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POST-APPLICATION
DRAFT
BASIC ASSESSMENT REPORT

FOR THE

PROPOSED DEVELOPMENT OF A TRUCK STOP AND ASSOCIATED INFRASTRUCTURE LOCATED ON ERF 56 AND ERF 57 OF MOSSDUSTRIA, MOSSEL BAY LOCAL MUNICIPALITY, WESTERN CAPE.

Compiled in terms of Appendix 1 of the Environmental Impact Assessment Regulations of 2014, as amended (GNR 326 of 2014), as promulgated in terms of the National Environmental Management Act of 1998 (Act No 107 of 1998).

PREPARED FOR:	Confuel (Pty) Ltd
DEA&DP REF:	16/3/3/1/D6/29/0012/23
SES REF NO:	13/CT/DBAR/06/23
DATE:	19 June 2023

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EXECUTIVE SUMMARY

Sharples Environmental Services CC has been appointed by Confuel (Pty) Ltd to oversee the Environmental Processes for the proposed truck stop and associated infrastructure located on Erven 56 and 57 in Mossdustria, Mossel Bay Local Municipality, Garden Route District Municipality. The proposed development will be approximately 1.8 ha in extent and will be located on properties zoned as Industrial Zone II under the Mossel Bay Municipal Land Use Scheme.

The proposed development will be equipped with a services building, a canopied filling area (including several filling islands), parking areas (that will be able to accommodate double- and single-wagoned trucks), an aboveground tank farm (diesel) with observation wells, site access, fencing and services connections (water, sewer and electricity infrastructure).

The proposed development will aim to service clients only registered with the Applicant's client network. Therefore, only companies and associated drivers registered with the Applicants management network will be granted access to the proposed facilities. The facilities will not be open access, in other words, no uncontrolled off-the-street access will be permitted. The facilities will not be available for use by regular light motor vehicles. The only access by such vehicles will be into the administrative area of the proposed development.

Strict security measures will be in place toward safeguarding not only the proposed facilities (infrastructure, administrative team and all clients), but also the surrounding area. The security measures include, but are not limited to:

- The stationing of two (2) rotating security offers (2 per shift) patrolling the site;
- Strict access control of the site – The site will operate a customer code system where the only exclusion to this is when approval from the facilities management team is obtained.
- Customers that do not have an account code will park one side (inside premises) and report to the admin office to sign up as a client, only then is a driver allowed near the pumps and resting facilities.
- The proposed premises will not be allowed to be used as a storage facility. Therefore, truck horses will not be allowed to leave the premises without their trailer and approval needs to be obtained by management if alternative arrangements were made.
- No vehicle will be allowed to park within the premises if not approved by management. This includes a meticulous recordkeeping strategy of all admin staff and registered customers.
- No more than three (3) people may occupy a vehicle entering the site.
- No over-nighting by females and children (when accompanying a truck driver) will be allowed. Further management measures of access by females and children have been provided in the Basic Assessment Report.
- Female truck drivers using the facilities will also be treated in such a manner so as to prevent harm to them and their vehicles.
- No visitors for truck drivers will be received at the facilities.
- Amongst other measures, no alcohol will be allowed on site or with truck drivers in their trucks.

Additional security measures have been presented in greater detail as part of the Basic Assessment Report.

An application for Environmental Authorisation will be lodged with the Western Cape Department of Environmental Affairs and Development Planning in terms of the Environmental Impact Assessment Regulations of 2014, as amended (Government Notice Regulation 326 of 2017)

promulgated in terms of the National Environmental Management Act of 1998 (Act No. 107 of 1998) (NEMA).

Authorisation will be applied for the following listed activities triggered under the EIA Regulations:

- Government Notice Regulation 327: 14 and 27
- Government Notice Regulation 324: 2 and 12

Based on the above, in terms of Regulation 15(2)(a) of the EIA Regulations of 2014, as amended, a Basic Assessment process is being be followed for the purpose of gaining Environmental Authorisation for the proposed project for activities triggered in terms of a Notice issued in terms of Section 24D of the NEMA. The process for obtaining Environmental Authorisation has been illustrated in the Figure below. This visualisation has been compiled in line with regulations 19, 20 and 25 of the EIA Regulations of 2014, as amended, as well as the requirements of the Western Cape Department of Environmental Affairs and Development Planning. The current stage of the process has been marked in Red. Due to the comprehensive Public Participation Process conducted by the Town Planner appointed for the project, a pre-application public participation process was not undertaken for the proposed development.

The Basic Assessment Report has been compiled in accordance with the requirements of Appendix 1 of the EIA Regulations of 2014, as amended.

As per Regulation 40 in terms of the EIA Regulations of 2017, as amended, a Public Participation Process is required to be followed for any project for which Environmental Authorisation is being applied for. Regulation 41 details the minimum requirements for any Public Participation Process. A comprehensive description of the Public Participation procedures undertaken for the proposed development has been provided in Section F of the Basic Assessment Report.

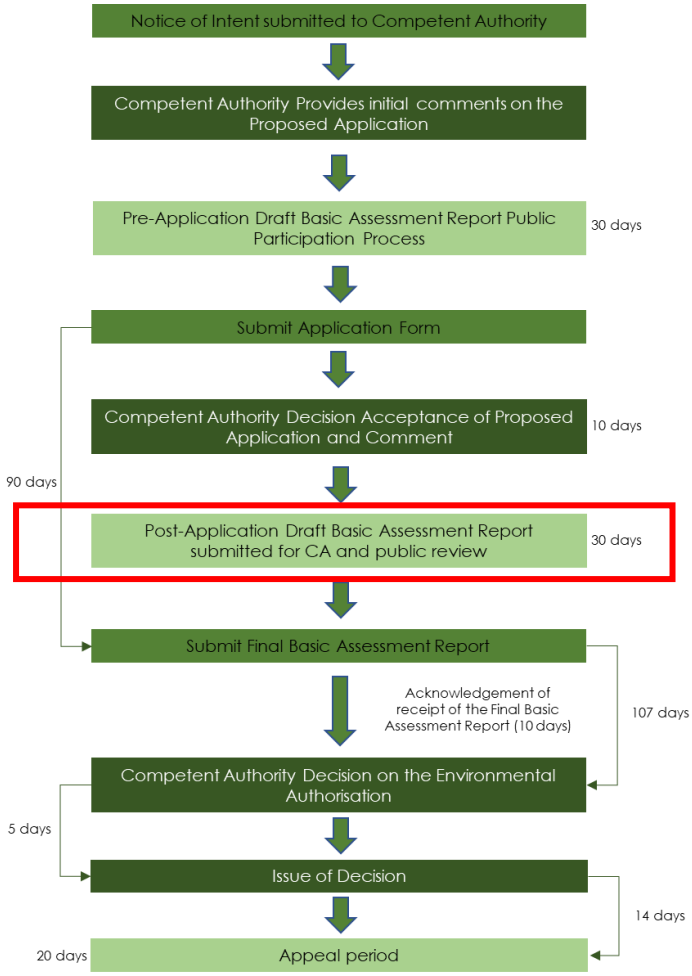


Figure 1. Summary of the Environmental Assessment Process (In the form of a Basic Assessment) followed for the purpose of obtaining Environmental Authorisation for the proposed project.

Based on the findings of the Screening Tool Report generated from the Department of Forestry, Fisheries and Environment's web-based tool, several sensitive features and subsequent specialist reports were identified to be conducted. However, following the sensitivity verification site visit conducted by both the Environmental Assessment Practitioner (Betsy Ditcham: 13 October 2022) and the various appointed specialists, it was found that only selected specialist studies would be required. For the purpose of evaluating the impacts of the proposed project on the receiving environment, the following specialists were appointed to evaluate the sensitivity of the site based on a variety of themes:

- Agricultural Compliance Statement – Johann Lanz
- Heritage and Palaeontological Evaluation and Notice of Intent to Develop – ASHA Consulting (Pty) Ltd (Jayson Orton and Elize Butler).
- Aquatic Biodiversity Compliance Statement – Confluent Consulting (James Dabrowski).
- Terrestrial Biodiversity and Plant Species Assessment – Confluent Consulting (Bianke Fouche).
- Animal Species Compliance Statement – Cossypha Ecological (Robyn Phillips).
- Traffic Impact Motivation letter – Element Consulting Engineers
- Geotechnical and Geohydrological Report – Terra GeoTechnical

Herewith a summary of the appointed specialists' findings:

Specialist Company	Specialist Details	Sensitivity of receptors	Summary of findings
HERITAGE AND PALAEONTOLOGICAL OBSERVATIONS			
ASHA Consulting (Pty) Ltd	Jayson Orton (Heritage Consultant) Barry Millsteed (Palaeontological Consultant	Negligible	**Archaeological and Cultural Heritage Theme** From a cultural heritage and landscape perspective, based on the nature of the proposed project and the nature of the receiving environment of the proposed development. **No heritage resources of significance were identified within the site.**
		Negligible	**Palaeontological Theme** According to the SAHRIS Palaeosensitivity map as being of high sensitivity. Based on the findings of the appointed specialist, through the assistance of the geotechnical report, it was determined that the soil profile is in excess of 1m deep across the entire site and that the soil consists of an anthropogenic horizon at the top, followed by a clay horizon and then a residuum composed of weathered sandstone cobbles and sand and clay. These deposits are suggested to have **no palaeontological potential**. It is evident that sensitive bedrock is much deeper then any depth that will be penetrated by the proposed development (especially since the tank farm will be stationed above ground) and that impacts to fossils will thus not occur.
AQUATIC BIODIVERSITY ASSESSMENT			
Confluent Consulting (Pty) Ltd	James Dabrowski	Negligible	**Aquatic Biodiversity Theme** According to the findings of the aquatic biodiversity specialist, no watercourses (drainage lines/wetlands) were identified on the proposed development site. A small depression was noted on site during the site visit, however the specialist noted that this feature is not considered a wetland, rather it would be a feature that had been developed as a result of the recent clearance of the site, including the rainfall events that occurred prior to the site visit conducted by the specialist, has led to the formation of the feature on site. A drainage line was observed approximately 250m east of the proposed development site. This feature was identified as a wetland by both the NFEPA and the National Wetland Map-5 mapping regime. This was confirmed to not be a wetland by the specialist. Therefore, **the proposed site is not located within any watercourses** (as defined by the NWA (Act 36 of 1998), or within the regulatory area as defined by GN 509 of 2016 promulgated in terms of the NWA (Act 36 of 1998).
TERRESTRIAL BIODIVERSITY AND PLANT SPECIES ASSESSMENT			
Confluent Consulting (Pty) Ltd	Bianke Fouche	Low	**Terrestrial Biodiversity Theme** The proposed development area is located within the North Langeberg Sandstone Fynbos. This ecosystem type is not an ecosystem which requires to be protected in terms of the Revised National List of Ecosystems which are Threatened and in Need of Protection promulgated under the National Environmental Management: Biodiversity Act (Act 10 of 2004). The site has been described as part of the Critical Biodiversity Area and Other Natural Areas regime in terms of the Western Cape Spatial Biodiversity Plan (2017). However, based on the transformed nature of the site Erven 56 and 57 do not meet the definition for being considered CBA1 areas, as the vegetation on the site is not in a natural condition, and it is not feasible or practical to use these properties to contribute towards the biodiversity targets of the Western Cape. Based on the condition of the vegetation on site, the sensitivity of the site to re-infestation by alien invasive species, and the location of the site (being in an industrial area), **the Site Ecological Importance (SEI) was determined to be Low, with the fringes of the site determined as Very Low**, as these areas are more prone to infestation by alien invasive plant species.

Specialist Company	Specialist Details	Sensitivity of receptors	Summary of findings
		Very High	**Plant Species Theme** During the site visit only **one** Species of Conservation Concern (SCC) was noted, *Hermannia lavandulifolia*. The establishment of this species' dispersal in the proposed development site follows the site clearance event that took place in 2022. The specialist noted that the this species is one of six species with a likelihood of occurrence in the area. In total, 67 plant species, including the SCC and the alien invasive species, were noted on site during the site visit conducted on the 15th of March 2023. The following alien invasive species of specific concern (due to their Category 1b status in terms of the NEMBA) were found on site: *Cirsium vulgare, Echium plantagineum, Acacia cyclops, Acacia saligna, Cenchrus clandestinus, Datura stramonium and Verbena bonariensis.* The specialist indicated that a permit from CapeNature would be required for impacting on the *Hermannia lavandulifolia* specimens on site. Additionally, an Alien Invasive Species Management Plan must be in place prior to the commencement of the proposed works, if approved.
AGRICULTURAL COMPLIANCE STATEMENT			
Johann Lanz	Johann Lanz	Very Low	**Agricultural Theme** An agricultural impact is a change to the future agricultural production potential of land. The significance of the agricultural impact is directly proportional to the extent of the change in production potential. In this case, the site is non-agricultural land within an industrial area . The development will cause **no loss of agricultural production potential**. and the development will not therefore result in any change to that potential.
ANIMAL SPECIES COMPLIANCE STATEMENT			
Cossypha Ecological	Robyn Phillips	Low	**Animal Species Theme** The site is mostly comprised of patches of bare ground and secondary patchy vegetation, scattered with common indigenous and alien grasses and shrubs. Faunal activity on the site was very low with only common and generalist birds and small mammals recorded. Some of the species recorded on the site included Barn Swallow *Hirundo rustica*, Karoo Prinia *Prinia maculosa*, Cape Bulbul *Pycnonotus capensis*, and Common Mole-Rat *Cryptomys hottentotus*. **No faunal SCC were recorded during the site surveys.**
GEOTECHNICAL AND GEOHYDROLOGICAL ASSESSMENT			
Terra GeoTechnical	Eugene van der Walt	Low	**Geotechnical** During the geotechnical investigation undertaken for the site, it was found that no problems were foreseen for the shallow foundations and deep service trenches up to 2m below ground level. During the investigations, no rock – and/or pedocrete outcrops were encountered. Additionally, no groundwater seepage was encountered. However, pedogenic material (calcified material) was identified across the site, indicating the occurrence of a fluctuating water table or soil moisture evaporation. The sidewalls of the test pits generally remained stable for at least 1 hour. Based on the laboratory testing done, it was found that the clayey alluvium and the reworked residual sandstone, found on site is potentially expansive, and both were deemed moderately compressible. Both material classified as worse than G9-type materials according to the COLTO Classification system and has since not been recommended for any design layer works under foundations or roads.
		Low	**Geohydrological**

Specialist Company	Specialist Details	Sensitivity of receptors	Summary of findings
			According to the inputs received from the Geotechnical Investigations Report, two boreholes were used to evaluate the groundwater resource within proximity to the proposed development. These boreholes are located within 2.5 km of the proposed development footprint, with only one located within 1 km (925 m) from the development site. • Samples were taken of groundwater abstracted from both boreholes (i.e.: downstream and upstream of the proposed development) and submitted to the relevant water laboratories for testing. The samples were taken directly from the discharge pipe, and thus represents the water being utilized from these boreholes. The following results were obtained: o **Borehole GZ00190 (Borehole 1)** ▪ The water is deemed of Dangerous quality with regard to the South African drinking water standards. This is due to the high Chloride value of 1205 mg/l. The water also exhibits high Electrical Conductivity and Sodium counts. o **Borehole GZ00189 (Borehole 2)** ▪ The water is deemed of Marginal quality with regard to the South African drinking water standards. This is due to the moderate Chloride value of 336 mg/l.
TRAFFIC IMPACT STATEMENT			
HC Lourens	Robyn Phillips	Negligible	**<u>Traffic Impact</u>** The following observations were made by the specialist: • The site distances at the access point onto Mkuze Street are excellent in both direction in terms of horizontal and vertical alignments. • Existing traffic volumes are very low and below the expectation for the existing industrial uses in vicinity to the proposed development site. • Based on the fact that the Mossdustria complex has been relatively developed to capacity, the long-term traffic growth is low (<1%) and will eventually reach zero in the long-term. • All trips will be distributed to the N2. • No mitigation measures or road upgrades are required from a capacity or geometrical design perspective. • **The proposed development will have a negligible impact on the capacity and Level of Service (LOS) of the adjacent road network during either the morning or afternoon peak hours.**

Based on the assessments done for the proposed development, the project will have a cumulatively low impact on the receiving environment AFTER mitigation. A summary of the impacts identified have been provided in the table below:

Impact	Nature	Significance Without Mitigation	Significance with mitigation
Pre-construction / Planning Phase			
Compliance with Legislative Requirements	Negative	Low	No significance
Site establishment and pre-construction activities	Negative	Medium-High	Low
Construction Phase			
Aquatic Resources: Impact on Aquatic Resources	Negative	No significance	No significance
Agricultural Resources: Impact on Agricultural Resources	Negative	Very Low	Very Low
Botanical Resources: Habitat loss and degradation	Negative	Medium-High	Medium
Botanical Resources: Impact of construction on SCC	Negative	Medium-High	Low
Botanical Resources: Construction vehicles on sensitive habitat surrounding the development site	Negative	Medium	Low
Animal Species theme: Impact on faunal SCCs	Negative	Low	No significance
Heritage and Palaeontological Resources: Potential impact	Negative	No significance	No significance
Pollution management: Pollution of hydrocarbons due to spills and leaks	Negative	Low	Low
Visual: Noise, dust, light and general housekeeping	Negative	High	Low
Road safety: Road traffic impacts as a result of the construction works	Negative	Medium-High	No significance
Socio-economic impact: Employment opportunities created	Positive	High	High
Post-Construction / Operational Phase			
Botanical Resource: Impact on Terrestrial Biodiversity	Negative	Low	No significance
Nuisance and pollution management: Dust, noise and visual impacts	Negative	Low	No significance
Health and Safety: Increased vulnerability of the area to fire	Negative	Medium	Low
Groundwater Resources: Impact on groundwater as a result of on-site activities	Negative	Low	No significance
Traffic Impact: Increased traffic leading into Mossdustria	Negative	No significance	No significance
Socio-economic impact: Impact on the surrounding properties	Negative	Medium-High	Low
Socio-economic impact: Provision of safe trucking facilities to the logistics sector	Positive	Very High	Very High
Socio-economic impact: Employment opportunities created	Positive	Medium-High	Medium-High

During the construction phase of the proposed development, the most notable negative impacts will be the impact on the botanical resources of the site (both the terrestrial biodiversity impacts and the impact on species of conservation concern), the visual impacts of the proposed construction works and the road safety impacts resulting from the construction vehicles accessing the site. The most notable negative impacts of the operational phase of the proposed development will be the impact of increased vulnerability of the area due to the increased fire risk and the impact on the proposed activities on the surrounding properties. As indicated above, all negative impacts can be mitigated to have negligible to low significance.

The motivation for the proposed development is deeply rooted in the positive socio-economic impacts that these facilities would have on not only a local scale (during construction phase), but also on a regional scale. As there is a desperate need for a well-managed formalised truck stop that is located away from any residential areas, that is easily accessible by truckers and can be used by both male and female truckers.

