

CHAPTER ONE: INTRODUCTION

1.1 BACKGROUND AND PROJECT OVERVIEW

The applicant, 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 ~243.82ha in extent. Sylvania is an existing working farm and the applicant proposes to transform a portion on the western section of the farm, which measures ~115ha. The area proposed to be transformed within the ~115ha area under assessment, measures ~65ha in extent. Approximately 50ha of citrus is proposed to be established within the development footprint and ~15ha is proposed to be cleared for associated infrastructure (roads, irrigation, dam etc.). Irrigation of the proposed agricultural expansion requires the construction of a new dam with a capacity to store ~30 000m³ (~2.1ha footprint), of water, as well as 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 ~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 applicant, located ~2km south of Sylvania, are also proposed to be utilised for the expanded agricultural development on Sylvania.

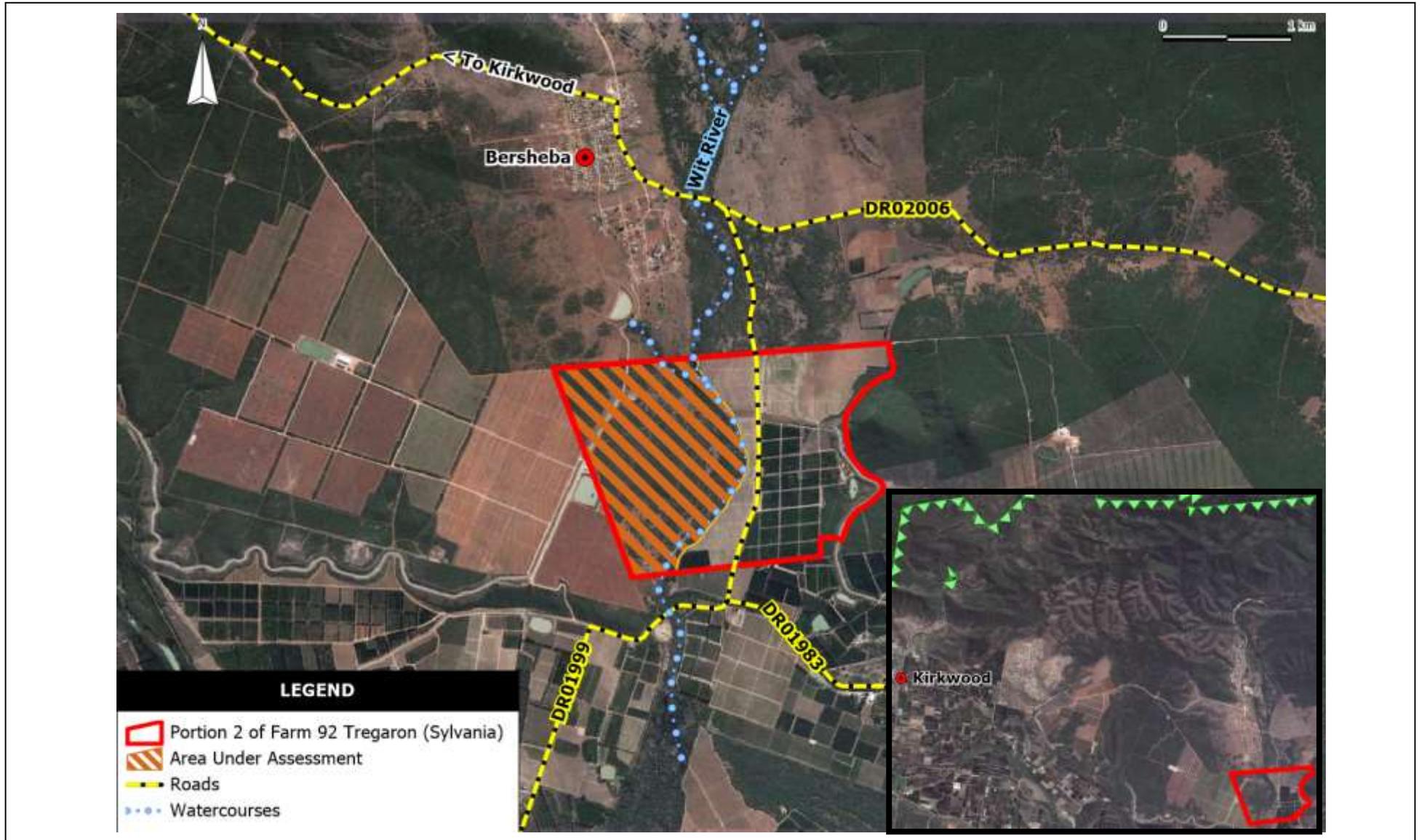
In terms of the NEMA EIA Regulations, 2014 (as amended), published in GN R326, 327, 325 and 324, promulgated under Chapter Five of the National Environmental Management Act (Act 107 of 1998) (“NEMAA”), and published in Government Gazette 40772 on the 7 April 2017, the project requires full Scoping and 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 applicant has appointed Public Process Consultants as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping and Environmental Assessment (Scoping and EIA) 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. These regulations had subsequently been amended by the publication of GN R326, 327, 325 and 324 in Government Gazette 40772 on the 7 April 2017.

