



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

DEPARTMENT OF ENVIRONMENTAL AFFAIRS

Application form for the rectification of unlawful commencement or continuation of a listed activity in terms of S24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended.

NB: PLEASE TAKE NOTE: In compliance with section 24H of NEMA, 2017 as amended, you are required to provide the following:

EAPASA REGISTRATION NUMBER : 2019/1362

and ATTACH PROOF OF REGISTRATION

Failure to comply, your application will automatically be rejected, effective from the 08 August 2022

Kindly note that:

1. This application form must be completed for all applications in terms of S24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended.
2. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the application form have been published or produced by the relevant competent authority.
3. The content of the application for rectification form comprises of:

Section A: Application Information

Section B: Activity Information

Section C: Description of Receiving Environment

Section D: Preliminary Impact Assessment

Section E: Alternatives

Section F: Appendices

Section G: Declarations

4. An independent EAP must be appointed to complete the application form on behalf of the applicant; the declaration of independence must be completed by the independent EAP and submitted with the application.
5. The required information must be typed within the spaces provided. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The space provided extend as each space is filled with typing. A legible font type and size must be used when completing the form. The font size should not be smaller than 10pt (e.g. Arial 10).
6. The use of “*not applicable*” in the application form must be done with circumspection.
7. No faxed or e-mailed applications will be accepted. This application form must be submitted by hand or mailed to the relevant competent.
8. Unless protected by law, all information contained in and attached to this application form may become public information on receipt by the competent authority. Upon request, any interested and affected party must be provided with the information contained in and attached to this application form.
9. This application form constitutes the initiation of the S24G application process.

DEPARTMENTAL DETAILS

The Deputy Director General: Chemicals and Waste Management
 Department of Environment, Forestry and Fisheries
 Private Bag X447
 Pretoria
 South Africa
 0001

SECTION A: APPLICATION INFORMATION

1. APPLICANT PROFILE INDEX

Cross out the appropriate box “☒”.

1.1	The applicant is an individual	YES	NO
1.2	The applicant is a company	YES	NO
1.3	The applicant is a state-owned enterprise or municipality	YES	NO
1.4	Other (specify)	YES	NO
1.5	There is more than one individual / company responsible for the unlawful commencement of listed activities	YES	NO

Name of Project applicant:	Telkom SA SOC Limited												
RSA Identity number:	7	9	0	3	0	6	0	4	6	0	0	8	4
Contact person:	Simangele Mthembu												
Position in company	Environmental Specialist												
Registered Name of Company/ Closed Corporation	Telkom SA SOC Limited												
Trading name (if any):													
Registration number	1991/005476/30												
Postal address:	Private Bag X881,												
	Pretoria						Postal code:	0001					
Telephone:	(021) 311 3911						Cell:	N/A					
E-mail:	N/A						Fax:	(N/A)					

Please Note: In instances where there is more than one individual / company responsible for the unlawful commencement of listed activities, please attach a list of with all contact details to the back of this page.

Environmental Assessment Practitioner (EAP):	Chantel Müller & Jonathan Lassen		
Contact person:	Chantel Müller		
Postal address:	Suite 401, Tokai on Main, 2 Burchell Road, Tokai		
	Cape Town	Postal code:	7645
Telephone:	(021) 712 5060	Cell:	(071) 313 4193
E-mail:	chantel@environmentalconsultants.co.za	Fax:	N/A
EAP Qualifications	M Phil in Environmental Management (2008) BA in Social Dynamics (2004). Chantel Muller is a registered EAP with EAPSA 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.		
EAP Registrations/Associations	Chantel Muller (Registered EAP (2019/1362)) & Jonathan Lassen (Candidate EAP (2024/8038))		

Name of Landowner(s):	Koenehelo Thejane		
Contact person(s):	Koenehelo Thejane		
Postal address:	61 Oak Avenue, Highveld, Techno Park Private Bag X148		
	Centurion 0157	Postal code:	0157
Telephone:	N/A	Cell:	0814900352
E-mail:	koenehelo.thejane@gyrogroup.co.za	Fax:	()

Please Note: In instances where there is more than one landowner, please attach a list of landowners with their contact details to the back of this page.

Municipality in whose area of jurisdiction the activity falls:	City of Tshwane Municipality: Ward 64		
Contact person:	Gert Visser		
Postal address:			
Telephone	()	Postal code:	
E-mail:	Gert.p.visser@gmail.com	Cell:	
		Fax:	()

Please Note: In instances where there is more than one Municipality involved, please attach a list of Municipalities with their contact details to the back of this page.

Project title:	Section 24G Application for Telkom Park, 61 Oak Avenue, Highveld, Centurion, Gauteng.					
Property location:	Telkom Park, 61 Oak Avenue, Highveld, Centurion, 0157.					
Farm/Erf name & number (incl. portion):	Erf 2751.					
SG21 Digit code:	T0JR01110000275100000					
Co-ordinates:	Latitude (S):			Longitude (E):		
	28°	11'	16.29"	25°	52'	39.04"

Please Note:

Where a large number of properties are involved (e.g. linear activities), attach a list of property descriptions to the back of this page.

Indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates must be in degrees, minutes and seconds. The minutes must be given to at least three decimals to ensure adequate accuracy. The EAP is required to contact the relevant competent authority with regards to the projection that must be used.

Street address:	61 Oak Avenue, Highveld, Centurion, 0157
Magisterial District or Town:	City of Tshwane Municipality: Ward 64

Please Note: In instances where there is more than one town or district involved, please attach a list of towns or districts as well as complete physical address information for the entire area to the back of this page.

Closest City/Town:	Centurion	Distance	5Km
Zoning of Property:	Industrial 2		

Please Note: In instances where there is more than one zoning, please attach a map clearly indicating zoning of the different portions.

Was a rezoning application required?	YES	NO
Was a consent use application required?	YES	NO
Please Note: Where planning approvals have been granted please attach the relevant approvals.		
Owners consent:	Letters of consent from all landowners or a detailed explanation by the applicant explain why such letters of consent are not furnished must be attached to the application form	

2. APPLICATION HISTORY

(Cross out the appropriate box "X" and provide a description where required).

Has any national, provincial or local authority considered any development applications on the property previously?	Yes	No
If so, please give a brief description of the type and/or nature of the application/s: (In instances where there were more than one application, please attach a list of these applications)		
N/A		
Which authority considered the application(s):		
N/A		
Has any one of the previous application/s on the property been approved or rejected so provide a list of the successful and unsuccessful application/s and the reasons decision/s.	Yes	No
N/A		
Provide detail on the period of validity of decision(s) and expiry dates of the above applications/ permits etc.		
N/A		

SECTION B: ACTIVITY INFORMATION

1. ACTIVITIES APPLIED FOR:

Separate rectification applications are required for one development site where more than one listed activity has commenced and where these unlawfully commenced activities constitute offences in terms of different EIA regulations (refer to Table 1 & 2 of the S24G guideline).

Applicants and EAPS are strongly advised to discuss the merits of a combined application (*if deemed applicable*) with the relevant competent authority prior to the completion of this application form and submission thereof.

The relevant competent authority will use its discretion in deciding to allow one rectification application for more than 1 Section 24F(2)(a) contravention on one development site.

All potential listed activities associated with the development must be indicated below. (See Annexures B, C, D and E). Only those activities for which the applicant applies will be considered.

The onus is on the applicant to ensure that all the applicable listed activities are included in the application.

Listed activities applied for. Identify the relevant listed activities applied for below:

ECA EIA Contraventions : Between 08 September 1997 end of day 09 May 2002	
Activities unlawfully commenced with on or after 08 September 1997 and before end 09 May 2002: EIA Regulations promulgated in terms of the ECA, Act No 73 of 1989, as amended	
Listed Activity(ies)	Details of Activity(ies)
Schedule 1 (c)	The Construction or Upgrading of: c. Transportation routes and structures, and manufacturing, storage, handling or processing facilities for any substance which is considered as dangerous or hazardous and is controlled by national legislation.

ECA EIA Contraventions: Between 10 May 2002 and before end of day 02 July 2006	
Activities unlawfully commenced with on or after 10 May 2002 and before end 02 July 2006: EIA Regulations promulgated in terms of the ECA, Act No 73 of 1989, as amended	
Listed Activity(ies)	Details of Activity(ies)
Schedule 1 (c)	The Construction or Upgrading of:

	d. Transportation routes and structures, and manufacturing, storage, handling or processing facilities for any substance which is considered as dangerous or hazardous and is controlled by national legislation.
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NEMWA, 2009: Between 01 July 2009 and before end of today	
Activities unlawfully commenced with in terms of the NEMWA, 2008 promulgated in terms of the NEMA, Act No 107 of 1998 after 01 July 2009 and...	
Government Notice No. List of Waste Management Activities No(s):	Details of Activity(ies) requiring Basic Assessment
Government Notice No. List of Waste Management Activity No(s):	Details of Activity(ies) requiring a Scoping Report and EIA

2. ACTIVITY DESCRIPTION

(Cross out the appropriate box "☒" and provide a description where required).

(a) Is/was the project a new development or an upgrade of an existing development?	New	Upgrade
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(b) Clearly describe the activity and associated infrastructure commenced with, indicating what has been completed, what still has to be completed and applicable commencement dates.
<u>Introduction</u> Telkom Park is situated at 61 Oak Ave, highveld, Centurion and consists of the Core, Nexus, and Hub areas. (refer to Layout Plan showing existing and future proposed tanks included in Appendix B of this form). <u>PREVIOUSLY UNLAWFULLY INSTALLED TANKS (i.e., current fuel storage and supply facility present on site)</u>

Background

As part of the emergency and uninterrupted power supply on site, Telkom has an existing fuel storage system.

This existing fuel storage was installed without prior environmental authorisation in 1999 (Nexus and Core areas) and 2003 (Hub area), respectively.

