

# Comments and Response Table:

018045 Kaap Agri Depot Expansion, Moorreesburg  
6<sup>th</sup> November 2018

Comments Received during the 30-Days Public Participation on the <u>Pre Application</u> BAR (Initial Commenting Period)					
Nr	Comment Received	Date Received	I&AP	Company / Representing	Response
<b>HEALTH, FIRE &amp; SAFETY RISK</b>					
1	Proof of registration of the facility as a Major Hazard Installation must be provided including the validity period for registration.	1st October 2018	Doretha Kotze	Chief Fire Officer: West Coast District Municipality	With reference to the Major Hazard Installation Risk Assessment (Appendix G of the BAR), we confirm that the facility is an ISO/IEC-17020 Company Accredited by SANAS as a Type A Major Hazard Risk Installation.  Registering as an MHI involves notification to the Authorities of the MHI installation which has been done.
2	A comprehensive Fire Plan must be provided to both the West Coast District and Swartland Municipalities for approval prior to any construction taking place.	1st October 2018	Doretha Kotze	Chief Fire Officer: West Coast District Municipality	Noted. We have updated the EMPR to include as a pre-construction phase requirement (see Objective 5 of Pre-Construction Design Phase) that a Fire Plan must be compiled and approved by the Chief Fire Officer.
3	1. With reference to the Disaster Management Act No 57 of 2002 we are to provide for an integrated and co-ordinated disaster management policy that focuses on preventing or reducing the risk of disasters, mitigating the severity of disasters, emergency preparedness, rapid and effective	1st October 2018	Doretha Kotze	Disaster Manager: West Coast District Municipality	1. The MHI Assessment (Appendix G) and associated Emergency Response & Evacuation Plan (Annexure C of the EMPr) includes similar information that has been requested to be included in a Disaster Risk Management Plan. It identifies the potential