Based on the anticipated impacts of the proposed project on the receiving environments (biophysical and socio-economic), it is the opinion of the Environmental Assessment Practitioner that the Environmental Authorisation for the proposed development should be grated with the condition that all mitigation measures proposed in the Environmental Management Programme submitted as part of this Basic Assessment Report be complied with.

UITVOERENDE OPSOMMING

Sharples Environmental Services CC was deur Confuel (Pty) Ltd aangestel om die Omgewingsbestuur prosesse vir die voorgestelde trokstop en geassossieerde infrastruktuur op Erwe 56 en 57 in Mossdustria, Mosselbaai Plaaslike Munisipaliteit, Garden Route Distrik Munisipaliteit, te ondergaan. Die voorgestelde ontwikkeling sal ongeveer 1.8 ha in grote wees en sal op eiendomme geleë wees wat as Industriële Sone II gesoneer is onder die Mosselbaai Munisipale Landsverbruikers Skema.

Die voorgestelde ontwikkeling sal met 'n dienste gebou, 'n beskutde vul area (wat menigvuldigde vuleilande sal behuis), parkeer areas (wat dubbel en enkel wa trokke kan akkomodeer), 'n bogrondse tank plaas (diesel) met obserwasie gate, toegang tot die perseel, 'n heining en dienste konneksies (water, riool en elektrisiteit).

Die voorgestelde ontwikkeling sal beoog om slegs kliënte te diens wat met die Aansoeker se kliëte basis geregistreer is. Dus, slegs maatskappye en geassossieërde bestuurders wat geregistreer is met die Aansoeker se bestuurdernetwerk sal toegang gebied word tot die voorgestelde perseel. Die toegang tot die fasiliteite sal nie vrylik toeganklik wees nie, met ander woorde, geen onbeheerde toegang sal toegelaat word nie. Die fasiliteite sal nie beskikbaar wees vir gebruik deur gewone lig motor voertuie nie. Toegang deur die tipe voertuie sal sleg gebied word in die administratiewe area van die voorgestelde ontwikkeling (deur 'n afsonderlike toegangspunt).

Streng sekuriteitsmaatreëls sal in plek gesit word om nie net die infrastruktuur, admistratiewe span en die kliënte te beskerm nie, maar ook die area direk rondom die fasiliteite. Die sekuriteits maatreëls sluit die, maar is nie beperk deur, volgende maatreëls in:

- Die stasionering van twee (2) roterende sekuriteitsbeamptes (2 per skof) wat die terrein sal patrolleer.
- Streng toegangsbeheer sal toegepas word op terrein – Die terrein sal geoppereer word deur 'n kliënt-kode sisteem waar die enigste uitsondering hierop sal wees as toestemming van die fasiliteitsbestuursspan verkry word.
- Kliënte wat nie 'n rekening kode het nie sal instruksie kry om aan die een kant te parkeer (binne-in die perseel) en moet direk aan die administratiewe kantoor raporteer om as kliënt op te teken. Slegs dan sal die bestuurder toegelaat word om naby die pompe en rusfasiliteite te kom.
- Dit sal nie geduld word om die voorgestelde persele as 'n stoor fasiliet te benut nie. Dus, vragmotor perde sal nie toegelaat word om die perseel te verlaat sonder hulle sleepwaens nie. Indien dit nodig sou wees, moet toestemming verkry word deur bestuur.
- Geen voertuig sal toegelaat word om in die perseel te parkeer sonder toestemming van die fasiliteitsbestuur nie. Dit sluit personeel en geregstreerde kliënte in.
- Nie meer as drie (3) mense mag in voertuig wees wanneer die voertuig die fasiliteite binnetree nie.
- Geen vroue of kinders (wat 'n trokdrywer vergesel) mag oornag nie. Verder bestuursmetodes van vroue en kinders is in die Basiese Assesseeringsverslag beskryf.
- Vroue trokdrywers wat van die fasiliteite gebruik maak sal ook in so manier hanteer word dat hulle en hulle voertuie se veiligheid bewaar kan word.
- Geen besoekers vir trokdrywers sal ontvang word by die fasiliteite nie.
- Onder ander bestuursmaatreëls, sal geen alkoholiese verversings toegelaat word in die perseel, of in die trokke saam met die drywers nie.

Meer besonderhede rondom die sekuriteitsmaatreëls is in uitgelê in die verslag.

'n Aansoek om Omgewingsgoedkeuring te verkry sal ingedien word by die Weskaap se Departement van Omgewingsake en Ontwikkelingsbeplanning in terme van die

Omgewingsimpakbeoordelings Regulasies van 2014, soos aangepas (Regeringskennisgewing Regulasie 326 van 2017) wat in terme van die Nasionale Omgewingsbestuurswet van 1998 (Wet no. 107 van 1998) gepromulgeer is. Die goedkeuring sal voor aansoek gedoen word vir die volgende gelysde aktiwiteite In terme van die Omgewingsimpakbeoordelings Regulasies:

- Regeringskennisgewing Regulasie 327: 14 and 27
- Regeringskennisgewing Regulasie 324: 2 and 12

Gebasseer op die begenoemde, in terme van Regulasie 15(2)(a) van die OIB Regulasies van 2014, soos aangepas, word 'n Basiese Assesseringsproses gevolg vir die doeleinde om Omgewingsgoedkeuring vir die gelyste aktiwiteite (in terme van Seksie 24D van die NOBW) wat geaktiveer sal, te verkry. Die proses wat gevolg sal word om die Omgewingsgoedkeuring te verkry is in die figuur aangetoon wat hieronder uitgebeeld word. Die uitbeelding is in lyn met Regulasies 19, 20 en 25 van die OIB Regulasies van 2014, soos aangepas saamgestel en dit neem ook die vereistes van die Weskaapse Departement van Omgewingsake en Ontwikkelingsbeplanning in ag. Die fase waaring die projek tans is, is met Rooi gemerk. Asgevolg van die deeglike manier waarin die Stadsbeplanners hulle Publieke deelname proses gehardloop het, sal 'n publieke deelname proses nie gedoen word voordat die aansoek geloodts word nie.

Die Basiese assesseringsverslag is saamgestel in lyn met die vereistes van Bylaag 1 van die OIB Regulasies van 2014, soos aangepas.

In terme van Regulasie 40 van die OIB Regulasies van 2014, soos aangepas, word 'n Publieke Deelname Proses verlang vir enige projek waarvoor daar aansoek om Omgewingsgoedkeuring te verkry benodig. Regulasie 41 beskryf die minimum vereistes van enige Publieke Deelname Proses. 'n Alomvatende beskrywing van die Publieke deelname prosedures wat gevolg is vir die voorgestelde ontwikkeling is in Seksie F van die Basiese Assesseringsverslag gedetailleer.

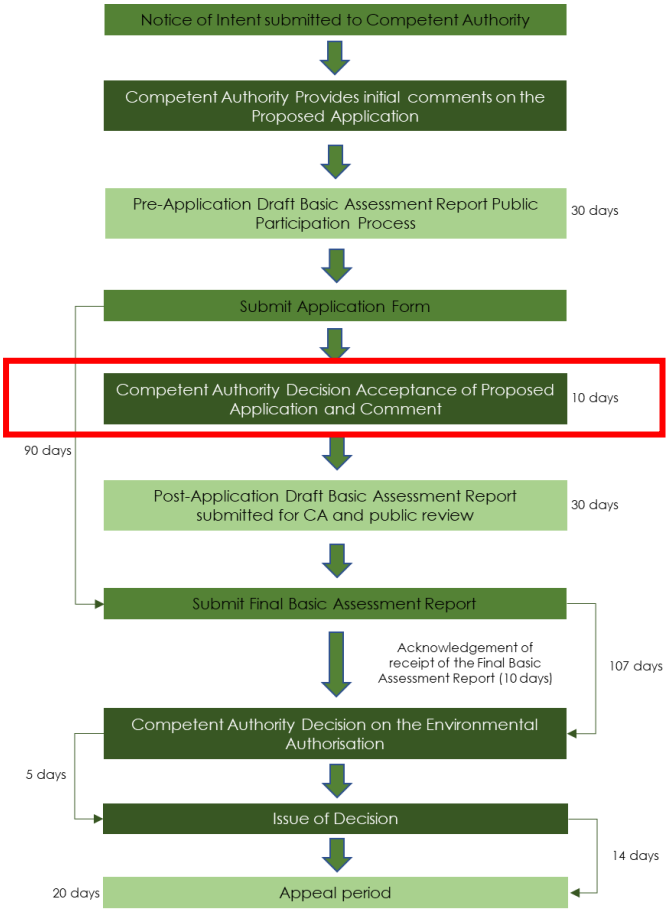


Figure 2. Opsomming van die Omgewings Assesseringsproses (in die vorm van 'n Basiese Assessering) wat gevolg sal word ter verkryging van die Omgewingsgoedkeuring vir die voorgestelde projek.

