Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

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THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

August 2025

(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

(This must Include an overview of the project including the Farm name/Portion/Erf number)

Proposed installation of 3 x 83m³ (249m³) Diesel Aboveground Storage Tanks (AST's) on Erf 601, Stasie Road, Lutzville, West Coast District.

IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.

2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 19998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".

3. *Submission of documentation, reports and other correspondence:*

   The Department has adopted a digital format for corresponding with proponents/applicants or the general public. If there is a conflict between this approach and any provision in the legislation, then the provisions in the legislation prevail. If there is any uncertainty about the requirements or arrangements, the relevant Competent Authority must be consulted.

   The Directorate: Development Management has created generic e-mail addresses for the respective Regions, to centralise their administration. Please make use of the relevant general administration e-mail address below when submitting documents:

   DEADPEIAAdmin@westerncape.gov.za
   Directorate: Development Management (Region 1):
   City of Cape Town; West Coast District Municipal area;
   Cape Winelands District Municipal area and Overberg District Municipal area.

   DEADPEIAAdmin.George@westerncape.gov.za
   Directorate: Development Management (Region 3):
   Garden Route District Municipal area and Central Karoo District Municipal area

   General queries must be submitted via the general administration e-mail for EIA related queries. Where a case-officer of DEA&DP has been assigned, correspondence may be directed to such official and copied to the relevant general administration e-mail for record purposes.

   All correspondence, comments, requests and decisions in terms of applications, will be issued to either the applicant/requester in a digital format via email, with digital signatures, and copied to the Environmental Assessment Practitioner ("EAP") (where applicable).

4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.

5. All applicable sections of this BAR must be completed.

6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.

7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at http://www.westerncape.gov.za to check for the latest version of this BAR.

8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.

10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.

11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.

12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.

13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.

14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link https://screening.environment.gov.za/screeningtool to generate the Screening Tool Report. The screening tool report must be attached to this BAR.

15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA"), the submission of the Report must also be made as follows, for-
Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

    Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licensing Authority or this Department's Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

DEPARTMENTAL DETAILS	
CAPE TOWN OFFICE: **DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)** (City of Cape Town, West Coast District, Cape Winelands District & Overberg District)	**GEORGE REGIONAL OFFICE:** **DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3)** (Central Karoo District & Garden Route District)
The completed Form must be sent via electronic mail to: DEADPEIAAdmin@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 1) at: E-mail: DEADPEIAAdmin@westerncape.gov.za Tel: (021) 483-5829 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000	The completed Form must be sent via electronic mail to: DEADPEIAAdmin.George@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 3) at: E-mail: DEADPEIAAdmin.George@westerncape.gov.za Tel: (044) 814-2006 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development **must** be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): o Watercourses / Rivers / Wetlands o Flood lines (*i.e.*, 1:100 year, 1:50 year and 1:10 year where applicable);

	○ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): ○ Ridges; ○ Cultural and historical features/landscapes; ○ Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as **Appendix C**. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as **Appendix D**.
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as **Appendix A3**.

ACRONYMS

DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme
HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment
NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government

ATTACHMENTS

Note: The Appendices must be attached to the BAR as per the list below. Please use a ✓ **(**tick) or a **x** (cross) to indicate whether the Appendix is attached to the BAR.

The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A1:	**Locality Map**	✓
	Appendix A2:	**Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning**	N/A
	Appendix A3:	**Map with the GPS co-ordinates for linear activities**	N/A
Appendix B:	**Appendix B1:**	**Site development plan(s)**	✓
	Appendix B2	**A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;**	N/A
Appendix C:	**Photographs**		**X**
Appendix D:	**Biodiversity overlay map**		✓
Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.**		
	Appendix E1:	**Final comment/ROD from HWC**	N/A
	Appendix E2:	**Copy of comment from Cape Nature**	No comment received.
	Appendix E3:	**Final Comment from the DWS**	No comment received.
	Appendix E4:	**Comment from the DEA: Oceans and Coast**	N/A
	Appendix E5:	**Comment from the DAFF**	N/A
	Appendix E6:	**Comment from WCG: Transport and Public Works**	No comment received.
	Appendix E7:	**Comment from WCG: DoA**	N/A
	Appendix E8:	**Comment from WCG: DHS**	N/A
	Appendix E9:	**Comment from WCG: DoH**	N/A

	Appendix E10:	**Comment from DEA&DP: Pollution Management**	No comment received.
	Appendix E11:	**Comment from DEA&DP: Waste Management**	No comment received.
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	No comment received.
	Appendix E13:	**Comment from DEA&DP: Air Quality**	No comment received.
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	N/A
	Appendix E15:	**Comment from the local authority**	No comment received.
	Appendix E16:	**Confirmation of all services (water, electricity, sewage, solid waste management)**	N/A
	Appendix E17:	**Comment from the District Municipality**	No comment received.
	Appendix E18:	**Copy of an exemption notice**	N/A
	Appendix E19	**Pre-approval for the reclamation of land**	N/A
	Appendix E20:	**Proof of agreement/TOR of the specialist studies conducted.**	N/A
	Appendix E21:	**Proof of land use rights**	N/A
	Appendix E22:	**Proof of public participation agreement for linear activities**	N/A
	Appendix E23:	**Comment from the DEAD&DP: Development Management**	✓
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.**		✓
Appendix G:	**Specialist Report(s)**	**Appendix G1: Animal Species Compliance Statement**	✓
		Appendix G2: Aquatic Biodiversity Compliance Statement	✓
		Appendix G3: Plant Species Compliance Statement	✓
		Appendix G4: Terrestrial Biodiversity Compliance Statement	✓
		Appendix G5: Specialist proof of proficiency	✓

Appendix H:	**EMPr**	✓
Appendix I:	**Appendix I1: Screening tool report**	✓
	Appendix I2: SSVR	✓
Appendix J:	**The impact and risk assessment for each alternative**	N/A
Appendix K:	**Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline**	N/A
Appendix L:	**Zoning Map**	✓
Appendix M:	**Project Plan**	✓

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		~~GEORGE OFFICE: BEGION 3~~
	(City of Cape Town, West Coast District	~~(Cape Winelands District & Overberg District)~~	~~(Central Karoo District & Garden Route District)~~

Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Graeme Wayne Sim	
Name of contact person for Applicant/Proponent (if other):	Tiaan Lessing	
Company/ Trading name/State Department/Organ of State:	Agrimark (Pty) Ltd.	
Company Registration Number:	1995/000336/06	
Postal address:	1 Westhoven, Charleston Hill	
Postal code:	7646	
Telephone:	(021) 860 3227	Cell: 083 440 0165
E-mail:	Tiaan.lessing@agrimark.co.za	Fax: N/A
Company of EAP:	Sillito Environmental Consulting	
EAP name:	Registered EAP: Chantel Muller Candidate EAP: Jonathan Lassen	
Postal address:	Suite 401, Tokai on Main, 2 Burchell Road, Tokai	
Postal code:	7945	
Telephone:	(021) 712 5060	Cell: (071) 313 4193
E-mail:	chantel@environmentalconsultants.co.za	Fax: N/A
Qualifications:	**Lead EAP: Chantel Muller** M Phil in Environmental Management (2008) BA in Social Dynamics (2004) Chantel Muller is a registered EAP with EAPSA (2019/1362) as well as a member of the International Association for Impact Assessment (IAIA). Chantel is also an Accredited Professional with the Green Building Council of South Africa. **Candidate EAP: Jonathan Lassen** Advanced Diploma in Marine Sciences (2021), candidate registered EAP (2024/8038).	
EAP registration no:	Chantel Muller: 2019/1362 Jonathan Lassen: 2024/8038	
Duplicate this section where there is more than one landowner Name of landowner:	**Same as Applicant**	
Name of contact person for landowner (if other):		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )
Name of Person in control of the land:	**Same as Applicant**	
Name of contact person for person in control of the land:		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	Matzikama Municipality

Contact person:	Municipal Manager (Lutzville)	
Postal address:	PO Box 98, 37 Church Street, Vredendal.	
Postal code:	8160	
Telephone	(027) 201 3301	Cell: N/A
E-mail:	munman@matzikama.gov.za	Fax: N/A

SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INLCUDED IN THE APPLICATION FORM

1.	Is the proposed development (please tick):	~~New:~~	N/A	Expansion:	X
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
Brownfield Site: The Erf is completely developed with a fuel service station (including a forecourt area), Agrimark convenience store, Agrimark warehouse and Agrimark retail store present on the proposed site, the remaining space is being utilised as parking bays.					
~~3.~~	**~~For Linear activities or developments~~**				
~~3.1.~~	~~Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:~~				
~~3.2.~~	~~Development footprint of the proposed development for all alternatives.~~				~~m²~~
~~3.3.~~	~~Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.~~				
~~3.4.~~	~~Indicate how access to the proposed routes will be obtained for all alternatives.~~				
~~3.5.~~	~~SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives~~				
~~3.6.~~	**~~Starting point co-ordinates for all alternatives~~**				
	~~Latitude (S)~~	~~°~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~°~~	~~'~~	~~"~~	
	~~Middle-point co-ordinates for all alternatives~~				
	~~Latitude (S)~~	~~°~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~°~~	~~'~~	~~"~~	
	~~End point co-ordinates for all alternatives~~				
	~~Latitude (S)~~	~~°~~	~~'~~	~~"~~	
	~~Longitude (E)~~	~~°~~	~~'~~	~~"~~	
~~Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.~~					
4.	**Other developments**				
4.1.	Property size(s) of all proposed site(s):				17 130.38m²
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):				3009.97m²
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:				N/A
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).				

The site located on Erf 601, Stasie Road, Lutzville, in the West Coast District, spans a total area of 17,130.38 m². Currently, existing developments occupy only 17.57% of the site, covering 3,009.7 m². The infrastructure on the site includes a fuel service station with a forecourt area, a convenience store, a gas storage facility, a mini substation, an Agrimark retail store, and two Agrimark warehouses. Additionally, the site features 80 designated parking bays for visitors and staff.

The proposed expansion involves adding three 83m³ (249m³) above-ground diesel storage tanks in the northern section of the site, as shown in the attached Site Development Plan (SDP) (**Appendix I**). The development will include the construction of a bund floor with new stairs (1.14 m²), a new petrol dispenser area (22.5 m²), a spill slab (120 m²), and a new bund floor area (237.17 m²). The total ground coverage of the expansion will be 380.81 m².

Locality Map (Expansion area in red zone)

Figure 1. Locality Map – with proposed expansion area highlighted in red zone (Cape Farm Mapper)

4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.																				
The proposed site can be accessed via either of the three entry/exit points along Stasie Road. The fuel service station consists of an individual entry/exit point and the Agrimark retail store consists of two entry/exit points to accommodate potential traffic created by the influx of customers.																					
4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	7	8	0	0	0	7	0	0	0	0	0	0	6	1	0	0	0	0	0

4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	**31°**	**33'**	**18.81"**
	Longitude (E)	**18°**	**20'**	**43.79"**

SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

1. Exemption applied for in terms of the NEMA and the NEMA EIA Regulations

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18.	~~YES~~	NO

2. Is the following legislation applicable to the proposed activity or development.

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	~~YES~~	NO
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	~~YES~~	NO
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	~~NO~~
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	~~YES~~	NO
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	~~YES~~	NO

The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	~~YES~~	NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	~~YES~~	NO
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	~~YES~~	NO

3. Other legislation

List any other legislation that is applicable to the proposed activity or development.

- Spatial Planning Land Use Management Act 16 of 2013
- Mineral and Petroleum Resources Act 49 of 2008
- National Energy Regulator Act 40 of 2004
- The National Environmental Management Act, Act 107 of 1998, as amended.
    - The proposed expansion of fuel storage capacity will take place according to the conditions set out in the NEMA, whereby environmental authorization is required for the expansion of facilities for the storage (or for the storage and handling) of dangerous goods (i.e. fuel), where the capacity of such storage facility will be expanded by more than 80m3.
- EIA regulations in terms of Chapter 5 of the NEMA, 1998. Regulations R982, R983, R984 and R985 of December 2014.

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.

- The proposed activities will fall in line with the Municipal SDF, the area that the proposed expansion falls into is designated for commercial use as well as an area highlighted for upgrading.
- Western Cape Spatial Development Framework (PSDF), 2009
- West Coast District Municipality SDF 2020
- West Coast District Municipality IDP Process Plan 2022
- DEA Integrated Environmental Management Guidelines Series, Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations.

5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.

The following guidelines were used to guide the EAP to ensure all the requirements with regards to the consideration of alternatives, public participation, and procedures to assess the need and desirability were assessed and inquired. These guidelines were considered during the Draft BAR and preparation of this report:

- Guideline Document, EIA Regulations, Implementation of Sections 21, 22 and 26 of the Environment Conservation Act, 1998.
- DFFE Integrated Environmental Management Guideline Series, Guideline 3: General Guide to the Environmental Impact Assessment Regulations, 2006.
- DFFE Integrated Environmental Management Guideline Series, Guideline 4: Public Participation in support of the Environmental Impact Assessment Regulations, 2006.
- DFFE Integrated Environmental Management Guideline Series, Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006.
- DFFE Companion to the NEMA EIA Regulations of 2010.
- DFFE Integrated Environmental Management Guideline Series, Guideline 5: Companion to the Environmental Impact Assessment Regulations, 2012
- DEA&DP Guideline Document: Guideline on Alternatives, March 2013.
- DEA&DP Guideline Document: Guideline on Public Participation, March 2013.
- DEA&DP Guideline Document: Guideline on Need and Desirability, March 2013.
- DEA&DP Guideline for determining the scope of specialist involvement in the EIA process, June 2005.
- DEA&DP Guideline for the review of specialist input in the EIA process, June 2005.