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	<p>response to disasters and post-disaster recovery and rehabilitation. As such, the WCDM Disaster Management Centre wishes to recommend that a Disaster Risk Management (DRM) Plan be drawn up by the client to ensure co-ordinated organizational and institutional arrangements. This is to prevent or reduce any of the hazards from occurring and to prepare and respond if a hazard cannot be avoided.</p> <p>2. The DRM Plan will guide the tactical and operational co-ordination mechanism between all the relevant stakeholders, both pro-actively and reactively. Due to the nature of the risks faced by the organisation, the DRM Plan must be considered a “work in progress” or “live document” which requires regular review and adjustment due to circumstances.</p> <p>3. The On-Site Disaster Risk Management Plan should:</p> <ol style="list-style-type: none"> <li>a. Anticipate the likely types of emergencies, both from within the organisation or adjacent sources, and their possible impact;</li> <li>b. Identify the vulnerable areas and people;</li> <li>c. Provide for appropriate prevention, risk reduction and mitigation strategies;</li> <li>d. Identify and address weaknesses in capacity to deal with possible emergencies; and</li> <li>e. Facilitate maximum emergency preparedness.</li> </ol> <p>4. Additionally, the On-Site Disaster Risk Management Plan should provide for:</p>			<p>disasters (emergency situations) and details how the facility should respond. Various mitigation measures to prevent fire risk / disaster risk / emergency situations from occurring have also been recommended in the MHI Assessment that has been included in the Operational Phase EMPR to mitigate Fire, Health &amp; Safety Risk. The EMPR has however been updated to include “Objective 6: Updating the Existing Emergency Plan” prior to the start of the construction phase.</p> <p>2-6 I refer to your email correspondence in this regard dated 16th October 2018 in which it is confirmed that a separate DRM Plan is not required because the already produced on site Emergency Plan and Evacuation Procedure satisfies most of the requirements for the “on site” Emergency &amp; Evacuation procedure in the case of a disaster event and therefore responds to comments 2 – 6. The EMPR has however been updated to include “Objective 6: Updating the Existing Emergency Plan” prior to the start of the construction phase.</p> <p>6 Section 11 of the BAR and Section 7 of the EMPR has been updated to include these legislative requirements.</p> <p>7 I refer to your email correspondence in this</p>
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	<ul style="list-style-type: none"> <li>i. the allocation of responsibilities to the various stakeholders, and coordination in carrying out those responsibilities;</li> <li>ii. prompt emergency response and relief that will:             <ul style="list-style-type: none"> <li>a) Save lives,</li> <li>b) Reduce further risk exposure,</li> <li>c) A reduce suffering,</li> <li>d) Protect property,</li> <li>e) Protect the environment,</li> <li>f) Reduce economic and social losses, and</li> <li>g) Provide for the safety and health of all responders;</li> </ul> </li> <li>iii. disaster recovery, business continuity and rehabilitation, which are again focused on risk elimination and/or mitigation efforts;</li> <li>iv. the procurement of essential goods and services;</li> <li>v. the establishment of strategic communication links; and</li> <li>vi. the dissemination of information.</li> </ul> <p>5. The purpose of The On-Site Disaster Risk Management Plan, covering the identified group of hazards, is intended to facilitate multi-departmental coordination in both the proactive and reactive tactical and operational elements required for dealing with these hazards, as provided for in the Disaster Management Act 57 of 2002.</p> <p>6. Relevant legislation to be noted:</p> <ul style="list-style-type: none"> <li>i. Fire Brigade Services Act,99 of 1987</li> <li>ii. Swartland Municipality Fire Safety Bylaw</li> </ul>				<p>regard dated 16th October 2018 in which it is confirmed that a “off-site” Emergency Plan and Evacuation Procedure is still required as the “off-site” aspects have not been included in the already compiled Emergency Plan. Alternatively the Emergency Plan that has been compiled needs to be updated to include “on-site” and “off-site” aspects as detailed in the comments provided.</p> <p>Therefore, the EMPR has been updated to include during the pre-construction design phase that the existing Emergency Plan needs to be updated to include the “on site” and “off-site” aspects, as detailed in the comments provided by the WCDM.</p> <p>The “off-site” part of the plan will include what arrangements have been made with business / community etc. in their immediate surrounds in order to ensure business continuity, sheltering, etc. Both plans must provide for the safety and evacuation or sheltering of the workers as well as that of the public. These emergency plans have to be compiled with the input and cooperation of both the employer and the local government). Moreover these plans needs to be tested every 6 months, annually etc.</p>
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	<p>iii. Disaster Management Act,57 of 2002</p> <p>iv. Occupational Health and Safety Act,85 of 1993</p> <p>v. Major Hazardous Installations (MHI) Regulations issued in terms of the Occupational Health and Safety Act.</p> <p>7. The client/owner/occupant should consider the Off-Site Disaster Risk Management Plan- This must be drafted to supplement the organisation's own On-Site DRM and to confirm the institutional arrangements for the emergency and essential services and other identified stakeholders and needs to be done in co-operation of the Local Authority on local and district level, to work together in an integrated, effective and efficient manner when a major incident or an emergency occurs or is about to occur at or near the facility.</p>				
4	<p>The environmental section recommend that all safety measures be complied with in terms of safety requirements and as per legislation from a Fire Department point of view. It is recommended that an operation and emergency plan be compiled/updated before further upgrades commence to address any possible future incident/accident on the property, including possible spillages and how such spillages will be dealt with to prevent environmental pollution /degradation.</p>	1st October 2018	Doretha Kotze	Environmental Section: West Coast District Municipality	<p>Please refer to the Emergency Response &amp; Evacuation Plan in Annexure C of the Environmental Management Programme. This plan does also indicate how to respond to spills but it has been recommended by the EAP that a separate Spill Contingency Plan is compiled and included as Annexure D to the EMP, prior to the start of the construction phase (as per EMP design phase objectives). This can be a condition of the Environmental Authorisation.</p>
5	<p>Myself and Chief Fire Officer Bertus Senekal have</p>	15 <sup>th</sup> October	Doretha	Environmental	<p>Therefore, the EMPR has been updated to include</p>

