

CHAPTER ONE: INTRODUCTION

1.1 BACKGROUND AND PROJECT OVERVIEW

The proponent, San Miguel Fruits SA (Pty) Ltd, proposes to expand citrus production at their existing operations on Portion 2 of Farm 92, known as Sylvania, which measures approximately 243.82ha in extent. Sylvania is an existing working farm and the proponent proposes to transform a portion on the western section of the farm, which measures approximately 115 ha. The area to be transformed will be informed by the various specialist assessments which will be undertaken during the assessment process. Irrigation of the proposed agricultural development requires the construction of a new dam with a capacity of approximately 30 000m³ (0.5ha footprint) and the installation of irrigation pipelines of varying diameters. The farm portion under assessment falls within the Sundays River Valley Municipal area (SRVM) and the nearest town is Kirkwood, which is located approximately 9.3km northwest of the site (see Map 1.1).

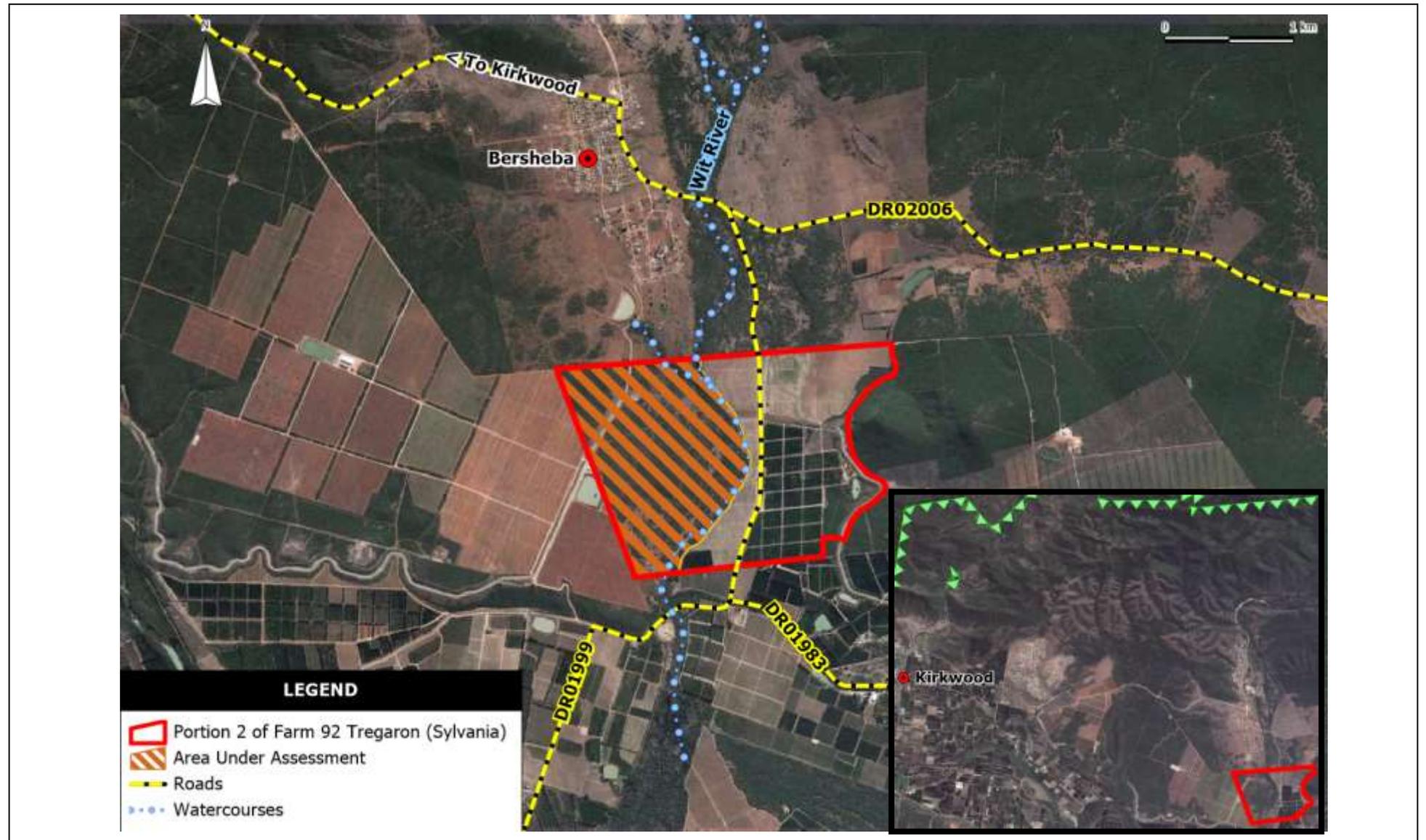
The existing buildings on the Farm are proposed to be used for the storage of vehicles, pesticides and herbicides, as well as to provide administrative support to the development. In addition, the administrative facilities at another farm (known as Mfuleni) owned by the proponent, located approximately 2km south of Sylvania, are also proposed to be utilised for the expanded agricultural development on Sylvania.