6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form

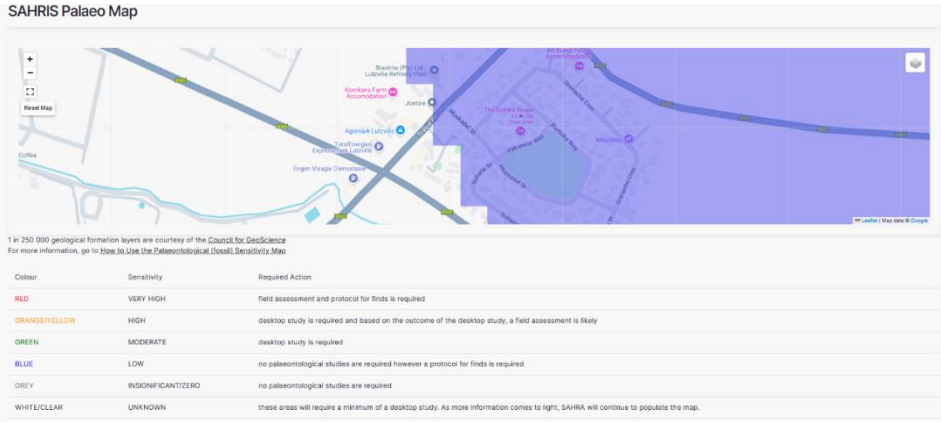
The sensitivities identified in the Screening Tool (attached as **Appendix D**) were as follows:

Theme	Very High Sensitivity	High Sensitivity	Medium Sensitivity	Low Sensitivity
Agriculture Theme				X
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme		X		
Defence Theme				X
Paleontology Theme			X	
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

The following themes for which protocols were legislated on the 20th of March 2020, have been identified in the Screening Tool Report (**Appendix D**):

No	Theme	DEA Sensitivity	Agree / Disagree	Proposed Sensitivity	Motivation
1	Agriculture Theme	Low Sensitivity	Agree	Low Sensitivity	The proposed site for expansion is an existing site, that has been completely transformed and does not support any agricultural crops. This site is located within a built-up area which is not zoned for agricultural use and the surrounding land uses include commercial businesses and residential homes. Due to the factors highlighted above, it is envisaged that the proposed site for fuel storage expansion would not support any agricultural activities and therefore, the site will have a 'Low' agricultural site sensitivity rating.
2	Animal Species Theme	High Sensitivity	Disagree	Low Sensitivity	Anthropogenic activities, associated with the previous clearance and current operation of the site have resulted in the transformation and disturbance of the area. The proposed expansion activities would take

					place on an already existing site with infrastructure such as a fuel service station, warehouses, mini sub station and convenience store present. There is no indigenous vegetation present on the site, and it is therefore unlikely that the site would be able to support any fauna, listed as being present, in the general site area. Based on the factors outlined above, it is envisaged that the site will have a 'Low' Animal Species theme sensitivity. An Animal Species Biodiversity compliance statement was completed by Enviro-EAP and the findings were in support of the opinions of the EAP, the conclusions of the specialists report are further discussed under **Section G** of this report.
3	Aquatic Biodiversity Theme	Very High Sensitivity	Disagree	Medium Sensitivity	The Aquatic Biodiversity Theme has been rated as 'Very High' due to an Aquatic Ecological Support Area 1 (ESA1) being in proximity and overlapping onto the proposed site. A non-perennial river also runs along the western boundary of the site and is associated with the ESA1. The proposed installation of the three 83m3 aboveground diesel storage tanks would have no impact on the non-perennial river and due to the tanks being aboveground, possible leaks can be efficiently managed and monitored. In addition, due to anthropogenic activities being present in the surrounding areas and the site being already being developed it is envisaged that the proposed expansion will have little to no impact on the ESA1 and non-perennial river. It is therefore the opinion of the EAP that the assigned rating should be 'Low'. An Aquatic compliance statement was completed by Enviro-EAP and the findings were in support of the opinions of the EAP. In addition, the report also outlined that the ESA area present on the online mapping tool (Cape Farm Mapper) was falsely mapped and the conclusions of the specialists report therefore supported the opinions of the EAP. The results of the specialists report are further discussed under **Section G** of this report.
4	Archaeological and Cultural Heritage Theme	Low Sensitivity	Agree	Low Sensitivity	The Archaeological and Cultural Heritage Theme has been rated as 'Low', due to the nature of the site and proposed expansion activities; the EAP agrees with the assigned 'Low' sensitivity rating. Due to the nature of the proposed expansion activities, a "chance finds" clause will still be included and if any archaeological or cultural remains were uncovered, the necessary specialists would be contacted to determine the way forward.
5	Civil Aviation Theme	High Sensitivity	Disagree	Negligible	The Civil Aviation Theme has been rated as 'High' due to the site being within an 8km proximity of a civil aviation aerodrome. The proposed expansion activities will have no impact on any surrounding civil aviation activities or infrastructure; it is therefore envisaged that the assigned sensitivity rating should be 'Negligible'.
6	Defence Theme	Low Sensitivity	Disagree	Negligible	The Defence Theme has been rated as 'Low', due to the nature of the site and proposed expansion activities, the development will have no impact on any Defence related infrastructure or activities. The

					EAP therefore disagrees with the assigned 'Low' sensitivity rating, and it is envisaged that the rating should be 'Negligible'.
7	Palaeontology Theme	Medium Sensitivity	Disagree	Low Sensitivity	According to Paleontological Online Map Tool (https://sahris.sahra.org.za/map/palaeo), the proposed site is situated on the border an area of low paleontological significance. Moreover, the site has been previously transformed. The proposed fuel storage expansion is therefore unlikely to impact any paleontological resource. It is envisaged that the proposed site has a 'Low' sensitivity relative to the Paleontological Theme. As mentioned for Sensitivity Theme 4 (Archaeological and Cultural Heritage Theme) a chance finds clause will still be included and if any archaeological or cultural remains were uncovered, the necessary specialists would be contacted to determine the way forward.  **Figure 2.** Paleontological Sensitivity of the proposed site for fuel storage expansion. Source: SAHRIS, 2024.
8	Plant Species Theme	Medium Sensitivity	Disagree	Low Sensitivity	Anthropogenic activities, including previous clearance and the current operation of the site, have led to significant transformation and disturbance of the area. The proposed expansion will occur on an already developed site that includes infrastructure such as a fuel service station, warehouses, a mini substation, and a convenience store. There is no indigenous vegetation on the site, and it is currently operational with ongoing commercial activities. As such, it is unlikely that the site can support any flora that are listed as present in the surrounding area. Given these considerations, it is the opinion of the EAP that the site is expected to have a 'Low' sensitivity for plant species. A Plant Species Biodiversity compliance statement

					was completed by Enviro-EAP and the findings were in support of the opinions of the EAP, the conclusions of the specialists report are further discussed under **Section G** of this report.
9	Terrestrial Biodiversity Theme	Very High Sensitivity	Disagree	Medium Sensitivity	The Terrestrial Biodiversity Theme has been rated as 'Very High' due to an Ecological Support Area 2 (ESA2) being in proximity and overlapping onto the proposed site. A non-perennial river also runs along the western boundary of the site and is associated with the ESA2. The proposed installation of the three 83m^3 aboveground diesel storage tanks would have no impact on the ESA2 because all development works would be contained within the already established site. In addition, due to anthropogenic activities being present in the surrounding areas and the site being already being developed it is envisaged that the proposed expansion will have little to no impact on the ESA2 and non-perennial river. It is therefore the opinion of the EAP that the assigned rating should be 'Low'. A Terrestrial Biodiversity compliance statement was completed by Enviro-EAP and the findings were in support of the opinions of the EAP, the conclusions of the specialists report are further discussed under **Section G** of this report.

In addition, the site has been completely transformed and is currently in operation, the proposed expansion of fuel storage capacity is envisaged to have negligible impacts should proposed mitigation measures, to be outlined in the DBAR (this report) and EMPr (**Appendix H**), be implemented. Based on the factors outlined above, the proposed expansion of fuel storage capacity will have a negligible impact on the receiving environment.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
51	The expansion and related operation of facilities for the storage, or storage and handling, of a dangerous good, where the capacity of such storage facility will be expanded by more than 80 cubic metres.	The proposed expansion is for the installation of three 83m^3 Aboveground Diesel Storage Tanks. The combined capacity of the tanks will be 249m^3 The tank capacity exceeds 80m^3, as confirmed by DEAD&DP this listed activity will be triggered.
Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A		
Note: • The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. • Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.		

List the applicable waste management listed activities in terms of the NEM:WA

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Category A**	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A		

List the applicable listed activities in terms of the NEM:AQA

Activity No(s):	Provide the relevant **Listed Activity(ies)**	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A		

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.
Due to the nature of the proposed development and the fact that the proposed activities are in relation to the expansion of an already established facility, the proposed alternative outlined in this report was the only alternative considered. This is due to the limited space available on the proposed site for the expansion of fuel storage and the fact that the proposed site is completely developed for business/retail purposes.	
2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.
Erf 601 is currently zoned for business, the expansion of fuel storage for business/retail purposes therefore falls within the Erf's existing land use rights.	
3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.
N/A. The proposed expansion of fuel storage capacity will not conflict with any existing approvals linked to the site.	
4.	Explain how the proposed development will be in line with the following?

4.1	The Provincial Spatial Development Framework.

The proposed expansion of fuel storage capacity aligns with the Western Cape Provincial Spatial Development Framework (2014) by supporting strategic infrastructure investment aimed at enabling economic growth and ensuring energy security. The Framework emphasizes the importance of maintaining and enhancing critical infrastructure, particularly in areas identified for industrial and business development. The expansion also reinforces spatial targeting principles by focusing development within established infrastructure corridors, contributing to a more resilient and efficient provincial economy. Furthermore, it supports the goal of sustainable development by consolidating infrastructure in designated nodes, minimizing environmental impact and maximizing existing service capacity.

4.2	The Integrated Development Plan of the local municipality.

The proposed expansion of fuel storage capacity aligns with the Saldanha Bay Municipality Integrated Development Plan (IDP) 2022–2027 by supporting strategic infrastructure development aimed at unlocking the area's economic potential. The IDP identifies the Saldanha Bay region as a key logistics and industrial hub within the West Coast, with a focus on energy infrastructure, and strategic location to boost economic activity. The plan specifically promotes infrastructure investments that enable energy and industrial growth, which are vital to enhancing the region's status as an investment destination and strengthening the Saldanha Bay Industrial Development Zone (IDZ). Expanding fuel storage aligns with these objectives by improving the municipality's logistical capabilities, supporting the needs of the industrial sectors, and enabling resilience in fuel supply critical for regional development.

4.3.	The Spatial Development Framework of the local municipality.

The proposed expansion of fuel storage capacity aligns with the Saldanha Bay Municipal Spatial Development Framework (MSDF) as it supports the municipality's strategic objective of strengthening the industrial hub of the Saldanha Bay region. The MSDF specifically identifies the Saldanha Bay Industrial Development Zone (IDZ) as key economic drivers, and promotes investment in infrastructure, including fuel and gas storage, within designated industrial precincts. This expansion is consistent with the spatial intent to cluster heavy industrial uses in appropriate locations, leverage existing logistics infrastructure, and enhance energy security, thereby contributing to long-term spatial and economic resilience.

4.4.	The Environmental Management Framework applicable to the area.

The proposed expansion of fuel storage capacity aligns with the Environmental Management Framework (EMF) for the Greater Saldanha area by adhering to key EMF principles that promote sustainable development, environmental protection, and responsible land use. The EMF emphasizes the importance of guiding development in a manner that maintains ecosystem services, avoids ecologically sensitive areas (such as Critical Biodiversity Areas and Ecological Support Areas), and ensures proper planning within designated Environmental Management Zones (EMZs). The proposed expansion will also be governed by mitigation measures outlined in this BA Report and the Environmental Management Plan, attached as **Appendix H**.

5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.

No comments in relation to biodiversity were received during the Pre-Application BAR public participation phase. Comments have been requested from the relevant biodiversity state departments and Cape Nature as part of the public participation phase for this report, the Post-Application BAR.

6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.

The Western Cape Biodiversity Spatial Plan identifies Critically Biodiverse (CBA) and Ecological Support Areas (ESA), as areas of vital importance for maintaining biodiversity patterns, ecological processes, and ecosystem services. According to the guidelines, development within CBAs is generally discouraged due to the high risk of biodiversity loss, while developments within ESAs may be permitted only if they do not compromise ecosystem functionality and are accompanied by appropriate mitigation measures. As defined by the specialist within the Aquatic, Terrestrial, Plant and Animal Species compliance statements, the desktop mapping falsely identified an ESA area, and the proposed development will therefore not be within proximity of or have any negative impacts on any CBA or ESA areas.

The proposed expansion of fuel capacity will however undergo an environmental assessment, and the approved activities will be governed by mitigation measures outline in this report and the EMPr attached under **Appendix H.**

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.

N/A. The proposed development will not be in proximity to the coastal zone and will not have any negative impacts on the coastal zone.

8.	Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I.

The Screening Report has remained unchanged and the Aquatic, Terrestrial, Plant and Animal Species Compliance Statements support the opinions of the EAP outlined in the attached Screening Tool Report and Site Sensitivity Verification Report.

9.	Explain how the proposed development will optimise vacant land available within an urban area.

The proposed development will optimise vacant land available within an urban area by repurposing underutilised space for economically productive infrastructure, thus supporting densification and efficient land use. By situating the expansion of Above Ground Storage Tanks (ASTs) on existing vacant urban land, the development avoids contributing to urban sprawl, limits disturbance to surrounding natural ecosystems, and aligns with sustainable spatial planning principles. This approach enhances infrastructure availability within established urban boundaries, reduces the need for additional services or road networks, and promotes the compact, integrated development vision outlined in municipal planning frameworks.

10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.

The proposed development will optimise the use of existing resources and infrastructure by leveraging established utilities, transport networks, and support services already present within the urban area. By expanding fuel storage capacity on a site that is already serviced (access roads, electricity supply, and drainage systems), the project avoids duplicating infrastructure investments and reduces environmental and financial costs. This approach enhances operational efficiency, shortens implementation timelines, and supports sustainable development by building on existing capacity rather than requiring new, resource-intensive installations.

11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).

No additional service confirmations will be required for the proposed expansion of fuel storage capacity, as the development does not rely on effluent disposal, electrical supply, or other municipal services typically applicable to residential or commercial developments. Furthermore, the site is already established, and municipal services have previously been made available, ensuring that all necessary infrastructure for site access and general operations are in place.

12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.

Strategic Infrastructure and Economic Need

The project responds to a need for enhanced fuel storage capacity in the Western Cape, specifically within the Saldanha Bay region, a recognized logistics and industrial hub. Increasing storage capacity supports and enables industrial growth and enhances resilience in fuel supply chains. These functions are vital for supporting economic activity and meeting current and future energy demands in line with the Western Cape Provincial Spatial Development Framework (2014) and the Saldanha Bay Municipality Integrated Development Plan (2022–2027).

Alignment with Spatial Planning and Development Objectives

The desirability of the project is reinforced by its strategic siting within established industrial precincts and infrastructure corridors, as promoted by the Saldanha Bay Municipal Spatial Development Framework (MSDF). The expansion aligns with the municipality's vision to strengthen the Saldanha Bay Industrial Development Zone (IDZ) and cluster heavy industrial activities in appropriate zones. By utilizing already designated land for industrial use, the development supports a compact, efficient spatial form and minimizes urban sprawl.

Environmental Sustainability and Responsible Land Use

The development is desirable from an environmental standpoint due to its location on previously disturbed, underutilized urban land. The project adheres to the principles of the Environmental Management Framework (EMF) and the Western Cape Biodiversity Spatial Plan, ensuring that the natural environment is not compromised. The inclusion of mitigation measures within this Basic Assessment Report and the attached Environmental Management Plan further supports responsible development.

Optimal Use of Existing Infrastructure

The installation will leverage existing utilities, transport infrastructure, and support services already available on-site. This avoids duplication of infrastructure, reduces financial and environmental costs, and enhances the sustainability and efficiency of the development. It represents an optimal use of land and services, contributing to smart growth principles and reducing the carbon footprint associated with greenfield developments.

SECTION F: PUBLIC PARTICIPATION

The Public Participation Process ("PPP") must fulfil the requirements as outlined in the NEMA EIA Regulations and must be attached as Appendix F. Please note that If the NEM: WA and/or the NEM: AQA is applicable to the proposed development, an advertisement must be placed in at least two newspapers.

1. Exclusively for linear activities: Indicate what PPP was agreed to by the competent authority. Include proof of this agreement in Appendix E22.

No linear activities are proposed.

2. Confirm that the PPP as indicated in the application form has been complied with. All the PPP must be included in Appendix F.

A Public Participation Process has been conducted notifying Potential and Registered I&APs of the opportunity to (i) register as an I&AP, and (ii) the availability of the Pre-Application DBAR for comment. A comment period of a minimum of 30 days will be given to Potential and Registered I&APs. Comments received during the Pre-Application PPP will be recorded and addressed in a Comments and Response Report. The PPP will be conducted in accordance with the approved PPP and Chapter 6 of the 2014 NEMA EIA Regulations, as amended. All PPP proof will be attached as **Appendix F** in the Draft and Final BAR.