Gebasseer op die bevindinge van die Siftingsinstrumentverslag wat deur die Nasionale Departement van Bosbou, Visserye en Omgewing (DFFE) se web-gebaseerde instrument verkry is, is daar vele sensitiewe kenmerke opgetel, elk met hulle eie vereistes in terme van verslaglewering. Alhoewel, gebasseer op die uitkoms van die sensitiwiteit verifikasie terrein besoek wat deur beide die Omgewingsassesseringspraktisyn (Betsy Ditcham: 13 Oktober 2022) en die verskeie aangestelde spesialiste ondergaan is, is dit gevind dat slegs sekere spesialiste studies benodig sal word. Vir die doeleindes om die impakte van die voorgestelde projek op die omgewing te assesseer, is die volgende spesialiste aangestel gebasseer op hulle velde van kundigheid:

- Landbou voldoeningsverklaring – Johann Lanz
- Erfenis- en paleontologiese evaluering en kennisgewing van voorneme om te ontwikkel – ASHA Consulting (Pty) Ltd (Jayson Orton and Barry Millsteed)
- Akwatiese Biodiversiteitsassessering – Confluent Consulting (James Dabrowski).
- Terrestriële Biodiversiteit en Plant Spesies Assessering and Plant Species Assessment – Confluent Consulting (Bianke Fouche).
- Diere Spesies voldoeningsverklaring– Cossypha Ecological (Robyn Phillips).
- Verkeersimpak Motiveringsbrief – Element Consulting Engineers.
- Geoteginiese insette (insluitend Geohidrologiese bevindinge) – Terra GeoTechnical.

Hiermee 'n opsomming van die bevindinge van die bogenoemde spesialiste se ondersoeke:

Specialist Company	Specialist Details	Sensitivity of receptors	Summary of findings
HERITAGE AND PALAEONTOLOGICAL OBSERVATIONS			
ASHA Consulting (Pty) Ltd	Jayson Orton (Heritage Consultant) Barry Millsteed (Palaeontological Consultant	Onbeduidend	**Argeologiese en Kulturele Tema** Vanaf ;n kulturele en landskapsensitiviteits perspektief, gebasseer op die aard van die voorgestelde projek, en die aard van die ontvangende omgewing van die voorgestelde ontwikkeling, is daar geen impak op die erfenis hulpbronne van die area nie. Dus geen erfenis hulp[bronne van belang was tydens die veldwerk op terrein gevind nie.
		Onbeduidend	**Palaeontogiese Tema** Vogens die SAHRIS palaeosensitiwiteitskaart word die terrein a hoogsensitief bekou. Gebasseer op die bevindinge van die specialis, met hulp van die geotegniese insette op die terrein, was dit bepaal dat die grond profile van die terrein meer as 1m diep lê regoor die ontwikkelingseindom. Die grond profile bestaan uit 'n antropogeniese horison wat die boonste lag saamstel, wat boop 'n kleihorison lê, wat bo-op 'n samestelling van verweerde sandsteen grondlaag le wat uit verweerde sandsteen klippies, sand en klei bestaan. Die **afsettings is nie bekend om palaeontologiese potensiale te dra nie**. Dit is skynbaar dat die sensitiewe kliplae heelwat dieper as die vermoede diepte van die voorgestelde infrastruktuur sal wees (omrede die tankplaas bogrond geposisioneer sal word) en dus sal daar nie enige impak as gevolg van die voorgestelde ontwikkeling op die fossile in die onderliggende kliplae wees nie.
AQUATIC BIODIVERSITY ASSESSMENT			
Confluent Consulting (Pty) Ltd	James Dabrowski	Onbeduidend	**Akwatiese Biodiversiteit Tema** Volgens die bevindinge van die akwatiese biodiversiteitspesialis, is daar geen waterlope (dreinerings kanale/vleilande) binne die perke van die voorgestelde ontwikkelingsterrein gevind nie. 'n Klein depressive was opgemerk op terrein, maar dit was ook deur die specialis gemerk dat die kenmerk nie as 'n vleiland beskou word nie. Dit word liewer as 'n kenmerk wat asgevolg van die skoonmaak van die terrein en onglangse reënweer wat voor die terreinbesoek plasgevind het, ontwikkel het. 'n Dreineringslyn was tydens die terrein besoek geidentifiseer. Die waterloop is ongeveer 250m oos van die voorgestelde ontwikkelings terrein. Die kenmerk is as 'n vleiland gemerk deur beide die NFEPA en die Nasionale Vleiland Kaart-5 gemerk. Die spesialis het bevestig dat die nie 'n vleiland is nie, maar wel 'n dreinerings lyn. Dus, **die voorgestelde terrein is nie binne enige waterlope** (soos deur die Nasionale Water Wet (Wet No. 36 van 1998) gekenmerk nie. Dit lê ook nie binne die regulasie area van enige waterlope, soos gedefinieer deur GN 509 van 2016 (soos gepromulgeer in term van die NWW (Wet 36 van 1998), nie.
TERRESTRIAL BIODIVERSITY AND PLANT SPECIES ASSESSMENT			
Confluent Consulting (Pty) Ltd	Bianke Fouche	Laag	**Terrestriële Biodiversiteit Tema** Die voorgestelde ontwikkelingsarea is geleë binne die Noord Langeberg Sandsteen fynbos ekosisteem. Die ekosisteem is nie 'n gelyste ekosisteem in terme van die Gehersiende Nasionale Lys van Ekosisteme wat Bedreig is en in nood van beskerming is wat in terme van die Nasionale Omgewingsbestuur: Biodiversiteitswet (Wet 10 van 2004), gepromulgeer is. In terme van die Weskaapse Biodiversiteits Ruimte Plan (2017) is die terrein is as 'n Kritiese Biodiversiteitsarea en Ander Natuurlike Areas beskryf, alhoewel, gebasseer op die getransformeerde natuur van die terrein, beryk Erwe 56 en 57 nie die definisie van die beskrywing van die CBA (KBA) areas nie. Dit is omdat die plantegroei op terrein nie in 'n natuurlike toestand is nie. Dit is dus nie prakties or redelik om die eiendomme tot die standaard te hou nie, omdat hulle nie kan bedrae lewer tot die biodiversiteitsdoelwitte van die Weskaap nie.

Specialist Company	Specialist Details	Sensitivity of receptors	Summary of findings
			Gebasseer op die kondisie van die plantegroei op terrein, die kwesbaarheid van die terrein om deur indringer spesies oorheers te word en die posisionering van die terrein (met die dat die voorgestelde in die middle van 'n industriële area geleë is), word die **Terrein Ekologiese Belangrikheid as Laag beskou, met die randte daarvan as baie laag beskou,** spesifiek omdat die areas die meeste kwesbaarheid toon vir indringer spesies.
		Baie Hoog	**Plant Species Theme** Tydens die terrein besoek is daar een spesie van beskermingswaarde op terrein gemerk, *Hermannia lavandulifolia*. Die vestiging van die spesies volg die terrein skoonmaak gebeurtenis wat in 2022 plaasgevind het. Soos gemerk deur die spesialis, is die spesie die enigste spesie (uit 'n beskermingsoogpunt) wat op terrein gemerk is. Die spesiaalis het wel vyf ander spesies van beskermingswaarde, wat in die omliggende Mossdustria area voorkom, uitgelig. In totaal is 67 plant spesies, insluitend die spesie van beskermingswaarde en die indringer plant spesies, op terrein gevind tydens die terreinbesoek wat op die 15de Maart 2023 plaasgevind het. Die volgende indringer spesies van belang (gelyste spesies wat as NEM:BA kategorie 1b geklassifiseer is) is op terrein gevind: *Cirsium vulgare, Echium plantagineum, Acacia cyclops, Acacia saligna, Cenchrus clandestinus, Datura stramonium en Verbena bonariensis.* Die spesialis het aangedui dat 'n permit moet verkry word vanaf CapeNature, en 'n Indringer Spesie beheersplan moet in plek gestel moet word vir die terrein.
AGRICULTURAL COMPLIANCE STATEMENT			
Johann Lanz	Johann Lanz	Baie Laag	**Landbou Tema** 'n Landbou impak sien 'n verandering aan die toekomstige landbou produksie potensiaal van grond. Die drakrag van die landbou impak is direk proporsioneel aan die area van die verandering van produksie potensiaal. In die geval word die terrein nie gebruik vir landbou doeleindes nie,. Dus sal die voorgestelde ontwikkeling **geen verlies op die landbou produksie Potensiaal hê nie.**
ANIMAL SPECIES COMPLIANCE STATEMENT			
Cossypha Ecological	Robyn Phillips	Laag	**Diere Spesies Tema** Die terrein bestaan meestal uit skoon areas met sekondêre plantegroei tussendeur wat bestaan uit algemene inheemse en indringer grasses en struike. Uit 'n dier species perspektief was die teenwoordigheid van diere spesies baie laag gewees met slegs algemen voëls en klein soogdiere wat gemerk is tydens die terreinbesoek. Die spesies sluit in die skuur swaeltjie (*Hirundo rustica*), die Karoo Prinja (*Prinia maculosa*), die Kaapse Bulbul (*Pycnonotus capensis*) en die Algemene Mol-rot (*Cryptomys hottentotus)*. **Geen diere spesies van bewaarsbelang os tydens die terrein besoek gemerk nie.**
GEOTECHNICAL AND GEOHYDROLOGICAL ASSESSMENT			
Terra GeoTechnical	Eugene van der Walt	Laag	**Geotegnies** Tydens die geotegniese ondersoek wat vir die terrein ondergaan is, is dit bepaal dat daar geen probleme voorsien word vir vlak fondasie en diep dienste slote tot en met 2m onder die grondvlak nie. Gedurende die ondersoek was daar geen kliplae of geopenbaarde pedocrete teëgekom nie. Geen grondwater deurslag is gemerk nie. Alhowevel, pedogeniese material (gekalsifiseerde material) was gemerk in al die toetsgate wat gemaak is. Dit dui aan dat daar 'n fluktureerende watertafel