The fuel storage system at Telkom Park for the emergency and uninterrupted power supply consists of decentralized below-ground tanks connected to various day tanks and includes the tanks pump's, pump controllers, filtering, and distribution manifolds.

Legislative Requirements

The installation of these tanks during 1999 and 2003 with a total capacity storage capacity of 155 000litres triggered Schedule 1 (c) of ECA, Act No 73 of 1989, and given that an environmental authorisation was not obtained prior to this installation, a Section 24G Application is required.

2 EXISTING FUEL STORAGE

The bulk fuel storage for the campus consists of a decentralized system that can be summarized as follow:

Generator Description	Power Demand		Fuel Demand		Day Tanks		Bulk Storage			Total		
	kVA	Load	(L/hr.)	(L/hr.)	(L)	(L)	QTY	(L)	(L)	(L)		
CORE 1	1500	50%	185	619	300	1200	2	23000	46000	47200		
CORE 2	1500	50%	185		300							
BACKUP	2000	0%			300							
NEXUS C	1250	66%	249		300							
NEXUS A	1250	66%	249	868	300	1200	2	1400	48800	50000		
NEXUS B	1250	66%	249		300							
NEXUS 1	1500	50%	185		300		2	23000				
NEXUS 2	1500	50%	185		300							
HUB A	1250	66%	170	1082	300	2500	3	9000	55000	57500		
HUB B	1250	66%	170		300							
HUB C	1250	66%	170		300							
HUB 1	1000	50%	158		300		2	14000				
HUB 2	1225	50%	158		300							
HUB 6	2000	50%	256		1000							
HUB5	550	100%	170			300	300				300	

(c) Provide details of all components of the activity and attach diagrams (e.g. architectural drawings or perspectives, engineering drawings, process flow charts etc.).

Buildings	YES	NO
Provide brief description:		
N/A		
Infrastructure (e.g. roads, power and water supply/ storage)	YES	NO

Provide brief description:		
N/A		
Processing activities (e.g. manufacturing, storage, distribution)	YES	NO
Provide brief description:		
As part of the emergency and uninterrupted power supply on site, Telkom has an existing fuel storage system. This existing fuel storage was installed without prior environmental authorisation in 1999 (Nexus and Core areas) and 2003 (Hub area), respectively. The fuel storage system at Telkom Park for the emergency and uninterrupted power supply consists of decentralized below-ground tanks connected to various day tanks and includes the tanks pump's, pump controllers, filtering, and distribution manifolds. The installation of these tanks during 1999 and 2003 triggered Schedule 1 (c) of ECA, Act No 73 of 1989, and given that an environmental authorisation was not obtained prior to this installation, a Section 24G Application is required.		
Storage facilities for raw materials and products (e.g. volume and substances to be stored)		
Provide brief description	YES	NO
<u>Introduction</u> Telkom Park is situated at 61 Oak Ave, highveld, Centurion and consists of the Core, Nexus, and Hub areas. (refer to Layout Plan showing existing and future proposed tanks included in Appendix B of this form). <u>PREVIOUSLY UNLAWFULLY INSTALLED TANKS (i.e., current fuel storage and supply facility present on site)</u> <u>Background</u> As part of the emergency and uninterrupted power supply on site, Telkom has an existing fuel storage system. This existing fuel storage was installed without prior environmental authorisation in 1999 (Nexus and Core areas) and 2003 (Hub area), respectively. The fuel storage system at Telkom Park for the emergency and uninterrupted power supply consists of decentralized below-ground tanks connected to various day tanks and includes the tanks pump's, pump controllers, filtering, and distribution manifolds. <u>Legislative Requirements</u> The installation of these tanks during 1999 and 2003 with a total capacity storage capacity of 155 000litres triggered Schedule 1 (c) of ECA, Act No 73 of 1989, and given that an environmental authorisation was not obtained prior to this installation, a Section 24G Application is required.		

2. EXISTING FUEL STORAGE

The bulk fuel storage for the campus consists of a decentralized system that can be summarized as follow:

Generator Description	Power Demand		Fuel Demand		Day Tanks		Bulk Storage			Total		
	kVA	Load	(L/hr.)	(L/hr.)	(L)	(L)	QTY	(L)	(L)	(L)		
CORE 1	1500	50%	185	619	300	1200	2	23000	46000	47200		
CORE 2	1500	50%	185		300							
BACKUP	2000	0%			300							
NEXUS C	1250	66%	249		300							
NEXUS A	1250	66%	249	868	300	1200	2	1400	48800	50000		
NEXUS B	1250	66%	249		300							
NEXUS 1	1500	50%	185		300		2	23000				
NEXUS 2	1500	50%	185		300							
HUB A	1250	66%	170	1082	300	2500	3	9000	55000	57500		
HUB B	1250	66%	170		300							
HUB C	1250	66%	170		300							
HUB 1	1000	50%	158		300		2	14000				
HUB 2	1225	50%	158		300							
HUB 6	2000	50%	256		1000							
HUB5	550	100%	170		300	300				300		