In addition to the above, this report, the Post-Application BAR will be made available to Registered I&AP's for a minimum of 30 days for comment. Comments received will be highlighted in the attached comments and response table and where applicable comments will be incorporated into the BAR and relevant supporting documents.

3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.

NAME OF ORGANIZATION / PARTY REPRESENTED	NAME AND SURNAME	EMAIL ADDRESS
Department of Environmental Affairs and Development Planning: Development Management		deadpeiaadmin@westerncape.gov.za
Department of Environmental Affairs and Development Planning: Development management (Region 1)	Zaahir Toefy	zaahir.toefy@westerncape.gov.za
Western Cape Department of Agriculture	Adriaan Conradie / Cor van de Walt	landuse.elsenburg@elsenburg.com AdriaanC@elsenburg.co.za
Department of Environmental Affairs and Development Planning: Waste Management	Saliem Haider	Saliem.Haider@westerncape.gov.za eddie.hanekom@westerncape.gov.za Alet.vanstaden@westerncape.gov.za August.Hoon@westerncape.gov.za
Department of Environmental Affairs and Development Planning: Air Quality Management	Joy Leaner	joy.leaner@westerncape.gov.za
Department of Environmental Affairs and Development Planning: Pollution and Chemicals Management	Arabel McClelland / Zayed Brown	Arabel.McClelland@westerncape.gov.za
Department of Transport and Public Works Directorate Road Planning	Devlin Fortuin	devlin.fortuin@westerncape.gov.za
Department of Water Affairs and Sanitation	Warren Dreyer, Derril Daniels, M. Noqhamza, and R Singo	dreyerw@dwa.gov.za danielsd@dwa.gov.za SingoR@dws.gov.za noqhamzam@dws.gov.za
Environmental Control Officers and Heritage Inspectors	Maurietta Stewart	Maurietta.steward@capetown.gov.za Dimitri.georgeades@capetown.gov.za

CapeNature-Land Use Advice	Ismat Adams	iadams@capenature.co.za mwheeler@capenature.co.za
Heritage Western Cape	Waseefa Dhansay	waseefa.dhansay@westerncape.gov.za
Eskom	John Geeringh	GeerinJH@eskom.co.za HenninWM@eskom.co.za RanwedRP@eskom.co.za
Saldanha Bay Municipality	Lindsey Gafley	Monwabisi.Langa@sbm.gov.za
Saldanha Bay Municipality - Project Management Unit	Abigail Louw	Abigail.Louw@sbm.gov.za
Saldanha Bay Municipality – Integrated Development Planning	Asanda Tolbadi	Asanda.Tolbadi@sbm.gov.za
Saldanha Bay Municipality – Local Economic Development	Thabisile Mkhize	Thabisile.Mkhize@sbm.gov.za
Saldanha Bay Municipality – Town Planning		Townplanning@sbm.gov.za
Saldanha Bay Municipality – Environment & Heritage	Nazeema Duarte	Nazeema.Duarte@sbm.gov.za

4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

N/A

5. if any of the State Departments and Organs of State did not respond, indicate which.

A Comments and Response Report has been attached to this report, the Post-Application Draft BAR as **Appendix F**. During the public participation phase conducted for the Pre-Application BAR, comments were only received from the DEAD&DP: Develop Management branch. Comments have been requested from all of the state departments outlined in the table above, as part of the public participation phase for this report, the Post-Application BAR.

6. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated into the development proposal.

A Comments and Response Report has been attached to this report, the Post-Application Draft BAR as **Appendix F**. During the public participation phase conducted for the Pre-Application BAR, comments were only received from the DEAD&DP: Develop Management branch. Comments have been requested from all of the state departments outlined in the table above, as part of the public participation phase for this report, the Post-Application BAR.

Note:

A register of all the I&AP's notified, including the Organs of State, and all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing.

The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

Your attention is drawn to Regulation 40 (3) of the NEMA EIA Regulations which states that *"Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but **must** be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority."*

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F.

All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F.

Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required "proof" the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
  - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);
  - if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
  - if a facsimile was sent, a copy of the facsimile Report;
  - if an electronic mail was sent, a copy of the electronic mail sent; and
  - if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

1.1.	Was a specialist study conducted?	~~YES~~	NO
1.2.	Provide the name and or company who conducted the specialist study.		
N/A			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		

The designated development area is characterised by a minor aquifer and is listed as least vulnerable with a low susceptibility. The aquifer is of Karst type and has a yield of 0.5 to 2.0 l/s. Based on the nature of the aquifer, the area being already developed and the fact that the tanks will be stored above ground rather than underground, it is envisioned that with proper management and mitigation measures the installation and operation of the above ground storage tanks will have little to no impact on the surrounding groundwater.

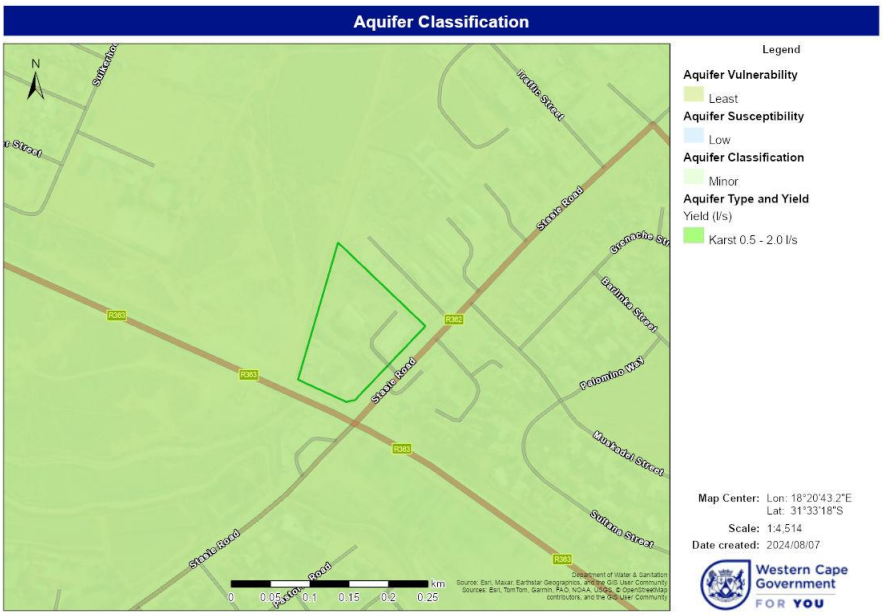


Figure 3. Aquifer Classification (Cape Farm Mapper)

1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.	

Based on the Cape Farm Mapper Tool, the designated development area is characterised by a minor aquifer and is listed as least vulnerable with a low susceptibility. The aquifer is of Karst type and has a yield of 0.5 to 2.0 l/s. In addition, the depth to groundwater is listed as 38.46 metres. Based on the nature of the aquifer, the area being already developed and the fact that the tanks will be stored above ground rather than underground, it is envisioned that with proper management and mitigation measures the installation and operation of the above ground storage tanks will have little to no impact on the surrounding groundwater.

2. Surface water

2.1.	Was a specialist study conducted?	YES	~~NO~~
2.2.	Provide the name and/or company who conducted the specialist study.		
Enviro-EAP			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		

A non-perennial river located approximately 70 meters west of the proposed site was identified during environmental assessments. This watercourse is in poor ecological condition and primarily functions as a stormwater channel receiving runoff from urban development, with flow diverted under the R362 road via a culvert and discharged into the Stasie Road stormwater system. Its upper catchment area has been significantly altered by historical landfilling activities.

Influence on Site Design and Mitigation Measures

Although the non-perennial river is not in close proximity to the AST footprint, its presence has influenced the project design and necessitated strict mitigation measures to prevent contamination or environmental risk:

- Tanks will be installed within bunded areas capable of containing at least 110% of the total tank volume, to ensure containment of any spills.
- Installation and design will comply with industry standards and SANS codes, ensuring robust safety and environmental performance.
- Fuel delivery procedures will include mandatory on-site supervision, emergency cut-off systems, and use of flexible hoses with dry-break couplings to minimize spillage risks.
- Spill incidents must be documented and reported to the Environmental Control Officer (ECO) and logged in a site register for accountability and monitoring.

3. Coastal Environment

3.1.	Was a specialist study conducted?	~~YES~~	NO
3.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
N/A. The proposed expansion is not in proximity to the coastal zone.			
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
N/A. The proposed expansion is not in proximity to the estuarine zone.			
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.		
N/A. The proposed expansion is not in proximity to the coastal zone.			

4. Biodiversity

4.1.	Were specialist studies conducted?	YES	~~NO~~
4.2.	Provide the name and/or company who conducted the specialist studies.		
Enviro-EAP (Plant, Animal & Terrestrial Biodiversity)			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		

The EAP originally made use of Cape Farm Mapper to provide mapping of the terrestrial and plant biodiversity. This was completed to identify and possible sensitive areas containing critically endangered vegetation, Ecological Support Areas, Critically Biodiverse Areas and high-risk bioregions. The Screening Tool Report advised that Terrestrial, Plant and Animal biodiversity was of concern, the EAP argued these points within the attached SSVR and then appointed a specialist to undertake Terrestrial, Plant and Animal Species compliance statements to confirm the relevant sensitivity of the proposed development area.

Terrestrial Biodiversity:

A non-perennial river, located approximately 70 meters west of the site and in poor ecological condition, was identified. This river collects stormwater from the upper town development and is not ecologically pristine, as its original upper catchment area was previously infilled by a landfill. The watercourse has been significantly modified and now functions primarily as a stormwater channel, with its flow diverted via a culvert under the R362 road and discharged into the Stasie Road stormwater system.

The National Environmental Screening Tool initially classified the proposed development site as having "Very High" terrestrial biodiversity sensitivity, based on the presence of an Ecological Support Area (ESA 2) mapped on the western side of the site in association with the non-perennial river. However, a detailed site sensitivity verification and biodiversity field survey conducted by Nicolaas Hanekom (Enviro-EAP) found that this classification was not an accurate reflection of the site's actual ecological condition. The verification concluded that the site does not possess high ecological value or sensitivity, and therefore, a terrestrial biodiversity impact assessment was not warranted.

The habitat on site is mapped as Namaqualand Heuweltjieveld, which is categorized as "Least Concern" according to the National Environmental Management: Biodiversity Act's 2022 list of threatened ecosystems. Furthermore, there are no Freshwater Ecosystem Priority Areas (FEPAs) located in or near the proposed development footprint. Based on these findings, the Site Ecological Importance has been classified as low, and the proposed development is anticipated to result in a low negative impact on biodiversity, even in the absence of additional mitigation measures.

Based on the findings of Enviro-EAP, the proposed development is supported from a terrestrial biodiversity perspective. No additional biodiversity-related management, mitigation, or monitoring measures are required for inclusion in the Environmental Authorization or the Environmental Management Plan.

Plant Species Biodiversity:

The Department of Environmental Affairs' screening report, generated from the national web-based environmental screening tool, assigned the proposed development site a "medium sensitivity" rating. However, based on the findings of Nicolaas Hanekom (Enviro-EAP) in his attached Plant Species Compliance Statement, this classification was found to be inaccurate, as the site sensitivity was incorrectly mapped. A site-specific assessment confirmed that the development area has a low Site Ecological Importance within the Project Area of Influence. The site is entirely transformed and lacks any indigenous vegetation. Historically, the area was characterized by Namaqualand Heuweltjieveld vegetation, which is listed as "Least Concern" in the 2022 National Environmental Management: Biodiversity Act's List of Threatened Ecosystems. As a precautionary measure, it is recommended that construction activities be confined strictly to identified and clearly demarcated areas to avoid unnecessary disturbance.

Animal Species:

Based on the findings in the attached Animal Species Compliance Statement compiled by Enviro-EAP - the ecological site sensitivity of the proposed development area has been confirmed as low, contradicting the high sensitivity classification provided by the national environmental screening tool, which inaccurately mapped the area. The site is already significantly transformed, with no remaining natural vegetation or suitable habitat for conservation-dependent species. A site survey and animal species verification conducted by Nicolaas Hanekom found that none of the animal species listed in the screening tool report were observed on site. Due to the degraded condition of the environment and the surrounding developments, these species are unlikely to occur in the area or be impacted by the proposed development. Additionally, the habitat required for listed invertebrate species is not present. As a result, no animal species of conservation concern were identified, and there is no need for biodiversity-related management, mitigation, or monitoring measures to be included in the Environmental Authorization or Environmental Management Plan.

4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.

The Western Cape Biodiversity Spatial Plan identifies Critically Biodiverse (CBA) and Ecological Support Areas (ESA), as areas of vital importance for maintaining biodiversity patterns, ecological processes, and ecosystem services. According to the guidelines, development within CBAs is generally discouraged due to the high risk of biodiversity loss, while developments within ESAs may be permitted only if they do not compromise ecosystem functionality and are accompanied by appropriate mitigation measures. As defined by the specialist within the Aquatic, Terrestrial, Plant and Animal Species compliance statements, the desktop mapping falsely identified an ESA area, and the proposed development will therefore not be within proximity of or have any negative impacts on any CBA or ESA areas.

4.5.	Explain what impact the proposed development will have on the site-specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.
Refer to the above.	
4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.
N/A. The site is not within any protected areas.	
4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.

As stated in the attached Plant and Animal Species compliance statements, the site is fully developed and there are therefore no plant or animal species within the proposed development area, as a precautionary mitigation measure the proposed development will be confined to the already developed area and this will assist in ensuring external resources are not affected.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
No geographical aspects will be affected by the proposed expansion.

6. Heritage Resources

6.1.	Was a specialist study conducted?	~~YES~~	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
The proposed expansion is for the addition of three 83m^3 (249m3) Aboveground Storage Tanks, it is therefore envisaged that no major excavation works will take place. Additionally, the site is almost completely developed and in operation, it is therefore unlikely that any Heritage resources will be impacted by the proposed expansion activities.			

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.
The site has been previously transformed with a variety of facilities, outlined above, present on the site. As this is already an existing, developed site, it is envisaged that any archaeological and/or cultural heritage artefacts would have been uncovered during the previous clearance and earthworks associated with the development of the existing infrastructure. Thus, it is envisaged that the proposed expansion activity will have a "Very Low" impact.

8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.

The proposed expansion will take place in Lutzville, a small town which forms part of the Matzikama Municipality. The Socio-Economic characteristics of Lutzville are outlined in the table below (Matzikama Municipality, 2023):

Socio-Economic Factor	
Total Population	5232
Young (0-14)	29%
Working Age (15 – 64)	66.1%
Elderly (65+)	4.9%
Dependency Ratio	51.4
Sex Ratio	101.6
Population Density	2244 persons per km^2
No Schooling aged 20+	4%
Higher Education aged 20+	5.9%
Matric Aged 20+	28%
Number of households	1382
Average household size	3.7
Formal Dwellings	84.3%

Matzikama Municipality. (2023). *Integrated Development Plan (IDP) 2022–2027: Amendment May 2023*. Vredendal: Matzikama Municipality. Available at: https://www.matzikamamunicipality.co.za

8.2.	Explain the socio-economic value/contribution of the proposed development.

The proposed expansion of fuel capacity will promote socio -economic development in the following ways:

- Supply the increasing demand for fuel in the area.
- Reduce the number of fuel re-loading (decreasing traffic-related impacts associated with tankers driving in/out of the existing fuel service station).
- Creation of short- and long-term employment and skills development opportunities associated with the construction and operational phases of the development.
- The proposed fuel storage expansion caters for the needs of the defined customer base.

