

APPENDIX B: CORRESPONDENCE WITH DEDEAT

Correspondence sent to DEDEAT

Letter 1: Notice of Intention to Commence with Scoping and EIA

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22 May 2018

Attention: Mr Andries Struwig
Department of Economic Development, Environmental Affairs and Tourism
Private Bag X 5001
Greenacres
6057

Dear Sir,

RE: NOTICE OF INTENTION TO COMMENCE WITH A SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT PROCESS: AGRICULTURAL DEVELOPMENT ON PORTION 525 OF FARM STRATHSOMERS ESTATE NO. 42, AND ASSOCIATED IRRIGATION INFRASTRUCTURE ON PORTION 523 OF FARM STRATHSOMERS ESTATE NO. 42, SUNDAYS RIVER VALLEY MUNICIPALITY

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, this serves as notification to the competent authority, in this case the Provincial Department of Economic Development, Environmental Affairs and Tourism, Cacadu Region, that a Scoping and Environmental Impact Assessment Process is being conducted on behalf of Umgcambo Trading (Pty) Ltd (the project proponent), for the proposed agricultural development on Portion 525 of Farm 42 (~154.60ha), in the SRVM, for the establishment of citrus orchards and associated infrastructure (dam, internal roads, internal irrigation pipes, logistical services area). To supply the proposed development with the necessary irrigation water, an irrigation water pipeline is proposed to be installed on a portion of an adjacent property, Portion 523 of Farm 42, owned by the same landowner. The area to be cultivated will be informed by the various specialist assessments which will be undertaken during the EIA process

PROJECT PROPONENT
Umgcambo Trading (Pty) Ltd

PROJECT NAME
Agricultural Development on Portion 525 of Farm Strathsomers Estate No. 42, and Associated Irrigation Infrastructure on Portion 523 of Farm Strathsomers Estate No. 42, Sundays River Valley Municipality

PROJECT LOCALITY
Portion 525 is located ~7km south of Kirkwood (as the crow flies), in the SRVM. Access to the farm is proposed via an existing gravel road (DR01976) on the eastern boundary of the site, which links the farm to the tarred R336 (Kirkwood/ Addo Road). The farm can be accessed by turning south at the intersection of the DR01976 and R336 and is located ~2 km south of the intersection on the west of the DR01976. The nearest boundary of the Addo Elephant National Park is located more than 10km north of Portion 525 and therefore, project activities proposed to take place on this property do not trigger listed activities which would require the assessment of impacts on the National Park. The installation of the irrigation water pipeline is proposed to take place on Portion 523, which is adjacent to Portion 525. While Portion 523 is located within 10km of the Addo Elephant National Park, the installation of the irrigation water pipeline does not trigger any listed activities, which would require the assessment of impacts on the National Park. The locality map attached provides an overview of the location of the proposed agricultural development (on Portion 525) and associated pipeline route (Portion 523).

BRIEF PROJECT DESCRIPTION
The area proposed for the agricultural development is located on Portion 525, ~7km south of Kirkwood in the SRVM. Portion 525 measures ~154.60ha in extent. The farm is currently zoned for Agricultural use. The total area to be cleared, including associated

infrastructure (dam, internal roads, internal irrigation pipes, logistical services area), will be determined through specialist and technical input, authority consultation, as well as consultation with I&APs.

Irrigation water for the development is proposed to be supplied from the LSRWUA canal system, via a pipeline with an internal diameter of $\varnothing 500\text{mm}$ and a length of $\sim 1,5\text{km}$, to be installed on an adjacent property, Portion 523, which is owned by the same landowner. The pipeline will convey water from an existing dam located on Portion 523 and is proposed to follow the fenceline of that property until it reaches the boundary of Portion 525, at which point it is proposed to be installed under the DR01976, to connect into a new dam to be constructed on Portion 525. The new dam proposed to be constructed on Portion 525 is anticipated to have a storage capacity of $\sim 80\,000\text{m}^3$ and a footprint of $\sim 3.8\text{ha}$. The size and measurement of the new dam, as well as the length and diameters of the irrigation pipelines to be installed within the orchards, will be confirmed through the assessment process.

In order to provide logistical support to the development it is proposed that a logistical/ administration area of $\sim 2\text{ha}$ is constructed to include a manager's house and future buildings; offices and store for tractors, trailers, maintenance equipment including a fully enclosed bunded, roofed facility of 30m^2 for temporary chemical storage; mess area, washing and toilets; loading and collection zone for the delivery and collection of product; and a new access road around the facility. It is further anticipated that the proposed development will entail the following activities on the site:

- Vegetation clearing
- Levelling and landscaping the site to provide runoff control and stormwater management
- Establishment of unpaved internal roads to provide access to the orchards
- Construction of a new dam
- Installation of irrigation infrastructure
- Planting orchards and windbreaks (if required)
- Construction of a logistical/ administration area

Once the necessary infrastructure has been established, the area will be used for the establishment of a variety of citrus. The logistical and services buildings on the farm will require additional associated services infrastructure such as electricity, sanitation, domestic water and stormwater management. The final design and layout/ footprint of the proposed development will be informed by technical and environmental specialist input during the EIA process.

APPLICABLE LEGISLATION

The Scoping and EIA process is being undertaken in terms of the NEMA EIA Regulations, 2014 (as amended): GN R326, 327, 325 and 324, promulgated under Chapter 5 of the National Environmental Management Act (as amended), and published in Government Gazette 40772 on the 7 April 2017. The need for Scoping and EIA is triggered by the inclusion of activities listed in R325 (Listing Notice 2), in particular:

"15. The clearance of an area of 20 hectares or more of indigenous vegetation,..."

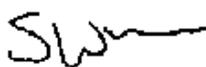
Public Process Consultants has been appointed by Umgcambo Trading (Pty) Ltd (the proponent), as the Environmental Assessment Practitioner to undertake the Scoping and EIA process, including Public Participation. The purpose of this letter is to notify the competent authority and other relevant Organs of State that have jurisdiction over any aspect of the proposed project, of the intention to submit an Application for Environmental Authorisation in respect of the above project, as well as commence with the Scoping and EIA process for the proposed project.

Please find attached with this correspondence the following documentation:

- Background Information Document including the Approach to the Assessment process and Locality Map
- Comment Form

We trust that you will find the above in order. Please do not hesitate to contact Sandy, Marisa or Zandri at the contact details above should you have any comments or queries with regards to this submission.

