

## CHAPTER ONE: INTRODUCTION

### 1.1 BACKGROUND AND PROJECT OVERVIEW

The applicant, BF Joubert Familie Trust, is proposing to clear approximately 255 ha of vegetation for the phased establishment of citrus orchards and associated activities on three adjoining properties, which measure approximately 586,13 hectares in extent, namely:

- Portion 343 Commando Kraal No 113 (71.29 ha)
- Portion 276 of Farm Commando Kraal No 113 (350.37 ha) and
- Remainder of the Farm Vellore Outspan No 153 (164.47 ha)

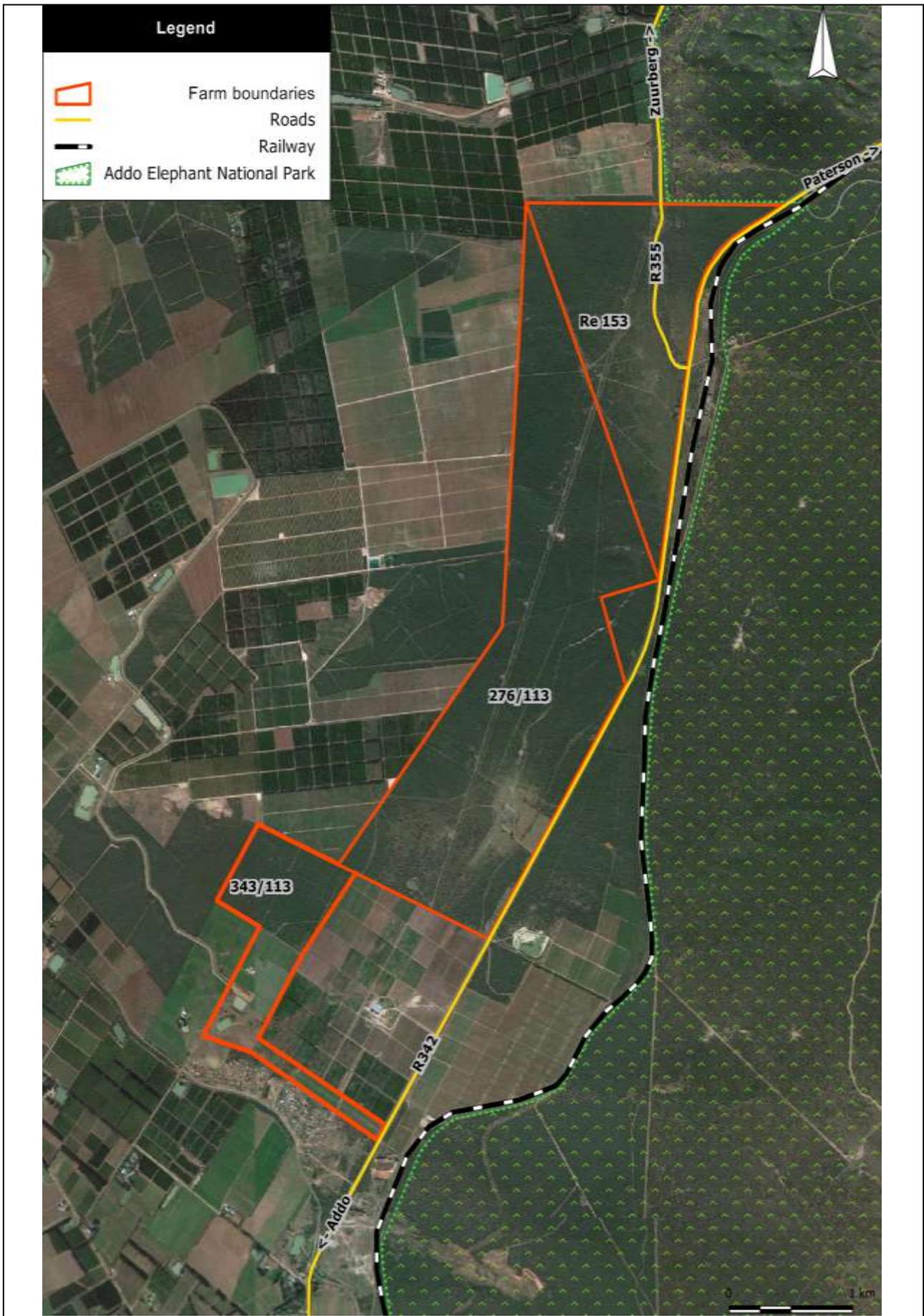
The proposed agricultural development will include the establishment of approximately 220ha of citrus orchards and 35ha of associated infrastructure (internal roads, dam and water supply infrastructure, lay-down areas and windbreaks) totaling a development area of approximately 255 ha. The vegetation clearing associated with the proposed agricultural development is anticipated to be undertaken in three phases as follows:

- Phase 1: Clearance of ~37ha of vegetation on Portion 343 of Farm 113 for the establishment of ~34ha of citrus orchards.
- Phase 2: Clearance of ~94ha of vegetation on Portion 276 of Farm 113 for the establishment of ~82ha of citrus orchards.
- Phase 3: Clearance of ~113ha of vegetation on Portion 276 of Farm 113 for the establishment of ~104ha of citrus orchards.