On the 2 February 2018, acceptance of the Final Scoping Report (FSR) and approval of the Plan of Study for EIA was received from DEDEAT, and the reference number EC06/C/LN2/M/64-2017 has been assigned to the application. In line with the NEMA EIA Regulations 2014 (as amended), the process has moved into the EIA phase of the assessment.



Map 1.1: The location of the area under assessment (~115ha) 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 assessment 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 have been 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 ~243.82ha in extent. Approximately 49% (~120ha) of the farm (Ptn 2 of Farm 92 Tregaron) has been transformed for agriculture. The portion of Sylvania which is proposed for development measures ~65ha, which represents 27% of the farm. The area not proposed for transformation (intact vegetation) on Sylvania measures ~52ha in extent (21% of the farm). The area proposed for cultivation is located on an existing, working farm with sufficient facilities, access to water and water rights, that will be required to service the additional area proposed for cultivation.

The area under assessment (~115ha) 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 ~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 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 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 EIA, 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 Scoping and 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. These listed activities require Environmental 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 Scoping an 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 applicant 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 Scoping and EIA process is being implemented in four phases, the details of which are outlined in Chapter Four of this report:

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

As part of the Pre-Application phase, notice of Intention to commence with a Scoping EIA process was submitted to the competent authority, DEDEAT, Cacadu Region, on 11 April 2017. On the 20 October 2017 an Application Form for Environmental Authorisation, in order to commence with the legislated portion of the Scoping and EIA process in terms of the NEMA EIA Regulations, 2014 (as amended), was submitted to the competent authority prior to the release of the Consultation Scoping Report (CSR) and the legislated 30-day consultation period. Acknowledgement of receipt of the submission of the Application Form, as well as the CSR was received from DEDEAT on the 2 November 2017. Reference number EC06/C/LN2/M/64-2017 has been assigned to the application.

This Draft EIA has been preceded by a comprehensive Scoping Process with the FSR, including the Plan of Study for EIA, being submitted to DEDEAT on the 29 November 2017. On the 12 January 2018 acknowledgement of receipt of the FSR was received from DEDEAT. On the 2 February 2018 acceptance of the FSR and approval of the Plan of Study for EIA was received from DEDEAT. As per GN R326, regulation 23. (1) *The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority - (a) an environmental impact assessment report inclusive of any specialist reports, and an EMPr, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority;*”

The EIA phase of the assessment is currently at the stage where the Draft EIA and Draft EMPr is being released for a 30-day authority and I&AP comment period. Copies of correspondence sent to and received from DEDEAT are included in Appendix B of this report. Copies of correspondence to and from I&APs are contained in Appendix E and F, respectively.

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 & Nic Wiltshire	CTS Heritage	Heritage Impact Assessment
Coenraad Fraenkel	Agrimotion Consulting	Soil Suitability Assessment and Orchard Layout
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	Applicant 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 Strategic Environmental Assessments. Under this role, Sandy was actively involved in projects such as the 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).

Ms Sandy Wren of Public Process Consultants 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). See Appendix A for curriculum vitae.

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". Zandri has worked as a Junior EAP, on various Scoping and EIA processes for agricultural developments.

1.6 OBJECTIVES OF THE EIA PHASE OF THE ASSESSMENT

This Draft EIA Report forms part of a series of reports and information documents that are prepared during the EIA process for the proposed agricultural expansion. The EIA Report must be undertaken in line with the approved Plan of Study for EIA as contained in the accepted FSR. The primary objective of EIA phase of the assessment is to present to I&APs and affected organs of state an overview of the predicted impacts, proposed mitigation measures (both positive and negative), closure outcomes, residual impacts of the activity and management actions required to avoid or mitigate the negative impacts; or enhance the positive impacts of the project. The assessment of alternatives forms an important part of the assessment process, see Chapter Five of this report.