Regards,



Sandy Wren
Environmental Assessment Project Leader

Letter 1: Background Information Document

FULL SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

UMGCAMBO CITRUS

Agricultural Development on Portion 525 of Farm Strathsomers Estate No. 42, and Associated Irrigation Infrastructure on Portion 523 of Farm Strathsomers Estate No. 42, Sundays River Valley Municipality



BACKGROUND INFORMATION DOCUMENT, May 2018

INTRODUCTION

The project proponent, Umgcambo Trading (Pty) Ltd, proposes to develop a portion of Portion 525 of Farm Strathsomers Estate No. 42 (~154.60ha), Sundays River Valley Municipality (SRVM), for the establishment of citrus orchards and associated infrastructure (dam, internal roads, internal irrigation pipes, logistical services area). In order to supply the proposed development with the necessary irrigation water, an irrigation water pipeline is proposed to be installed on a portion of an adjacent property, Portion 523 of Farm Strathsomers Estate No. 42, owned by the same landowner. The farms are currently zoned Agriculture and the area to be cultivated, including associated infrastructure, will be determined by the outcome of the various specialist assessments forming part of this Scoping and Environmental Impact Assessment (Scoping and EIA) process.

The proponent has obtained a Water Use Licence from The Department of Water and Sanitation (DWS), for the taking of water from a water resource in terms of Section 21 (a) of the National Water Act, which entitles them to utilise 100ha (900 000m³ per annum) of water from the LSRWUA canal system. In order to irrigate the proposed agricultural development, a new dam will have to be constructed on Portion 525. Additionally, the proposed development will require the installation of internal irrigation pipelines of various diameters. The dimensions and water storage capacity of the new dam, as well as the length and diameters of the irrigation pipelines, will be determined through the assessment process.

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 (Scoping and EIA). The applicant has appointed Public Process Consultants as the independent Environmental Assessment Practitioner (EAP) to undertake the assessment, including the public participation for this project.

PROJECT LOCALITY

Portion 525 is located ~7km south of Kirkwood (as the crow flies), in the SRVM. Access to the farm is proposed via an existing gravel road (DR01976) on the eastern boundary of the site, which links the farm to the tarred R336 (Kirkwood/ Addo Road). The farm can be accessed by turning south at the intersection of the DR01976 and R336 and is located ~2 km south of the intersection on the west of the DR01976. The nearest boundary of the Addo Elephant National Park is located more than 10km north of Portion 525 and therefore, project activities proposed to take place on this property do not trigger listed activities which would require the assessment of impacts on the National Park. The installation of the irrigation water pipeline is proposed to take place on Portion 523, which is adjacent to Portion 525. While Portion 523 is located within 10km of the Addo Elephant National Park, the installation of the irrigation water pipeline does not trigger any listed activities, which would require the assessment of impacts on the National Park. The locality map attached provides an overview of the location of the proposed agricultural development (on Portion 525) and associated pipeline route (Portion 523).

HOW CAN I PARTICIPATE IN THIS ENVIRONMENTAL ASSESSMENT PROCESS?

In terms of regulation 42(b) of Government Notice R326, Interested and Affected Parties (I&APs) are to request in writing, that their names be placed on the register of I&APs. To register on the database, complete the comment and registration form included with this correspondence or submit your contact details (via fax or email), stating your full name, address and contact numbers, to the consultant indicated in this documentation. In terms of regulation 43(1), a registered I&AP is entitled to comment in writing on all reports and plans submitted as part of the public participation process and raise any issues which may be of significance to the consideration of the application. Additionally, I&APs are required to disclose any direct business, financial, personal or other interest which they may have in the approval or refusal of the application. By registering on the project database, you will be notified as and when information on the project is available for I&AP review and comment.

WHAT DOES THIS DOCUMENT TELL YOU?

This document provides you, as an I&AP, with background information on the proposed agricultural development, as well as the Scoping and EIA and Public Participation Process. It indicates how you can become involved in the assessment process, receive information and raise issues that may interest and/ or concern you. The sharing of information forms an important component of the public participation process and provides you with the opportunity to become actively involved in the EIA process from the outset. The input received from I&APs together with scientific and technical investigations assists the competent authority, in this instance

the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT), Cacadu Region, with their decision-making.

ALTERNATIVES AND SITE SELECTION

A key component of the EIA process is the identification and assessment of reasonable and feasible alternatives. The following alternatives have been identified and will be considered in the assessment process:

- No-go alternative
- Layout/ footprint alternatives
- Alternatives as identified by I&APs

Reasonable and feasible alternatives as raised by I&APs, specialists and the technical team will be considered in the assessment process.

WHAT DOES THE PROJECT ENTAIL?

The area proposed for the agricultural development is located on Portion 525, ~7km south of Kirkwood in the SRVM. Portion 525 measures ~154.60ha in extent. The farm is currently zoned for Agricultural use. The total area to be cleared, including associated infrastructure (dam, internal roads, internal irrigation pipes, logistical services area), will be determined through specialist and technical input, authority consultation, as well as consultation with I&APs.

Irrigation water for the development is proposed to be supplied from the LSRWUA canal system, via a pipeline with an internal diameter of $\varnothing 500\text{mm}$ and a length of ~1,5km, to be installed on an adjacent property, Portion 523, which is owned by the same landowner. The pipeline will convey water from an existing dam located on Portion 523 and is proposed to follow the fenceline of that property until it reaches the boundary of Portion 525, at which point it is proposed to be installed under the DR01976 to connect into a new dam to be constructed on Portion 525. The new dam proposed to be constructed on Portion 525 is anticipated to have a storage capacity of ~80 000m³ and a footprint of ~3.8ha. The size and measurement of the new dam, as well as the length and diameters of the irrigation pipelines to be installed within the orchards, will be confirmed through the assessment process.

In order to provide logistical support to the development it is proposed that a logistical/ administration area of ~2ha is constructed to include a manager's house and future buildings; offices and store for tractors, trailers, maintenance equipment including a fully enclosed bunded, roofed facility of 30m² for temporary chemical storage; mess area, washing and toilets; loading and collection zone for the delivery and collection of product; and a new access road around the facility. It is further anticipated that the proposed development will entail the following activities on the site:

- Vegetation clearing
- Levelling and landscaping the site to provide runoff control and stormwater management
- Establishment of unpaved internal roads to provide access to the orchards
- Construction of a new dam
- Installation of irrigation infrastructure
- Planting orchards and windbreaks (if required)
- Construction of a logistical/ administration area

Once the necessary infrastructure has been established, the area will be used for the establishment of a variety of citrus. The logistical and services buildings on the farm will require additional associated services infrastructure such as electricity, sanitation, domestic water and stormwater management. The final design and layout/ footprint of the proposed development will be informed by technical and environmental specialist input during the EIA process.