8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.

Four employment opportunities will be created/retained upon the completed expansion of the fuel storage expansion project. Short-term jobs will be created during the construction phase whereas four long-term employment opportunities will be created during the operational phase of the project.

8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.

Regarding the health and well-being of individuals in the vicinity of the development, no significant negative impacts are anticipated. The expected effects concerning noise, odours, visual character, and sense of place are summarized below:

Noise: The construction and operation of the proposed expansion are expected to have a minimal impact on noise levels, as the site is located within a heavily modified landscape of commercial, industrial, and urban developments, and already has a fuel service station as well as other infrastructure operating on site. All recommended mitigation measures and operational protocols, as detailed in Section H of this report, and in the Environmental Management Program (EMPr) attached as **Appendix H**, must be strictly followed.

Odours: Fuel vapour emissions will result from the operations at the existing fuel service station, particularly during fuel tank refilling by road tankers and, to a lesser extent, during refuelling activities. The entire expansion project and installations will comply with the SANS guidelines, which include, but are not limited to, the following:

- A comprehensive set of design criteria covering civil, structural, mechanical, electrical, and traffic engineering aspects.
- Pump and tank installations with necessary measures such as fuel storage, fuel lines, evaporation lines, non-return valves, and gas break manholes.
- Public safety measures, including accessibility for people with disabilities.
- Fire safety and protection requirements.
- Stormwater and water management.
- Waste management practices.
- Energy usage management.

All recommended mitigation measures and operational protocols outlined in Section H of this report and the EMPr attached as **Appendix H** must be adhered to.

Visual Character and Sense of Place: The visual character of the site is not expected to change, as the site is already developed with infrastructure including a fuel service station present. Therefore, the proposed expansion activities will be consistent with the current appearance and character of the site.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred property and site alternative.

Given the scope of this proposal, specifically, the expansion of fuel storage capacity on an already transformed and disturbed site, no alternative site was deemed feasible.

Site Alternative: The chosen site has already been disturbed and transformed, as outlined in the Terrestrial, Plant, and Animal Species Biodiversity Compliance Statements. Establishing fuel storage infrastructure on a new, undeveloped (virgin) site would likely cause more substantial environmental impacts. Additionally, given the existing ownership and accessibility of the current location, selecting an alternative site was deemed neither practical nor sustainable.

Provide a description of any other property and site alternatives investigated.

Given the scope of this proposal, specifically, the expansion of fuel storage capacity on an already transformed and disturbed site, no alternative site was deemed feasible.

Provide a motivation for the preferred property and site alternative including the outcome of the site selectin matrix.

The selected site has already been disturbed and transformed, as documented in the Terrestrial, Plant, and Animal Species Biodiversity Compliance Statements. Establishing fuel storage infrastructure on a new, undeveloped site would likely lead to more significant environmental impacts. Moreover, due to the current site's ownership and availability, exploring an alternative location was neither practical nor environmentally sustainable.

Provide a full description of the process followed to reach the preferred alternative within the site.

The selected site has already been disturbed and transformed, as documented in the Terrestrial, Plant, and Animal Species Biodiversity Compliance Statements. Establishing fuel storage infrastructure on a new, undeveloped site would likely lead to more significant environmental impacts. Moreover, due to the current site's ownership and availability, exploring an alternative location was neither practical nor environmentally sustainable.

Provide a detailed motivation if no property and site alternatives were considered.

The selected site has already been disturbed and transformed, as documented in the Terrestrial, Plant, and Animal Species Biodiversity Compliance Statements. Establishing fuel storage infrastructure on a new, undeveloped site would likely lead to more significant environmental impacts. Moreover, due to the current site's ownership and availability, exploring an alternative location was neither practical nor environmentally sustainable.

List the positive and negative impacts that the property and site alternatives will have on the environment.

The proposed installation of aboveground storage tanks will take place within an already developed area. While fuel storage during the operational phase may pose potential environmental risks, these impacts can be effectively avoided or minimized through the application of operational mitigation measures detailed in the attached Environmental Management Programme (EMPr).

1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred activity alternative.

Given the scope of this proposal, specifically, the expansion of fuel storage capacity on an already transformed and disturbed site, no activity alternative was deemed feasible.

Activity Alternative: To address the increasing fuel demand in the area and surrounding regions, expanding the fuel storage capacity was identified as the only practical and viable activity alternative for this site. Since the proposed development will occur on a previously disturbed and transformed site, no other activity alternatives were considered feasible or suitable to meet the identified need.

Provide a description of any other activity alternatives investigated.

Due to the nature of the proposed development, the expansion of fuel storage capacity, no activity alternatives were considered.

Provide a motivation for the preferred activity alternative.

The site currently consists of a Kaap Agrimark retail site as well as an existing service station and is completely developed. The expansion will not result in the altering of virgin land and will be confined to the already established/developed site. The expansion of the fuel storage capacity on site will assist in addressing the needs of the customer base and the demand for fuel in the surrounding region.
Provide a detailed motivation if no activity alternatives exist.
Due to the nature of the proposed development, the expansion of fuel storage capacity, no activity alternatives were considered. The site currently consists of a Kaap Agrimark retail site as well as an existing service station, the expansion of the fuel storage capacity on site will assist in addressing the needs of the customer base and the demand for fuel in the surrounding region.
List the positive and negative impacts that the activity alternatives will have on the environment.

Below is a summary of the positive and negative implications of the proposed activity alternative, no additional alternatives were considered due to the large-scale negative impacts associated with the development of virgin land.

Socio-Economic

Positive:

- The proposed expansion of fuel storage capacity is expected to yield several positive socio-economic benefits. It will support the growing fuel demand in the area, reduce the frequency of tanker reloading (thereby minimizing associated traffic impacts), and generate both short-term and long-term employment opportunities during the construction and operational phases. Additionally, it ensures continued service to an established customer base while contributing to skills development in the local workforce. From a community health and well-being perspective, no significant adverse effects are anticipated.

Negative:

- Potential negative impacts, such as noise, odours, and visual changes, are expected to be minimal due to the already transformed and industrial nature of the site. Moreover, these impacts can be effectively managed through the implementation of strict operational protocols and mitigation measures outlined in the Environmental Management Program (EMPr). Overall, the socio-economic advantages of the project are considered to outweigh the manageable environmental risks

Environmental

Positive:

- The proposed development will make use of already developed land which has been previously transformed and disturbed, with an existing fuel service station already established on site. Making use of already developed land ensures that virgin land remained untouched, development of virgin land could result in the loss of terrestrial features as well as the negative impacts on freshwater features.

Negative:

- Although the proposed development will occur on an already transformed site, the installation of above-ground storage tanks may still pose environmental risks. These include the potential for fuel vapour emissions, as well as the risk of soil and groundwater contamination in the event of a spill or leak during the operational phase. Additionally, health and safety risks to workers and surrounding communities must be considered and managed appropriately.

1.3.	Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts

Provide a description of the preferred design or layout alternative.

Given the scope of this proposal, specifically, the expansion of fuel storage capacity on an already transformed and disturbed site, no layout alternative was deemed feasible.

Layout Alternative: the proposed facility layout (as per Appendix C) remains the preferred (and only considered alternative) as this layout optimises the use of vacant space on site.

Provide a description of any other design or layout alternatives investigated.

The design and layout of the proposed Above Ground Storage Tanks (ASTs) are constrained by site-specific factors such as the limited space available on-site. The installation and configuration of the ASTs will comply with the relevant South African National Standards (SANS), including but not limited to:

- ***SANS 10089-3 (2010): The petroleum industry – Part 3: The installation, modification, and decommissioning of storage tanks, pumps/dispensers, and pipework at service stations and consumer installations;***
- ***SANS 10400-TT (Fire Protection): Sections 1–6, dealing with the application of the National Building Regulations regarding the installation of liquid fuel dispensing pumps and tanks;***
- ***SANS 10087-3 (2008): The handling, storage, distribution, and maintenance of liquefied petroleum gas in installations involving storage vessels with individual water capacities exceeding 500 L.***

The installation of the ASTs and associated infrastructure will also adhere to the requirements of the National Building Regulations and Standards Act (No. 103 of 1977), local municipal bylaws, and the Occupational Health & Safety Act (No. 85 of 1993). Due to these constraints and regulatory requirements, limited options for alternative site configurations, designs, or layouts were feasible or considered.

Provide a motivation for the preferred design or layout alternative.

The preferred layout for the proposed Above Ground Storage Tanks (ASTs) has been selected based on site-specific constraints, primarily the limited available space within the already developed area. This layout optimally utilizes the existing footprint while maintaining operational efficiency and safety. It ensures compatibility with surrounding infrastructure and minimizes additional site disturbance. Furthermore, the proposed design fully complies with all applicable South African National Standards (SANS), including:

- ***SANS 10089-3 (2010): Installation, modification, and decommissioning of storage tanks and related infrastructure at service stations and consumer installations;***
- ***SANS 10400-TT (Fire Protection): Application of National Building Regulations for the safe installation of fuel dispensing systems;***
- ***SANS 10087-3 (2008): Standards for the storage and handling of liquefied petroleum gas in large-capacity vessels.***

The installation will also meet the requirements of the National Building Regulations and Standards Act (No. 103 of 1977), local municipal bylaws, and the Occupational Health & Safety Act (No. 85 of 1993). Given these physical, regulatory, and operational considerations, this layout option is regarded as the most practical, compliant, and sustainable solution for the site.

Provide a detailed motivation if no design or layout alternatives exist.

Please refer to the above.

List the positive and negative impacts that the design alternatives will have on the environment.

Socio-Economic:

Positive:

- The proposed design for the expansion of fuel storage capacity is expected to bring several socio-economic benefits. It will meet the increasing fuel demand in the region, reduce the frequency of tanker deliveries thereby lowering traffic related impacts and create both short-term construction jobs and long-term operational employment. The development also supports continued service to the existing customer base and contributes to local skills development.

Negative:

- Potential socio-economic drawbacks, such as noise, odour, or visual impacts, are expected to be minimal due to the site's existing industrial character. These can be effectively mitigated through adherence to the Environmental Management Program (EMPr) and other recommended operational protocols. The benefits of the proposed design are considered to significantly outweigh the limited, manageable risks.

Environmental:

Positive:

- By developing within an already transformed site, the project avoids disturbing virgin land, thereby protecting intact terrestrial and freshwater ecosystems from degradation. This approach aligns with sustainability principles by limiting habitat loss and environmental footprint.

Negative:

- Despite being located on previously developed land, the installation of above-ground storage tanks carries environmental risks such as potential fuel vapour emissions and the risk of soil and groundwater contamination in the event of a spill or leak during operations. Health and safety risks for workers and nearby communities also exist but can be effectively managed through the application of mitigation measures and safety protocols.

1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred technology alternative:

Underground Storage Tanks (USTs) are commonly used for fuel storage; however, they pose higher environmental risks due to their concealed nature once installed below ground. Leaks from USTs are not immediately detectable through visual inspection and can only be identified through the use of monitoring wells. While these wells serve to alert operators to potential leaks and assist with remedial actions, they do not prevent contamination of the surrounding environment.

This development proposes the installation of three 83m³ Above Ground Storage Tanks (ASTs). ASTs are considered a more environmentally responsible and operationally manageable alternative, as they allow for direct visual inspection, enabling early detection of leaks. In the event of a spill, the above-ground location typically within a bunded area facilitates quicker containment and response, thereby significantly reducing the potential for environmental contamination.

Factor	Above Ground Storage Tanks (ASTs)	Underground Storage Tanks (USTs)
Installation Cost	Lower – easier and cheaper to install	Higher – excavation and compliance with stricter regulations needed
Leak Detection	Easy – visual inspections possible	Difficult – requires complex monitoring systems
Environmental Risk	Lower – leaks are more easily contained and less likely to reach groundwater	Higher – leaks can go undetected and contaminate soil or groundwater
Maintenance Access	Easy – fully accessible for inspection and maintenance	Difficult – access requires excavation or special equipment
Regulatory Compliance	Easier – fewer hidden components, better visibility for inspectors	Stricter – due to potential for undetected leaks
Corrosion Risk	Lower – exposed to air, easier to protect and monitor for rust	Higher – moisture and soil conditions accelerate corrosion
Aesthetics	Visible – may require fencing or camouflage	Invisible – no visual impact on surroundings
Flexibility & Mobility	High – can be relocated or modified more easily	Low – permanent once installed
Service Life	Often longer due to easier upkeep and materials choice	Often shorter due to corrosion and difficult maintenance

Given these advantages, only the preferred design alternative was considered for this development.

Provide a description of any other technology alternatives investigated.

As outlined above, Above Ground Storage Tanks (ASTs) are the preferred alternative due to their comparatively lower environmental risk and ease of monitoring and management. No other technological alternatives were considered, as they would likely result in increased environmental risks and reduced effectiveness in preventing or responding to potential fuel spills or leaks.

Provide a motivation for the preferred technology alternative.

This development proposes the installation of three 83m³ Above Ground Storage Tanks (ASTs). ASTs are considered a more environmentally responsible and operationally manageable alternative, as they allow for direct visual inspection, enabling early detection of leaks. In the event of a spill, the above-ground location typically within a bunded area facilitates quicker containment and response, thereby significantly reducing the potential for environmental contamination.

Provide a detailed motivation if no alternatives exist.

As outlined above, Above Ground Storage Tanks (ASTs) are the preferred alternative due to their comparatively lower environmental risk and ease of monitoring and management. No other technological alternatives were considered, as they would likely result in increased environmental risks and reduced effectiveness in preventing or responding to potential fuel spills or leaks.

List the positive and negative impacts that the technology alternatives will have on the environment.

Environmental:

Positive:

Early Leak Detection: ASTs allow for direct visual inspection, enabling quicker identification of leaks or structural damage, thereby reducing the risk of prolonged unnoticed fuel releases.

Improved Spill Containment: ASTs are typically installed within bunded (contained) areas, making it easier to contain and clean up any spills before they can reach soil or water sources.

Reduced Soil and Groundwater Contamination Risk: Since ASTs are not buried, the risk of undetected leaks contaminating surrounding soil and groundwater is significantly lower.

Simplified Maintenance and Inspection: Routine maintenance and inspections are more straightforward with ASTs, allowing for proactive management of potential environmental hazards.

Easier Decommissioning and Removal: ASTs can be more easily removed or relocated with minimal ground disturbance, reducing long-term environmental issues.

Fewer Excavation-Related Impacts: The installation of ASTs does not require deep excavation, thereby avoiding potential disruption to underground ecosystems, heritage resources, or water tables.

Reduced Need for Leak Detection Infrastructure: Unlike USTs, ASTs do not require complex underground monitoring wells, which may not prevent contamination but only signal it after the fact.

1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred operational alternative.

No operational alternatives were considered for this proposal as this proposal is for the expansion of fuel storage capacity on an existing site which contains a fuel service station.

Provide a description of any other operational alternatives investigated.

No operational alternatives were considered for this proposal as this proposal is for the expansion of fuel storage capacity on an existing site which contains a fuel service station.

Provide a motivation for the preferred operational alternative.

No operational alternatives were considered for this proposal as this proposal is for the expansion of fuel storage capacity on an existing site which contains a fuel service station.

Provide a detailed motivation if no alternatives exist.

No operational alternatives were considered for this proposal as this proposal is for the expansion of fuel storage capacity on an existing site which contains a fuel service station.