As per Appendix 3 of the NEMA EIA Regulations, 2014 (as amended), the objectives of the EIA phase of the assessment is to, through a consultative process –

- Determine the policy and legislative context within which the activity is located and document how the proposed activities complies with and responds to the policy and legislative context
- Describe the need and desirability of the proposed activity, as well as within the context of the development footprint on the approved site as contemplated in the accepted scoping report
- Identify the location of the development footprint within the approved site based on an impact and risk assessment process, including cumulative impacts, and the ranking of all the identified development footprint alternatives, focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects of the environment.
- Determine the –
 - Nature, significance, consequence, extent, duration and probability of the impacts to inform identified preferred alternatives; and
 - The degree to which these can be reversed; may cause irreplaceable loss of resources; and can be avoided, managed or mitigated
- Identify the most ideal location for the activity within the development footprint of the approved site based on the lowest level of environmental sensitivity
- Identify, assess and rank impacts on the development footprint on the approved site as contemplated in the approved scoping report through the life of the activity
- Identify suitable measures to avoid, manage or mitigate identified impacts
- Identify residual risks that need to be managed and monitored

The EIA is required to be undertaken through a consultative process and thus the EIA must, 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 I&APs, the acknowledgment of their comments, as well as recording and responding to 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 the FSR. Chapter Four of this report includes comments raised by I&APs after the closure of the comment period on the FSR and prior to release of the Draft EIA for review. The Final EIA report will include comments received from I&APs during the review of the Draft EIA. Chapter Four of this report provides detail on the public participation process undertaken for the EIA phase of the assessment. Appendix F of this report includes copies of comments received from I&APs and affected Organs of State via mail, email or fax and from meetings held. No comments have been received from I&APs or Organs of State subsequent to the submission of the FSR.

In terms of legal requirements, a crucial objective of the EIA Phase of the assessment is to satisfy the requirements of Appendix Three of GN R326 of the NEMA EIA Regulations, 2014 (as amended). Appendix Three regulates and prescribes the scope and content of the EIA Report and specifies the content required in a report for the competent authority to consider and come to a decision on an application. Table 1.2 below indicates how the requirements of Appendix Three are met by the different sections of this EIA Report. Specialist Studies undertaken as part of the EIA need to comply with the requirements of Appendix Six of the NEMA EIA Regulations, 2014 (as amended).

Table 1.2: Summary of where information requirements in terms of Appendix Three of the EIA Regulations, 2014, (as amended) are provided for in this report.

Section in Appendix 3	Requirements for an Environmental Impact Assessment process	Where this is provided in this Draft EIA Report
3. (1) (a) (i)	details of the EAP who prepared the report	Appendix A
3. (1) (a) (ii)	the expertise of the EAP, including curriculum vitae;	Appendix A
3. (1) (b)	the location of the development footprint of the activity on the approved site as contemplated in the accepted scoping report, including-	Chapter 2 and Chapter 5 for Alternatives.
3. (1) (b) (i)	the 21-digit Surveyor General code of each cadastral land parcel;	Chapter 2
3. (1) (b) (ii)	where available, the physical address and farm name;	Chapter 2
3. (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
3. (1) (c)	a plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is-	Appendix H
3. (1) (c) (i)	a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken;	This is not a linear activity.
3. (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.
3. (1) (d)	a description of the scope of the proposed activity, including-	Chapter 2
3. (1) (d) (i)	all listed and specified activities triggered and being applied for; and;	The scope of the activity in Chapter 2 and listed activities in Chapter 4.
3. (1) (d) (ii)	a description of the associated structures and infrastructure related to the development;	Chapter 2
3. (1) (e)	a description of the policy and legislative context within which the development is located and an explanation of how the proposed development complies with and responds to the legislative and policy context;	Chapter 4 and Chapters 6 to 10.
3. (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 development footprint within the approved site as contemplated in the accepted scoping report;	Chapter 1
3. (1) (g)	A motivation for the preferred development footprint within the approved site as contemplated in the accepted scoping report;	Chapter 5
3. (1) (h)	a full description of the process followed to reach the proposed development footprint within the approved site as contemplated in the accepted scoping report, including:	Chapter 5: Assessment of Alternatives.
3. (1) (h) (i)	details of the development footprint alternatives considered;	Chapter 5 for Alternatives and Chapters 6 to 10 for specialist studies.
3. (1) (h) (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 B, D, E and F.
3. (1) (h) (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: Comments and Responses Trail.