The orchard development area is therefore proposed to be approximately 244ha. This will include areas required for roads, windbreaks and lay-down areas. An additional approximately 11ha will be required for the establishment of the dam and associated irrigation infrastructure as well as the Logistical Services area and associated infrastructure (access road and turning circle for Logistical Services area). Thus, the total development footprint is anticipated to be approximately 255ha.

The applicant proposes to construct a dam with a total capacity of ~50 000m<sup>3</sup> and a footprint of approximately 2.24ha (140m x 160m x 2.2m) on Portion 343 of Farm 113 in parallel with the vegetation clearing associated with Phase 1. The dam is proposed to be located adjacent to the existing manager's house and storage shed, in an area which is currently planted with lucerne. The project will also include the construction of a logistical services/ handling area of approximately 4 200m<sup>2</sup>. This will consist of a storage shed/s for the storage of tractors, trailers, chemicals, and an administration/ office area, the total building dimensions will be approximately 30m x 25m (750m<sup>2</sup>) as well as a suitably surfaced/paved area which is required for delivery and collection of products via tractor-trailer and trucks, associated with the agricultural activities (plastic crates, wooden pallets, collection of citrus). Associated infrastructure includes water, sanitation and effluent management.

In terms of the National Environmental Management Act (Act no 107 of 1998), as amended (NEMAA), and the NEMA EIA regulations, 2010 published in Government Notice R 543, 544, 545 and 546 on the 18 June 2010 in Government Gazette 33306 (as amended), the project requires full Scoping and Environmental Impact Assessment prior to the commencement of any activities on the site. As per the Transitional Arrangements of the 2014 EIA Regulations, Chapter Four of this Report lists activities in the 2010 regulations similarly listed in the 2014 regulations, as well as any newly listed activities in terms of the 2014 EIA Regulations triggered by the project, which require assessment. Map 1.1 below indicates the locality of the properties included in this assessment process.



Map 1.1 Locality of the properties included in this assessment.

The applicant appointed Public Process Consultants as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping and Environmental Impact Assessment for the project. The environmental assessment needs to show the decision-making authority (DEDEAT), and the applicant, BF Joubert Familie Trust, what the consequences of their proposed activities would be in biophysical, social and economic terms.

## 1.2 PROJECT NEED AND DESIRABILITY

The following section of the report outlines the need and desirability of the proposed project.

### 1.2.1 National Context

South Africa's National Development Plan, 2011, has as one of its focal points the expansion of agriculture in order to facilitate job creation. The following is an extract from the National Development Plan, 2011 (page 197).

