm Mapper, ver. 2.6.
Enviro-EAP, 2023, DEA Screening Tool Report and Site Sensitivity Verification Report.
Google Earth Pro, 2023.

DECLARATION OF THE APPLICANT

Note: Duplicate this section where there is more than one Applicant.

I, GAVIN STIGLING ID Number: 5 8 0 2 2 4 5 1 3 4 0 8 9

in my personal capacity or duly authorised thereto hereby declare/affirm that:

- the information provided or to be provided as part of this Application form, is true and correct;
- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, as defined in Chapter 5 of NEMA (as amended) and any relevant Specific Environmental Management Acts and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware that is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I appointed the Environmental Assessment Practitioner ("EAP") which:
  - meets the requirements of the Section 24H Registration Authority Regulations, 2016, promulgated in terms of NEMA;
  - meets all the requirements in terms of Regulation 13 of the EIA Regulations, 2014;
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the EIA Regulations, 2014;
- I will provide the EAP and specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the EIA Regulations, 2014 and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the EIA Regulations, 2014;
  - costs in respect of specialist reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures; and
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority; hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which the Applicant or EAP is responsible in terms of the EIA Regulations, 2014 and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.

Signature of the Applicant:

1/4/2025

Date:

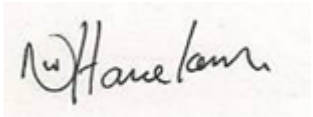
ALL BILLBOARD SOLUTIONS PTY LTD

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I **Nicolaas Willem Hanekom**, EAPASA Registration number **2020/1146**. as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this scoping report and any other documents/reports submitted in support of this report;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
    - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
    - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;



01/04/2025

Signature of the EAP: Date:

Enviro-EAP (Pty) Ltd

Name of company (if applicable):