3. (1) (h) (iv)	the environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;	Chapter 5 for Alternatives and Chapters 6 to 10. for specialist studies
3. (1) (h) (v)	the impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the 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 in Chapter 5. Specialist Studies including the assessment of impacts and risks in Chapters 6 to 10.
3. (1) (h) (vi)	the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks;	Alternatives in Chapter 5. The methodology used for the rating of impacts in the EIA Phase of the Assessment is provided in Chapter 4.
3. (1) (h) (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 in Chapter 5. Specialist Studies including the assessment of impacts and risks in Chapters 6 to 10.
3. (1) (h) (viii)	the possible mitigation measures that could be applied and level of residual risk;	Specialist Studies including mitigation measures proposed and level of residual risk in Chapters 6 to 10.
3. (1) (h) (ix)	if no alternative development footprints for the activity were investigated, the motivation for not considering such; and	Site alternatives have not been assessed as part of this assessment, reasoning for such is provided in Chapter 5.
3. (1) (h) (x)	a concluding statement indicating the location of the preferred alternative development footprint within the approved site as contemplated in the accepted scoping report;	Chapter 5 for Assessment of Alternatives.
3. (1) (i)	a full description of the process undertaken to identify, assess and rank the impacts the activity and associated structures and infrastructure will impose on the preferred development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity, including-	Chapter 5 for Assessment of Alternatives. Results of specialist studies in Chapter 6 to 10.
3. (1) (i) (i)	a description of all environmental issues and risks that were identified during the environmental impact assessment process; and	Results of specialist studies in Chapter 6 to 10.
3. (1) (i) (ii)	an assessment of significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures;	Results of specialist studies in Chapter 6 to 10.

3. (1) (j)	An assessment of each identified potentially significant impact and risk, including- (i) cumulative impacts; (ii) the nature, significance and consequence of the impact and risk; (iii) the extent and duration of the impact and risk; (iv) the probability of the impact occurring; (v) the degree to which the impact and risk can be reversed; (vi) the degree to which the impact and risk may cause irreplaceable loss of resources; and (vii) the degree to which the impact and risk can be mitigated;	Results of specialist studies in Chapter 6 to 10.
3. (1) (k)	where applicable, a summary of the findings and recommendations of any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final assessment report;	Chapter 11 for a summary of the key findings of the EIA.
3. (1) (l)	an environmental impact statement which contains- (i) a summary of the key findings of the environmental impact assessment:	Chapter 11 for a summary of the key findings of the EIA.
3. (1) (l) (ii)	a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred development footprint on the approved site as contemplated in the accepted scoping report indicating any areas that should be avoided, including buffers; and	Appendix H
3. (1) (l) (iii)	a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;	Chapter 5 for the Assessment of Alternatives. Chapter 11 for a summary of the key findings of the EIA.
3. (1) (m)	based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management outcomes for the development for inclusion in the EMPr as well as for conditions of authorisation;	Chapter 6 to 10 for recommendations from specialist studies for management actions to be included in the EMPr. Chapter 11 for a summary of the key findings of the EIA and conditions of authorisation. Part B of this report for the EMPr.
3. (1) (n)	the final proposed alternatives which respond to the impact management measures, avoidance and mitigation measures identified through the assessment;	Chapter 5 for the Assessment of Alternatives.
3. (1) (o)	any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation	Chapter 11 for a summary of the key findings of the EIA and conditions of authorisation.
3. (1) (p)	A description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed;	Chapters 6 to 10 for specialist studies and any assumptions, uncertainties and gaps in knowledge.
3. (1) (q)	a reasoned opinion as to whether the proposed 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 for a summary of the key findings of the EIA and conditions of authorisation.

3. (1) (r)	where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required and the date on which the activity will be concluded and the post construction monitoring requirements finalised;	This activity does include operational aspects. Recommendations for the period of the Environmental Authorisation in Chapter 2, Section 2.4.
3. (1) (s)	an undertaking under oath or affirmation by the EAP in relation to - (i) the correctness of the information provided in the reports; (ii) the inclusion of comments and inputs from stakeholders and I&APs; (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; 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;	Appendix A
3. (1) (t)	where applicable, details of any financial provision for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts;	Not applicable.
3. (1) (u)	an indication of any deviation from the approved scoping report, including the plan of study, including- (i) any deviation from the methodology used in determining the significance of potential environmental impacts and risks; and (ii) a motivation for the deviation;	No deviations from the approved Scoping Report.
3. (1) (v)	any specific information that may be required by the competent authority; and	None requested to date.
3. (1) (w)	any other matters 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.
3. (2)	Where a government notice <i>gazetted</i> by the Minister provides for any protocol or minimum information requirement to be applied to an environmental impact assessment report the requirements as indicated in such notice will apply.	Where applicable this will be indicated.