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<p>perused the Emergency Response and Evacuation Plan (EREP).</p> <p>I am responding on behalf of us both:</p> <p>I agree with Ms Elston –much of the details requested by Disaster Management is included in their (EREP) however the off-site details as made reference in my original comment is not included (example) if any activation during a disaster/ or emergency is actioned (what arrangements has been made with business / community etc. in their immediate surrounds in order to ensure business continuity, sheltering, etc . Has any (formal) arrangement in terms of a SOP been made to ensure efficient institutional arrangements with relevant authorities. etc. (This plan consists of two types namely the on-site and off-site plans. The on-site plan is the responsibility of the employer of the major hazard installation and the off-site one that of the local government. Both plans are the outcome of the risk assessment and must provide for the hazards identified in the risk assessment. Both plans must provide for the safety and evacuation or sheltering of the workers as well as that of the public. These emergency plans have to be compiled with the input and cooperation of both the employer and the local government). Moreover these plans needs to be tested every 6 months, annually etc.</p> <p>Secondary with reference to the Chief Fire Officer comments – the EREP is not a fire plan- He is referring to a schematics and narrative on the location of necessary</p>	<p>2018</p>	<p>Kotze</p>	<p>Section: West Coast District Municipality</p>	<p>during the pre-construction design phase that the existing Emergency Plan needs to be updated (Objective 6) to include the “on site” and “off-site” aspects, as detailed in the comments provided by the WCDM.</p> <p>In addition, we have updated the EMPR to include as a pre-construction phase requirement (see Objective 5 of Pre-Construction Design Phase) that a Fire Plan must be compiled and approved by the Chief Fire Officer.</p>
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	extinguishers, hydrants, ingress, exits, assembly points, bund walls –any and all that speaks to provision of water and safety of the emergency response agencies/public/business-surrounds.				
<b>CONTAMINATION AND POLLUTION</b>					
6	<p>The D: PCM proposed that the following be included in the EMPr for the operational phase, in order to prevent pollution or degradation of the environment:</p> <ol style="list-style-type: none"> <li>1. Dust should be managed responsibly. Under no circumstances should potable water be used for dust suppression. Potable water should not be used for anything besides drinking.</li> <li>2. Additional fire prevention mechanisms must be implemented.</li> <li>3. The ECO should inspect the site regularly monitored to ensure all appropriate measures are implemented.</li> <li>4. The water table should be regularly monitored to ensure no contamination of ground water.</li> <li>5. Proper fuel storage records must be maintained to verify storage volumes in the event of possible leaks that may occur.</li> <li>6. When installing any underground pipes excavation must be conducted responsibly without causing significant pollution or degrading the environment. Excavation should not be conducted at depth below water table.</li> </ol>	17 September 2018	Russell Mehl	DEA & DP: Pollution & Chemical Management	<ol style="list-style-type: none"> <li>1. The EMPR has been updated to include this requirement.</li> <li>2. The EMPR included numerous fire prevention mechanisms for both the construction &amp; operation phase.</li> <li>3. The EMPR states that the responsibilities of the ECO and the contractor will include monitoring of compliance with the EMPr by the applicant and any sub-contractors during the construction phase. The frequency of the site inspections will be fortnightly until the completion of the construction phase.</li> <li>4. It is not in this case proposed to install a groundwater monitoring well for the operational phase of the activity to monitor the groundwater quality. The reason for this is because this project is for above ground storage tanks. It is therefore clear if a tank leaks (will be contained in the bunded area). It is only for underground fuel storage tanks that groundwater monitoring is common practise as it is not known if the tank</li> </ol>

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					<p>leaks.</p> <p>5. Fuel storage records will be kept on site (incoming &amp; outgoing fuel). This has been included in the EMPR.</p> <p>6. It has been included in the EMPR that a Ground Probing Radar (GPR) survey is required to take place prior to construction to map out the existing fuel lines on site. The objective is to avoid accidental damage of service &amp; fuel lines which may cause impacts to the receiving environment. Damaged water pipes may cause erosion, soil compaction and flooding, and damaged sewage pipes may cause pollution and soil contamination. Damaged fuel lines could cause contamination.</p>
<b>TRAFFIC AND ACCESS</b>					
7	<p>The subject property does not abut any proclaimed roads and this Branch accordingly does not have any requirement to comment.</p> <p>You can remove this Branch from the Interested &amp; Affected Parties list.</p>	12 September 2018	Devlin Fortuin	Directorate: Road Planning Transport and Public Works Western Cape Government	Noted.
8	As there are no Proclaimed Roads, this Branch is not	18 September	Grace	Western Cape	Noted.