OVERVIEW OF THE SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

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. The table below lists potential listed activities in GN R327, 325 and 324, which trigger either a Basic Assessment or full Scoping and EIA, which may require Environmental Authorisation, should such be granted. A cautious approach has been adopted towards the identification of listed activities. Where there is currently uncertainty with regards to the applicability of a listed activity, it has been included in the table below.

GN R327 – Listing Notice 1 requiring Basic Assessment	
Listed Activity	Description of Project Activity
<p>9. <i>The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water—</i></p> <p><i>(i) with an internal diameter of 0,36 metres or more; or</i> <i>(ii) with a peak throughput of 120 litres per second or more;</i></p>	<p>In order to supply the proposed development with the necessary irrigation water, a pipeline with an internal diameter of 0.5 metres and a length of ~1,500 metres is proposed to be installed on an adjacent property, Portion 523 of Farm Strathsomers Estate No. 42. The dimensions and throughput capacity of the proposed pipeline will be confirmed through the assessment process.</p>

	This listed activity requires Environmental Authorisation.
<p>10. The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes—</p> <p>(i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more;</p>	<p>The logistical services area will require the management of domestic effluent and waste water (domestic waste water). The combined length of the pipes and throughput capacity will be determined by the project's civil engineer.</p> <p>The applicability of this listed activity requires confirmation through the assessment process.</p>
<p>13. The development of facilities or infrastructure for the off-stream storage of water, including dams and reservoirs, with a combined capacity of 50 000 cubic metres or more, unless such storage falls within the ambit of activity 16 in Listing Notice 2 of 2014.</p>	<p>A new dam will be required to store the necessary irrigation water for the proposed agricultural development. It is proposed that the dam will have the capacity to store ~80 000 cubic metres, will have a maximum wall height of ~6 metres and will measure about 3.8 hectares in extent. However, the dimensions, capacity and location of the new dam will be confirmed through the assessment process.</p> <p>The applicability of this listed activity requires confirmation through the assessment process.</p>
<p>24. The development of a road—</p> <p>(ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres;</p> <p>but excluding a road –</p> <p>(c) which is 1 kilometre or shorter</p>	<p>While the reserve of internal roads for the areas to be cultivated are not anticipated to be wider than 13.5 meters, access to the logistical services area is required for heavy vehicles, and the width of this road may exceed 8 meters. However, if this road will be less than 1 kilometre in length, this listed activity will not apply. The width and length of the roads will be determined by the project's civil engineer.</p> <p>The applicability of this listed activity requires confirmation through the assessment process.</p>
GN R325 – Listing Notice 2 requiring Full Scoping and EIA	
Listed Activity	Listed Activity
<p>15. The clearance of an area of 20 hectares or more of indigenous vegetation ...</p>	<p>The area under assessment measures ~154.6 hectares. The area to be cleared for cultivation, including associated infrastructure will exceed 20 hectares. The final layout will be informed by the specialist input forming part of this assessment process.</p> <p>This listed activity requires Environmental Authorisation.</p>
GN R324 – Listing Notice 3 requiring Basic Assessment	
Listed Activity	Description of Project Activity
<p>2. The development of reservoirs, excluding dams, with a capacity of more than 250 cubic metres.</p> <p>a. Eastern Cape</p> <p>ii. Outside urban areas, in: (dd) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</p>	<p>The proposed agricultural development will require the construction of a new dam, which is anticipated to exceed 250 cubic meters.</p> <p>The site is located within the Eastern Cape, outside an urban area and the area under assessment falls within a terrestrial and aquatic Critical Biodiversity Area (BLMC2 and ALBMC 2a and 2b) in terms of the Eastern Cape Biodiversity Conservation Plan. The dimensions, capacity and location of the new dam will be determined through the assessment process.</p> <p>The applicability of this listed activity requires confirmation through the assessment process.</p>
<p>4. The development of a road wider than 4 metres with a reserve less than 13,5 metres.</p> <p>a. Eastern Cape</p> <p>i. Outside urban areas: (ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</p>	<p>It is anticipated that internal vehicle tracks in excess of 4 metres will be required to service various sections of the proposed orchards. In addition, a new access road and service road is required for the logistical services area.</p> <p>The site is located within the Eastern Cape, outside an urban area and the area under assessment falls within a terrestrial and aquatic Critical Biodiversity Area (BLMC2 and ALBMC 2a and 2b) in terms of the Eastern Cape Biodiversity Conservation Plan. The width of the internal</p>

	roads will be determined through the assessment process. This listed activity will require Environmental Authorisation.
<p>10. The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres.</p> <p>a. Eastern Cape</p> <p>i. Outside urban areas: (ee) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</p>	<p>The proposed development will require the temporary storage of chemicals on site within a facility which will have a capacity to store ~30 cubic metres.</p> <p>The site is located within the Eastern Cape, outside an urban area and the area under assessment falls within a terrestrial and aquatic Critical Biodiversity Area (BLMC2 and ALBMC 2a and 2b) in terms of the Eastern Cape Biodiversity Conservation Plan.</p>

The applicability of all the listed activities indicated above will be determined through the assessment process. The listed activities require Environmental Authorisation from the DEDEAT, prior to the commencement of any activities on the site. The EIA needs to show the competent authority, the DEDEAT, and the project proponent, what the consequences of their choices will be in biophysical, social and economic terms. Public involvement forms an important component of this process, by assisting in the identification of issues and alternatives to be evaluated. The EIA Process being implemented can be divided into four phases namely:

- **Pre-Application Scoping Phase**
 - Project Announcement and Registration of I&APs (30 days)
 - Draft Consultation Scoping Report review (30 days)
- **Application and Scoping Phase**
 - Submit Application form for Environmental Authorisation to the DEDEAT
 - Review of the Consultation Scoping Report (30 days)
 - Submit Final Scoping Report to the DEDEAT
- **Environmental Impact Assessment Phase (EIA Phase)**
 - Draft Environmental Impact Assessment Report Review (30 days)
 - Submit Final Environmental Impact Assessment Report to the DEDEAT
- **Decision Making and Appeal Period**
 - Notice to I&APs of decision and appeal period