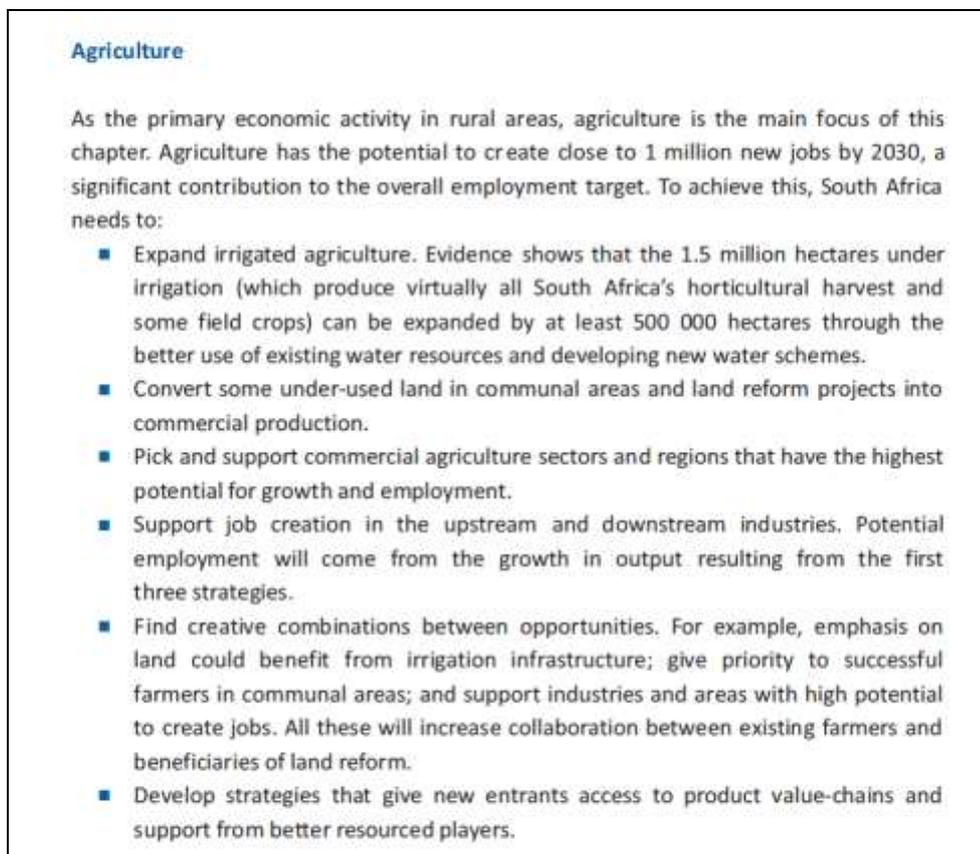


Figure 1.1: Extract from the National Development Plan, 2011, page 197.

The National Development Plan, page 200, further notes the following:

*“Expanding commercial agriculture has the potential to create 250 000 direct jobs and a further 130 000 indirect jobs. This can be achieved by picking winning agricultural sub-sectors where the expansion in production and further value-adding processes are sustainable over the long term. Expansion is not only driven by higher levels of productivity, but also supported by foreign and domestic demand. Without boosted demand, increased production will depress domestic price, which is bad for employment creation in the sector.” (National Development Plan, 2011).*

## 1.2.2 Regional and Local Planning Context

The following provides extracts from Regional and Local Municipal Planning Frameworks. Biodiversity Planning Frameworks are addressed in Chapter Six of this report.

According to the SRVM Final Integrated Development Plan, 2013/2014 (page 10) *"The Sundays River Valley Municipality (SRVM) is one of the developing local municipalities within the Cacadu District Municipality (Western Region). It is located in the Eastern Cape approximately 80km north and east of the Nelson Mandela Bay Municipality. The municipality boasts with its eco-tourism and agricultural potential. The Addo Elephant National Park (AENP) and citrus production are two important economic drivers in the SRVM."* The Final IDP (2015/2016) for the Sundays River Valley Municipality (SRVM) indicates that the current unemployment rate in the municipal area may be as high as 38.54%. The Agricultural sector provides room for growth in terms of employment opportunities, as it currently represents approximately 11% of the employment for the SRVM area (Final SRVM IDP 2015/2016).

By making use of this labor market the proposed development would also support the vision of the Sundays River Valley Local Economic Strategy as outlined in the SDF (April 2013) which indicates Agriculture as a Local Economic Development Priority and identifies the need to *"...expand the agricultural section in the region."* as an Economic Development Objective. With regards to agriculture the following is indicated on page 82 of the SRVM SDF, 2013.

Agriculture	<i>To eradicate poverty and Improve food Security for the poor through sustainable livelihood programme</i>	Initiate poverty alleviation and food security programmes by availing municipal resources and support (including municipal infrastructure)
	<i>To expand the agricultural section in the region</i>	Facilitate establishment of SRV Agricultural Forum to ensure effective and efficient planning, support and allocation of stakeholders resources to achieve the expansion of the SRV agricultural sector

*The economy of the Cacadu District Municipality is derived from four sectors, one of which is agriculture. (SRVM SDF, 2013, page 83)*

It is the applicant's intention to build on this economic base in the SRVM, by making optimum use of the available resources the area has to offer, i.e. the availability of a sustainable supply of irrigation water from the Lower Sunday River Water Users Association canal system; and the suitability / fertility of the soils on the property under assessment. The suitability of the site for such agricultural activities is supported by the cultivation practices on the adjacent citrus farms to the north, west and south of the area under assessment.

The Sundays River Valley Local Municipality is characterised by low levels of employment and a high percentage of people who are not economically active. This in turn accounts for the high poverty levels and low income levels. Only 33.9% of the population between the ages of 15 and 64 are employed (SRVM SDF, April 2013). Adjacent to the southern boundary of Portion 343 of Commando Kraal No 113 is an informal settlement. Approximately 2 km south of the site is the Addo, Nomathamsanqa settlement, which provides ready access to a labour force, from communities with a high unemployment rate.