In terms of the NEMA EIA Regulations, 2014 (as amended), published in GN R326, 327, 325 and 324, promulgated under Chapter Five of the National Environmental Management Act (Act 107 of 1998) (“NEMAA”), and published in Government Gazette 40772 on the 7 April 2017, the project requires full Scoping and Environmental Impact Assessment (S&EIR), prior to the commencement of any activities on the site due to amongst others, activities listed in GN R325, namely:

“15. The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for -...”

Chapter Four of this report provides details of the listed activities which require Environmental Authorisation. The project proponent has appointed Public Process Consultants as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping and Environmental Assessment for the project. The competent authority who must consider and decide upon this application is the Provincial Department of Economic Development, Environmental Affairs and Tourism (DEDEAT), Cacadu Region.

Notice of Intention to commence with Scoping and EIA was submitted to the competent authority, and sent to all identified Interested and Affected Parties (I&APs) and Organs of State on 11 April 2017. Notification was provided in terms of the NEMA EIA Regulations, 2014 published in Government Notice R982, 983, 984 and 985 on the 4 December 2014 in Government Gazette 38282. However, subsequent to initiation of the Scoping and EIA process it was brought to the EAP’s attention that these regulations had been amended by the publication of GN R326, 327, 325 and 324 in Government Gazette 40772 on the 7 April 2017. Therefore, the proposed Scoping and EIA process will be undertaken in terms of the NEMA EIA Regulations, 2014 (as amended on 7 April 2017), and the project will be re-advertised in terms of the amended EIA regulations.



Map 1.1: The location of the area under assessment which is situated on Portion 2 of Farm 92 Tregaron, known as Sylvania. The map insert is showing Sylvania in relation to the nearest town, Kirkwood, as well as the distance from the Addo Elephant National Park (green border).

1.2 PROJECT NEED AND DESIRABILITY

One of the objectives of the Scoping Process is to, through a consultative process, “*motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location.*” DEA (2017), Guideline on Need and Desirability, Department of Environmental Affairs, (DEA), Pretoria, South Africa, ISBN: 978-0-9802694-4-4 has reference, as follows:

“The National Strategy for Sustainable Development and Action Plan 2011 – 2014 (NSSD 1) (2011) states the following:

Although the concept of sustainable development has been on the international agenda since the United Nations Conference on the Human Environment in Stockholm in 1972, the terms ‘sustainability’ and ‘sustainable development’ have been used and interpreted in widely different ways. In developing this strategy for sustainable development, a fixed definition of these terms has been accepted in a South African context.

Sustainability (or a sustainable society) is seen as the overall goal of the NSSD 1. Sustainability in this context implies **ecological sustainability**. In the first instance, it recognises that the maintenance of healthy ecosystems and natural resources are preconditions for human wellbeing. In the second instance, it recognises that there are limits to the goods and services that can be provided. In other words, ecological sustainability acknowledges that human beings are part of nature and not a separate entity.

Sustainable development is the process that is followed to achieve the goal of sustainability. Sustainable development implies the selection and implementation of a development option, which allows for appropriate and justifiable social and economic goals to be achieved, based on the meeting of basic needs and equity, without compromising the natural system on which it is based.”

As per the DEA Guideline on Need and Desirability (2017), the relevant questions to be engaged with when considering need and desirability will be taken into account by the various specialist studies to be undertaken for this assessment.

South Africa’s National Development Plan, 2011, has as one of its focal points, the expansion of agriculture in order to facilitate job creation. Figure 1.1 below is an 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).

Agriculture

As the primary economic activity in rural areas, agriculture is the main focus of this chapter. Agriculture has the potential to create close to 1 million new jobs by 2030, a significant contribution to the overall employment target. To achieve this, South Africa needs to:

- Expand irrigated agriculture. Evidence shows that the 1.5 million hectares under irrigation (which produce virtually all South Africa's horticultural harvest and some field crops) can be expanded by at least 500 000 hectares through the better use of existing water resources and developing new water schemes.
- Convert some under-used land in communal areas and land reform projects into commercial production.
- Pick and support commercial agriculture sectors and regions that have the highest potential for growth and employment.
- Support job creation in the upstream and downstream industries. Potential employment will come from the growth in output resulting from the first three strategies.
- Find creative combinations between opportunities. For example, emphasis on land could benefit from irrigation infrastructure; give priority to successful farmers in communal areas; and support industries and areas with high potential to create jobs. All these will increase collaboration between existing farmers and beneficiaries of land reform.
- Develop strategies that give new entrants access to product value-chains and support from better resourced players.