To meet the timeframes as prescribed in the EIA Regulations 2014 (as amended), specialist studies to be included as part of this assessment process will commence in parallel to the Scoping process. The following specialist studies are proposed to be undertaken for this assessment:

- Vegetation and Aquatic Assessment
- Soil Suitability Assessment
- Heritage Impact Assessment
- Traffic Impact Assessment
- Roads and Wet Services

Phase 1: Pre-Application Scoping Phase (CURRENT STAGE)

- **Project Announcement and registration of I&APs**

The first stage in the process entails notification to the DEDEAT, as well as interested and affected parties (I&APs) of the intention to proceed with the Scoping and EIA process. Identified I&APs are provided with a Background Information Document (BID) on the project, a locality map and a comment form. An advertisement will be placed in a local newspaper and a site notice board will be erected at the site. I&APs are required to register their interest in the project to receive further project information. I&APs will be provided with a **30-day** period to register their interest on the project database and raise any issues for inclusion in the Draft Consultation Scoping Report (Draft CSR).

- **Draft Consultation Scoping Report Review**

A Draft CSR will be compiled which will include a Comments and Responses Trail – indicating the issues and concerns raised by I&APs during the **30-day** project announcement period. This report will include the Plan of Study for EIA, which will outline the specialist studies proposed to be undertaken for this assessment process, as well as the methodology for the identification, and rating of impacts. In terms of the NEMA EIA Regulations 2014 (as amended), the Scoping process is to, amongst others, through a consultative process:

- identify policies and legislation relevant to the activity;
- motivate the need and desirability of the proposed activity and its 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;
- agree on 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 **Draft CSR** will be released for a **30-day** comment period. All registered I&APs on the project database will be notified in writing of the opportunity to comment. In order to assist I&APs with their understanding of the project and to facilitate the identification of issues for inclusion in the Consultation Scoping Report (CSR), I&APs will be provided with an executive summary of the Draft CSR, as well as a comment form. Copies of the report will also be made available on the website www.publicprocess.co.za.

Phase 2: Application and Scoping Phase

- **Application Form Submission**

An Application Form for Scoping and EIA will be compiled based on the relevant project information provided by the project proponent, as well as preliminary specialist input and will be submitted to the DEDEAT.

- **Consultation Scoping Report Review**

In parallel to the compilation and submission of the Application Form, the CSR will be compiled which will include a Comments and Responses Trail – indicating the issues and concerns raised by I&APs during the 30-day project announcement period as well as the 30-day review of the Draft CSR (Phase 1: Pre-application scoping phase).

Subsequent to the submission of the Application Form to the competent authority, the CSR will be released for a minimum, legislated 30-day comment period. All registered I&APs on the project database will be notified in writing of the opportunity to comment. In order to assist I&APs with their understanding of the project and to facilitate the identification of issues for inclusion in the Final Scoping Report (FSR), I&APs will be provided with an executive summary of the CSR, as well as a comment form. Copies of the report will also be made available on the website www.publicprocess.co.za.

- **Final Scoping Report Submission**

The FSR, together with the Plan of Study for EIA, will be prepared for submission to the DEDEAT for their decision-making, within 44 days of submission of the Application Form. The comments received from I&APs, the competent authority and other Organs of State, during the review processes are included in the FSR before it is submitted to the DEDEAT for their consideration. All I&APs on the project database will be notified in writing of the submission of the FSR to the competent authority. The FSR will include the Plan of Study for EIA and Terms of Reference for specialist studies to be undertaken as part of the EIA process. The FSR and the Plan of Study is subject to consideration by the competent authority.

Phase 3: Environmental Impact Assessment Phase

Once DEDEAT accepts the FSR, with or without conditions, and upon receipt of the approval thereof, the EIA Phase may proceed or continue with the tasks contemplated in the Plan of Study for EIA. The purpose of this stage of the EIA is to undertake specialist investigations to address the issues identified through the Scoping process which may be of significance to the consideration of the application. The specialists will build on the information that was gathered for Stage 1, but will focus their studies on the area under assessment. The specialist studies will include the assessment of alternatives, identification of impacts and the determination of the significance of impacts. Specialists will, where appropriate, formulate mitigatory measures to maximise positive benefits or avoid/minimise potential negative impacts.

- **Draft EIA Report and Environmental Management Programme (EMPr) Review**

The Draft EIA Report and Environmental Management Programme (EMPr) will be prepared and released for a 30-day review period and will include, amongst others, the following:

- Address issues that have been raised through the Scoping process
- Assess alternatives in relation to the proposed activity, including different means of meeting the general purpose and requirements of the activity (including No Go Option)
- Assess potential impacts
- Recommend management actions to enhance positive benefits or avoid/ minimise negative impacts.

All registered I&APs will be notified of the 30-day comment period in writing. All comments received from I&APs and authorities via meetings held or written correspondence during this period are compiled into a Comments and Responses Trail for inclusion in the Final EIA Report. The Comments and Responses Trail will indicate the nature of the comment, when and who raised the comment,

as well as indicate how the comment received has been considered in the Final EIA Report, in the project design or the EMPr for the project.

- **Final EIA Report and EMPr Submission**

The Final EIA Report, including the Comments and Responses Trail and EMPr will be compiled for submission to the competent authority for their consideration (DEDEAT). The applicant must within 106 days of acceptance of the Scoping Report submit to the competent authority an Environmental Impact Report, inclusive of specialist studies and an EMPr which has been subjected to a 30-day public participation process. All I&APs on the project database will be notified in writing of the submission of the Final EIA Report.

Phase 4: Decision Making and Appeal Period

All I&APs on the project database will be notified in writing once the competent authority has reached a decision on the application. The applicant must, within 14 days of the date of the decision, notify all registered I&APs of the decision and provide them with access to the decision and reasons for the decision, as well as indicate the manner of appeal.

WHAT IS YOUR ROLE AS AN I&AP?

1. I&APs are required to respond to the letters of notification and/ or newspaper advertisements and register their interest on the project database.
 - By emailing, faxing or mailing a comment form to the participation consultant indicated below.
 - By registering your interest in the project, you will be kept informed of the process and will be notified of any opportunities to comment.
2. I&APs are required to state their area of interest and/ or concern in the matter.
 - By emailing, faxing or mailing a comment form to the public participation consultant indicated below.
3. By telephonically contacting the public participation consultant if you have a query, comment, or require further project information.
4. By reviewing the Draft Reports and submitting any comments/ issues within the specified comment periods.