List the positive and negative impacts that the operational alternatives will have on the environment.

Positive:

- Creation of employment opportunities.
- Provision of fuel to traffic and commercial vehicles operating in the general area.
- Reduced resource consumption as this proposal will tie into existing infrastructure present on site.
- Increase in social and economic infrastructure in the area.

Negative:

- Possible health and safety risk in case of an emergency.

1.6.	The option of not implementing the activity (the 'No-Go' Option).

Provide an explanation as to why the 'No-Go' Option is not preferred.

The No-Go alternative involves maintaining the site in its current condition and continuing operations without the proposed expansion. Choosing this option would have several negative implications, including:

1. the forfeiture of both short-term and long-term employment opportunities,
2. lost potential for revenue generation and business growth for Kaap Agri (Pty) Ltd,
3. the continued degradation and underutilisation of existing infrastructure on both portions of the site, and
4. an inability to meet the growing local demand for fuel, thereby missing the opportunity to improve fuel availability within the community.

In effect, this alternative would hinder the facility's ability to respond to future diesel supply needs in the region.

1.7.	Provide and explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.

None. Refer to Section H.

1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.

Based on the outcomes of the site, activity, layout, technology, and operational alternatives assessment, the preferred alternative is the installation of three 83m³ Above Ground Storage Tanks (ASTs) at the existing Kaap Agri site, which currently

operates as a developed Agrimark retail and fuel service station. The selected location, an already disturbed and transformed site, was chosen due to its suitability in avoiding the significant environmental impacts associated with developing a new, undeveloped (virgin) site. This site is strategically positioned, under the ownership of the applicant, and provides ease of access and integration with existing infrastructure.

The preferred property and site alternative ensures minimal additional disturbance to the natural environment, while optimally utilising already impacted land. The activity alternative, focused on expanding existing fuel storage capacity, directly addresses the growing fuel demand in the region and supports regional socio-economic development. The design and layout alternative, constrained by site-specific factors, complies with applicable legislation and national standards, and ensures operational efficiency and safety. The technology alternative, favouring ASTs over USTs, significantly reduces environmental risks, particularly those related to undetected fuel leaks and groundwater contamination. No operational alternatives were required, given the nature of the existing operations and the alignment of the proposed expansion with current infrastructure.

In contrast, the No-Go alternative would result in negative socio-economic and infrastructural outcomes, including missed employment opportunities, constrained fuel availability, and the continued degradation of the site.

Accordingly, the implementation of the proposed activity at the existing site, using ASTs and the proposed layout, represents the most environmentally responsible, socio-economically beneficial, and technically feasible alternative.

2. "No-Go" areas

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).
No-Go Area: Any areas outside of the proposed site area, all development activities must be contained within the defined development area. **No-Go Alternative**: The No-Go alternative entails leaving the site in its current state and continuing operations without any expansion. This option would result in several negative consequences, including: (i) the loss of both temporary and permanent employment opportunities, (ii) missed revenue and growth potential for Kaap Agri (Pty) Ltd, (iii) ongoing deterioration and neglect of existing infrastructure across both portions of the site, and (iv) the inability to meet the increasing local demand for fuel, resulting in a missed opportunity to enhance fuel supply to the community. Ultimately, the No-Go alternative would prevent the facility from accommodating the anticipated future diesel demand in the region.

3. Methodology to determine the significance ratings of the potential environmental impacts and risks associated with the alternatives.

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.
The Basic Assessment was undertaken in accordance with the principles of Integrated Environmental Management as detailed in Section 23 of NEMA and in the NEMA EIA Regulations. The impact assessment is aimed at determining the likely significance of any impacts (positive or negative) associated with the development. The significance of the impacts is determined by investigating certain key aspects, or parameters, of the potential impact, which are determined by the nature of the activity, as well as the nature of the receiving environment. Aspects investigated include the extent, duration and timing, and magnitude of the impact. **Table A. Methodology in determining the extent, duration, probability, significance, reversibility, and cumulative impact of an environmental impact (to be read with impact tables below).** **Determination of Extent (Scale):**

Site Specific	The impact is limited to the development site (development footprint) or part thereof.
Local	The impacted area includes the whole or a measurable portion of the site, but could affect the area surrounding the development, including the neighbouring properties and wider municipal area.
Regional	The impact would affect the broader region (e.g., neighbouring towns) beyond the boundaries of the adjacent properties.
National	The impact would affect the whole country (if applicable).

Determination of Duration:

Improbable	The possibility of the impact occurring is very low, due either to the circumstances, design, or experience.
Probable	There is a possibility that the impact will occur to the extent that provisions must therefore be made.
Highly probable	It is most likely that the impacts will occur at some stage of the development. Plans must be drawn up to mitigate the activity before the activity commences.
Definite	The impact will take place regardless of any prevention plans.

Determination of Significance (without mitigation):

No significance	The impact is not substantial and does not require any mitigation action.
Low	The impact is of little importance but may require limited mitigation.
Medium	The impact is of sufficient importance and is therefore considered to have a negative impact. Mitigation is required to reduce the negative impacts to acceptable levels.
Medium-High	The impact is of high importance and is therefore considered to have a negative impact. Mitigation is required to manage the negative impacts to acceptable levels.
High	The impact is of great importance. Failure to mitigate, with the objective of reducing the impact to acceptable levels, could render the entire development option or entire project proposal unacceptable. Mitigation is therefore essential.
Very High	The impact is critical. Mitigation measures cannot reduce the impact to acceptable levels. As such the impact renders the proposal unacceptable.

Determination of Significance (with mitigation):

No significance	The impact will be mitigated to the point where it is regarded to be insubstantial.
Low	The impact will be mitigated to the point where it is of limited importance.
Low - Medium	The impact will be mitigated to a point where it may occur but will have a limited / low effect / impact to people and / or the environment. Taken within the overall context of the project this impact can be mitigated to a significance rating that is acceptable given the overall benefit.
Medium	Notwithstanding the successful implementation of the mitigation measures, the impact will remain of significance. However, taken within the overall context of the project, such a persistent impact does not constitute a fatal flaw.
High	Mitigation of the impact is not possible on a cost-effective basis. The impact continues to be of great importance, and taken within the overall context of the project, is considered to be a fatal flaw in the project proposal.

Determination of Reversibility:

Completely Reversible	The impact is reversible with implementation of minor mitigation measures
Partly Reversible	The impact is partly reversible but more intense mitigation measures
Barely Reversible	The impact is unlikely to be reversed even with intense mitigation measures
Irreversible	The impact is irreversible and no mitigation measures exist

Determination of Degree to which an Impact can be Mitigated:

Can be mitigated	The impact can be completely mitigated

Can be partly mitigated	The impact can be partly mitigated
Can be barely mitigated	It is possible to mitigate the impact only slightly
Not able to mitigate	It is not possible to mitigate the impacts

Determination of Loss of Resources:

No loss of resource	The impact will not result in the loss of any resources
Marginal loss of resource	The impact will result in a marginal loss of resources
Significant loss of resources	The impact will result in a significant loss of resources
Complete loss of resources	The impact will result in a complete loss of all resources

Determination of Cumulative Impact:

Negligible	The impact would result in negligible to no cumulative effects
Low	The impact would result in insignificant cumulative effects
Medium	The impact would result in minor cumulative effects
High	The impact would result in significant cumulative effects

Other factors which are also considered in the assessment of impacts include whether the impact is direct, indirect, or cumulative. A direct impact can be explained as being a direct result of activities associated with the development, such as damage to on-site infrastructure due to a fire.

An indirect impact would be a downstream, secondary or "knock-on" impact resulting from an impact directly associated with the development (such as the contamination of freshwater resources downstream of the municipal stormwater system in the event of a contamination incident).

A cumulative impact would be an impact which already occurs in the receiving environment associated with other activities taking place in proximity to the development, such as noise, vibration and dust due to industrial activities in the area.

Other factors considered include whether the impact is reversible; and whether the impact could cause an irreplaceable loss of resources.

The impact assessment methodology used has been closely guided by the DEAT EIA Guideline Document 5, on the assessment of impacts and alternatives (DEAT 2006); as well as reference to the description of the criteria used for the assessment of impacts as contained in the DEA&DP Specialist Guidelines Series (2005).

4. Assessment of each impact and risk identified for each alternative

Note: The following table serves as a guide for summarising each alternative. The table should be repeated for each alternative to ensure a comparative assessment. The EAP may decide to include this section as Appendix J to this BAR.

PLANNING, DESIGN AND CONSTRUCTION PHASE	
Potential impact and risk:	**Soil & Groundwater Contamination & Pollution:** Fuel, oil, lubricants and other pollutants may leak from vehicles/ machinery and contaminate the soil. Pollution and soil contamination could also occur from chemical toilets, cement mixing directly on the soil and stormwater runoff may flow over the site camp area and carry contaminants off-site.
Nature of impact:	Negative
Extent and duration of impact:	Site-specific; temporary
Consequence of impact or risk:	Contamination & pollution of the soil and/or groundwater.
Probability of occurrence:	Probable

Degree to which the impact may cause irreplaceable loss of resources:	No loss of resource
Degree to which the impact can be reversed:	Partly reversible
Indirect impacts:	Soil and groundwater contamination could result in human health impacts if humans are exposed to the soil or contaminated groundwater by dermal contact (touching the soil or drinking the groundwater)
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low to Medium
Degree to which the impact can be avoided:	Can be avoided
Degree to which the impact can be managed:	Can be managed
Degree to which the impact can be mitigated:	Can be mitigated
Proposed mitigation:	1. A Spill Contingency Plan must be produced. This should be a stand- alone operational procedure). It should be compiled prior to the construction phase of the extension to the fuel depot and included as an Annexure to the EMP. 2. The appointed Environmental Control Officer (ECO) must undertake at least one site inspection fortnightly, for the duration of the construction phase, and to produce a short ECO report monitoring the compliance of the property developer with the conditions of the approved EMP. 3. During the construction phase of the common bund area for the fuel storage tanks and associated infrastructure, an experienced contractor will be appointed, and it will be ensured that the correct protocols will be followed that relate to the handling of materials, thereby minimising the likelihood of such an incident occurring. 4. Adequate training of construction personnel will ensure that incidents resulting in product spills are minimised and that the correct actions are taken in the event of an incident. 5. In the event of such an emergency condition, a suitably trained clean- up contractor will be appointed to clean up the spill. Hazardous waste may be generated when absorbent materials are used to mop up a product spill. This will be suitably contained and handled by a specialist contractor using the correct personal protective equipment and hazardous waste temporary storage receptacles. 6. Disposal of such waste at a suitable hazardous landfill site with chain-of-custody documentation provided by the contractor as proof of end recipient. 7. The ECO will supervise any remediation procedures in order to ensure that the correct material is treated. 8. If the location of the existing fuel lines is not known, 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 & fuel lines which may cause impacts to the receiving environment. In addition, the following general management measures will be implemented to avoid contamination of soil and groundwater: **<u>Waste Management:</u>** 1. Hazardous waste bins must be kept on an impermeable bunded surface capable of holding at least 110% of the volume of the bins. 2. Skips/ bins must be provided with secure lids or covering that will prevent scavenging and windblown waste or dust. 3. Waste bins/skips must be regularly emptied and must not be allowed to overflow. 4. Construction workers must be instructed not to litter and to place all waste in the appropriate waste bins provided on site.

	5. All waste, hazardous as well as general, which results from the proposed activities must be disposed of appropriately at a licensed Waste Disposal Facility (WDF). **<u>Pollution Management – hydrocarbons (oil, fuel etc.)</u>** 1. Vehicles and machinery must be in good working order and must be regularly inspected for leaks. 2. If a vehicle or machinery is leaking pollutants it must, as soon as possible, be taken to an appropriate location for repair. 3. Repairs to vehicles/ machinery may take place on-site, within a designated maintenance area at the site camp. Drip trays, tarpaulin or other impermeable layers must be laid down prior to undertaking repairs. 4. Refuelling of vehicles/ machinery may only take place at the site camp or vehicle maintenance yard. Where refuelling must occur, drip trays should be utilised to catch potential spills/ drips. 5. Drip trays must be utilised during decanting of hazardous substances and when refilling chemical/ fuel storage tanks. 6. Drip trays must be placed under generators (if used on site) water pumps and any other machinery on site that utilises fuel/ lubricant, or where there is a risk of leakage/spillage. 7. Soil contaminated by hazardous substances must be excavated and disposed of as hazardous waste. **<u>Pollution Management – Ablution facilities</u>** 1. Chemical toilets should be kept at the site camp, on a level surface and secured from blowing over. 2. Toilets must be located well outside of any stormwater drainage lines and may not be linked to the stormwater drainage system in any way. 3. Chemical toilets must be regularly emptied, and the waste disposed of at an appropriate wastewater disposal/ treatment site. Care must be taken to prevent spillages when moving or servicing chemical toilets. **<u>Cement Batching:</u>** 1. Cement batching must take place on an impermeable surface large enough to retain any slurry or cement water run-off. If necessary, plastic/bedim-lined detention ponds (or similar) should be constructed to catch the run-off from batching areas. Once the water content of the cement water/ slurry has evaporated the dried cement should be scraped out of the detention pond and disposed of at an appropriate disposal facility authorised to deal with such waste 2. Cement batching should take place on already transformed areas within the footprint of the facility. 3. Unused cement bags must be stored in such a way that they will be protected from rain. Empty cement bags must not be left lying on the ground and must be disposed of in the appropriate waste bin. 4. Washing excess cement/concrete into the ground is not allowed. All excess concrete/cement must be removed from the site and disposed of at an appropriate location.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**

Potential impact and risk:	**Dust & Noise Impacts**: As a result of the construction phase of this development noise and dust impacts are expected to occur in the area due to an increase in construction vehicles and road tankers for the duration of the construction phase while materials are being transported to the site and excavations are being made.
Nature of impact:	Negative
Extent and duration of impact:	Site-specific; short term
Consequence of impact or risk:	Nuisance to surrounding residents
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resource
Degree to which the impact can be reversed:	Completely reversible
Indirect impacts:	Nuisance impacts to surrounding residents
Cumulative impact prior to mitigation:	Negligible
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low to Medium
Degree to which the impact can be avoided:	Can be avoided
Degree to which the impact can be managed:	Can be managed
Degree to which the impact can be mitigated:	Can be mitigated
Proposed mitigation:	**Dust Mitigation:** 1. If dust issues occur, dust can be suppressed on access roads and the construction site during dry periods by the regular application of non-potable water or a biodegradable soil stabilisation agent. Under no circumstances should potable water be used for dust suppression. Potable water should not be used for anything besides drinking. 2. Dust suppression measures such as the wetting down of sand heaps as well as exposed areas around the site should be implemented especially on windy days. Appropriate dust control systems fitted on cement silos in order to reduce dust emissions during the loading, unloading and transfer of bulk materials. 3. Water browser to set site floor prior to loading activities. Municipal water may not be used. 4. Maximum speed limit on site of 30km/h. 5. The use of straw worked into the sandy areas may also help and the ECO must advise when this is necessary. 6. If dust appears to be a continuous problem the option of using shade cloth to cover open areas may be necessary or the erecting of shade netting above the fenced-off area may need to be explored. 7. All vehicles transporting sand need to have tarpaulins covering their loads which will assist in any windblown sand occurring off the trucks. 8. Dust levels specified in the National Dust Control Regulations (GN 827 of November 2013) may not be exceeded. 9. A Complaints Register must be available at the site office for inspection by the ECO of dust complaints that may have been received. 10. The appointed Environmental Control Officer (ECO) must undertake regular site inspections for the duration of the construction phase, and to produce regular ECO monitoring audit reports, auditing on the compliance of the CCT with the conditions of the Environmental Authorisation and the approved EMP. **Additional Dust Control Measures:** 11. Nine (9) additional dust control measures were identified for dust in the construction phase as summarized below: 12. Machinery generating emissions must be regularly serviced and maintained such that their emissions are acceptable.