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	involved.	2018	Swanepoel	Government	
<b>LAND USE PLANNING</b>					
9	<p>Erf 3827, Moorreesburg is zoned Industrial zone 3 in terms of Schedule 2 of the Swartland Municipal Land Use Planning By-Law (PK 7741, dated 3 March 2017).</p> <p>Erf 3827, Moorreesburg consist of the correct land use rights in order to accommodate the proposed upgrade of the existing Kaap Agri Diesel Depot.</p>	11 September 2015	Mr. A J Burger	Swartland Municipality	Noted.
<b>SERVICES (WATER, SEWAGE, WASTE)</b>					
10	<p>A letter of approval from the municipality, stating that they will be able to accommodate the waste generated by the new development must be obtained.</p>	28 <sup>th</sup> September 2018	Ongeziwe Ndletyana	DEA & DP: Waste Management	<p>During the operational phase of the development hazardous waste may be generated in the case of a spillage that may occur on site (contaminated material, etc.). If this takes place then a private waste contractor (licensed to transport hazardous waste) will be contracted to remove the waste (contaminate soil) for disposal at a licensed hazardous waste disposal facility.</p> <p>The existing diesel storage depot produces a small amount of domestic waste from the existing employees that is collected on a weekly basis by the municipality.</p> <p>The proposed development (the installation of an additional four above ground diesel storage tanks) will not produce additional domestic waste that</p>



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					needs to be collected by the municipality.  The proposed activity is not associated with waste generation during the operational phase, only in the case of a diesel spill.
11	The Department is satisfied that the EMPR addresses waste management during the construction and operation phase. The EMPR must be easily accessible to the person responsible for managing the proposed activity, and the adherence to its conditions must be strictly monitored.				An ECO is required to be appointed to monitor the implementation of the EMPR during the construction phase. The EMPR must be kept on site at all times and should be used as an “operational procedure” to manage environmental, health & safety impacts to be implemented by the Operational Manger / SHEQ Manager.
<b>HERITAGE</b>					
12	The request as per the motivation dated 26 <sup>th</sup> July 2018 for the non-applicability of a requirement of a NID to be submitted has been supported. No NID will be required for the upgrade to the existing Kaap Agri diesel depot.	30th July 2018	Whaseefa Dhansay	Heritage Western Cape	Noted.
<b>EIA PROCESS REQUIREMENTS &amp; LEGISLATION, POLICIES AND/ OR GUIDELINES</b>					
13	The environmental section would like to highlight that the applicant take note of Section 28 (1) of the National Environmental Management Act (Act No. 107 of 1998) (hereinafter “NEMA”) provides that every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot	1st October 2018	Doretha Kotze	Environmental Section: West Coast District Municipality	Section 9.1 of the EMPR states that the applicant has a general duty of care as stated in Section 28 of the National Environmental Management Act, 1998

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	reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.				
14	<p>The applicant should also take note of Section 30(5) in which the responsible person or, where the incident occurred in the course of that person's employment, his or her employer, must within 14 days of the incident, report to the Director General, provincial head of department and municipality such information as is available to enable an initial evaluation of the incident, including:</p> <p>a) the nature of the incident;  b) the substances involved and an estimation of the quantity released and their possible acute effect on persons and the environment and data needed to assess these effects;  c) initial measures taken to minimise impacts;  d) causes of the incident, whether direct or indirect , including equipment, technology, system or management failure; and  e) measures taken and to be taken to avoid a recurrence of such incident.</p>	1st October 2018	Doretha Kotze	Environmental Section: West Coast District Municipality	This mitigation measure has been included in the EMPR for the management of operational phase impacts under Objective 1: Avoid Soil & Groundwater Contamination.
15	In terms of section 30(1)(a) of NEMA, an "incident" means an unexpected, sudden and uncontrolled release of a hazardous substance (such a diesel/fuel), including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property. In line with section 24 of the Constitution of the Republic of South Africa( Act No. 108 of 1996), "serious "is taken to be measure of the impact of an incident where such an incident has had,	1st October 2018	Doretha Kotze	Environmental Section: West Coast District Municipality	With reference to the comment & response above, the EMPR has been updated to include the definition of "incident" (see footnote under Objective 1)