WHO SHOULD YOU CONTACT?

Sandy Wren, Public Process Consultants

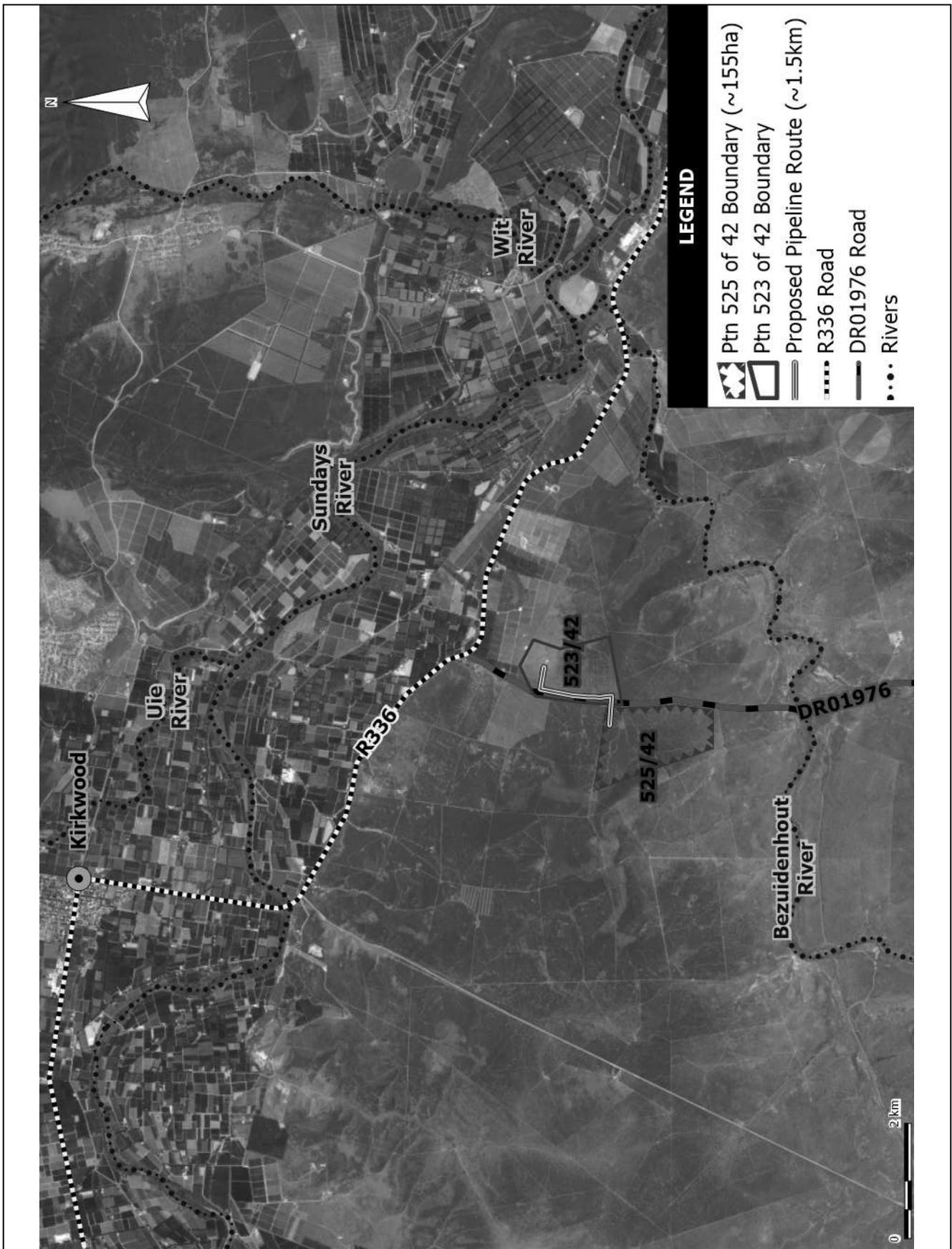
PO Box 27688, Greenacres, 6057.

Phone 041-374 8426

Fax 041-373 2002

Email sandy@publicprocess.co.za

Information on the project can be downloaded from the following website: www.publicprocess.co.za



Locality of Portion 525 and Portion 523 of Farm Strathsomers Estate No. 42, in relation to major roads and towns, in the Sundays River Valley Municipality.

Letter 1: Comment Form

SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT

Pre-Application Comment and Registration Form

Proponent: Umgcambo Trading (Pty) Ltd
Project: Agricultural Development on Portion 525 of Farm Strathsomers Estate No. 42, and Associated Irrigation Infrastructure on Portion 523 of Farm Strathsomers Estate No. 42, Sundays River Valley Municipality
Primary Listed Activity: GN R325 (Listing Notice 2) Activity No 15.

Return Completed Reply Form to:

*Public Process Consultants, PO Box 27688, Greenacres 6057
Phone: 041 – 374 8426 or Fax 041-373 2002 or Email sandy@publicprocess.co.za*

Complete all Relevant Sections Below and Return by: 25 June 2018

Please provide your full contact details:

<i>FIRST NAME:</i>	<i>SURNAME:</i>
<i>ORGANISATION:</i>	<i>TITLE/ POSITION:</i>
<i>POSTAL ADDRESS:</i>	
<i>CODE:</i>	
<i>PHONE:</i>	<i>FAX:</i>
<i>CELL:</i>	<i>EMAIL:</i>

Would you like to register as an interested and affected party? (please tick the appropriate box)

NOTE: You are required to register as an I&AP in order to receive further correspondence regarding the EIA process.

YES

NO

Please clearly state any interest you may have in the project and/or list your issues and comments or questions you may have (use additional pages if required)

Registration and comment form for Issues and Concerns

Letter 2: Notice of Submission of the Draft Consultation Scoping Report

PO Box 27688 Greenacres 6057
120 Diaz Road Adcockvale, PE 6001
Phone 041-3748426 Fax 041-3732002
Email sandy@publicprocess.co.za
Ck 97/32984/23 VAT 44601 68273



10 October 2018

Attention: Mr Andries Struwig

Department of Economic Development, Environmental Affairs and Tourism
Private Bag X5001
Greenacres
6057

Dear Sir,

RE: NOTICE OF COMMENT PERIOD: DRAFT CONSULTATION SCOPING REPORT - AGRICULTURAL DEVELOPMENT ON PORTION 525 OF FARM NO. 42 STRATHSOMERS ESTATE AND ASSOCIATED IRRIGATION INFRASTRUCTURE ON PORTION 523 OF FARM NO. 42 STRATHSOMERS ESTATE, SUNDAYS RIVER VALLEY MUNICIPALITY

With reference to our previous correspondence submitted to your offices, dated 22 May 2018, please find included herewith, a copy of the Draft Consultation Scoping Report (CSR) for the abovementioned agricultural development.