### 1.2.3 Location Suitability

The farm portions which form part of this assessment are located near the town of Addo, approximately 3.5km southeast of the development area, in the Sundays River Valley Municipality (SRVM), and are owned by BF Joubert Familie Trust. The land owned by the applicant in the SRVM is primarily used for the cultivation of various citrus varieties. During picking season an independent Packhouse is used to pack the citrus, after which it is exported.

It is the intention of the applicant to expand their existing cultivation capacity on suitable land which they currently own. The properties currently owned by the applicant measure approximately 2816ha in extent, currently 280ha has been transformed (mostly for citrus) on farms within the SRVM, Nelson Mandela Bay Municipality and the Ikwezi local Municipality. Approximately 2248ha are currently not proposed for transformation.

The main entrance to the Addo Elephant National Park (off the R335) is located approximately 240 meters north-east of the Remainder of the Farm Vellore Outspan No 153. However, as per the recommendations of the specialist studies, which formed part of this Environmental Assessment, no development is proposed to take place on this property. The nearest proposed developed portion of the site, is on the eastern boundary of Portion 276 of Farm 113, approximately 2.2 km (as the crow flies) from the main entrance to the Addo Elephant National Park (off the R335).

The properties under assessment are bounded to the north, west and south by existing citrus orchards, and to the east by the R342 (MR450) road (Addo/ Paterson Road). The R335 (Zuurberg Road) bisects the Remainder of the Farm Vellore Outspan No 153, however no development is proposed on this portion of the site. The southern section of portion 276 of Farm 113 has been previously disturbed and is largely modified. In addition, an Eskom servitude runs across the length of the property which has also resulted in modification of the natural environment. Chapter Three of this report outlines in more detail the environment which will be affected by the proposed development.

### 1.3 REQUIREMENTS FOR SCOPING AND ENVIRONMENTAL ASSESSMENT

In terms of the National Environmental Management Act (Act no 107 of 1998), as amended (NEMAA), and the NEMA EIA Regulations, 2010, published in Government Notice R 543, 544, 545 and 546 on the 18 June 2010 in Government Gazette 33306 (as amended), the project requires full Scoping and Environmental Impact Assessment prior to commencement of activities on site.

Subsequent to the initiation of the Scoping and EIA process for this application, new EIA regulations (GN R 982, 983, 984 and 985) were published in Government Gazette No 38282 on the 4 December 2014 and came into effect on 8 December 2014. In terms of section 53 of GN R982, all pending applications (applied for in terms of NEMA) must review the new listed activities contained in Listing Notice 1, 2 and 3 (GN R983, 984 and 985), so as to determine if any activities not previously applied for in terms of the 2010 Regulations, are now required to be applied for and must fully assess all impacts of the newly identified listed activities. Chapter Four of this report provides an overview of the listed activities triggered by the project proposal in terms of the 2010 and 2014 EIA Regulations.

The EIA phase of this assessment was preceded by a comprehensive Scoping Process and the submission of a Final Scoping Report, including the Plan of Study for EIA, to the DEDEAT on **16 September 2015**. Acceptance of the Scoping Report and Approval of the Plan of Study for EIA was received on **20 November 2015**. EIA reference number **EC06/C/LN2/M/51-2014** has been

assigned to this application. An extension to the timeframes for submission of the Draft EIA was requested on 31 May 2016 and granted, in terms of Regulation 67 (2) of the NEMA 2010 EIA Regulations, by the DEDEAT in correspondence dated **14 June 2016**. Copies of correspondence with DEDEAT and approval of the PoS for EIA is attached as Appendix B of this report.

All I&APs have been afforded an opportunity to review and comment on the Draft EIA Report which was released for a **62 day** comment and review period which extended from **24 November 2016 to 24 January 2017**. In terms of Regulation 3 (2) of the NEMA EIA Regulations, 2014, the period between 15 December and 5 January must be excluded in the reckoning of days. Therefore, the comment period was extended from 40 to 62 days (to 24 January 2017) in order to accommodate the above regulation. Acknowledgement of receipt of the submission of the Draft EIA to DEDEAT was received on the **29 November 2016**. See copy of the correspondence attached as Appendix B to this report. Comments received during the review period have been included in the Final EIA Report in preparation of the submission thereof to the DEDEAT for their decision-making.

#### 1.4 EIA TEAM

This section of the report provides an overview of the EIA project team under the leadership of Public Process Consultants, who has been appointed as the independent Environmental Assessment Practitioner (EAP) for the Scoping, EIA and public participation processes.

Table 1.1 EIA Team and Specialists.