Storage and treatment facilities for solid waste and effluent generated by the project	YES	NO
Provide brief description		
N/A		
Other activities (e.g. water abstraction activities, crop planting activities)	YES	NO
Provide brief description		
N/A		

3. ACTIVITY NEED AND DESIRABILITY

Describe the need and desirability of the activity:

The existing bulk fuel storage on site was intended to support the dynamic rotary machines and is a decentralised system consisting of the following fuel storage capacity:

2 EXISTING FUEL STORAGE

The bulk fuel storage for the campus consists of a decentralized system that can be summarized as follow:

Generator Description	Power Demand		Fuel Demand		Day Tanks		Bulk Storage			Total	
	kVA	Load	(L/hr.)	(L/hr.)	(L)	(L)	QTY	(L)	(L)	(L)	
CORE 1	1500	50%	185	619	300	1200	2	23000	46000	47200	
CORE 2	1500	50%	185		300						
BACKUP	2000	0%			300						
NEXUS C	1250	66%	249		300						
NEXUS A	1250	66%	249	868	300	1200	2	1400	48800	50000	
NEXUS B	1250	66%	249		300						
NEXUS 1	1500	50%	185		300		2	23000			
NEXUS 2	1500	50%	185		300						
HUB A	1250	66%	170	1082	300	2500	3	9000	55000	57500	
HUB B	1250	66%	170		300						
HUB C	1250	66%	170		300						
HUB 1	1000	50%	158		300		2	14000			
HUB 2	1225	50%	158		300						
HUB 6	2000	50%	256		1000						
HUB5	550	100%	170		300	300				300	

With the replacement of various Dynamic Rotary machines with Batteries & Generators, the existing diesel configuration is not suitable to support mission-critical service and needed to be reconfigured.

Need and desirability:

EXISTING:

The existing diesel configuration is not suitable to support mission-critical service and needed to be reconfigured. The existing bulk fuel storage is also not compliant with legislative requirements, including the fact that the original installations of 1999 and 2003 respectively, was undertaken without prior environmental authorisation.

Indicate the benefits that the activity has/had for society in general and also indicate what benefits the activity has/had for the local communities where it is located:

Refer to the above.

4. PHYSICAL SIZE OF THE ACTIVITY

REFER TO SECTION 2 (B) ABOVE FOR FUEL STORAGE CAPACITIES.

Indicate the physical spatial size of the activity as well as associated infrastructure (footprints):	+/- 1900m²
Indicate the area that has been transformed / cleared to allow for the activity as well as associated infrastructure	+/- 1900m²
Total area (sum of the footprint area and transformed area)	+/- 1900m²

5. SITE ACCESS

Was there an existing access road?	YES	NO
If no, what was the distance over which the new access road was built?	N/A	
Describe the type of access road constructed: [indicate the position of the access road on the site plan]		
N/A		

6. SITE PHOTOGRAPHS

Colour photographs of the site and its surroundings (taken of the site and from the site), both before (if available) and after the activity commenced, with a description of each photograph must be attached to this application. 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 past and recent aerial photographs. It should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Photographs must be attached under Appendix D to this form.

7. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

Please list all legislation, policies and/or guidelines that were or are relevant to this activity.

Legislation	Administering Authority	Type Permit/ license/ authorization/comment	Date (if already obtained):
National Environmental Management Act, 1998 (Act No. 107 of 1998)	Department of Forestry, Fisheries, and the Environment (DFFE)	Environmental Authorisation	N/A
2014 Environmental Impact Assessment Regulations, promulgated in terms of Section 24(5) of NEMA (as amended on 07 April 2017)	Department of Forestry, Fisheries and the Environment (DFFE)	Environmental Authorisation	N/A
National Heritage Resources Act, 1999 (Act No. 25 of 1999)	South African Heritage Resources Agency (SAHRA)	Comment/ Record of Decision	N/A
POLICY/ GUIDELINES		ADMINISTERING AUTHORITY	
Guidelines on EIA Regulations 2014		Guideline was consulted while compiling the S24G Application.	
Guidelines on Public Participation, 2014		Guideline was consulted while compiling the S24G Application.	
Guidelines on Need and Desirability, 2013		Guideline was consulted while compiling the S24G Application.	
Guideline for Environmental Management Plans (June 2005)		Guideline was consulted while compiling the S24G Application.	

SECTION C: DESCRIPTION OF RECEIVING ENVIRONMENT

Site/Area Description

For linear activities (pipelines etc) as well as activities that cover very large sites, it may be necessary to complete copies of this Section for each part of the site that has a significantly different environment. In such cases please complete copies of Section C and indicate the area which is covered by each copy No. on the Site Plan.

Section C Copy No. (e.g.
1, 2, or 3):

1. GRADIENT OF THE SITE

Indicate the general gradient of the site(s) (cross out the appropriate box).

Flat	Flatter than 1:10	1:10 – 1:5	Steeper than 1:5
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2. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site (cross out ("X") the appropriate box (es)).