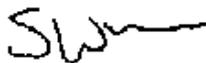
The Draft CSR has been prepared in terms of the NEMA EIA Regulations 2014 (as amended). A comprehensive list of the listed activities which may require Environmental Authorisation is included in Chapter Four of the report and are summarised in the enclosed Executive Summary.

You are hereby notified of the release of the Draft CSR for a non-legislated 30-day comment period, extending from the 10 October 2018 to 9 November 2018. In terms of Regulation 7 (5) of the NEMA EIA Regulations 2014 (as amended), we hereby respectfully request comment from the competent authority on the abovementioned report, in order to ensure that the report complies with the DEDEAT's requirements for Scoping. To assist you in making comments on the report, please find included herewith a copy of the following:

- A hard copy of the Draft CSR, including Appendices
- An electronic copy of the Draft CSR, including Appendices, on CD
- An Executive Summary of the Draft CSR
- A comment form

We trust that you will find the above in order. Please do not hesitate to contact Sandy Wren, Marisa Jacoby or Zandri Grobbelaar at the contact details above should you have any comments or queries with regards to this submission.

Regards,



Sandy Wren
Environmental Assessment Project Leader

Letter 2: Executive Summary of the Draft Consultation Scoping Report

INTRODUCTION

The proponent, Umgcambo Trading (Pty) Ltd, proposes to develop a portion of Portion 525 of Farm Strathsomers Estate No. 42 (~154.28ha, hereafter known as Umgcambo), in the Sundays River Valley Municipality (SRVM), for the establishment of citrus orchards and associated infrastructure (e.g. new dam, internal roads, irrigation infrastructure, logistical services area).

The proponent has obtained a Water Use Licence from The Department of Water and Sanitation (DWS) for the taking of water from a water resource in terms of Section 21(a) of the National Water Act, which entitles them to utilise 100ha (900 000m³ per annum) of water from the LSRWUA canal system. Irrigation of the proposed agricultural development requires the construction of a new dam with a capacity of ~80 000m³ (~4 ha footprint) and the installation of irrigation pipelines of varying diameters. Irrigation water for the development is proposed to be supplied from the LSRWUA canal system, via a pipeline with an internal diameter of ø500mm and a length of ~1,5km, to be installed on an adjacent property, Portion 523 of Farm No. 42 Strathsomers Estate, which is owned by the same landowner. The pipeline will convey water from an existing dam located on Portion 523 and is proposed to follow the fenceline of that property until it reaches the boundary of Umgcambo, at which point it is proposed to be installed under the DR01976 to connect into the new dam to be constructed on Umgcambo.

Access to Umgcambo is proposed off the gravel DR01976, via an existing access point and the nearest town to Umgcambo, Kirkwood, is located ~6.8km northwest of the site (see Locality Map in Chapter Two of the report). The nearest boundary of the Addo Elephant National Park (AENP) is located more than 10km north of Umgcambo and therefore, project activities proposed to take place on this property do not trigger listed activities which would require the assessment of impacts on the National Park. The installation of the irrigation water pipeline is proposed to take place on Portion 523, which is adjacent to Umgcambo. While Portion 523 is located within 10km of the AENP, the installation of the irrigation water pipeline does not trigger any listed activities, which would require the assessment of impacts on the National Park (i.e. activities in Listing Notice 3).

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 (Scoping and EIA), 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 -..."

At this stage of the assessment process a cautious approach has been adopted towards the identification of listed activities, and where there is uncertainty as to whether a listed activity applies to this project, it has been included. The following listed activities potentially require Environmental Authorisation:

- Listing Notice 1 (GN R327): 9. (i) and (ii); 10. (i) and (ii); and 24. (ii) (c)
- Listing Notice 2 (GN R325): 16.
- Listing Notice 3 (GN R324): 2. a. ii. (dd); 4. a. i. (ee); and 10. a. i. (ee)

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 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), Sarah Baartman Region.

Subject to the outcome of the assessment process, specialist studies, technical input and consultation process, the project proponent, Umgcambo Trading (Pty) Ltd, intends to utilise the agricultural potential of the land for the establishment of citrus orchards. Umgcambo measures ~154.28ha in extent and is zoned Agriculture I. It is anticipated that a portion of Umgcambo 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 developed will be informed by the various specialist assessments through the assessment process.

In order to provide logistical support to the development it is proposed that a logistical services area of ~2ha is constructed to include offices and a store for tractors, trailers, maintenance equipment, as well as a fully enclosed bunded, roofed facility of 30m³ for temporary chemical storage; mess area and ablution facilities (washing and toilets); loading and collection zone for the delivery and collection of product; and a new access road around the facility, as well as a manager's house and other future buildings. The additional services infrastructure required to support the logistical services area will require input from a qualified civil engineer, as well as a traffic specialist.

Additional power supply will be required in order to pump the irrigation water out of the proposed new dam on Umgcambo. Electricity is available up to the existing dam on the adjacent property, Portion 523. An extension to the existing electrical infrastructure of ~1km in length from the existing infrastructure to the new dam on Umgcambo will be required. Written confirmation is required from Eskom regarding the spare capacity of this line to provide the additional electricity required to service the proposed development as well as approval of the proposed line extension.

The proposed agricultural development on Umgcambo can be divided into the following phases, which are outlined in more detail in the sections below:

- Preconstruction
- Construction
- Operational

Preconstruction Phase

The fruit proposed to be produced on site is predominantly for international markets, with some of the fruit to be processed (juiced) for local markets. In order to meet the requirements of export stock, seed (the foundation block seed) is required to be booked and purchased from a certified agency, the Citrus Foundation. This is booked approximately two years in advance in order to secure the seed, which includes a financial deposit.