<b>EIA PROJECT TEAM</b>		
Sandy Wren	Public Process Consultants	EIA Team Leader
Wandile Junundu	Public Process Consultants	Community Consultation
Marisa Jacoby	Public Process Consultants	Senior Environmental Assessment Practitioner and Biophysical Specialist. Ecological specialist assessment conducted by Marisa Jacoby and includes the findings of the Vegetation and Aquatic Specialist assessment conducted by Deborah Vromans
Zandri Grobbelaar	Public Process Consultants	Junior Environmental Assessment Practitioner
Deborah Vromans	Independent Environmental Scientist	Vegetation and Aquatic Specialist Assessment
Dr John Almond	Natura Viva	Desktop Palaeontological Assessment
Dr Johan Binneman	EC Heritage Consultants	Phase 1 Archaeological Assessment
Dr Freddie Ellis and BHA Schloms	Private	Soil Suitability Assessment and Opinion on Organic Farming
Cary Hastie	Engineering Advice and Services	Traffic Impact Statement
Mark Marshall and Roy de Kock	Sandula Conservation	Visual Impact Assessment
<b>TECHNICAL TEAM</b>		
Francois Joubert (Project Applicant)	BF Joubert Familie Trust	Electricity requirements
Jaco Spies	JJ Spies Consulting Engineers	Civil Engineering Services (Logistical Services Area)
Marius Seyfferdt	EP Irrigation	Dams and Irrigation Infrastructure

## 1.5 DETAILS AND EXPERTISE OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) AND EXPERTISE TO CARRY OUT SCOPING AND EIA

Public Process Consultants was established in 1997 by Sandy Wren. Initially the company was established to focus on the overarching management and integration of the public participation component for Scoping Reports, EIAs and SEAs. Under this role Sandy was actively involved in projects such as the Strategic Environmental Assessment ("SEA") for the expansion of Addo Elephant National Park, SEA for the Coega Industrial Development Zone and Port of Ngqura, the EIA for the Boardwalk Casino and development of a Sustainable Coastal Development Policy for SA. This management and integration role expanded through years of experience to include the management of Basic Assessments, Scoping and EIA Reports. Sandy has over 15 years of experience in the management of Scoping and EIA's as well as Basic Assessment reports for numerous projects within the Nelson Mandela Bay Metropolitan Area and beyond, for both public and private clients.

The application for the project EIA team is being led by Sandy Wren (EIA Team Leader) who will be supported by Marisa Jacoby (Environmental Scientist). Appendix A includes the CV for Sandy Wren and Marisa Jacoby.

**Ms Sandy Wren** of Public Process Consultants, who has over 15 years of experience in Scoping and EIA studies. Sandy is a graduate from the University of Port Elizabeth, majoring in Political Science, Sociology and Industrial and Organisational Psychology. Sandy obtained a BA Honours Degree in Development Studies in 2003 for which she obtained distinctions in courses in Environmental Management. Sandy is a former Regional Director of Idasa (Institute for Democracy in SA). Sandy's EIA project management experience includes, proposed new housing and "estate" type developments, expansion of agricultural related activities (broiler house facilities and citrus production), bulk infrastructure related projects (sewer, stormwater, sewage reticulation works and pump stations) as well as industrial type developments (SA Breweries IBhayi Biogas facility, NiRoVe Paint Stripping and increase in LNG for Umicore). Sandy continues to play a key role in the management of various public participation processes associated with the Coega Project (Proposed Regional Hazardous Waste Site Facility; Proposed Bulk Liquid Storage and Handling Facility in the Coega IDZ: Marine Servitude and Pipelines in the Coega IDZ), as well as various renewable energy projects (wind and solar).

**Marisa Jacoby**, Environmental Assessment Practitioner, has a BSc (Botany & Geography) and a BSc Hons Botany (*cum laude*) awarded by the Nelson Mandela Metropolitan University (formerly University of Port Elizabeth). Marisa has worked as an Environmental Assessment practitioner as well as a biophysical specialist (fauna and flora) on various Basic Assessments, Scoping and EIA Processes for new residential developments, expansion of agricultural activities, broiler production facilities, and bulk infrastructure projects.

Curriculum vitae for both Sandy Wren and Marisa Jacoby is attached as Appendix A of this report.

## 1.6 OBJECTIVES OF THE EIA PHASE OF THE ASSESSMENT

This Final EIA Report was preceded by a comprehensive scoping process that led to the submission of a Final Scoping Report (and Plan of study for EIA) to DEDEAT for approval. The Final Scoping Report was submitted during September 2015. Approval for the Scoping Report and Plan of Study for EIA was received from DEDEAT on 20 November 2015, which marked the end of the Scoping phase of the EIA process. The project then moved into the impact assessment phase of the EIA process.