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

Sylvania measures approximately 243.82ha in extent. Approximately 45% (~110ha) of the Farm (Ptn 2 of Farm 92 Tregaron) has been transformed for agriculture. The portion of Sylvania which is currently under assessment measures approximately 115ha in extent and is currently undeveloped. However, it is anticipated that a portion thereof will not be deemed suitable for development, subject to the recommendations by the various specialists as well as technical input (aquatic resources and associated buffers, areas required to meet biodiversity targets, soil suitability, slope etc). The area to be transformed will be informed by the various specialist assessments through the assessment process.

The area under assessment is bordered by existing agricultural development to the west and east and is zoned for Agriculture. The site does not require rezoning in order for the proposed activity to proceed. The town of Bersheba and surrounds is located adjacent to the northern boundary of the area under assessment. Based on the experience of the EAP; land available for cultivation, situated adjacent to existing agricultural areas and which is zoned for agricultural use, have existing water use rights, suitable soils, and is near the LSRWUA canal system, is becoming scarce in the Sundays River Valley. Chapter Three of this report provides detail of the surrounding land use activities.

The Final IDP (2015/ 2016) for the 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). According to the SRVM Integrated Development Plan (2013/ 2014) "...the Sundays River Valley is one of the developing local municipalities within the Cacadu District Municipality (Western Region) and boasts with its eco-tourism and agricultural potential..." (pg10). "The agricultural sector is one of the key economic

drivers of the Sundays River Valley Municipality.”, according to the SRVM Spatial Development Plan (April 2013) (pg. 8).

It is the proponent’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 LSRWUA canal system, the suitability/ fertility of the soils, as well as the available work force from local communities. By making use of this labour 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.

1.3 REQUIREMENTS FOR SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT

In terms of the NEMA EIA Regulations, 2014 (as amended), published in GN R326, 327, 325 and 324, promulgated under Chapter Five of the National Environmental Management Act (Act 107 of 1998) (“NEMAA”), and published in Government Gazette 40772 on the 7 April 2017, the project requires full Scoping and Environmental Impact Assessment (S&EIR), prior to the commencement of any activities on the site due to amongst others, activities listed in GN R325 (Listing Notice 2), namely:

“15. The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for -...”

Chapter Four of this report includes a list of the activities contained in GN R327, 325 and 324, which may be triggered by the project components and thus, form part of this S&EIA process. The reader’s attention is drawn to the fact that the EIA Regulations were amended on the 7 April 2017 and thus, the listed activities outlined in Chapter Four are in line with the amendments to the EIA Regulations, and references differ to those provided in the initial correspondence to I&APs of the 11 April 2017, prior to the amendment of the EIA Regulations 2014. These listed activities require authorisation from the competent authority, DEDEAT Cacadu Region, prior to the commencement of any activities on site.

The purpose of the EIA process is to identify, assess and report on the impact project activities may have of the receiving environment, if implemented. An important element of the S&EIA process is to identify potential impacts, both positive and negative, and make recommendations for the mitigation of impacts, to reduce potentially negative impacts and enhance potentially positive impacts. The EIA needs to show the competent authority, I&APs and the project proponent what the consequences of their choices will be in terms of impacts on the social, economic and biophysical environments.

In compliance with the above legislation and regulations this S&EIA process is being implemented in four phases, the details of which are outlined in Chapter Four of this report:

- Pre-Application Scoping Phase (**current stage**)
- Application and Scoping Phase
- Environmental Impact Assessment Phase
- Decision Making and Appeal Period

As part of the Pre-Application phase, notice of Intention to commence with a S&EIA process was submitted to the competent authority, DEDEAT, Cacadu Region, on 11 April 2017. Copies of correspondence sent to DEDEAT are included in Appendix B of this report. An application form for

Environmental Authorisation, in order to commence with the legislated portion of the S&EIA process in terms of the NEMA EIA Regulations, 2014 (as amended), is being prepared and will be submitted to the competent authority prior to the release of the Consultation Scoping Report (CSR) and the legislated 30-day consultation period.

1.4 EIA TEAM

This section of the report provides an overview of the EIA project team under the management of Public Process Consultants.

Table 1.1: EIA Team and Specialists.