Ridgeline	Plateau	Side slope of hill/mountain	Closed valley	Open valley	Plain	Undulating plain/low hills	Dune	Sea-front	Other
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3. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

Is the site(s) located on or near any of the following [cross out ("X") the appropriate boxes]?

Shallow water table (less than 1.5m deep)	YES	NO	UNSURE
Seasonally wet soils (often close to water bodies)	YES	NO	UNSURE
Unstable rocky slopes or steep slopes with loose soil	YES	NO	UNSURE
Dispersive soils (soils that dissolve in water)	YES	NO	UNSURE
Soils with high clay content	YES	NO	UNSURE
Any other unstable soil or geological feature	YES	NO	UNSURE
An area sensitive to erosion	YES	NO	UNSURE

~~If any of the answers to the above are "YES" or "UNSURE", specialist input may be requested by the Department. Information in respect of the above will often be available at the planning Sections of local authorities. Where it exists, the 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used.~~

4. SURFACE WATER

Indicate the surface water present on and or adjacent to the site and alternative sites (cross out ("X") the appropriate boxes)?

Perennial River	YES	NO	UNSURE
Non-Perennial River	YES	NO	UNSURE
Permanent Wetland	YES	NO	UNSURE
Seasonal Wetland	YES	NO	UNSURE
Artificial Wetland	YES	NO	UNSURE
Estuarine / Lagoonal wetland	YES	NO	UNSURE

5. VEGETATION AND GROUNDCOVER

5.1 VEGETATION / GROUNDCOVER (PRE-COMMENCEMENT)

Cross out ("X") the block or describe (where required) the vegetation types / groundcover present on the site before commencement of the activity.

Indigenous Vegetation—good condition	Indigenous Vegetation with scattered aliens	Indigenous Vegetation with heavy alien infestation
Describe the vegetation type above:	Describe the vegetation type above:	Describe the vegetation type above:
Provide ecosystem status for above:	Provide ecosystem status for above:	Provide Ecosystem status for above:
Indigenous Vegetation in an ecological corridor or along a soil boundary / interface	Veld dominated by alien species	Distinctive soil conditions (e.g. Sand over shale, quartz patches, limestone, alluvial deposits, termitaria etc.)—describe
Bare soil	Building or other structure	Sport field
Other (describe below)	Cultivated land	Paved surface
The site is completely transformed and thus no vegetation is present.		

5.2. VEGETATION / GROUNDCOVER (POST-COMMENCEMENT)

Cross out ("X") the block or describe (where required) the vegetation types / groundcover present on the site after commencement of the activity.

Indigenous Vegetation – good condition	Indigenous Vegetation with scattered aliens	Indigenous Vegetation with heavy alien infestation
Describe the vegetation type above:	Describe the vegetation type above:	Describe the vegetation type above:
Provide ecosystem status for above:	Provide ecosystem status for above:	Provide Ecosystem status for above:
Indigenous Vegetation in an ecological corridor or along a soil boundary / interface	Veld dominated by alien species	Distinctive soil conditions (e.g. Sand over Sandstone, quartz patches, limestone, alluvial deposits, termitaria etc.) – describe
Bare soil	Building or other structure	Sport field
Other (describe below)	Cultivated land	Paved surface
The site is completely transformed and thus no vegetation is present.		
Please note: The Department may request specialist input/studies depending on the nature of the vegetation type / groundcover and impact(s) of the activity/ies. To assist with the identification of the <u>vegetation type</u> and <u>ecosystem status</u> consult http://bgis.sanbi.org or BGIShelp@sanbi.org. Information is also available on compact disc (cd) from the Biodiversity-GIS Unit, Ph (021) 799 8698. This information may be updated from time to time and it is the applicant/ EAP's responsibility to ensure that the latest version is used.		

5.3 VEGETATION / GROUNDCOVER MANAGEMENT

Describe any mitigation/management measures that were adopted and the adequacy of these:

The site is completely transformed and thus no vegetation is present.

6. LAND USE CHARACTER OF SURROUNDING AREA (PRE-COMMENCEMENT)

Cross out ("X") the block that reflects the past land uses and/or prominent features that occur/red within +/- 500m radius of the site and neighbouring properties if these are located beyond 500m of the site.

Please note: The Department may request specialist input/studies depending on the nature of the land use character of the area and impact(s) of the activity/ies.