Specialist Company	Specialist Details	Sensitivity of receptors	Summary of findings
			is of heelwat grondvogtigheid verdamping plaasvind. Die symure van die toetsgatte het in die algemeen vir 'n uur stabiel gebly. Die grond profile bestaan uit 'n antropogeniese horison wat die boonste lag saamstel, wat boop 'n kleihorison lê, wat bo-op 'n samestelling van verweerde sandsteen grondlaag le wat uit verweerde sandsteen klippies, sand en klei bestaan.. Gebaseer op die labrotoriese toetse wat gedoen is, is dit gevind dat die kleilaag en die verweerde sandsteen beide 'n uitbreidingspotensiaal het, en beide was as matiglik saamdrukbaar beskou. Beide materiaal tipes was geklassifiseer as erger as 'n G9-tipe material volgens die COLTO Klassifikasie siteem en word nie aanbeveel om gebruik te word tydens enige laewerk onder fondasies of padwerke nie.
		Laag	**<u>Geohidrologies</u>** Twee boorgate was gebruik om die grondwater hulpbron te evalueer wat binne ryk van die voorgestelde ontwikkeling is. Die boorgate is beide geleë binne 2.5 km vanaf die voorgestelde ontwikkelingsterrein, met slegs een wat binne 1 km van die ontwikkelingsterrein geleë is. Monsters van die grondwater is uit beide boorgate geneem (i.e. stroomop en stroomaf van die voorgestelde ontwikkeling. Die volgende resultate is gevolglik gekry: • Boorgat GZ00190 (Boorgat 1): o Die water kwaliteit word as gevaarlik beskou in terme van die Suid Afrikaanse drink standaarde. Dit is asgevolg van die hoë chloriede waarde van die water (1205mg/l). Die water het ook 'n hoë elektriese geleidingsvermoë en hoë natrium telings. • Boorgat GZ00189 (Boorgat 2) o Die water kwaliteit word as matig beskou in terme van die Suid Afrikaanse drink standaarde en het 'n matige chloriede waarde van die water (336mg/l).
TRAFFIC IMPACT STATEMENT			
Element Consulting Engineers	Robyn Phillips	Onbeduidend	**<u>Verkeersimpak</u>** Die volgende observasies is deur die spesialis gemaak: • Die sigbaarheidsafstande vanaf die toegangspunt op Mkuza Straat is uitstekend in beide rigtings in terme van horisontale en vertikale liggings. • Bestaande verkeersvolumes is laag en onder verwagtinge vir'n bastaande industriële gebied. • Gebasseer op die bogenoemde, en die feit dat Mossdustria is al relatief tot kapasiteit toe ontwikkel is, word dit vermoed dat die lang-termyn verkeersgroei laag sal wees (<1%). Dit sal uiteindelik nul beryk. • Na aanleiding van die projek plan, sal alle reise die N2 benut. • Geen versagtingsmaatreëls of opgraderings van die pad word verlang vanaf 'n kapasiteits en geometriese ontwerps perspektief nie. • **Die voorgestelde ontwikkeling sal 'n onbeduidende impak op die kapasiteit en die Vlak van Dienslewering hê op die aangrensende padnetwerk tydens die oggend en middag spits ure.**

Gebasseer op die assesserings wat vir die voorgestelde ontwikkeling gedoen is, sal die projek 'n kumulatiewe lag impak op die omgewing hê NADAT versagtingsmaatreëls toegepas was. 'n Omsomming van die impakte wat geidentifiseer is is in die onderstaande table verskaf:

Impak	Natuur	Significance Without Mitigation	Significance with mitigation
Voor konstruksie / Beplanningsfase			
Voldoening aan wetgewende vereistes	Negatief	Laag	Onbeduidend
Terreinvestiging en pre-konstruksie aktiwiteite	Negatief	Medium-Hoog	Laag
Konstruksie fase			
Akwatiese Hulpbronne: Impak op Akwatiese Hulpbronne	Negatief	Onbeduidend	Onbeduidend
Landbouhulpbronne: Impak op Landbouhulpbronne	Negatief	Baie Laag	Baie Laag
Botaniese Hulpbronne: Habitatverlies en agteruitgang	Negatief	Medium-Hoog	Medium
Botaniese Hulpbronne: Impak van konstruksie op SCC	Negatief	Medium-Hoog	Laag
Botaniese hulpbronne: Konstruksievoertuie op sensitiewe habitat rondom die ontwikkelingsterrein	Negatief	Medium	Laag
Dierespesies tema: Impak op fauna SCC's	Negatief	Laag	Onbeduidend
Erfenis en Paleontologiese Hulpbronne: Potensiële impak	Negatief	Onbeduidend	Onbeduidend
Besoedelingsbestuur: Besoedeling van koolwaterstowwe as gevolg van stortings en lekkasies	Negatief	Laag	Laag
Visueel: Geraas, stof, lig en algemene huishouding	Negatief	High	Laag
Padveiligheid: Padverkeer impakte as gevolg van die konstruksiewerke	Negatief	Medium-Hoog	Onbeduidend
Sosio-ekonomiese impak: Werksgeleenthede geskep	Positief	Hoog	Hoog
Na Konstruksie / Operasionele fase			
Botaniese hulpbron: impak op aardse biodiversiteit	Negatief	Laag	Onbeduidend
Oorlas en besoedelingbestuur: Stof, geraas en visuele impakte	Negatief	Laag	Onbeduidend
Gesondheid en Veiligheid: Verhoogde kwesbaarheid van die gebied vir brand	Negatief	Medium	Laag
Grondwater impakte: Impakte op grondwater as gevolg van aktiwiteite op terrein	Negatief	Laag	Laag
Verkeersimpak: Verhoogde verkeer wat na Mossdustria lei	Negatief	Onbeduidend	Onbeduidend
Sosio-ekonomiese impak: Impak op die omliggende eiendomme	Negatief	Medium-Hoog	Laag
Sosio-ekonomiese impak: Voorsiening van veilige vragmotorfasiliteite aan die logistieke sektor	Positief	Baie hoog	Baie hoog
Sosio-ekonomiese impak: Werksgeleenthede geskep	Positief	Medium-Hoog	Medium-Hoog

Gedurende die konstruksie fase van dievoorgestelde ontwikkeling sal die mees kenmerkende negatiewe impakte op die botaniese hulpbronne (in terme van terrestriële biodiversiteit en die impak op spesies van beskermingswaarde), visuele impakte van die voorgestelde konstruksie werke en die padsveiligheid impakte, wat gesien sal word. Die mees kenmerkende negatiew impak van die operasionele fase van die voorgestelde ontwikkeling sal die verhoogde kwesbaarheid van die area wees as gevolg van die verhoogde brandgevaar risiko wat gepaard sal gaan met grootskaalse brandstof stoor fasiliete. Verder sal daar ook 'n moontlike impak op die omliggende eiendomme wees. Dit gesê, soosin die impakte tabel aangedui, sal die negatiewe impakte kan versag word tot op so mate dat dit 'n onbeduidende tot lae impak sal hê op die omgewing.

Die motivering om die voorgestelde ontwikkeling te vestig is diep gevestig in die positiewe sosio-ekonomiese impakte wat die fasiliteite sal hê op nie net 'n plaaslike vlak (gedurende die konstruksie fase), maar ook op 'n streekskaal. Daar is 'n groot aanvraag om goed gebestuurde, geformaliseerde vragmotor fasiliteite te verskaf in die gebied wat weg van die residensiële gebied geleë is, wat maklik toeganklik is deur vragmotors wat die N2-Hoofweë gebruik as 'n hoofroete en wat veilig deur beide manlike en vroulike bestuurders gebruik kan word.

Gebasseer op die verwagte impakte wat die voorgestelde projek op die omgewing sal (biofisies en sosio-ekonomies), is dit die opinie van die Omgewingsassesseringspraktisyn dat die Omgewingsgoedkeuring gedien moet word met die voorwaarde dat alle versagtingsmaatreëls soos voorgestel in die Omgewingsbestuurprogram nagekom moet word.

Western Cape Government
Environmental Affairs and Development Planning

FORM NO.BAR10/2019

BASIC ASSESSMENT REPORT

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

NOVEMBER 2019

(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)

THE PROPOSED DEVELOPMENT OF A TRUCK STOP AND ASSOCIATED INFRASTRUCTURE ON ERF 56 AND 57 IN MOSSDUSTRIA, MOSSEL BAY LOCAL MUNICIPALITY, GARDEN ROUTE DISTRICT MUNICIPALITY, WESTERN CAPE.

Confuel (PTY) Ltd is proposing the development of a truck stop and associated infrastructure on Erven 56 and 57 in Mossdustria located within the Mossel Bay Local Municipality, Garden Route District Municipality. The proposed development will be equipped with a services building, a canopied filling area (including several filling islands), two parking areas (that will be able to accommodate double- and single-wagoned trucks), an aboveground tank farm (diesel) with observation wells, site access, fencing and services connections (water, sewer and electricity infrastructure).

The zoning of the proposed development area is Industrial Zone II and it is located within the Industrial Node in terms of the Spatial Development Framework (SDF) of the Mossel Bay Municipality. Consent Use for the proposed land use has been obtained in accordance with the Land Use Scheme of the Municipality (2021).

Specifically, regarding the storage of dangerous goods, the proposed development will follow a phased approach. As part of this application, it is proposed that the onsite storage area will have a combined capacity of 482 m^3. Once the proposed development is operational, the need for additional storage capacity will be confirmed and the necessary expansion activities (in terms of the EIA Regulations) will be applied for.

A detailed description of the proposed works has been provided in Section E of the Basic Assessment Report (BAR).

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. 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.

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

5. 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.

6. This BAR is current as of **November 2019**. 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/eadp to check for the latest version of this BAR.

7. 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.

8. 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.