The primary objective of this Final EIA Report is to present key stakeholders and affected organs of state with an overview of the predicted impacts and associated management actions required to avoid or mitigate the negative impacts; or enhance the positive impacts of the project. This report has been released for a 62 day I&AP review period to enable the authorities and I&APs to provide input and comment before the report is finalised and submitted to DEDEAT for their decision-making. Acknowledgement of receipt of the submission of the Draft EIA to DEDEAT was received on the 29 November 2016. See copy of the correspondence attached as Appendix B to this report.

In terms of legal requirements, a crucial objective of the EIA phase of the assessment is to satisfy the requirements of Sections 31, 32 and 33 of the NEMA EIA Regulations, 2010 (as amended). These sections regulate and prescribe the content of the EIA Report and specify the type of supporting information that must accompany the submission of the report to the authorities. An overview of where the requirements for section 31, 32 and 33 of NEMA are addressed in this report is presented in Table 1.2 below.

Furthermore, the process is designed to satisfy the requirements of Regulations 55, 56 and 57 of the NEMA EIA Regulations 2010 (as amended), which relate to the public participation process and, specifically, the registration of interested and affected parties including the recording of their comments and views on the proposed project. All I&APs on the current database for this EIA (see copy attached as Appendix E) were notified in writing of the release of the Draft EIA Report for a 62 day I&AP review period. All comments received during this review period are included in the Comments and Responses Trail of Chapter Four of this report and a copy of the comment received is included in Appendix D.

*Table 1.2 Summary of where the requirements for EIA Reports (in terms of Section 31, 32 and 33 of the NEMA EIA Regulations, 2010 (as amended) are provided for in this report.*

Section	Requirement for EIA Report	Where this is provided in this Final EIA Report
(2) (a) (i)	The EAP who compiled the report	Chapter 1, Appendix A
(2) (a) (ii)	The expertise of the EAP to carry out an environmental impact assessment	Chapter 1, Appendix A
(2) (b)	A detailed description of the proposed activity	Chapter 2
(2) (c)	A description of the property on which the activity is to be undertaken and the location of the activity on the property	Chapter 3 and Chapters 6 to 10
(2) (c) (i)	A linear activity, a description of the route of the activity	This is not a linear activity
(2) (c) (ii)	An ocean-based activity, the coordinates where the activity is to be undertaken	This is not an ocean based activity
(2) (d)	A description of the environment that may be affected by the activity and the manner in which the physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity	Chapter 3 and Chapters 6 to 10
(2) (e)	Details of the public participation process conducted in terms of sub-regulation	Chapter 4
(2) (e) (i)	Steps undertaken in accordance with the plan of study	Chapter 4
(2) (e) (ii)	(2) (e) (ii) A list of persons, organisations and organs of state that were registered as interested and affected parties	Appendix E
(2) (e) (iii)	A summary of comments received from, and a summary of issues raised by registered interested and affected parties, the date of receipt of these comments and the response of the EAP to those comments	<u>Comments and Responses Trail in Chapter Four.</u>

(2) (e) (iv)	Copies of any representation, objections and comments received from registered interested and affected parties	Appendix D
(2) (f)	A description of the need and desirability of the proposed activity and identified potential alternatives to the proposed activity including advantages and disadvantages that the proposed activity or alternatives may have on the environment and the community that may be affected by the activity	Chapter 1 (1.2), Chapter 2 (2.2) and Chapter 5 for Alternatives
(2) (g)	An indication of the methodology used in determining the significance of potential environmental impacts	Chapter 4
(2) (h)	A description and comparative assessment of all alternatives identified during the environmental impact assessment process	Chapter 5 & 11
(2) (i)	A summary of the findings and recommendations of any specialist report or report on a specialised process	Chapters 6 to 11
(2) (j)	A description of all environmental issues that were identified during the environmental impact assessment process, an assessment of the significance of each issue and an indication of the extent to which the issue could be addressed by the adoption of mitigation measures	Chapters 6 to 11
(2) (k)	An assessment of each identified potentially significant impact	Chapters 6 to 11
(2) (k) (i)	Cumulative impacts	Chapters 6 to 11
(2) (k) (ii)	The nature of the impact	Chapters 6 to 11
(2) (k) (iii)	The extent and duration of the impact	Chapters 6 to 11
(2) (k) (iv)	The probability of the impact occurring	Chapters 6 to 11
(2) (k) (v)	The degree to which the impact can be reversed	Chapters 6 to 11
(2) (k) (vi)	The degree to which the impact may cause irreplaceable loss of resources	Chapters 6 to 11
(2) (k) (vii)	The degree to which the impact can be mitigated	Chapters 6 to 11
(2) (l)	A description of any assumptions, uncertainties and gaps in knowledge	Chapter 1 (1.7), and Chapters 6 to 10 (for specialist studies)
(2) (m))	An opinion as to whether the activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation	Chapter 11
(2) (n) (i)	A summary of the key findings of the environmental impact assessment	Chapter 11
(2) (n) (ii)	A comparative assessment of the positive and negative implications of the proposed activity	Chapter 11
(2) (o)	A draft Environmental management plan that complies with regulation 35	Part B
(2) (p)	Copies of any specialist reports and reports on specialised processes complying with regulation 33	Included in Chapter 6 to 10, water use in Appendix F and specialist declarations in Appendix G