Untransformed area	Low density residential	Medium density residential	High density residential	Informal residential
Retail	Commercial & warehousing	Light industrial	Medium industrial	Heavy industrial
Power station	Office/consulting room	Military or police base/station/compound	Casino/entertainment complex	Tourism & Hospitality facility
Open cast mine	Underground mine	Spoil heap or slimes dam	Quarry, sand or borrow pit	Dam or reservoir
Hospital/medical center	School	Tertiary education facility	Church	Old age home
Sewage treatment plant	Train station or shunting yard	Railway line	Major road (4 lanes or more)	Airport
Harbour	Sport facilities	Golf course	Polo fields	Filling station
Landfill or waste treatment site	Plantation	Agriculture	River, stream or wetland	Nature conservation area
Mountain, koppie or ridge	Museum	Historical building	Graveyard	Archaeological site
Other land uses (describe):				

7. REGIONAL PLANNING CONTEXT

Is/was the activity permitted in terms of the property's existing land use rights? Please explain

Yes, as the property is currently zoned as industrial 2.			
Is/was the activity in line with the following?			
○ Provincial Spatial Development Framework (PSDF)	YES	NO	Please explain
The PSDF indicates this area as industrial 2.			
○ Urban edge / Edge of Built Environment for the area	YES	NO	Please explain
The area is within the Urban Edge.			
○ Integrated Development Plan of the Local Municipality	YES	NO	Please explain
The area is designated as an industrial 2 on the IDP.			
○ Spatial Development Framework of the Local Municipality	YES	NO	Please explain
The area is designated as an industrial 2 area on the SDF.			
○ Approved Structure Plan of the Municipality	YES	NO	Please explain
The area is designated as an industrial 2 area.			
○ Any other Plans	YES	NO	Please explain
N/A			

8 SOCIO-ECONOMIC CONTEXT

8.1 SOCIO-ECONOMIC CONTEXT (PRE-COMMENCEMENT)

Describe the pre-commencement social and economic characteristics of the community in order to provide baseline information.

If the underground storage tanks had not been installed, Telkom Park's Core, Nexus, and Hub components could have faced operational disruptions during loadshedding, severely impacting mission-critical services. This would have risked service outages, affecting communication infrastructure and dependent clients. Additionally, such interruptions could have undermined job stability for the 2,915 employees on-site. The lack of fuel reserves would have jeopardized business continuity. Overall, it would have compromised both economic activity and service reliability.

8.2 SOCIO-ECONOMIC CONTEXT (POST-COMMENCEMENT)

Describe the post commencement social and economic characteristics of the community in order to determine any change.

The existing underground fuel storage tanks support mission-critical services, however in a worst-case scenario, it would not be sufficient. This allows for the Core, Nexus, and Hub portions of the Telkom Park facility to function during loadshedding. The development provides permanent and temporary employment opportunities, with approximately 2915 employees working at the facility.

CULTURAL/HISTORICAL FEATURES

Were there any signs or evidence (unearthed during construction) of culturally or historically significant elements including archaeological or palaeontological sites, on or in close proximity to the site?		YES	NO
		UNCERTAIN	
If YES, explain:			
If uncertain, the Department may request that specialist input be provided to establish whether such possibilities occurred on or close to the site.			
Briefly explain the findings of the specialist if one was already appointed:			

Were any buildings or structures older than 60 years affected in any way?	YES	NO
Was it necessary to apply for a permit in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999)?	YES	NO
If yes, please submit or, make sure that the applicant or a specialist submit the necessary application to SAHRA or the relevant provincial heritage agency and attach proof thereof to this application.		

SECTION D: PRELIMINARY IMPACT ASSESSMENT

Please note, the impacts identified below refer to general impacts commonly associated with development activities. The list below is not exhaustive and may need to be supplemented. Where required, please append the information on any additional impacts to this application.

1. WASTE, EFFLUENT AND EMISSION MANAGEMENT

(a) Solid waste management

Did/does the activity produce any general waste (e.g. domestic-, commercial-, certain industrial waste, including building rubble also known as solid waste) during the construction phase <u>and/or</u> the operational phase?	YES	NO
If yes, briefly describe what type of waste was produced (i.e. green waste, building rubble, etc.) in which phase. N/A		
What quantity was/is produced during the construction period?	Unknown m ³	
What was/is the estimated quantity that will be produced per month during the operational phase?	Unknown m ³	

Did/does the activity produce any <u>hazardous</u> waste (e.g. chemical, medical waste, infectious, nuclear etc.) during the construction and/or the operational phase?	YES	NO
If yes, briefly describe what type of waste was produced (i.e. infectious waste, medical waste, etc.) in which phase. N/A		
What quantity was/is produced during the construction period?	m ³	
What was/is the estimated quantity that will be produced per month during the operational phase?	m ³	

Where and how was/is waste treated / disposed of (describe each waste stream)?		
Has the municipality or relevant authority confirmed that sufficient capacity exist for treating /disposing of the solid waste to be generated by this activity(ies)? If yes, provide written confirmation from municipality or relevant authority	YES	NO
Does/did the activity produce solid waste that was/will be treated and/or disposed of at another facility other than into a municipal waste stream?	YES	NO

If yes, did/has this facility confirmed that sufficient capacity exist for treating / disposing of the solid waste to be generated by this activity(ies)? Provide written confirmation from the facility and provide the following particulars of the facility:		YES	NO
Did/does the facility have an operating license? (If yes, please attach a copy of the license.)		YES	NO
Facility name:			
Contact person:			
Postal address:			
		Postal code:	
Telephone:		Cell:	
E-mail:		Fax:	