	13. Use of water bowsers and wetting down of loose soil areas, as well as the erection of shade netting screens to prevent off-site movement of dust is required and/or other appropriate action to minimise windblown dust and sand. 14. Rubble, waste and dust generated on higher open floor levels vulnerable to the effects of the wind must be covered and removed regularly to prevent becoming windblown and migrating off site. 15. The use of straw stabilisation or mulching of exposed sandy areas may also be considered in consultation with the ECO. 16. The height of exposed loose material stockpiles, such as sand, rubble, etc. must be minimised as far as possible and covered or screened during high wind conditions, overnight and over weekends. 17. No potable water may be used for dust suppression purposes. 18. Spraying of stockpiles with a fine mist of water for 10–15 minutes during windy conditions. Municipal potable water will not be used. 19. All vehicles transporting sand need to have tarpaulins covering their loads which will assist in any windblown sand occurring off the trucks. **<u>Noise Mitigation:</u>** 1. The daytime rating level of noise emitted from existing operations was lower than the typical rating level for noise in an industrial district. The applicant is therefore compliant with Regulation 4 of the Western Cape Noise Control Regulations, 2013 (NCR). No noise mitigation measures are required; 2. During operation, the proposed addition of ASTs will have a negligible intensity of noise impact in terms of SANS 10103:2008. 3. 4 of the NCR. No noise mitigation measures are required; and 4. A noise complaints register must be opened. 5. Excavations and earth-moving activities should be restricted to normal construction working hours (7:30 – 17:30) as far as possible. 6. Vehicles and equipment should be kept in good working condition. If deemed necessary, machinery and equipment should be fitted with mufflers/ exhaust silencers. No unnecessary disturbances should be allowed to emanate from the construction site. 7. Noise levels must comply with the relevant health & safety regulations and SANS codes and should be monitored by the Health & Safety Officer as necessary and appropriate. 8. The appointed Environmental Control Officer (ECO) must undertake regular site inspections for the duration of the construction phase, and to produce regular ECO monitoring audit reports, auditing on the compliance of the property developer with the conditions of the Environmental Authorisation and the approved EMP.
Residual impacts:	None
Cumulative impact post mitigation:	Negligible
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low (-)**
Potential impact and risk:	**Fire, Health & Safety Risk:** Exposure through breathing vapours, swallowing hazardous substances or skin contact may have possible health effects. There is a minor risk of a diesel pool fire and toxic combustion gases if an incident occurs at the existing facility while construction takes place for the upgrade.
Nature of impact:	Negative
Extent and duration of impact:	Site Specific, Temporary
Consequence of impact or risk:	Damage to property and may cause injuries to people on site.
Probability of occurrence:	improbable

Degree to which the impact may cause irreplaceable loss of resources:	No loss of resource
Degree to which the impact can be reversed:	Barely reversible
Indirect impacts:	A localised fire may cause nuisance impacts such as smoke to surrounding residents.
Cumulative impact prior to mitigation:	Negligible
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Can be avoided
Degree to which the impact can be managed:	Can be managed
Degree to which the impact can be mitigated:	Can be mitigated
Proposed mitigation:	1. The mitigation measures listed under the operational phase to avoid fire, health and safety risks are also applicable to be implemented during the construction phase seeming as there are existing tanks on the site. 2. A Fire Plan schematic (layout plan) and supporting narrative must be compiled that shows the location of the fire extinguishers, hydrants, ingress, exits, assembly points, bund walls etc. 3. The installation of Fuel Storage Tanks and associated pipework must be implemented in accordance with the relevant South African National Standards (SANS), specifically (not exclusive to) the following standards: 4. SANS 10131(2004): Above-ground storage tanks for petroleum products. 5. SANS 10 400TT (Fire Protection) 53 Sections 1-6 (The application of the National Building Regulations-Installation of Liquid Fuel Dispensing Pumps and Tanks); 6. SANS 10087-3 (2008) (English): The handling, storage, distribution and maintenance of liquefied petroleum gas in domestic, commercial, and industrial installations Part 3: Liquefied petroleum gas installations involving storage vessels of individual water capacity exceeding 500 L 7. The installation of the Fuel Storage Tanks and associated pipework must comply with the National Building Regulations and Standards Act No. 103 of 1977; 8. The installation must comply with local authority bylaws and all procedures and equipment used must be in accordance with the Occupational Health & Safety Act (No. 85 of 1993); 9. Upon completion of the UST installation, an engineer is to inspect and verify that the tanks and the associated infrastructure have been installed as per the design criteria described in the final BAR and to all required SABS / SANS standards and applicable legislation. 10. The installation must comply with local authority bylaws and all procedures and equipment used must be in accordance with the Occupational Health & Safety Act (No. 85 of 1993); 11. Adequate training in emergency response situations of the contractor and personnel undertaking the construction activities will be carried out. All workers on site will be informed of the emergency procedure to follow in the event of accidental fires. 12. No open fires will be allowed on the construction site during any phase of the project. No smoking will be allowed on the construction site. 13. Minimisation of hot work by using alternative methods and equipment such as air-driven tools, cold cutting and pre-fabrication off-site. 14. The use of appropriate shielding and screening such as blanketing with firefighting foam and water screens to minimise fire risk. 15. Minimisation through spark quenching by wetting down and/or using construction power tools such as jackhammers under sprayed water.

	16. All people working on-site are responsible for their safety on site. Contractors and Principal Agent/s shall at all times comply with the relevant statutory requirements including the Occupational Health and Safety Act, Act 85 of 1993. 17. A comprehensive site-specific first aid kit must always be available on-site. 18. At least one person trained in safety and first aid and familiar with the first aid equipment on site must always be present on the site. 19. Emergency procedures will be established prior to the start of construction works on site. 20. Awareness training of personnel at the site and for road tanker drivers delivering fuel to the site will be conducted. 21. Personnel must wear correct PPE and adhere to appropriate signage. 22. Training measures must be in place regarding housekeeping. 23. Personnel must use the correct equipment and ensure regular monitoring of such equipment.
Residual impacts:	**None**
Cumulative impact post mitigation:	**Negligible**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Low to Medium (-)**
Potential impact and risk:	**Traffic, Safety and Access Impacts:** As a result of the construction phase of this development traffic impacts are expected to occur in the area due to an increase in construction vehicle and truck traffic in the area for the duration of the construction phase while materials are being transported to the site. Road safety impacts and road condition impacts could also occur.
Nature of impact:	Negative
Extent and duration of impact:	Local; Short term
Consequence of impact or risk:	Safety risks may occur and damage to road infrastructure
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources
Degree to which the impact can be reversed:	Partly reversible
Indirect impacts:	Safety risks may occur and damages to road infrastructure. Nuisance impacts surrounding residents due to increased traffic
Cumulative impact prior to mitigation:	Low to Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low to Medium
Degree to which the impact can be avoided:	Can be partly avoided
Degree to which the impact can be managed:	Can be managed
Degree to which the impact can be mitigated:	Can be partly mitigated
Proposed mitigation:	1. The contractor must provide a traffic marshal for situations where heavy construction traffic may impede normal traffic flows on any roads adjacent to the site. 2. All drivers and machinery operators must exercise due caution when entering/ exiting the site. 3. Construction vehicles must adhere to the load-carrying capacity of road surfaces and adhere to all other prescriptive regulations regarding the use of public roads by construction vehicles. 4. The Contractor must ensure that any large or abnormal loads (including hazardous materials) that must be transported to/ from the site are routed appropriately, and that appropriate safety precautions are taken during transport to prevent road accidents. 5. All vehicles will be legally compliant. 6. All drivers will be competent and in possession of an appropriate valid driver's license. 7. All vehicles travelling on site will adhere to the specified speed limits. 8. The movement of all vehicles will be controlled such that they remain on designated routes.

	9. No member of the workforce will be permitted to drive a vehicle under the influence of alcohol or narcotic substances. 10. Warning signage (i.e. "trucks turning") must be erected near the access point to the site. 11. A traffic marshal should be posted at the entrance to the site to assist with the safe and smooth flow of vehicles on the road whilst heavy construction traffic is entering and exiting the site. 12. No construction traffic may access the site after normal working hours as defined by the local authority.
Residual impacts:	None
Cumulative impact post mitigation:	Negligible
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
Potential impact and risk:	**Visual Impacts:** The construction phase is associated with temporary disturbance as a result of construction (trench excavations, vehicles, machinery and signage) that may have a negative visual impact to the area.
Nature of impact:	Negative
Extent and duration of impact:	Site specific; temporary
Consequence of impact or risk:	Visual impacts to sensitive receptors
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resource
Degree to which the impact can be reversed:	Partly reversible
Indirect impacts:	None
Cumulative impact prior to mitigation:	Negligible
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low –Medium (-)
Degree to which the impact can be avoided:	Can be partly avoided
Degree to which the impact can be managed:	Can be managed
Degree to which the impact can be mitigated:	Can be partly mitigated
Proposed mitigation:	1. Consult with the ECO when determining the appropriate site for the site camp. 2. The site camp must be kept neat and tidy and free of litter at all times. 3. Waste must be managed according to the EMPr. 4. Good housekeeping practices on site must be maintained to ensure the site is kept neat and tidy. 5. The site camp, storage facilities, stockpiles, waste bins, and any other temporary structures on site should be located in such a way that they will present as little visual impact to surrounding residents and road users as possible. 6. Work on site must be well-planned and well-managed so that work proceeds quickly and efficiently, thus minimizing the disturbance time. 7. The site camp will require visual screening via shade cloth or other suitable material. 8. Special attention should be given to the screening of highly reflective material. 9. Use of lighting (if required) should take into account surrounding land users and should present little or no nuisance. Downward-facing, spill-off type lighting is recommended. 10. Construction vehicles must enter and leave the site during working hours. 11. The appointed Environmental Control Officer (ECO) must undertake at least one site inspection fortnightly for the duration of the construction phase, and to produce a short ECO report monitoring the compliance of the property developer with the conditions of the approved EMP.
Residual impacts:	None
Cumulative impact post mitigation:	Negligible

Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
Potential impact and risk:	**Socio-economic – Creation employment opportunities**: Temporary employment opportunities will be provided during the construction phase.
Nature of impact:	Positive
Extent and duration of impact:	Local Extent; Short term duration
Consequence of impact or risk:	This positive impact will result in job creation and income opportunity
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A – this is a positive impact
Degree to which the impact can be reversed:	N/A – this is a positive impact
Indirect impacts:	N/A – this is a positive impact
Cumulative impact prior to mitigation:	N/A – this is a positive impact
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low to Medium
Degree to which the impact can be avoided:	N/A – this is a positive impact
Degree to which the impact can be managed:	N/A – this is a positive impact
Degree to which the impact can be mitigated:	N/A – this is a positive impact
Proposed enhancement:	Preference should be given to historically disadvantaged individuals from the local, surrounding community when appointing employees for construction work.
Residual impacts:	None
Cumulative impact post mitigation:	N/A – this is a positive impact
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (+)
OPERATIONAL PHASE	
Potential impact and risk:	**Soil & Groundwater Contamination & Pollution:** During the operational phase of the proposed development soil and groundwater contamination could result due to fuel spills associated with re-filling of the fuel storage tanks. In addition, if stormwater is not managed correctly there is the potential for the unmanaged stormwater runoff to impact negatively on the environment, potentially causing pollution and contamination. The fuel storage tanks could leak and contaminate the soil and groundwater.
Nature of impact:	Negative
Extent and duration of impact:	Local; medium-term duration
Consequence of impact or risk:	Soil and/or groundwater impacts could cause health impacts to those exposed to the soil or groundwater
Probability of occurrence:	Improbable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resource
Degree to which the impact can be reversed:	Can be barely reversed
Indirect impacts:	Community health impacts
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Can be avoided
Degree to which the impact can be managed:	Can be managed
Degree to which the impact can be mitigated:	Can be mitigated
Proposed mitigation:	The following precautionary measures will be followed on-site: 1. Fuel storage records must be kept on site (incoming & outgoing fuel) to account for fuel leaks and spills. 2. Drip trays will be available for any vehicles that may be potentially leaking. 3. Emergency spill kits will be kept on site. 4. The storage tanks will be regularly inspected for any leaks. 5. The installation of Aboveground Storage Tanks and associated pipework must be implemented in accordance with the relevant South African National Standards (SANS), specifically (not exclusive to) the following standards:

	• **SANS 10131(2004): Above-ground storage tanks for petroleum products.** • **SANS 10 400TT (Fire Protection) 53 Sections 1-6 (The application of the National Building Regulations- Installation of Liquid Fuel Dispensing Pumps and Tanks);** • **SANS 10087-3 (2008) (English): The handling, storage, distribution and maintenance of liquefied petroleum gas in domestic, commercial, and industrial installations Part 3: Liquefied petroleum gas installations involving storage vessels of individual water capacity exceeding 500 L** 6. The installation of the Fuel Storage Tanks and associated pipework must comply with the National Building Regulations and Standards Act No. 103 of 1977. 7. The installation must comply with local authority bylaws and all procedures and equipment used must be in accordance with the Occupational Health & Safety Act (No. 85 of 1993); 8. Upon completion of the UST installation, an engineer is to inspect and verify that the tanks and the associated infrastructure have been installed as per the design criteria described in the final BAR and to all required SABS / SANS standards and applicable legislation. 9. An Emergency Response Plan & Spill Contingency Plan must be produced (or any existing plans updated) prior to the operation of the upgrade and included as an Annexure to the EMP. 10. Emergency incidents such as significant hydrocarbon spills must be brought to the attention of the relevant authorities as described in Section 30 of the National Environmental Management Act (NEMA) within the prescribed legal timelines. This would require notification to the relevant local and provincial authorities and any other authority deemed necessary. 11. If an "incident" takes place on-site, the owner of the facility must within 14 days of the incident, report to the Director General, the provincial head of department and municipality such information as is available to enable an initial evaluation of the incident, including (refer to footnote below for definition of "incident"): 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 measures are taken and to be taken to avoid a recurrence of such incident.
Residual impacts:	Groundwater contamination
Cumulative impact post mitigation:	Low – medium
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium (-)
Potential impact and risk:	**Fire, Health & Safety Impact**: Exposure through breathing vapours, swallowing hazardous substances or skin contact may have possible health effects.
Nature of impact:	Negative
Extent and duration of impact:	Local; Medium term
Consequence of impact or risk:	Damage to property and equipment, illness, injuries or death to people on-site or on the adjacent currently vacant erf.
Probability of occurrence:	Improbable
Degree to which the impact may cause irreplaceable loss of resources:	If loss of life occurs this will be irreplaceable.
Degree to which the impact can be reversed:	Partly reversible