### 1.6.1 Additional Information Requested by DEDEAT

As part of the approval of the Plan of Study for EIA dated 20 November 2015 DEDEAT has requested additional information to be considered in the Final EIA. The table below indicates the information requested and where this information has been included as part of this assessment process.

Table 1.3: Additional Information Requested by DEDEAT and where this is contained in the Final EIA.

No	Additional Information Requested	Status
1	The Department deems that a Visual Impact Study is imperative as the farm portions are within the buffer zone of the Addo Elephant National Park (AENP), especially given the comments from SANPARKS.	A Visual Impact Assessment has been undertaken and is included in Chapter 8 of the EIA Report.
2	The EIR to contain a list of all properties owned by the applicant, including an indication of the total area of land owned by applicant, the total area under cultivation, the total area of intact indigenous vegetation remaining vs. conservation targets for each vegetation type and projected future expansion.	A list of all the properties owned by the applicant and the current level of transformation thereof as well as how this relates to the required conservation targets is contained in Appendix H.
3	The constraints as listed in the FSR are noted. The FEIR must specifically address all these constraints, but particularly the water use for the proposed development, including proposed volumes required, and especially the need for additional water use rights. Should additional water rights not be obtained, the Department will deem this a fatal flaw and the development will not be authorised.	Confirmation of the existing water use entitlements to which the applicant has access is contained in Appendix F of the EIA Report. The applicant currently has 77ha of water use entitlements in reserve. This translates to sufficient irrigation water to irrigate approximately 116ha of citrus orchards. In addition, the applicant has made application for a Water Use licence for taking water from a water resource to the Department of Water and Sanitation in order to irrigate the additional 104ha of citrus orchards.
4	The EAP must investigate alternative indigenous species which can be utilized as windbreak species instead of the alien species discussed in the FSR, and must assess the pro's and con's of each alternative species and present a proposal of the best practical species to be utilized, and the possibility of using a number of species interspersed amongst each other must also be considered.	Alternative indigenous windbreak species have been investigated by the vegetation specialist and are included in Chapter 6 of the EIA Report.
5	Confirmation from Eskom is required regarding any electricity needs and their requirements regarding the servitude.	Eskom has confirmed that they will be able to provide a new supply of 200kVA for the additional electrical supply which will be required in order to pump the irrigation water from the dam on Portion 343 of Farm 113 to the orchards on Portion 276 of Farm 113 (see Appendix H of the EIA Report).  Eskom has also indicated the required buffer areas from the infrastructure which is located on Portion 276 of Farm 113 which requirements have been taken into account in the proposed layout. For more detail in this regard, see Chapter 2 of the EIA Report.

		<p><u>In correspondence dated the 26 January 2017, Eskom indicated that a co-usage servitude confirmation <b>may</b> be required for irrigation pipes, that traverse the Eskom Servitude. As per emails sent by Public Process Consultants to Eskom, dated the 27 January 2017 and 2 February 2017, the lines department must make this determination and revert back. Interaction with Eskom is detailed in Chapter 4 and copies of correspondence from Eskom is attached in Appendix D of the EIA Report.</u></p>
6	The project schedule to be updated in the EIR.	The revised project schedule is contained in Chapter 2 of the EIA report.
7	The assessment and site layout to include the alternative and feasibility of only utilizing historically transformed areas on the farm portions, as well as the alternatives described in point 12 below.	Alternative layouts have been assessed and are included in Chapter 5 of the EIA Report. The preferred layout alternative has been assessed in full and is described in Chapter 2.
8	Comprehensive engagement with other juristic Organs of State, especially SANPARKS, to be undertaken during the public participation process (PPP), and all comments and requirements to be included and satisfactorily addressed in the EIR.	<p>The Comments and Responses trail as well as a full description of the interaction with the respective juristic Organs of State is contained in Chapter 4 of the EIA Report.</p> <p><u>On the 18 November 2016, prior to the commencement of the comment period for the review of of the Draft EIA and in order to ascertain the correct SANParks representative from whom comment should be requested and email confirming such was sent to SANParks. Subsequently and in correspondence dated 24 November 2016, four representatives from SANParks were notified of the release of the Draft EIA Report for the 62 day review period. On the 10 January 2017 and prior to the closure of the comment period on the Draft EIA, a follow up email was sent to SANParks requesting comment on the Draft EIA and included an offer to meet with SANParks to discuss the Draft EIA. On the 23 January 2017, comment was received from Mr John Adendorff of SANParks regarding comment he had previously submitted on the Scoping Report and requesting clarity on the location of the project. In response to this email and on the 23 January 2017, it was confirmed with Mr Adendorff that comment was received from him, during the Scoping Phase of the Assessment, however the Draft EIA was available now for comment and Mr Adendorff was emailed a copy of Chapter 2, 6</u></p>