9. 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.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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: REGION 1 and REGION 2 **(Region 1: City of Cape Town, West Coast District)** **(Region 2: Cape Winelands District & Overberg District)**	**GEORGE OFFICE: REGION 3** **(Central Karoo District & Garden Route District)**
BAR must be sent to the following details: Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1 or 2) Private Bag X 9086 Cape Town, 8000 Registry Office 1st Floor Utilitas Building 1 Dorp Street, Cape Town Queries should be directed to the Directorate: Development Management (Region 1 and 2) at: Tel: (021) 483-5829 Fax (021) 483-4372	**BAR must be sent to the following details:** **Western Cape Government** **Department of Environmental Affairs and Development Planning** **Attention: Directorate: Development Management (Region 3)** **Private Bag X 6509** **George,** **6530** **Registry Office** **4th Floor, York Park Building** **93 York Street** **George** **Queries should be directed to the Directorate: Development Management (Region 3) at:** **Tel: (044) 805-8600** **Fax (044) 805 8650**

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); o Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): o Ridges; o Cultural and historical features/landscapes; o 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**	✓
	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;**	✓
Appendix C:	**Photographs**		✓
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**	✓

	Appendix E2:	**Copy of comment from Cape Nature**	**TBC**
	Appendix E3:	**Final Comment from the DWS**	**TBC**
	Appendix E4:	**Comment from the DEA: Oceans and Coast**	**N/A**
	Appendix E5:	**Comment from the DAFF**	**TBC**
	Appendix E6:	**Comment from WCG: Transport and Public Works**	**N/A**
	Appendix E7:	**Comment from WCG: DoA**	**TBC**
	Appendix E8:	**Comment from WCG: DHS**	**N/A**
	Appendix E9:	**Comment from WCG: DoH**	**N/A**
	Appendix E10:	**Comment from DEA&DP: Pollution Management**	**TBC**
	Appendix E11:	**Comment from DEA&DP: Waste Management**	**TBC**
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	**TBC**
	Appendix E13:	**Comment from DEA&DP: Air Quality**	**TBC**
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	**N/A**
	Appendix E15:	**Comment from the local authority**	**TBC**
	Appendix E16:	**Confirmation of all services (water, electricity, sewage, solid waste management)**	**TBC**
	Appendix E17:	**Comment from the District Municipality**	**TBC**
	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.**	✓

	Appendix E21:	**Proof of land use rights**	✓
	Appendix E22:	**Proof of public participation agreement for linear activities**	**N/A**
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 F1:	**Town planning public participation process including notice distributed, list of properties contacted**	✓
	Appendix F2:	**Interested and Affected Party Register (I&AP Register)**	✓
Appendix G:	**Specialist Report(s)**		
	Appendix G1:	**Aquatic Biodiversity Assessment**	✓
	Appendix G2:	**Terrestrial Biodiversity and Plant Species Assessment**	✓
	Appendix G3:	**Heritage and Palaeontological Undertaking and NID**	✓
	Appendix G4:	**Terrestrial Animal Compliance Statement**	✓
	Appendix G5:	**Geo-Environmental Assessment**	✓
	Appendix G6:	**Traffic Impact Statement**	✓
	Appendix G7:	**Agricultural Compliance Statement**	✓
Appendix H:	**Environmental Management Programme (EMPr)**		✓
Appendix I:	**Screening tool report**		✓
Appendix J:	**The impact and risk assessment for each alternative**		×
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**		×
Appendix L:	**Other Processes pertaining to the proposed project**		
	Appendix L1:	**Town Planning Approval and submitted documents**	✓
	Appendix L2:	**Wholesale Licence Permit received**	✓

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE:		**GEORGE OFFICE:**
	REGION 1 (City of Cape Town, West Coast District	REGION 2 (Cape Winelands District & Overberg District)	**REGION 3 (Central Karoo District & Garden Route District)**

Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Confuel (Pty) Ltd	
Name of contact person for Applicant/Proponent (if other):	Johannes Pretorius	
Company/ Trading name/State Department/Organ of State:	Confuel (Pty) Ltd	
Company Registration Number:	2022/545193/07	
Postal address:	3 Black Spider Road, Midstream Meadows, Olifantsfontein	
	Gauteng	Postal code: 1668
Telephone:	( )	Cell: 076 331 1389
E-mail:	johan@confuel.net	Fax: ( )
Company of EAP:	Sharples Environmental Services cc	
EAP name:	Betsy Ditcham	
Postal address:	P.O. Box 443	
	Milnerton	Postal code: 7435
Telephone:	(021) 554 5195	Cell: 082 456 6918
E-mail:	Betsy@sescc.net	Fax: (086) 575 2869
Qualifications:	BSc Hons (Wildlife Management), BSc (Zoology and Ecology)	
EAPASA registration no:	1480	
Duplicate this section where there is more than one landowner Name of landowner:	J.L.P. Prop (Pty) Ltd	
Name of contact person for landowner (if other):	Johannes Pretorius	
Postal address:	3 Black Spider Road, Midstream Meadows, Olifantsfontein	
	Gauteng	Postal code: 1668
Telephone:	( )	Cell: 076 331 1389
E-mail:	johan@confuel.net	Fax: ( )
Name of Person in control of the land:	Confuel (Pty) Ltd	
Name of contact person for person in control of the land:	Johannes Pretorius	
Postal address:	3 Black Spider Road, Midstream Meadows, Olifantsfontein	
	Gauteng	Postal code: 1668
Telephone:	( )	Cell: 076 331 1389
E-mail:	johan@confuel.net	Fax: ( )

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	Mossel Bay Local Municipality	
Contact person:	Carel Venter	
Postal address:	PO Box 29	
	Mossel Bay	Postal code: 6500
Telephone	(044) 606 5000	Cell: Not available
E-mail:	cventer@mosselbay.gov.za	Fax: (044) 606 5062

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

1.	Is the proposed development (please tick):	New	✓	Expansion	

2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.

This site would be considered a greenfield site, even though the site is located within an Industrial area and the site has been cleared prior to the current landowner's acquisition of the land.

The land has not previously been developed upon.

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.	

All of the proposed works will be accessible from the N12-Highway (from both Oudtshoorn and George).

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):	18 155 m²
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):	18 155 m²
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	18 155 m²
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).	

Confuel (PTY) Ltd is proposing the development of a truck stop and associated infrastructure on Erven 56 and 57 in Mossdustria located within the Mossel Bay Local Municipality, Garden Route District Municipality. The proposed development will be equipped with a services building, a covered filling area (including several filling islands), two parking areas (that will be able to accommodate double- and single-wagoned trucks), an aboveground tank farm with observation wells, site access, fencing and services connections (water, sewer and electricity infrastructure).

The proposed development will see to the installation of:

- 2 aboveground water reservoirs with a combined capacity of 740 kℓ (370 kℓ respectively);
- A main office building: With an area of 185.46 m². The building will include:
  - Four (4) Offices;
  - A reception area;
  - A kitchenette; and
  - Three (3) bathrooms
- The trucker facility building: With an area of 249.43 m². The building will include:
  - A restroom (for both males and females);
  - A laundry area;

    - A lobby;
    - An outdoor garden area (providing additional seating);
    - A dining area;
    - A canteen (with a kitchen); and
    - Two (2) Stores.
- A Bulk office: With an area of 69 m^2, that will be comprised of 2 offices.
- A guard house: With an area of 23.63 m^2 and will include a guard room and a bathroom.
- A bunded tank farm:
    - Including three (3) horizontal tanks of 46 m^3 each (with a bunded area of 187.93 m^2);
    - Four (4) vertical tanks of 86 m^3 each (with a bunded area of 137.70 m^2); and
    - Based on the future supply and demand, there will be sufficient area to accommodate an additional 4 vertical tanks, if required. The need therefore will however only be determined once the facilities are operational (if approved) and if the additional supply would be justified by the demand.
- A canopied filling area will include:
    - Four (4) filling islands with the capacity to provide services to seven (7) trucks at any one time;
    - A canopy will have an area of 449.55 m^2.
- A washbay with an overall area of 201.94 m^2.
- The site layout will also accommodate an additional building located toward the North-East boundary of the site which will be reserved for future use and the use of which will be aimed at providing an additional service (such as maintenance services) to the truckers using the proposed truck stop facilities.