Indirect impacts:	A localised fire may cause nuisance impacts such as smoke to surrounding residents.
Cumulative impact prior to mitigation:	Negligible
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High
Degree to which the impact can be avoided:	Can be avoided
Degree to which the impact can be managed:	Can be managed
Degree to which the impact can be mitigated:	Can be mitigated
Proposed mitigation:	1. Two mobile foam pourers of 100 kg should each be placed on the northern and southern sides of the diesel depot. 2. No flammable materials, such as wooden pallets, must be stored near the bulk diesel tanks or near the area where the road tanker parks for diesel deliveries. 3. The emergency management plan must be updated at least once per year. 4. Operating procedures must be updated for the facility, to include preventative measures against the following potential major incidents: a. Diesel leaks. 5. All possible ignition sources near areas where diesel is stored and handled at the facility must be eliminated. Guidelines for the control of ignition sources are as follows: a. Use only electrical equipment that is certified to be flameproof and spark proof. b. Control static electricity. c. Ensure that vulnerable equipment is properly bonded to the ground. d. Prohibit smoking, open flames and sparks. e. Prevent mechanical sparks and friction. f. Use separator devices to remove foreign materials capable of igniting from process materials. g. Separate heated surfaces from dust. h. Separate heating systems from dust. i. Select and use industrial trucks properly. j. Use cartridge-activated tools properly. k. Implement an equipment preventative maintenance programme. 6. The outcome of the risk assessment must be brought to the attention of all the employees at the facility. 7. The diesel storage tanks, and all pipelines and fittings must be protected against corrosion, to prevent diesel leaks. 8. The Maintenance Plan must be updated for all the equipment used on the facility. The Plan must contain at least the following: a. List of all equipment and facilities on the facility. b. Maintenance frequency. c. Particulars of maintenance activities must be performed on the listed equipment. d. Responsible person. 9. All hazardous equipment and facilities on the facility must be inspected on a weekly basis by means of an Inspection Register. The Register must contain at least the following: a. List of all equipment and facilities on the facility. b. Equipment items must be inspected. c. Facilities that must be inspected. d. Areas that must be inspected. e. Inspection findings. f. A responsible person who carried out the inspection. 10. Detailed operating procedures must be updated at least annually for all sections of the depot, in collaboration with the equipment suppliers. All authorised operators must be trained in the application of the procedure. Special attention must be given to the offloading of diesel via road tankers on the premises. 11. Material safety data sheets (MSDS) for the following hazardous materials must be available on-site at all times:

	a. Diesel. 12. All operating personnel at the facility must be made aware and kept aware of the dangers involving diesel. 13. Access to the facility must be controlled 24 hours per day. The safety guard on duty must comply with the following requirements: a. The guard must be trained in the potential major incidents that could occur at the site as well as the emergency procedure that must be followed. b. The guard must be linked via a safety management system or cellular phone with a responsible standby person of the operating company. c. The guard must be able to contact the local Fire Department immediately. 14. The Emergency Evacuation Procedure aimed at workers must be updated at least once per year in collaboration with the emergency services of the Saldanha Bay Municipality. 15. The Emergency Response Plan and Emergency Evacuation Procedure must be tested at least once every 12 months by means of mock emergencies. The Fire Department of the City of Saldanha Bay Municipality must preferably participate in such tests. 16. Customer parking bays must be located in an area where public vehicles will not cause obstruction of emergency vehicles. 17. Adequate space must be provided for the road tankers to enter, exit and park safely for the delivery of diesel to the bulk storage tanks. 18. The bulk storage tanks must be adequately earthed against lightning. 19. All workers and tank drivers will be informed of the emergency procedure to follow in the event of accidental fires. 20. Effective measures must be implemented to prevent overfilling of the storage tanks and the resultant spillage of diesel. 21. In order to minimise the risk of diesel spillages, the delivery road tanker may not reverse or manoeuvre on site. 22. No open fires will be allowed on the site. 23. A dedicated smoking area will be designated; no smoking is to take place outside of the dedicated smoking area. 24. Firefighting facilities will be to Oil Industry standards, which will include hand-held fire extinguishers and a hose reel. These facilities must be approved by the local fire department. 25. All people working on-site are responsible for their own safety on site. Contractors and Principal Agent/s shall at all times comply with the relevant statutory requirements including the Occupational Health and Safety Act, Act 85 of 1993. 26. A comprehensive site-specific first aid kit must be available on-site at all times. 27. At least one person trained in safety and first aid and familiar with the first aid equipment on site must be present on the site at all times.
Residual impacts:	None
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low to Medium (-)
Potential impact and risk:	**Air Quality Impact:** Fuel vapour emissions may cause an odour nuisance or health impacts to adjacent residents, staff on-site or users of the fuel depot.
Nature of impact:	Negative
Extent and duration of impact:	Site-specific; Medium term (the fuel vapour fumes will be present for the lifespan of the depot)
Consequence of impact or risk:	Odour nuisance to the adjacent residents and inhalation of fuel vapour fumes could cause health impacts to those exposed to the fumes.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resource
Degree to which the impact can be reversed:	Completely reversible
Indirect impacts:	Odour nuisance to the adjacent residents and health impacts due to inhalation to those exposed to the fumes.

Cumulative impact prior to mitigation:	Low – Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Not avoidable
Degree to which the impact can be managed:	Can be managed
Degree to which the impact can be mitigated:	Can be partly mitigated
Proposed mitigation:	1. Awareness training of personnel at the site and for road tanker drivers delivering fuel to the site will be conducted. 2. Contractors and Principal Agent/s shall at all times comply with the relevant statutory requirements including the Occupational Health and Safety Act, Act 85 of 1993. 3. The development of site-specific protocols with regard to the delivery and use of products and the use of the relevant SANS procedures. 4. The careful location and elevation of the vent pipes allow for the maximum dispersion of vapour. 5. Construction activities, namely bulk earthworks, construction of access roads and the USTs, and associated activities, were identified as potential dust-generating activities. Mitigation measures were added to the existing dust control measures currently implemented by Kaap-Agri.
Residual impacts:	Health impacts
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
Potential impact and risk:	**Traffic & Safety Impacts:** Traffic impacts are expected to occur for the duration of the operational phase of the activity as a result of the additional vehicles making use of the fuel depot. This could lead to a safety impact or damage to road infrastructure.
Nature of impact:	Negative
Extent and duration of impact:	Local extent; Long term duration
Consequence of impact or risk:	Nuisances to road users may occur. Infrastructure damages to the road network may occur and there may be safety risks associated with high-traffic events.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resource
Degree to which the impact can be reversed:	Partly reversible
Indirect impacts:	Nuisances to road users may occur. Infrastructure damages to the road network may occur and there may be safety risks associated with high- traffic events.
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	Not avoidable
Degree to which the impact can be managed:	Can be managed
Degree to which the impact can be mitigated:	Can be mitigated
Proposed mitigation:	1. Damages to the road network should be monitored and repaired as they occur. 2. All vehicles will be legally compliant. 3. All drivers will be competent and in possession of an appropriate valid driver's license. 4. All vehicles travelling on site will adhere to the specified speed limits. 5. The movement of all vehicles will be controlled such that they remain on designated routes. 6. No member of the workforce will be permitted to drive a vehicle under the influence of alcohol or narcotic substances. 7. Warning signage (i.e. "trucks turning") must be erected near the access point to the site.

	8. Substantial on-site road works to provide sufficient stacking for, and circulation through the site by the fuel tankers and grain trucks. The grain trucks and fuel tankers' tracking are separated once they enter the site. 9. The tank farm is located as far from the community on the opposite side of the access road as possible.
Residual impacts:	Even after the above mitigation measures have been implemented, when (worst case scenario) there is a breakdown of a road tanker or a customer's vehicle, or an unanticipated queue, temporary traffic impacts may occur to the flow of existing traffic in the area.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
Potential impact and risk:	**Visual Impact:** The visibility of the fuel storage tanks from prominent viewpoints and receptors
Nature of impact:	Negative
Extent and duration of impact:	Site-specific; long term
Consequence of impact or risk:	Impact to "sense of place" Improbable
Probability of occurrence:	No loss of resource
Degree to which the impact may cause irreplaceable loss of resources:	Irreversible
Degree to which the impact can be reversed:	No loss of resource
Indirect impacts:	Impact to "sense of place" however, the site comprises an existing fuel service station.
Cumulative impact prior to mitigation:	Negligible
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Cannot be avoided
Degree to which the impact can be managed:	Can be managed
Degree to which the impact can be mitigated:	Can be mitigated
Proposed mitigation:	Preventative Maintenance Plans for the facility should be implemented to ensure good housekeeping of the infrastructure.
Residual impacts:	None
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)
Potential impact and risk:	**Socio-economic – Creation of business and employment opportunities:** New permanent employment opportunities are proposed to be created.
Nature of impact:	Positive
Extent and duration of impact:	Local Extent; Long term
Consequence of impact or risk:	This positive impact will result in job creation and income opportunity
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A – this is a positive impact
Degree to which the impact can be reversed:	N/A – this is a positive impact
Indirect impacts:	N/A – this is a positive impact
Cumulative impact prior to mitigation:	N/A – this is a positive impact
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium (+)
Degree to which the impact can be avoided:	N/A – this is a positive impact
Degree to which the impact can be managed:	N/A – this is a positive impact
Degree to which the impact can be mitigated:	N/A – this is a positive impact
Proposed enhancement:	Preference should be given to historically disadvantaged individuals from the local, surrounding community, when appointing employees for operation phase.
Residual impacts:	None
Cumulative impact post mitigation:	N/A – this is a positive impact
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low – Medium (+)

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	Provide a summary of the findings and impact management measures identified by all Specialist and an indication of how these findings and recommendations have influenced the proposed development.

A series of specialist assessments conducted by Enviro-EAP, including terrestrial biodiversity, plant species, and animal species compliance statements, concluded that the proposed development of additional aboveground fuel storage tanks poses a low ecological risk and is therefore supported from a biodiversity perspective.

The site lies approximately 70 meters east of a non-perennial river that is in a poor ecological state and functions primarily as a stormwater channel. While the national environmental screening tool originally classified the site as having "Very High" terrestrial biodiversity sensitivity due to the nearby Ecological Support Area (ESA 2), a detailed on-site biodiversity verification by Nicolaas Hanekom refuted this classification. The habitat classified as Namaqualand Heuweltjieveld and listed as "Least Concern" was found to be highly disturbed and of low ecological importance, negating the need for a full biodiversity impact assessment or mitigation.

Although the non-perennial river is not in close proximity to the AST footprint, its presence has influenced the project design and necessitated strict mitigation measures to prevent contamination or environmental risk:

- Tanks will be installed within bunded areas capable of containing at least 110% of the total tank volume, to ensure containment of any spills.
- Installation and design will comply with industry standards and SANS codes, ensuring robust safety and environmental performance.
- Fuel delivery procedures will include mandatory on-site supervision, emergency cut-off systems, and use of flexible hoses with dry-break couplings to minimize spillage risks.

Spill incidents must be documented and reported to the Environmental Control Officer (ECO) and logged in a site register for accountability and monitoring.

Similarly, the plant species sensitivity rating of "medium" generated by the environmental screening tool was determined to be inaccurate upon site inspection. The site is completely transformed, with no indigenous vegetation remaining. The site-specific study reaffirmed the low ecological importance of the area. A simple precautionary measure is recommended: confining construction activities to clearly demarcated zones to minimize unnecessary disturbance.

The animal species sensitivity was also found to be incorrectly mapped in the screening tool. On-site verification revealed no presence of species of conservation concern, nor was there any suitable habitat for them or for listed invertebrate species. The surrounding development and ecological degradation further reduce the likelihood of any significant animal presence or impact. No management, mitigation, or monitoring measures are required.

The consistent finding across all three specialist reports that the site is transformed and of low ecological importance has strongly influenced and justified the decision to proceed with development at this location. The absence of sensitive habitats or protected species confirms that the environmental impact is minimal, and no additional biodiversity-related conditions need to be imposed in the Environmental Authorization or Environmental Management Plan. The only suggested measure is to restrict construction to pre-identified areas to prevent avoidable disturbances.

2.	List the impact management measures that were identified by all Specialist that will be included in the EMPr

The following precautionary measures were recommended and included in the attached EMPr:

- Construction activities are to be confined to clearly demarcated zones to minimize unnecessary disturbance.
- Tanks will be installed within bunded areas capable of containing at least 110% of the total tank volume, to ensure containment of any spills.
- Installation and design will comply with industry standards and SANS codes, ensuring robust safety and environmental performance.
- Fuel delivery procedures will include mandatory on-site supervision, emergency cut-off systems, and use of flexible hoses with dry-break couplings to minimize spillage risks.

3.	List the specialist investigations and the impact management measures that will **not** be implemented and provide an explanation as to why these measures will not be implemented.

N/A. All recommendations made by the specialist were incorporated into this report and the attached EMPr.

4.	Explain how the proposed development will impact the surrounding communities.

The proposed expansion of fuel storage capacity is anticipated to positively impact the surrounding communities by supporting local socio-economic development. It will help meet the growing fuel demand in the area, thereby improving service efficiency and reliability for consumers and businesses. The project is expected to reduce the frequency of fuel reloading trips, which in turn will decrease tanker traffic to and from the site, potentially reducing associated traffic congestion, noise, and emissions. In terms of economic upliftment, the development will generate both short-term and long-term employment opportunities

construction activities will create temporary jobs, while the operational phase will support ongoing employment and skills development within the community. This contributes directly to local income generation and economic stability.

In terms of health and well-being, no significant negative impacts on surrounding residents are expected. The development site is located within an already disturbed, urbanized area that includes existing commercial and industrial activity, including an operating fuel service station. As such, noise impacts from construction and operation are expected to be minimal and manageable with proper adherence to the mitigation measures outlined in the Environmental Management Program (EMPr). Fuel odours may arise during tank refilling and general operations; however, compliance with stringent SANS standards and design specifications including vapour recovery systems, non-return valves, and proper ventilation will help to mitigate these emissions effectively.

Regarding visual impact, the proposed development is in keeping with the existing infrastructure and character of the area. It will not introduce new or visually intrusive elements, and thus the site's sense of place will remain unchanged. Overall, the proposed expansion supports economic growth and service delivery with negligible environmental or social disruption when implemented with the recommended safeguards in place.

5.	Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.

In the context of the proposed installation of above ground fuel storage tanks, climate change must be addressed through two key approaches: adaptation and mitigation. Adaptation involves increasing the project's resilience to the potential impacts of climate change, while mitigation focuses on reducing the project's contribution to climate change, particularly through the reduction of greenhouse gas (GHG) emissions.

Adaptation:

Projected climate changes for the Eastern Cape region include increased average and extreme temperatures, more frequent heatwaves, intensified rainfall events, and a rise in sea levels with associated storm surges. These conditions could heighten fire risks and other hazardous events, particularly in fuel storage environments. To reduce vulnerability, the development must incorporate robust fire prevention and emergency response measures. With these mitigation measures in place, the potential risk posed by climate-related fire hazards can be reduced from medium to low.

Mitigation:

The proposed development contributes to climate change mitigation by reducing the frequency of fuel deliveries, thereby lowering GHG emissions from road tankers. To further minimize environmental impact, resource-efficient technologies should be integrated into the project, such as solar panels, LED lighting, and energy-efficient fittings. Additionally, encouraging the use of gas as an energy source for surrounding communities supports a shift from coal-based electricity, further promoting cleaner energy use.

6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.

N/A. There were no conflicts between the findings and conclusions of the EAP and Specialists.

7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.