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	could have had, is having, or will have a negative impact on human health or well –being.				
16	In terms of section 30(1)(b) of NEMA, the “responsible person” includes any person who:(i) is responsible for the incident; (ii) owns any hazardous substance involved in the incident; or (iii) was in control of any hazardous substance involved in the incident at the time of the incident.	1st October 2018	Doretha Kotze	Environmental Section: West Coast District Municipality	Noted.
17	In terms of section 2(h)(iii) of Appendix 2 of GN No.R.982 of 4 December 2014 (as amended),you must include all comments received from Interested and Affected Parties ( which includes the commenting authorities and private individuals/organisations) during the Public Participation Process, as well as the responses to those comments in the future reports which will be submitted to this Department.	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	Please refer to Appendix F1 – F6, which includes all proof of Public Participation, all comments received and the Comments & Responses Table.
18	Please be reminded that only those activities applied for will be considered for authorisation. The onus is on the applicant to ensure that the applicable listed activities are assessed as part of the EIA process.	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	Noted. The storage of fuel is the only activity that is triggered.
19	Please be reminded to include all proof of the Public Participation which was conducted in terms of the Regulation 41 of GN No.R.982 of 2014 (as amended).This must include, inter alia: proof of having fixing a notice board at the site where the activity will take place, giving written notice to interested and Affected Parties and placing an advertisement in the local newspaper.	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	Please refer to Appendix F2 & F3 which includes the proof of the site notice and newspaper advertisement placement. Appendix F4 includes all proof of notification of the availability of the Draft BAR.
20	It is stated on page 35 of the pre-application BAR that the “no-go alternative” is not preferred. You are therefore requested to elaborate on why the no-go alternative” is	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	The No-Go alternative entails maintaining the existing state of the site and to operate the depot in

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	not the preferred alternative.				<p>its current form. Negative impacts associated with the No-Go alternative include lack of temporary and permanent job opportunities, the additional profit opportunity cost lost for Kaap-Agri and the opportunity cost lost to supply diesel to the farmers. In 2018 the depot delivered 18 million litres to farmers in the vicinity (1.5 mil litres per month). The industry standard is that a depot must be able to carry at least a month's stock to be able to provide for the fuel demand. The depots current storage capacity is only 400 000 litres. The 2019 budget has been compiled based on the reported demand for fuel in the vicinity. It shows that Kaap Agri is expected to deliver in excess of 22 million litres during 2019 (2 million litres per month almost). The NO-GO alternative would result in the existing facility being unable to provide for the projected future diesel demand in the area.</p> <p>This section of the BAR has been updated to reflect the above.</p>
21	On page 50-61 of the pre-application BAR the impacts of the preferred alternative, i.e. Layout Alternative I are assessed. It is further indicated on page 50 of the pre-application BAR that no impacts are expected to occur in terms of the no-go alternative. However, there appears to be no assessment of impacts for Layout Alternative 2 and Layout Alternative 3 in the pre-application BAR. In terms of Appendix 1: Section 3 (1)(h) (v) of GN No. R. 982 of 4	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	With reference to Appendix 1: Section 33 (1)(h) (x) of GN No. R. 982 of 4 December 2014 (as amended), it states (section h) that " <i>if no alternatives were investigated, the motivation for not considering such must be provided</i> ". Section E: Details of Alternatives in the pre-application BAR has therefore been amended in response to this comment to motivate in detail why the two other

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	December 2014 (as amended), the impacts and risks identified for each alternative (including the no-go alternative) must be assessed. As such, please ensure all the alternatives, i.e. layout alternative 1, layout alternative 2, layout alternative 3 and the no-go alternative ( where applicable) are assessed and included in the pre-application BAR. This must also include the measured to avoid, or if not possible, mitigate such impacts.				<p>layout alternatives were originally considered, but disregarded as they were found to be unreasonable and unfeasible to implement by the applicant.</p> <p>Please refer to the amended Section E of the BAR.</p>
22	The pre-application BAR seems to have only assessed the visual impacts which may result during the construction phase of the development. You are therefore requested to also assess the visual impacts of the proposed development that may result during the operational phase. This may include, inter alia, confirmation of whether the proposed development, i.e. the storage tanks will be visible from prominent viewpoints and receptors, and the measures that will be implemented to avoid or if not possible mitigate the visual impacts.	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	<p>The BAR and EMP has been updated to include the potential visual impact during the operation phase and provided mitigation measures.</p> <p>It should be kept in mind that this is an industrial area and the proposed development is an expansion to an existing established diesel storage facility. What is proposed is in-effect a duplication of what is already on site. The visual impact during the operational phase is therefore not expected to be a significant impact.</p>
23	Please be reminded to include a spatial development plan of the overall development and associated infrastructure. The plan should include all the associated environmental constraints, such as the sensitive areas (if any) that will be avoided, e.g. buffer areas.	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	<p>A Spatial Development Plan (Site Layout Plan) of the site was provided in Appendix B. There are no environmental constraints such as sensitive areas on the site that need to be avoided hence none are shown on the layout plan.</p> <p>This is an existing industrial site. It is proposed to expand the existing facility by installing additional</p>