The seed is provided to a certified nursery for a two year grow-out period, during which the seeds are germinated and the seedlings grown to sapling stage. Meticulous coordination is required between the Citrus Foundation for the purchase of the seed, the nursery for grow-out, and the citrus producer, in order to meet contractual obligations for harvesting and export of the crop. This is an ongoing process, which is carefully timed and coordinated to allow the development of the site to take place seamlessly over the development timeframe proposed by Umgcambo.

Construction Phase

The project will entail the clearing of vegetation, levelling of the site, and the installation of the drip/ micro irrigation system, as well as the establishment of the bulk irrigation infrastructure (i.e. pipeline and proposed dam), prior to the planting of the saplings. Once the site is prepared, citrus orchards will be established (refer to the operational phase of the development). It is anticipated that vegetation clearing, landscaping, site preparation and planting will be done both by hand and with the aid of suitable earth moving equipment (excavators, bulldozers, TLBs). No workers' accommodation will be provided on site during the construction phase.

Site preparation will entail the following activities on site:

- Clearing of indigenous vegetation;
- Landscaping and levelling the site for citrus orchards, as well as to provide runoff control and stormwater management;
- Establishment of internal unpaved service roads;
- Pipeline connection to the existing outlet associated with the dam on Portion 523 and installation of the ø500mm irrigation pipe to Umgcambo;
- Construction of the new irrigation dam (~80 000m³) on Umgcambo;
- Installation of internal water reticulation and irrigation infrastructure;
- Construction of the logistical services area and new access road; and
- Construction of the manager's house
- Construction of associated domestic water and effluent management systems
- Planting of orchards and windbreaks (if necessary).

Site preparation needs to be completed to coincide with the planting of the trees, which occurs annually between September and March.

Operational Phase

Once the site is suitably prepared, the area will be utilised for the establishment of citrus orchards for predominantly international markets, with some fruit being sent for processing (juicing) for local markets. It is also the intention of the project proponent to plant vegetables for the local market (butternut and pumpkin) in between the orchards until the trees reach production stage.

Equipment required for the new operations will be stored in the proposed new storage sheds and workshop areas on Umgcambo. The following operational phase activities are associated with the project:

- Water for the development will be supplied from the LSRWUA canals which will be reticulated from the proposed new balancing dam; and
- It is anticipated that a number of additional seasonal (96) and permanent (11) employment opportunities will be created by the project.

For more detail regarding the project description see Chapter Two of the Report.

AFFECTED ENVIRONMENT

The vegetation on the properties surrounding Umgcambo to the north, west and east appears to be largely near-natural, although some modification (cut lines and vehicle tracks) is evident. In addition, these properties show various levels of degradation, presumably associated with domestic livestock grazing and game grazing. Portion 523, owned by the same landowner, is directly adjacent to the north eastern boundary of Umgcambo, and is currently engaged in commercial agricultural activities including citrus orchards, and vegetable production. Portion 523, upon which the irrigation pipe is proposed to be installed, is bound on its western,

northern and eastern boundaries by cultivation. The “Sundays River Valley” area is located ~2.1km north of Umgambo and is predominantly under intensive cultivation.

The site visit and preliminary input from the vegetation specialist confirmed that the vegetation on Umgambo is Sundays Spekboom Thicket.

The condition of the vegetation is considered highly degraded in some areas, specifically towards the southern boundary of the farm, and is likely due to past wildlife and domestic livestock grazing and browsing. This is evidenced by several grassy areas dominated by *Cynodon dactylon* (Bermuda Grass), patches of *Pentzia incana* (Karoobossie) and *Mesembryanthemum aitonis* (Brakslaai). Additionally, some trees, such as *Pappea capensis* (Pruimbessiebos) and *Portulacaria afra* (Spekboom), showed visible signs of browsing (i.e. umbrella shaped). *Opuntia ficus-indica* (Prickly Pear) and *Opuntia aurantiaca* (Jointed Cactus), possible indicators of a degraded vegetation state, occurred throughout the farm. Modified areas on the farm are represented by various cut lines and existing vehicle tracks, as well as footpaths.

The condition of the vegetation is in a relatively good ecological state to the west of the farm, with moderate degradation levels based on species diversity, intactness and a high level of impenetrability, despite the presence of *Opuntia ficus-indica* (Prickly Pear) and *Opuntia aurantiaca* (Jointed Cactus), as well as existing vehicle tracks and footpaths. Towards the northern boundary of the farm, including the steeply sloped areas, the condition of the vegetation is mostly intact, with a higher level of impenetrability (i.e. fewer grassy areas, lower prevalence of *Cynodon dactylon* (Bermuda Grass) and decreased levels of visible browsing).

The proposed pipeline on Portion 523 will be installed adjacent to the fenceline along an existing vehicle track within the existing citrus orchards. In the road reserve of the DR01976 road, where the irrigation pipe is proposed to cross under the road, the vegetation is irreversibly modified and edge effects have resulted due to the permanent removal of natural vegetation along this road.

The NFEPA Wetlands Map delineates one Unchanneled valley-bottom wetland, in this case a farm dam (artificial wetland) within 500m of the southern boundary of the farm. These onsite observations were supplemented by the review of relevant aerial imagery and planning frameworks for Umgambo and are subject to assessment by a vegetation, as well as an aquatic specialist during the EIA Phase of the assessment.

For further information regarding the affected environment see Chapter Three of the Report.

OVERVIEW OF THE ASSESSMENT PROCESS AND PUBLIC PARTICIPATION

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 (**WE ARE HERE**)
- Application and Scoping Phase
- Environmental Impact Assessment Phase
- Decision Making and Appeal Period

Public Process Consultants has been appointed as the independent Environmental Assessment Practitioner (EAP) to conduct the Scoping and EIA, including Public Participation for the proposed development. Notice of Intention to commence with Scoping and EIA, dated 22 May 2018, was submitted to the competent authority, DEDEAT, Sarah Baartman Region. The notice was also sent to all identified Interested and Affected Parties (I&APs) and Organs of State on 23 May 2018.

In order to commence the legislated portion of the Scoping and EIA process, an Application Form for Environmental Authorisation 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) for the legislated 30-day consultation period. All registered I&APs will be notified in writing of the release of the CSR for the legislated 30-day comment period.

The Final Scoping Report (FSR), together with the Plan of Study (PoS) for EIA, will be prepared for submission to the Provincial DEDEAT for their decision-making, within 44 days of submission of the Application Form. The FSR will include all the comments received from I&APs during the Project Announcement Phase, as well as the review of the Draft Consultation Scoping Report (Draft CSR) and CSR. Should DEDEAT accept the Scoping Report and approve the PoS for EIA, the assessment process will enter into the EIA Phase.