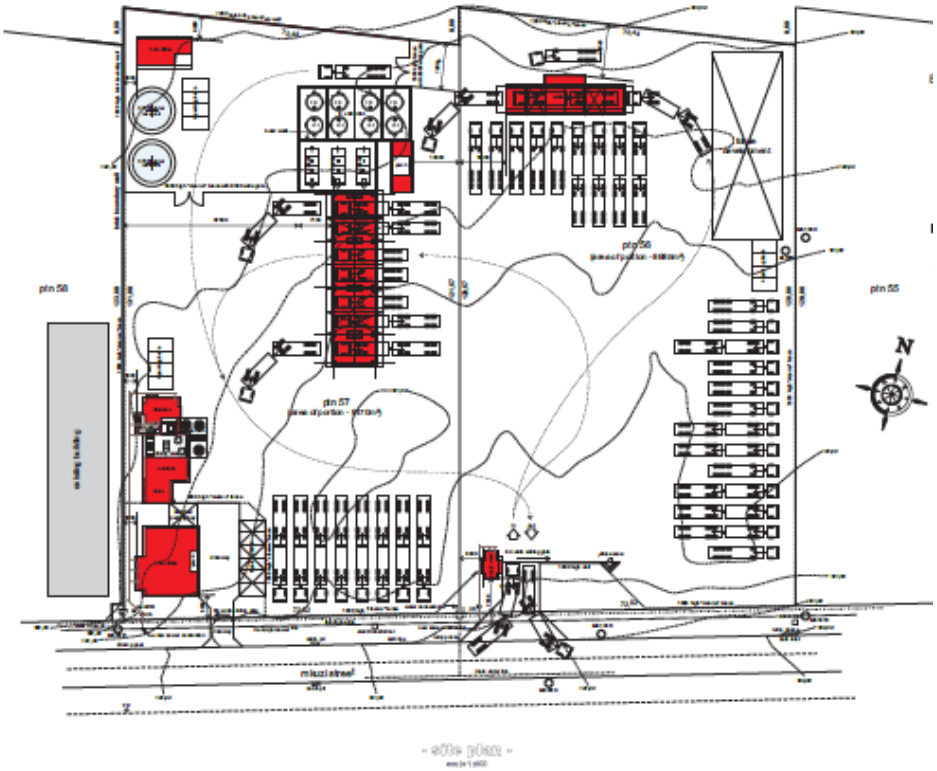


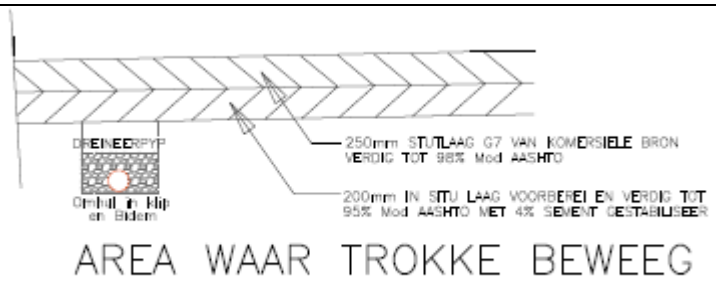
Figure 1. Site layout plan for the proposed truck stop and associated infrastructure on Erf 56 and 57 in Mossdustria.

The zoning of the proposed development area is Industrial Zone II, and is located within the Industrial Node in terms of the Spatial Development Framework (SDF) of the Mossel Bay Municipality. Consent Use for the proposed land use has been obtained in accordance with the Land Use Scheme of the Municipality (2021).

Specifically, regarding the storage of dangerous goods, the proposed development will follow a phased approach in the installation. As part of this application, it is proposed that the onsite storage area will have a combined capacity of 482 m^3. Once the proposed development is operational, the need for additional storage capacity will be confirmed and the necessary expansion activities (in terms of the EIA Regulations) will be applied for.

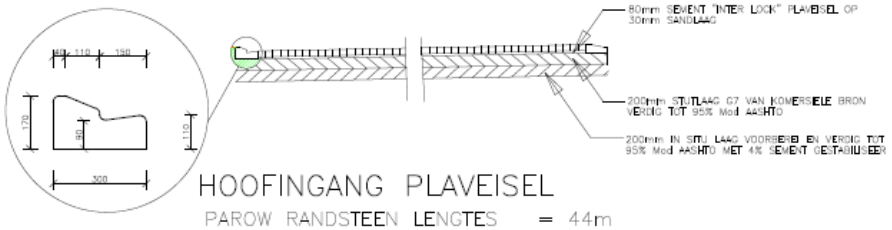
The dust management measures proposed for the operational phase of the proposed development will be mainly attributed to the foundational works done during the construction phase. These works will include:

- General area:
    - 200 mm of in situ layer which has been prepared and compacted to 95% Mod ASSHTO, stabilized with 4% cement;
    - A layer of 250 mm commercially sourced G7 material, compacted to 98% Mod ASSHTO.



AREA WAAR TROKKE BEWEEG

- Main entrance:
  - A 200 mm in situ layer prepared and compacted to 95% Mod ASSHTO, stabilized with 4% cement;
  - 200 mm commercially sources G7 material, compacted to 95% Mod ASSHTO; covered by
  - 30mm sand layer with an 80 mm cement interlocking pavement.

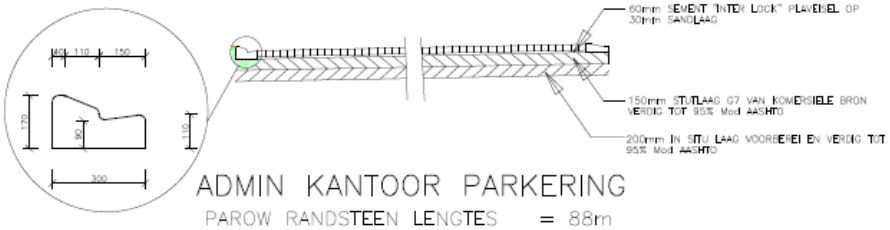


HOOFINGANG PLAVEISEL

PAROW RANDSTEEN LENGTES = 44m

PLAVEISEL OPPERVLAKTE = 330 vk.m

- Office parking area:
  - A 150 mm in situ layer prepared and compacted to 95% Mod ASSHTO, stabilized with 4% cement;
  - 200 mm commercially sources G7 material, compacted to 95% Mod ASSHTO; covered by
  - 30mm sand layer with an 60 mm cement interlocking pavement.



ADMIN KANTOOR PARKERING

PAROW RANDSTEEN LENGTES = 88m

PLAVEISEL OPPERVLAKTE = 375 vk.m

Further mitigation measures aimed towards facilitating dust management and monitoring has been incorporated into the impact assessment section of this report.

4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.																				
Access into the proposed development site will be obtained through an entrance way leading from Mkuze Street.																					
4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	5	1	0	0	1	4	0	0	0	0	0	0	5	6	0	0	0	0	0
		C	0	5	1	0	0	1	4	0	0	0	0	0	0	5	7	0	0	0	0	0

4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	34°	09'	40.93"
	Longitude (E)	22°	00'	18.97"

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**

1. 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**

2. OTHER LEGISLATION

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

Other legislation which holds relevancy over this project includes:

- The Constitution of the Republic of South Africa, 1998 (Act 108 of 1996) (The Constitution);
  In 1996, the South African Government promulgated the constitution of the Republic of South Africa (Act No. 108 of 1996) (The Constitution). Section 24 of the Constitution describes the following:
  24. Everyone has the right-
  (a) To and environment that is not harmful to their health or wellbeing; and
  (b) To have the environment protected, for the benegit of present and future generations, through reasonable legislative and other measures that-
  i. Prevent pollution and ecological degradation;
  ii. Promote conservation; and
  iii. Secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.

- National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA);
  In 1998, the South African Government promulgated the National Environmental Management Act (Act No. 107 of 1998) (NEMA) aimed towards providing means of governing of the environment and the latent impacts of activities on the different spheres of the environment (social, biophysical, cultural and economic), thereby promoting sustainable development. The Section 24 of the NEMA also provided the Government with the opportunity to promulgate regulations in terms of specific activities which would require approval authorisation prior to commencement. Through this, the following regulations were promulgated:
  - Environmental Impact Assessment (EIA) Regulations of 2014, as amended (GNR 326 of 2017) – Providing clear instruction as to the methodology to be followed for the purpose of obtaining Environmental Authorisation for a proposed project.
  - Listing Notice 1 of 2014, as amended (GNR 327 of 2017) – Infrastructure specific listed activities of moderate magnitude;
  - Listing Notice 2 of 2014, as amended (GNR 325 of 2017) – infrastructure specific listed activities of great magnitude;
  - Listing Notice 3 of 2014, as amended (GNR 324 of 2017) – infrastructure specific listed activities of small magnitude, based on the biographical sensitivity of the development site.

  The listed activities applicable to the proposed project has been indicated in Section D of this report.

- The National Environmental Management: Biodiversity Act (Act 10 of 2004) (NEM:BA);
  The National Environmental Management: Biodiversity Act (Act 10 of 2004) (NEMBA) is was promulgated in order to safeguard to Biodiversity resources of the country. Through this legislation numerous Regulations aimed

towards protecting the biosphere of South Africa. The legislation in terms of the NEMBA which holds relevance to the proposed project includes the following:

- In September 2020, the Department of Environment, Forestry and Fisheries (DEFF) promulgated the Alien and Invasive Species Regulations (GN 1020 of 2020) in terms of the NEMBA. Through these regulations, 567 species considered as alien and invasive were identified, all of which require some degree of control and management. The degree of management depends on which category the species have been identified in terms of these regulations. The onus rests on the land owner/person in control of the land to implement the actions required for the species occurring on the site. The categories identified include:
  - Category 1a: Listed species which must be combatted or eradicated.
  - Category 1b: Listed species which must be controlled.
  - Category 2: Listed species which require a permit to carry out a restricted activity within an area specified in the Notice or an area specified in the permit, as the case may be
  - Category 3: Listed species subject to exemptions in terms of section 71 (s) of the NEMBA and the prohibitions in terms of Section 71A of the NEMBA as specified in the Notice.
- In November 2022, the Department of Forestry, Fisheries & Environment (DFFE) promulgated the Revised National List of Ecosystems that are Threatened and in need of Protection (GN 2747 of 2022), which indicated that 120 of the 456 ecosystem types assessed have been categorised as threatened; and

As indicated by the Terrestrial Biodiversity and Plant Species Report compiled by Confluent (Pty) Ltd, the proposed development located in the North Langeberg Sandstone Fynbos, which is not in a protected Ecosystem Type (identified in term of GN 2747 of 2022). Seven listed Alien Invasive Plant species were recorded during the site visit conducted by the specialist. A list of these species has been provided in the Specialist Report Summary in Section G.