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					tanks on a completely disturbed and transformed site.
24	Please be reminded to include the original signed declaration forms in the final report.	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	Noted.
25	You are hereby requested to provide confirm whether the existing fuel depot required any environmental authorisation/approvals prior to being constructed. Should this be the case, please provide proof of having obtained the necessary environmental authorisation /approval.	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	<p>The depot was originally developed in October 2000. Please refer to Appendix I which shows the latest Environmental Authorisation for the depot which was expanded by one tank (85 000 litres).</p> <p>The DEA &amp; DP would not have authorized the expansion in 2009 if the existing depot before 2009 was not already approved. This should therefore suffice as proof of the legal standing of the existing depot.</p>
26	Your attention is drawn to Appendix 4 of Government Notice (“GN”) NO. R. 982 of 4 December 2014 (as amended), for the requirements with respect to the ‘Content of Environmental Management Programme’. Please ensure that these requirements are met.	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	Noted.
27	Your attention is drawn to Appendix 1 of Government Notice (“GN”) No. R. 982 of 4 December 2014 (as amended), for the requirements with respect to the ‘Content of basic assessment reports’. Please ensure that these requirements are met.	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	Noted.
28	Your attention is drawn to Appendix 6 of Government Notice (“GN”) No. R. 982 of 4 December 2014 (as amended), for the requirements with respect to the	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	Noted. There are no specialist reports that were compiled for this development proposal. The MHI

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	'Content of specialist reports'. Please ensure that these requirements are met.				Risk assessment content requirements are in line with the MHI Regulations.
29	Please note that the activity must not be commenced with prior to an environmental authorisation being granted by this Department. It is prohibited in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. Failure to comply in terms of this prohibition will result in the matter being referred to the Environmental Law Enforcement Directorate of this Department for possible prosecution. A person convicted of an offence in terms of the above is liable for a fine not exceeding R5 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	Noted.
<b>NEED &amp; DESIRABILITY</b>					
30	In terms of 'needs and desirability', it is illustrated in the pre-application Basic Assessment Report ("BAR"), how the proposed development is consistent with the strategic policy context. However, please be informed that you are also required to provide information on why the proposed development is required at this particular point in time. Please ensure that you address this aspect in terms of the 'needs and desirability' context of the proposed development.	15 <sup>th</sup> October 2018	Natasha Bieding	DEA & DP: Development Management	The development is needed and desired because negative impacts associated with the No-Go alternative include lack of temporary and permanent job opportunities, the additional profit opportunity cost lost for Kaap-Agri and the opportunity cost lost to supply diesel to the farmers. In 2018 the depot delivered 18 million litres to farmers in the vicinity (1.5 mil litres per month). The industry standard is that a depot must be able to carry at least a month's stock to be able to provide for the fuel demand. The depots current storage capacity is only 400 000 litres. The 2019

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					<p>budget has been compiled based on the calculated demand for fuel in the vicinity. It shows that Kaap Agri is expected to deliver in excess of 22 million litres during 2019 (2 million litres per month almost). The NO-GO alternative would result in the existing facility being unable to provide for the projected future diesel demand in the area and therefore the expansion is needed to meet the demand.</p> <p>The BAR has been updated to reflect the above.</p>
<b>OTHER</b>					
31	<p>The environmental section also recommend that Erf 3827 be rehabilitated appropriately if and when Kaap Agri disposes of the property or if the depot gets decommissioned in future, including the removal and rehabilitation of the area/diesel tanks.</p>				<p>Should decommissioning of the activity occur one day, Kaap Agri would need to undertake a new environmental impact assessment process because the decommissioning of a fuel depot triggered in the 2014 EIA Regulations, is a “listed activity” on its own. Therefore, the impacts and mitigation measures required to decommission the depot would be the subject of another EIA process and be managed under a separate decommissioning Phase Environmental Management Programme that would need to be compiled.</p>