(b) Effluent

Did/does the activity produce sewage and or any other effluent?		YES	NO
N/A			
What was/is the estimated quantity produced per month?		m ³	
Was/is the effluent treated and/or disposed of in a municipal system?		YES	NO
If Yes, did/has the Municipality or relevant authority confirmed that sufficient unallocated capacity exist for treating / disposing of the sewage or any other effluent generated by this activity(ies)? Provide written confirmation from the Municipality or relevant authority:			
Was/is any effluent produced be treated and/or disposed of on site?		YES	NO
If yes, briefly describe the nature of the effluent and how it was/will be disposed of:			
Did/does the activity produce effluent that was/will be treated and/or disposed of at another facility?		YES	NO
If yes, did/has this facility confirmed that sufficient capacity exist(ed) for treating / disposing of the liquid effluent generated by this activity(ies)? Provide written confirmation from the facility and provide the following particulars of the facility:		YES	NO
Does the facility have an operating license? (If yes, please attach a copy of the license.)		YES	NO
Facility name:			
Contact person:			
Postal address:			
		Postal code:	
Telephone:		Cell:	
E-mail:		Fax:	

Describe the measures that was/will be taken to ensure the optimal reuse or recycling of waste water, if any:
N/A

(c) Emissions into the atmosphere

Did/does the activity produce emissions that will be disposed of into the atmosphere?	YES	NO
If yes, did/does it require approval in terms of relevant legislation? If yes, attach a copy to this application	YES	NO
Describe the emissions in terms of type and concentration and how it was/will be treated/mitigated:		

(d) Describe any mitigation/management measures that were adopted and the adequacy of these:

N/A

2. WATER USE

(a) Please indicate the source(s) of water for the activity by crossing out ("X") the appropriate box(es)

Municipal	Water Board	Groundwater	River, Stream, Dam or Lake	Other	The activity did/does not use water
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If water was/is extracted from a groundwater source, river, stream, dam, lake or any other natural feature, please indicate the volume that was/is extracted per month:	Unknown m ³
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Please provide proof of assurance of water supply eg. letter of confirmation from Municipality/water user associations, yield of borehole etc.		
Did/does the activity require a water use permit / license from DWAF? If yes, attach a copy to this application	YES	NO
If yes, please submit the necessary application to Department of Water Affairs and Forestry and attach proof thereof to this application.		

(b) Describe any mitigation/management measures that were adopted and the adequacy of these:

N/A

3. POWER SUPPLY

(a) Please indicate the source of power supply eg. Municipality / Eskom / Renewable energy source.

Eskom

Has the Municipality or relevant service provider confirmed that sufficient electricity capacity (i.e. generation, supply and transmission) exist for activity(ies)? If yes, provide written confirmation from Municipality or relevant service provider.	YES	NO
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If power supply was/is not available, where was/is it sourced from?
During loadshedding hours, the facility makes use of diesel generators to power the mission-critical services.

(b) Describe any mitigation/management measures that were adopted and the adequacy of these:

The existing diesel fuel storage tanks are sufficient for shorter and less frequent loadshedding schedules. However, they may not be sufficient in the event of higher stages of loadshedding, thus, the upgrade of diesel fuel storage capacity would be adequate.

4. ENERGY EFFICIENCY

(a) Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:

The facility is currently operational and has existing energy efficiency measures in place.

(b) Describe how alternative energy sources have been taken into account or been built into the design of the activity, if any:

The facility is currently operational and has existing energy efficiency measures in place.

5. NOISE IMPACTS

(a) Did/does the activity result in any noise impacts?	YES	NO
If yes, please describe and indicate the measures implemented to mitigate and manage these impacts?		
N/A		

Please note: The Department may request specialist input/studies depending on the nature of the land use character of the area and potential noise impact(s) of the activity/ies.

6. VISUAL IMPACTS

(a) Did/does the activity result in any visual impacts?	YES	NO
If yes, please describe and indicate the measures implemented to mitigate and manage these impacts?		

N/A		
(b) Did/does the activity result in potential lighting impacts at night?	YES	NO
If yes, please describe and indicate the measures implemented to mitigate and manage these impacts?		
N/A		
(c) Were/are there any alternatives available to address this impact?	YES	NO
If yes, please describe these alternatives?		
N/A		

Please note: The Department may request specialist input/studies depending on the nature of the land use character of the area and potential visual impact(s) of the activity/ies.

7. SOCIO-ECONOMIC IMPLICATIONS OF THE ACTIVITY

(a) What was/is the expected capital value of the activity on completion?	R38 000 000
(b) What was/is the expected yearly income or contribution to the economy that will be generated by or as a result of the activity?	R300 000 000/day losses
(c) Did/does the activity contribute to service infrastructure?	YES NO
(d) How many permanent new employment opportunities were created?	0
(e) What was/is the expected current value of the employment opportunities to date?	R10 000 000
(f) What percentage of this accrued to previously disadvantaged individuals?	100%

How was (is) this (to be) ensured and monitored (please explain):

The works have been tendered and the preferred bidder is 100% BBBEE. Losses that emanated from the last failure cost Telkom R300 000 000.