For further detail regarding the Scoping Phase of the assessment process, including Public Participation, see Chapter Four of the Report. For further detail regarding the Plan of Study (PoS) for EIA, see Chapter Six of the Report.

Identification of Issues

Issues and concerns identified for inclusion in the Scoping Report that require specialist assessment in the EIA phase have been identified using the following methods:

- A Site Visit.
- Preliminary input from specialists.
- Desktop review of regional planning documentation and frameworks.

- Scoping of issues and concerns with I&APs, including authorities and affected Organs of State, through correspondence received (emails, comment forms) in response to the project announcement.

Based on issues identified thus far in the process, the table below indicates the specialist studies/ input required for the EIA Phase of the Assessment Process:

Specialist Study	Broad Scope of Assessment	Proposed Specialist
Ecological Specialist Assessment	To include an assessment of the potential impacts on vegetation and fauna (desktop), as well as the delineation of sensitive No-Go areas; and the determination of suitable buffer zones. To include an assessment of the impacts on aquatic features identified on the site and within a 500m radius, including wetlands and watercourses. To determine the Present Ecological State of the site and confirm the mapping of CBAs and ESAs, as included in various biodiversity planning frameworks (e.g. ECBCP and NFEPA mapping resources). To provide recommendations for management/ mitigation of residual impacts.	Deborah Vromans, Ecological Specialist Marisa Jacoby, Public Process Consultants
Phase 1 Paleontological Impact Assessment	To determine palaeontological features on site and the impact of the proposed development thereon. To provide recommendations for management/ mitigation of residual impacts.	Dr John Almond, Natura Viva
Phase 1 Archaeological Impact Assessment	To determine archaeological features on site and assess the potential impacts on these features. To provide recommendations for management/ mitigation of residual impacts.	Dr Johan Binneman, Eastern Cape Heritage Consultants
Soil Suitability Assessment	To determine the agricultural potential of the soils for citrus production and provide amelioration measures for soil limiting factors. Desktop slope analysis.	Danie Kritzinger, Agrimotion
Traffic Impact Assessment	To determine the impact of additional trip generation on the public road network, as well as the suitability and safety of the proposed access point.	Cary Hastie, Engineering Advice and Services
TECHNICAL TEAM		
Irrigation Infrastructure	To estimate the quantity of water required for irrigation, and to be stored on site in a proposed new dam. To confirm associated irrigation infrastructure (including drip/ micro irrigation) layout, including pipe diameters and length, as well as dam location, dimensions, storage capacity and design.	Jaco Kruger
Roads and Wet Services	To determine the footprint and locality of additional structures on site (i.e. offices and store; mess area, ablution facilities; loading and collection zone; manager's house and future buildings; as well as a road surrounding the facility), as well as bulk services requirements (i.e. domestic water, effluent management and stormwater management).	JJ Spies Civil Engineers

The full specialist Terms of Reference (ToR) are contained in Chapter Six of the Report. The results of the specialist studies and other relevant project information will be integrated into the Draft Environmental Impact Assessment Report (Draft EIA Report).

Current Stage in the Process

The project is currently at the stage where a Draft CSR including the PoS for EIA (Chapter Six) is being released for a 30-day authority and I&AP review period which will extend from **10 October 2018 to 9 November 2018**. This step in the process will be followed by the submission of the Application Form to the competent authority, the inclusion of the comments received from I&APs during this period, into the CSR, and the legislated 30-day comment period on the CSR.

Letter 2: Comment Form

SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT

Draft Consultation Scoping Report Comment Form

Proponent: Umcambo Trading (Pty) Ltd
Project: Agricultural Development on Portion 525 of Farm No. 42 Strathsomers Estate and Associated Irrigation Infrastructure on Portion 523 of Farm No. 42 Strathsomers Estate, Sundays River Valley Municipality
Primary Listed Activity: GN R325 (Listing Notice 2) Activity No 15

Return Completed Reply Form to:

Public Process Consultants, PO Box 27688, Greenacres 6057
Phone: 041 – 374 8426 or Fax 041-373 2002 or Email sandy@publicprocess.co.za

Complete all Relevant Sections Below and Return by: 9 November 2018

Please provide your full contact details:

FIRST NAME:	SURNAME:
ORGANISATION:	TITLE/ POSITION:
POSTAL ADDRESS:	
CODE:	
PHONE:	FAX:
CELL:	EMAIL:

Would you like to register as an interested and affected party? (please tick the appropriate box)

NOTE: You are required to register as an I&AP in order to receive further correspondence regarding the EIA process.

YES
NO

Please clearly state any interest you may have in the project and/ or list your issues and comments or questions you may have (use additional pages if required)

Letter 2: Email Notification of the Submission of the Draft Consultation Scoping Report sent to DEDEAT



Wed 2018/10/10 12:35 PM

Marisa Jacoby

NOTICE OF COMMENT PERIOD: DRAFT CONSULTATION SCOPING REPORT - AGRICULTURAL DEVELOPMENT ON PORTION 525 OF FARM NO. 42 STRATHSOMERS ESTATE AND ASSOCIATED IRRIGATION INFRASTRUCTURE ON PORTION

To 'Andries.Struwig@dedea.gov.za'

Cc Sandra Wren; Zandri Grobbelaar



Umgcambo Citrus - Draft CSR - DEDEAT - final - 10Oct2018.pdf
.pdf File

Afternoon Andries

NOTICE OF COMMENT PERIOD: DRAFT CONSULTATION SCOPING REPORT - AGRICULTURAL DEVELOPMENT ON PORTION 525 OF FARM NO. 42 STRATHSOMERS ESTATE AND ASSOCIATED IRRIGATION INFRASTRUCTURE ON PORTION 523 OF FARM NO. 42 STRATHSOMERS ESTATE, SRVM

Please find attached correspondence relating to the abovementioned assessment, which was submitted to your offices earlier today along with a hard copy and electronic copy on CD of the Draft Consultation Scoping Report and a comment form. The report has been released for a non-legislated 30 day review and comment period extending from 10 October 2018 to 9 November 2018.

If you have any queries regarding the above please don't hesitate to contact us.

We trust you will find the above in order.

Thank you.

Regards

Marisa Jacoby (BSc Hons)

Environmental Assessment Practitioner

Public Process Consultants

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