EIA PROJECT TEAM		
Team Member	Company	Role
Sandy Wren	Public Process Consultants	EIA Team Leader
Wandile Junundu	Public Process Consultants	Community Consultation
Marisa Jacoby	Public Process Consultants	Environmental Assessment Practitioner
Zandri Grobbelaar	Public Process Consultants	Junior Environmental Assessment Practitioner
Deborah Vromans	Private	Vegetation and Aquatic Specialist Assessment
Kathryn Smuts & Jenna Lavin	CTS Heritage	Heritage Impact Assessment
Coenraad Fraenkel	Agrimotion Consulting	Soil Suitability Assessment
Cary Hastie	Engineering Advice and Services	Traffic Impact Assessment
TECHNICAL TEAM		
Louis Grobler	CFT	Dam and Irrigation Infrastructure Design
Rory Niven	San Miguel Fruits SA (Pty) Ltd	Proponent representative
Sunell Botes	San Miguel Fruits SA (Pty) Ltd	Project/ CI Engineer

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 20 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 Assessment Practitioner) and Zandri Grobbelaar (Environmental Assessment Practitioner).

The EIA Project Team is being led by **Ms Sandy Wren** of Public Process Consultants, who has over 20 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. 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. See Appendix A for curriculum vitae.

Zandri Grobbelaar, Junior Environmental Assessment Practitioner obtained a BSc Honours in Botany, majoring in Aquatic Botany and Environmental Management from the Nelson Mandela Metropolitan University. In partial fulfilment of the requirements for this degree she completed a treatise entitled: "Determining the effect of a macroalgal bloom on salt marsh and *Zostera capensis* cover abundance in the Knysna Estuary".

1.6 OBJECTIVES OF THE SCOPING PROCESS

This Draft Consultation Scoping Report (Draft CSR) forms part of a series of reports and information documents that will be prepared during the EIA process for the proposed agricultural development.

The Scoping phase of the EIA refers to the process of determining the spatial and temporal (extent) boundaries for the EIA, as well as the key issues to be addressed in the EIA phase. This is done through a parallel process of consultation with interested and affected parties (I&APs), the competent authority, affected organs of state and specialist input. This includes a review of relevant background literature on the development (Local and Regional Planning Frameworks, EC Biodiversity Conservation Plan (ECBCP), and Subtropical Thicket Ecosystem Plan (STEP)). As per Appendix 2 of the NEMA EIA Regulations, 2014 (as amended), the objectives of the Scoping Process are to –

- identify relevant policies and legislation relevant to the activity;
- motivate the need and desirability of the proposed activity in the context of the preferred location
- identify and confirm the preferred activity, technology alternative and/ or site alternative; or if no alternatives, including location alternatives were investigated, the motivation for such;
- identify the key issues to be addressed in the assessment phase;
- confirm the level of assessment, methodology and expertise required as well as the extent of further consultation to be undertaken to determine the impacts and risks the activity will impose on the preferred site to inform the location of the development footprint within the preferred site; and
- identify suitable measures to avoid, manage or mitigate identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

The primary objective of the Draft CSR is to present (to key stakeholders and affected organs of state) an overview of the project, including key issues, as well as confirm the preferred alternative that requires assessment in the EIA Phase. As noted in section 1.3 above, the S&EIA process is being implemented in four phases.

The Scoping process is designed to, amongst others, satisfy the requirements of Chapter Six (Regulations 39-44) of GN R326 of the NEMA EIA Regulations, 2014 (as amended), which relates to the public participation process and the registration of interested and affected parties (I&APs) and the acknowledgment of their comments on the proposed project. Issues raised during the Scoping process have been included in a Comments and Responses Trail as part of Chapter Four of this report. Copies of comments received from I&APs and requests to register interest on the project database are included in Appendix F of this report. Regulation 43. (1) states the following:

43. (1) ***“A registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.”***

In terms of legal requirements, a crucial objective of the Scoping process is to satisfy the requirements of Appendix 2 of GN R326 of the NEMA EIA Regulations, 2014 (as amended). This section regulates and prescribes the content of Scoping Reports and specifies the type of supporting information that must accompany the submission of the Scoping Report to the competent authority. Table 1.2 below indicates how the requirements of these regulations are met by the different sections of this Scoping Report.

Table 1.2: Summary of where requirements for a Scoping Report (in terms of GN R326, Section 2 in Appendix 2 of the NEMA EIA Regulations, 2014, as amended) are provided for in this report.