		<p><u>and 8 of the Draft EIA. As no further comment was forthcoming, and on the 8 February 2017 Mr Adendorff was emailed requesting comment on the Draft EIA. On the 8 February 2017 comment was received from SANParks, which has been included in the Issues and Response Trail of Chapter 4 of this report. Proof of the interaction with SANParks has been included in Appendix D of the EIA Report and further details thereof included in Chapter 4, section 4.3.3.</u></p>
9	<p>It is noted that the agricultural potential is listed as Land Capability Class VII, which indicates that the land is unsuitable for cultivation. The soil analysis to be done in the EIA phase must be comprehensive and address the agricultural potential of the land.</p>	<p>A Soil Suitability Assessment has been undertaken and is included in Chapter 9 of the EIA Report.</p>
10	<p>It is noted that a comparison table between the 2010 EIA listed activities and the 2014 EIA listed activities is included. However, certain of these activities might also need a Water Use Licence from the Department of Water and Sanitation (DWS), such as Activity 11 and 18 of GN R. 544 and Activity 16 of GN R. 546.</p>	<p>The Department of Water and Sanitation has been included on the I&amp;AP database from the outset of the environmental assessment process. It is most likely that a WULA will be required prior to commencement with activities on site due to the proximity of activities to wetland features and a natural ephemeral drainage area which have been identified on the site. Confirmation on the requirement for a WULA has been sought from DWS.</p>
11	<p>Furthermore, legislation that must be taken into account must also include NEMBA, the Provincial Nature Conservation Ordinance, the Alien Invasive Species Regulations (AIS) issued in terms of NEMBA as well as CARA.</p>	<p>The relevant legislation and its applicability to the proposed development has been addressed by the vegetation specialist as contained in Chapter 6 of the EIA Report.</p>
12	<p>Alternatives identified in the FSR included only layout alternatives and technology alternatives in terms of windbreak species (refer to Point 4 above). These seem to be based on the applicant's wishes to maximize the agricultural development of the land. The Department requires that further alternatives are considered and assessed against the preferred alternative of developing the land to its maximum for citrus production. Such alternatives can include, but is not limited to, the following:</p>	<p>The assessment of alternatives is contained in Chapter 5 of the EIA report.</p>
a)	<p>Organic farming methods vs. traditional, currently utilised methods;</p>	<p>A specialist opinion on the use of organic farming methods versus traditional farming methods is contained in Appendix H of the EIA Report. The assessment of technology alternatives is contained in Chapter 5 of the EIA Report.</p>

<b>b)</b>	Game farming and conservation of the vegetation on site (including the removal of any domestic and extra-limital species should these species prove to degrade the vegetation on site). Rehabilitation of the remainder of the site must be considered, and the commercial viability of game farming considered.	The viability of commercial game farming has been assessed as an activity alternative in Chapter 5 of the EIA Report.
<b>13</b>	The EIR must fully describe all chemical, fertilizer, herbicide and pesticide use, including measures to limit drift into the AENP and impacts on any possible surface water and ground water. Cumulative impacts are to be addressed, and alternative methods of application as well.	A full list of all the chemicals, fertilizers, herbicides and pesticides which are proposed to be utilised is included in Appendix H of the EIA Report. The vegetation and aquatic specialist has addressed the potential impact thereof on surface and groundwater resources including cumulative impacts. Mitigation measures have been included to limit spray drift into the AENP. See Chapter 6 of the EIA Report for the specialist's recommendations
<b>14</b>	The Biophysical Assessment to consider the AIS Regulations in terms of NEMBA.	The relevant legislation and its applicability to the proposed development has been addressed by the vegetation specialist as contained in Chapter 6 of the EIA Report.