The findings and recommendations made by Enviro-EAP within the Animal, Plant, Terrestrial and Aquatic Compliance Statements were considered and incorporated into this report. The following precautionary measures were recommended and included in the attached EMPr:

- Construction activities are to be confined to clearly demarcated zones to minimize unnecessary disturbance.
- Tanks will be installed within bunded areas capable of containing at least 110% of the total tank volume, to ensure containment of any spills.
- Installation and design will comply with industry standards and SANS codes, ensuring robust safety and environmental performance.
- Fuel delivery procedures will include mandatory on-site supervision, emergency cut-off systems, and use of flexible hoses with dry-break couplings to minimize spillage risks.

8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.

All of the proposed mitigation measures made by the specialist were incorporated into this report and included in the attached EMPr. In addition, the recommendations of the EAP were incorporated into this report and the attached EMPr, all of the relevant documentation will be made available to the public as well as state departments to ensure that the comments of all interested and affected parties are considered. This ensures that all recommended mitigation measures are incorporated to certify that surrounding environment is protected from all possible impacts.

SECTION J: GENERAL

1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA.

The Environmental Impact Assessment (EIA) for the proposed installation of three 83m³ Aboveground Storage Tanks (ASTs) on Erf 601, Stasie Road, Lutzville, concludes that the development poses a low environmental risk and offers notable socio-economic benefits. The project is located on a previously developed and disturbed site currently used for commercial and fuel retail activities. As such, the site has low ecological sensitivity, with no indigenous vegetation, no species of conservation concern, and no Freshwater Ecosystem Priority Areas (FEPAs) present. Although a non-perennial river lies approximately 70 meters west of the site, it is in poor ecological condition and will not be directly impacted by the proposed development. Site-specific biodiversity assessments confirmed that the national screening tool's classifications of high sensitivity were inaccurate.

The use of ASTs was identified as the preferred technology alternative due to their operational and environmental advantages over underground storage tanks (USTs), such as improved visual monitoring, early leak detection, and more effective spill containment. No other site, design, or activity alternatives were considered feasible, as the use of already transformed land significantly reduces potential environmental impacts, particularly in comparison to development on virgin land.

From a socio-economic perspective, the project is expected to meet growing regional fuel demands, reduce fuel delivery traffic, and create both short- and long-term employment opportunities. Anticipated negative impacts, such as noise, odour, and changes to the site's visual character, are considered minimal due to the site's existing industrial nature and can be effectively managed through adherence to the Environmental Management Programme (EMPr). The proposed development aligns with applicable municipal and provincial planning frameworks, including the Western Cape Provincial Spatial Development Framework, the Saldanha Bay Municipality IDP and MSDF, and the Greater Saldanha Environmental Management Framework.

In conclusion, the EIA supports the implementation of the proposed AST installation, given its limited environmental impact, clear socio-economic benefits, and compliance with relevant environmental and planning legislation.

1.2.	Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)

This proposal is for the proposed expansion of fuel storage capacity. No environmental sensitivities are present on the site. Relevant maps of surrounding environmental sensitivities (and No-Go areas) have been appended to this BAR as **Appendix D**.

1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.

The proposed installation of three Aboveground Storage Tanks (ASTs) on Erf 601, Stasie Road, Lutzville, is expected to result in a range of positive and manageable negative impacts on both the environment and the surrounding community.

On the positive side, the development will take place on a previously disturbed and developed site, thereby avoiding the environmental degradation that would result from the use of virgin land. This minimizes ecological disturbance and protects surrounding terrestrial and freshwater ecosystems. The project will also generate socio-economic benefits, including the creation of temporary and permanent employment opportunities, enhanced fuel supply capacity to meet regional demand, and reduced fuel delivery frequency, which in turn lowers traffic congestion and emissions associated with tanker transport.

From an environmental risk perspective, the primary concerns relate to potential fuel vapour emissions and the risk of soil or groundwater contamination from spills or leaks during the operational phase. However, these risks are significantly mitigated through the use of ASTs, which allow for visual inspection and are installed within bunded areas designed to contain spills.

Additional minor impacts such as noise, odour, and visual changes are anticipated, but these are expected to be minimal given the site's existing industrial character and can be effectively managed through the implementation of measures outlined in the Environmental Management Programme (EMPr).

Overall, the proposed development presents a low-risk, high-benefit alternative that aligns with sustainable development principles and relevant planning and environmental frameworks.

Table 4. Summary of Construction and Operation Phase Impact Significant, After Mitigation:

CONSTRUCTION PHASE IMPACTS & BENEFITS

IMPACT	IMPACT SIGNIFICANCE AFTER MITIGATION
SOIL & GROUNDWATER CONTAMINATION & POLLUTION	LOW (-)
DUST & NOISE IMPACTS	LOW (-)
FIRE, HEALTH & SAFETY RISK	LOW – MEDIUM (-)
TRAFFIC, SAFETY & ACCESS IMPACTS	LOW (-)
VISUAL IMPACTS	LOW (-)

SOCIO ECONOMIC – CREATION OF JOB OPPERTUNITIES	**LOW (+)**
OPERATIONAL PHASE IMPACTS & BENEFITS	
SOIL & GROUNDWATER CONTAMINATION & POLLUTION	**LOW – MEDIUM (-)**
FIRE, HEALTH & SAFETY RISK	**LOW – MEDIUM (-)**
AIR QUALITY	**LOW (-)**
TRAFFIC & SAFETY IMPACTS	**LOW (-)**
VISUAL IMPACT	**LOW (-)**
SOCIO ECONOMIC – CREATION OF JOB OPPERTUNITIES	**LOW – MEDIUM (+)**

2. Recommendation of the Environmental Assessment Practitioner ("EAP")

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr

The general planning, design, construction, post-construction rehabilitation, and operational phase site management measures aimed at minimising health, safety, and environmental risks associated with the installation of the Aboveground Storage Tanks (ASTs) are outlined in the Environmental Management Programme (EMPr) attached as **Appendix H** and must be strictly adhered to. The EMPr consolidates the impact management, mitigation, and monitoring measures identified in the impact assessment and significance rating, ensuring a structured approach to environmental compliance throughout the project lifecycle.

The EMPr forms a binding contractual document for all parties involved in the project, including contractors, sub-contractors, and employees engaged in the construction, operation, or maintenance of the development. It serves as a key reference document for the project proponent and any appointed agents or contractors and is developed in accordance with Section 24N of the National Environmental Management Act (Act No. 107 of 1998), as amended (NEMA), and any additional requirements stipulated by the Department of Environmental Affairs and Development Planning (DEA&DP) or other relevant authorities.

The core objective of the EMPr is to guide all responsible stakeholders to comply with the environmental terms and conditions during each project phase. Its primary aim is to prevent avoidable environmental harm and to reduce or mitigate any unavoidable impacts arising from construction, operation, and maintenance activities. Successful implementation of the EMPr is contingent on the consistent application of its mitigation and management measures, alongside routine compliance monitoring and independent audits to verify outcomes.

The EMPr:

- Identifies project-related activities that may cause actual or potential environmental harm and outlines the necessary mitigation actions;
- Assigns responsibility for ensuring EMPr compliance to specific personnel;
- Provides standard procedures to reduce negative environmental impacts and promote environmental benefits;
- Establishes site-specific rules and actions, including detailed site plans showing designated construction zones, material and waste storage areas, and permitted access, parking, and turning routes for construction vehicles;
- Acts as a documented reference of roles, responsibilities, and procedures for all contractors, workers, and relevant personnel;
- Includes a monitoring and auditing programme to track compliance, detect any environmental issues, and ensure appropriate response measures are taken;
- Maintains a record of all implemented mitigation actions and tracks their effectiveness throughout the project's duration.

By adhering to the EMPr, the project ensures responsible environmental stewardship and compliance with legal and regulatory obligations.

2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.

The installation and configuration of the ASTs will comply with the relevant South African National Standards (SANS), including but not limited to:

- ***SANS 10089-3 (2010): The petroleum industry – Part 3: The installation, modification, and decommissioning of storage tanks, pumps/dispensers, and pipework at service stations and consumer installations;***
- ***SANS 10400-TT (Fire Protection): Sections 1–6, dealing with the application of the National Building Regulations regarding the installation of liquid fuel dispensing pumps and tanks;***

- ***SANS 10087-3 (2008): The handling, storage, distribution, and maintenance of liquefied petroleum gas in installations involving storage vessels with individual water capacities exceeding 500 L.***

The installation of the ASTs and associated infrastructure will also adhere to the requirements of the National Building Regulations and Standards Act (No. 103 of 1977), local municipal bylaws, and the Occupational Health & Safety Act (No. 85 of 1993). Due to these constraints and regulatory requirements, limited options for alternative site configurations, designs, or layouts were feasible or considered.

Upon completion of the Aboveground Storage Tank (AST) installation, a qualified engineer must conduct an inspection to verify that the tanks and all associated infrastructure have been installed in full compliance with applicable SABS/SANS standards and relevant legislation. Additionally, all stormwater and greywater management infrastructure, where applicable, must be installed according to recognised industry standards to minimise the risk of surface and groundwater contamination. Regular maintenance and monitoring of the ASTs must be carried out in accordance with the specifications outlined in the Environmental Management Programme (EMPr) attached as **Appendix H**, or as otherwise directed by the relevant authority. These measures are essential to ensure ongoing environmental compliance and operational safety.

2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.

Based on the findings presented in the Basic Assessment Report and supporting specialist compliance statements, it is recommended that the proposed installation of three 83m³ Aboveground Storage Tanks (ASTs) on Erf 601, Stasie Road, Lutzville be authorised. The proposed development is located on a previously disturbed and developed site, currently occupied by a Kaap Agri retail outlet and fuel service station. Site-specific assessments confirmed that the terrestrial, plant, and animal biodiversity sensitivities initially flagged as "Very High" and "Medium" by the national environmental screening tool were inaccurately mapped. Specialist Nicolaas Hanekom (Enviro-EAP) confirmed through on-site verification that the site is of low ecological value and that no species of conservation concern, nor suitable habitat, are present. The vegetation type, Namaqualand Heuweltjieveld, is classified as "Least Concern" under the National Environmental Management: Biodiversity Act (NEMBA) 2022 List of Threatened Ecosystems. Similarly, the presence of a degraded non-perennial river approximately 70 metres west of the site initially linked to high aquatic sensitivity was reassessed and downgraded to medium sensitivity due to its modified nature as a stormwater channel.

The proposed ASTs are considered a more environmentally responsible technological alternative when compared to underground storage tanks, as they allow for visual leak detection and containment within bunded areas, thereby significantly reducing the potential for soil and groundwater contamination. The proposed activity also supports regional socio-economic development by addressing the growing fuel demand, reducing the frequency of tanker deliveries, and generating both short-term construction and long-term operational employment opportunities. Potential negative impacts such as noise, odour, and visual intrusion are expected to be minimal and manageable given the site's existing industrial context and the mitigation measures outlined in the Environmental Management Programme (EMPr).

In light of the above, and given the low ecological sensitivity, existing land transformation, and operational safeguards proposed, the development is considered environmentally acceptable. It is recommended that authorisation be granted subject to the following conditions: compliance with the EMPr and all relevant SANS standards; installation of bunded containment areas with a capacity of at least 110% of the largest tank; restriction of construction activities to clearly demarcated zones; implementation of a spill prevention and response plan; regular inspection and maintenance of storage infrastructure; and adherence to a chance finds protocol in the event of the discovery of heritage resources during construction. With these measures in place, the proposed development poses minimal environmental risk and is consistent with the principles of sustainable development.

It is therefore recommended that this application be authorised with the necessary conditions of approval as described throughout this Draft BAR and the EMPr (Appendix H).

2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.

Assumptions:

- It is assumed that all information provided for the purpose of this report, and upon which the findings are based, is accurate and valid.
- The impacts identified in this report are based on current project information; however, actual impacts may vary once the project is underway due to unforeseen real-world conditions. The predicted impacts and recommended mitigation measures are based on the best available information at the time of assessment.
- It is assumed that all proposed mitigation measures outlined in this report and the Environmental Management Programme (EMPr) (Appendix H) will be effectively implemented and adhered to.
- The assessment of potential environmental impacts and the recommendation of mitigation measures are informed by the site-specific ecological characteristics observed during the site visit and based on the assessor's professional knowledge and experience with similar developments.

Uncertainties:

- It is assumed that construction activities will be carried out in accordance with standard operational procedures typically employed by oil companies.

- It is further assumed that site management will respond responsibly to environmental incidents by investigating causes and implementing appropriate corrective measures. A Health, Safety, and Environmental (HSE) consultant is expected to be appointed to assist with compliance under the Occupational Health and Safety Act (Act No. 85 of 1993).
- The accuracy of supporting data sources such as topographical and cadastral maps, vegetation and water resource maps, orthophotographs, geological maps, and the Department of Water and Sanitation's national groundwater database is assumed to be reasonably reliable.
- All specialist inputs and information extracted from the relevant specialist reports are assumed to be accurate and valid.
- The current site layout reflects one potential design proposed by oil companies; however, the client has indicated that final layout details may vary depending on future agreements with prospective purchasers.

Gaps in Knowledge:

- There are no significant gaps in knowledge that would compromise the integrity of this assessment or the viability of the proposed project.

2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

I.	**Validity of the EA**	10 years
II.	**The period within which commencement must occur;**	5 years
III.	**Estimated timeframe of completion o**f **construction;**	3 to 6 months
IV.	**The period for which the portion of the environmental authorisation that deals with non-operational aspects is granted; and**	5 years
V.	**The period for which the portion of the environmental authorisation that deals with operational aspects is granted.**	N/A – the operation phase is permanent.

3. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.
Potable water will be used exclusively for mixing cementitious materials such as concrete, mortar, and plaster. For all external works, treated effluent water transported to the site will be utilised. Any water leaks that occur will be promptly repaired to prevent unnecessary wastage.

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.
Existing waste management measures are already in place. During the construction phase, a portable chemical toilet must be provided on-site. This facility must not be located within 100 metres of any watercourse or river and must be regularly serviced by a registered waste disposal contractor. The toilet must be removed upon completion of construction, and waste disposal receipts must be retained as evidence of proper handling and disposal.

All waste generated on-site both general and hazardous must be collected and stored in designated containers, then removed and disposed of at registered waste disposal facilities. Waste must be separated into recyclable and non-recyclable categories, with recyclable materials delivered to an approved recycling facility, where applicable. Proof of disposal through official waste receipts must be maintained.

During the operational phase, the separation and proper disposal of recyclable waste will continue. A private waste removal contractor, already operating in the area, has been appointed and is responsible for sorting and transporting waste to appropriate recycling facilities.

5. Energy Efficiency

8.1.	Explain what design measures have been taken to ensure that the development proposal will be energy efficient.
Existing energy efficient measures have been implemented.	

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

Note: Duplicate this section where there is more than one Applicant.

I……, ID number ……in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;

- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;

- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;

- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;

- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;

- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.

Signature of the Applicant: Date:

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I ……, EAP Registration number …….. as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE REVIEW EAP

I ……, EAP Registration number …….. as the appointed Review EAP hereby declare/affirm that:

- I have reviewed all the work produced by the EAP;
- I have reviewed the correctness of the information provided as part of this Report;
- I meet all of the general requirements of EAPs as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the specialist (if any), the review specialist (if any), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I ……, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or

  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);

- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;

- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and

- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE REVIEW SPECIALIST

I ……., as the appointed Review Specialist hereby declare/affirm that:

- I have reviewed all the work produced by the Specialist(s):
- I have reviewed the correctness of the specialist information provided as part of this Report;
- I meet all of the general requirements of specialists as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the review EAP (if applicable), the Specialist(s), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.

Signature of the EAP: Date:

Name of company (if applicable):