8. PRELIMINARY IMPACT ASSESSMENT

Briefly describe the impacts (as appropriate), significance rating of impacts and significance rating of impacts after mitigation. This must include an assessment of the significance of all impacts. Please note: This is a preliminary impact statement. The Department may request specialist input/studies depending on the type and nature of the impact(s) of the activity/ies.

Possible Impacts	Significance rating of impacts after mitigation (Low, Medium, Medium-High, High, Very High):
Socio Economic Impact	Low
Biodiversity Impact	Low
Sense of Place Impact/Heritage Impact	Low
Index Pollution Impact	Low

SECTION E: ALTERNATIVES

As part of this report, consideration must be given to alternatives that are/may have been possible had an environmental impact assessment been undertaken prior to the commencement of the activity. Please provide a detailed description of the alternatives (whether location, technology or environmental) that were/are possible in terms of this application.

Based on the impacts identified as potentially being associated with the bulk fuel storage and supply facility, alternative means of fulfilling the general purpose of the application, which is the storage of diesel for the emergency and uninterrupted power supply, by means of generators, to the Telkom Park facility, have been identified and investigated during this EIA process.

Activity alternatives:

Solar power could have been considered as an activity alternative energy instead of relying on diesel-powered generators. This was however not deemed as a feasible alternative at the time, i.e. in 1999 and 2003 as solar power was expensive at the time with high upfront costs as well as high costs associated with energy storage of solar power.

Site alternatives:

It was deemed impractical to consider an alternative location for the bulk fuel storage and supply facility, as the fuel directly supplies the generators on the Telkom Park site, and the generators are essential for emergency and uninterrupted power supply to the Telkom Park facility.

Design, layout and operational alternatives:

The design and layout of the bulk fuel storage and supply facility, including the infrastructure, plant and equipment such as tanks, processing equipment and bunds, will affect the potential of the facility to impact negatively on the health and safety of staff at the site and at nearby facilities; to impact underlying soil and groundwater resources and air quality of the surrounding area.

The design of the infrastructure and abatement equipment is therefore a key aspect to consider for effective management of the potential impacts listed above.

Process/Operational alternatives:

Operational alternatives such as standard operating procedures and preventative maintenance schedules for equipment and infrastructure are a key aspect to consider in ensuring safe working practices.

Effective operational procedures can also assist with the minimisation of emissions and associated negative air quality impacts; as well as the minimisation of potential spills and leaks of hazardous inputs and wastes, which are contamination risks.

The No-Go Option:

In accordance with the requirements of the EIA Regulations, any of the alternatives which are found upon rigorous investigation to be reasonable and feasible alternatives for meeting the general purpose of the application, will be comparatively assessed against the No-Go Option during the EIA phase of the application process.

The No-Go Option is ordinarily understood as maintaining the status quo at a site, with the applicant meeting all of his legal responsibilities in terms of maintaining a site or operating a facility (DEA&DP *Guideline on Alternatives*, October 2011).

In this instance, the status quo at the site is an operational fuel supply and storage facility, which will have to obtain an Application for Authorisation in terms of NEMA EIA Listed activities as well as NEMA Section 24G, in line with the legal responsibilities of the applicant.

With respect to approaching the No-Go Option in this instance, in order to determine the drawbacks and benefits of operating the fuel storage and supply against the baseline of no such facility being established, the No-Go Option is considered in this case to be the option of the fuel supply facility ceasing to operate and the Telkom Park site thus not having emergency and uninterrupted power supply.

The option of not having emergency and uninterrupted power supply to the Telkom Park site in the form of diesel operated generators will thus be assessed in detail against the activity; site; process; and design, layout and operational alternatives found to be reasonable and feasible for the purposes emergency and uninterrupted power supply to the Telkom Park site both in terms of what has already been installed on site and what is proposed to be installed.

SECTION F: APPENDICES

The following appendices must be attached where appropriate:

Appendix	Cross out (“☒”) the box if Appendix is attached
Appendix A: Locality Map	X
Appendix B: Site & Layout plan(s)	X
Appendix C: Owner(s) consent(s)	N/A
Appendix D: Photographs	X
Appendix E: Permit(s) / license(s) from any other organ of state including service letters from the municipality	N/A
Appendix F: DEIA Report	X
Appendix G: Report on alternatives	Covered under Appendix F.
Appendix I: Declarations	X
Appendix J: Forms and Preliminary Public Participation	X
Appendix J: Comments & Response Table	X
Appendix J: Comments Received to Date	X
Appendix K: Additional Site Information	X
Appendix L: Baseline Report	X
Appendix M: EMPr	X
Appendix N: Bulk Tank Refueling Safe Operating Procedure	X
Appendix N: Emergency Preparedness and Response Procedure	X
Appendix N: Emergency Preparedness and Response Procedure	X
Appendix O: SEC Groundwater Monitoring Reports	X
Appendix P: Pre-Application Meeting Register Attendance	X
Appendix Q: Screening Tool Report	X
Appendix Q: Biodiversity Overlay Maps	X