Section 2 in Appendix 2	Requirement for Scoping Report	Where this is provided in this Draft CSR
(1) (a) (i)	details of the EAP who prepared the report	Appendix A
(1) (a) (ii)	the expertise of the EAP, including curriculum vitae;	Appendix A
(1) (b)	the location of the activity, including-	Chapter 2
(1) (b) (i)	the 21-digit Surveyor General code of each cadastral land parcel;	Chapter 2
(1) (b) (ii)	where available, the physical address and farm name;	Chapter 2
(1) (b) (iii)	where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;	Chapter 2
(1) (c)	a plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is-	Appendix H
(1) (c) (i)	a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or	This is not a linear activity.
(1) (c) (ii)	on land where the property has not been defined, the coordinates within which the activity is to be undertaken;	The property boundary has been defined.
(1) (d)	a description of the scope of the proposed activity, including-	Chapter 2

(1) (d) (i)	all listed and specified activities triggered;	The scope of the activity in Chapter 2 and listed activities in Chapter 4.
(1) (d) (ii)	a description of the activities to be undertaken, including associated structures and infrastructure;	Chapter 2
(1) (e)	a description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process;	Chapter 1 for Need and Desirability, Chapter 3 for Ecological and Chapter 4 for the listed activities and process followed.
(1) (f)	a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location;	Chapter 1
(1) (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 -	Chapter 4 for the process followed and Chapter 5 for an assessment of alternatives and preferred activity.
(1) (g) (i)	details of all the alternatives considered;	Chapter 5
(1) (g) (ii)	details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;	Chapter 4 and Appendix C, D, E and F.
(1) (g) (iii)	a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;	Chapter 4 for the Comments and Responses Trail.
(1) (g) (iv)	the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	Chapter 3 and 5.
(1) (g) (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;	Alternatives are discussed in Chapter 5. A detailed assessment of impacts will be provided in the EIA Phase of the assessment.
(1) (g) (vi)	the methodology used in identifying and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;	Alternatives are discussed in Chapter 5. The methodology to be used for the rating of impacts in the EIA Phase of the Assessment is provided in Chapter 6.
(1) (g) (vii)	positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	Alternatives are discussed in Chapter 5. A detailed assessment of impacts will be provided during the EIA Phase of the Assessment.
(1) (g) (viii)	the possible mitigation measures that could be applied and level of residual risk;	Specialist Terms of Reference are included in Chapter 6 and include the requirement to provide suitable mitigation measures.
(1) (g) (ix)	the outcome of the site selection matrix;	Site alternatives have not been assessed, but only considered, as part of this assessment, reasoning for

		such is provided in Chapter 5.
(1) (g) (x)	if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such and	Chapter 5
(1) (g) (xi)	a concluding statement indicating the preferred alternatives, including preferred location of the activity;	Chapter 5
(1) (h)	a plan of study for undertaking the environmental impact assessment process to be undertaken, including-	Chapter 6
(1) (h) (i)	a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity;	Chapter 5
(1) (h) (ii)	a description of the aspects to be assessed as part of the environmental impact assessment process;	Chapter 6
(1) (h) (iii)	aspects to be assessed by specialists;	Chapter 6
(1) (h) (iv)	a description of the proposed method of assessing the environmental aspects, including aspects to be assessed by specialists;	Chapter 6
(1) (h) (v)	A description of the proposed method of assessing duration and significance;	Chapter 6
(1) (h) (vi)	an indication of the stages at which the competent authority will be consulted;	Chapter 4 and 6.
(1) (h) (vii)	particulars of the public participation process that will be conducted during the environmental impact assessment process; and	Chapter 4 and 6.
(1) (h) (viii)	a description of the tasks that will be undertaken as part of the environmental impact assessment process;	Chapter 6
(1) (h) (ix)	identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.	Chapter 6
(1) (i)	an undertaking under oath or affirmation by the EAP in relation to- (i) the correctness of the information provided in the report; (ii) the inclusion of comments and inputs from stakeholders and interested and affected parties; and (iii) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties;	To be included in the Application Form for submission to DEDEAT. Comments raised to date are included in the Comments and Responses Trail in Chapter 4 and information provided to I&APs to date in Appendix E and received from I&APs in Appendix F.
(1) (j)	an undertaking under oath or affirmation by the EAP in relation to the level of agreement between the EAP and interested and affected parties on the plan of study for undertaking the environmental impact assessment;	To be included in the Application form and Final Scoping Report.
(1) (k)	where applicable, any specific information required by the competent authority; and	None requested to date. Where required this will be indicated.
(1) (l)	any other matter required in terms of section 24(4)(a) and (b) of the Act.	The Scoping and EIA process takes into consideration IEM principles as contained in NEMA.
(2)	Where a government notice <i>gazetted</i> by the Minister provides for any protocol or minimum information requirement to be applied to a scoping report, the requirements as indicated	This report.