- <u>The Conservation of Agricultural Resources Act (Act 43 of 1983) (CARA):</u>
  The Conservation of Agricultural Resources Act (Act 43 of 1983) (CARA) was promulgated in order to provide a means for the Department of Agriculture to control the utilisation of the natural agricultural resources of the country, which in turn would promote the conservation of soil, water resources and vegetation. In addition, the CARA provides a means of combating weeds and invader plants. In 2013, the CARA promulgated a list of alien and invasive species including, equipped with similar categories (1, 2 and 3) pertaining to the species. Five (5) listed Alien Invasive Plant species were recorded during the site visit conducted by the specialist. A list of these species has been provided in the Specialist Report Summary in Section G.

- <u>The National Water Act, 1998 (Act 36 of 1998) (NWA):</u>
  The purpose of the National Water Act, 1998 (Act 36 of 1998) (NWA), is to ensure that the country's water resources are protected, used, developed, conserved, managed and controlled in a manner that allows for equitable access opportunity to water, basic human needs are met, the management of resources in a safe manner and which promotes social and economic development.

  As part of the NWA, a number of water uses were identified aimed towards ensuring the equitable and responsible use of water resources throughout the Republic. These water uses were stipulated in Section 21.

  In terms Section 21 of the NWA, the following water uses holds relevancy to the proposed project:
  (a) Taking water from a water resource;
  (b) <u>Storing water</u>
  (c) impeding or diverting flow of water in a watercourse;
  (d) Engaging in a stream flow reduction activity;
  (e) Engaging In a controlled activity identified as such in section 37(1) or declared under section 28(1) of the NWA;
  (f) Discharging waste or water containing waste into a water resource;
  (g) Disposing of waste in a manner which may detrimentally impact on a water resource
  (h) Disposing of waste in a manner which contains wate from or which has been heated in any industrial or power generation process;
  (i) Altering the bed, banks, course or characteristics of a watercourse;
  (j) Removing, discharging or disposing of water found underground if it is necessary of the efficient continuation of an activity or for the safety of the people;
  (k) Using water for recreational purpose.

  In September 2016, the Department of Water and Sanitation promulgated GN509 of 2016 in terms of the NWA (Act 36 of 1998) which made provisions for the general authorisation of water uses (c) and (i) identified in terms Section 21 of the NWA provided the impacts of the proposed project are considered to be low as determined by the DWS Risk Assessment Matrix (modified 2015, DWS). A watercourse (drainage line) was identified approximately 235m away from the proposed development footprint. The proposed development does not lie

within the regulatory area of the watercourse. It is recognised that 2 reservoirs will be located on site. The combined capacity of the reservoirs will be 740kℓ. As per the guidance of the "Regulations Regarding The Procedural Requirements For Water Use Licence Applications And Appeals" Section 21 (b) water use relates commonly to the stored water from natural runoff or river water (i.e. raw water). The reservoir will not store raw water directly from a water resource.

Therefore, it was confirmed by the specialist that no water use licence/general authorisation in terms of the National Water Act (Act 36 of 1998) will be required.

- National Heritage Resources Act (Act 25 of 1999)

National Heritage Resources Act, 1999 (Act No. 25 of 1999) Section 38 of the Act states as follows: "38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as –

"(c) any development or other activity which will change the character of a site-

(i) exceeding 5 000 m² in extent; or

(ii) involving three or more existing erven or subdivisions thereof; or

(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or

(iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;"

must inform the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.

The Notice of Intent to Develop was submitted to Heritage Western Cape (HWC) regarding the observed sensitivity of the site on 2 May 2023. Their final comment has been received and has been included in as part of Appendix E1 of this Basic Assessment Report.

No objection was raised by HWC regarding the proposed development.

- National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)

The National Environmental Management: Waste Act (NEMWA) (Act 59 of 2008), strives to protect the health and well-being of the people and the environment by providing reasonable measures for the minimization of natural resource consumption, avoiding and minimizing the generation of waste, reducing, recycling and recovering waste, and treating and safely disposing of waste as a last resort.

Since only limited quantities of general waste will be generated during both the construction and operational phases, no activities under the NEM:WA will be triggered as part of the proposed project.

- Other legislation (outside of the One Environmental System) applicable to the proposed project:
  - Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013) (SPLUMA);
  - Deeds Registries Act, 1937 as amended (Act No. 47 of 1937);
  - Local Government: Municipal Systems Act (Act 32 of 2000);
  - Occupational Health and Safety Act, 1993 (Act 85 of 1993):
    - Major Hazard Installation Regulations, 2022 (GoN R. 2989 of 2023);
  - National Health Act, 2003 (Act No. 61 of 2003); and
  - National Petroleum Products Act, 1977 (Act No. 120 of 1977).

3. POLICIES

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
The following Municipal By-Laws will hold relevance to the infrastructural components proposed development: • Water Services By-Law (2016): The Services By-Law requires a landowner to get written permission to tie into the Municipal Water and Sewer services infrastructure. The management and altering of the infrastructure is to be done in alignment with the Building Regulations. The By-law also provides minimum standards for sanitation services for drainage installations. All standards provided in terms of this by-law will be complied with. The by-law also stipulates that grease traps be used should it be anticipated that any oil, grease, fat, solid matter be discharged into the sanitation system. • Stormwater By-Law (2010): The Stormwater By-Law of the Municipality requires all landowners proposing to tie into the municipal system to get written permission to do as such, as this would lead to altering the existing infrastructure. The by-law also provides specific measures toward safeguarding the water entering these networks, specifically, under the by-law, no contaminated water is to be released into the stormwater network. Therefore, specific stormwater filtering (such as a Grease trap) infrastructure will be required. Additionally, it is required that stormwater management measures are in place prior to the commencement of any construction activities on a site.

- Street By-Law (2010): This by-law requires the developer/landowner obtain written permission by the municipality to supply the site with an access-way (in terms of subsection 3 (a) of the bylaw), as the access way will require the altering of a Municipal Street and/or sidewalk. Additionally, written permission will be required from the Municipality in terms of this By-Law, as well as the Municipality's Outdoor Advertising Bylaw for the placement of any signage which may be visible from the street.
- Zoning Scheme By-Law (2021): In terms of the Municipal Land Use By-Law, the proposed development site has been zoned as Industrial Zone II with the access into the site being zoned as Transport. The purpose of Industrial Zone II is to accommodate all forms of industry, except for the noxious trade and risk activity. This zoning does allow non-industrial activities; however these activities may not compromise the general use of the area zoned for infrastructure. Under Section 11 of the Bylaws, provision is made for consent use for an activity provided that it falls within the description of the Consent Use column of the zoning descriptions (Schedule 1). As such a truck stop falls under the ambit of this description. The Land Use Consent application concluded on 13 January 2023 as the Municipality approved the consent use of the site.
- By-Law Relating to Community Fire Safety (2009): In accordance with this By-law all building plans must be submitted to the Controlling Authority and must comply with the National Building Regulations. This includes the fire protection measures to be available at the site, including, but not limited to, adequate access to the property for emergency vehicles, fire doors, assembly points and escape routes. The buildings must also be equipped with firefighting equipment as required by the SABS and the OHSA (Act No. 85 of 1993).
- Air Quality By-Laws (2013): This by-law indicates a number of activities that could potentially be cause for concern. These activities require monitoring and need to be mitigated through design as much as possible.

4. 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 inform the contents of this Basic Assessment Report (BAR):

- Guideline on Need and Desirability (DEA, 2017);
- Guideline on Need and Desirability (DEA&DP, 2013);
- EIA Guideline and Information Document Series: Generic Terms of Reference for EAPs and Project Schedules (DEA&DP, 2013);
- EIA Guideline and Information Document Series: Guideline of Public Participation (DEA&DP, 2013);
- EIA Guideline and Information Document Series: Guideline on Alternatives (DEA&DP, 2013);
- Guideline for the Review of Specialist Input in EIA Processes (DEA&DP, 2005)
- Guideline for determining the scope of specialist involvement in EIA processes (DEA&DP, 2005);
- Guideline for involving biodiversity specialists in EIA processes (DEA&DP, 2005);
- Guideline for Environmental Management Plans (DEA&DP, 2005);
- EADP: 0028/2014: "One Environmental Management System" and the 2014 Environmental Impact Assessment (EIA) Regulations (DEA&DP, 2014);
- Integrated Environmental Management Information Series 5: Impact Significance (DEA, 2002);
- Integrated Environmental Management Information Series 7: Cumulative effects Assessment (DEA, 2004);
- Integrated Environmental Management Information Series 11: Criteria for determining alternatives (DEA, 2004); and
- Integrated Environmental Management Information Series 15: Environmental Impact Reporting (DEA, 2004).

5. PROTOCOLS

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

In 2020, the Department of Environmental Affairs (now referred to as the Department of Forestry, Fisheries and Environment (DFFE)) promulgated the protocols for the minimum reporting criteria for the environmental themes as identified by the Environmental Screening Tool as promulgated in terms of Sections 24(5)(a) and (h), and 44 of the National Environmental Management Act, 1998 as amended (Act 107 of 1998), when applying for an Environmental Authorisation in terms of the EIA Regulations of 2014, as amended.

The table below indicates the environmental sensitivities as identified by the screening tool report (as accessed on 11 May 2023).

Table 1. Themes identified in terms of the DEA Screening Tool as promulgated in terms of the EIA Regulations of 2014, as amended (GNR 326 of 2017).

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**
Palaeontology Theme		**X**		
Plant Species Theme			**X**	
Terrestrial Biodiversity Theme	**X**			

Based on the screening tool results, it was recommended that the following specialist assessments be undertaken for the proposed project:

- Agricultural Impact Assessment
- Archaeological and Cultural Heritage Impact Assessment
- Palaeontology Impact Assessment
- Terrestrial Biodiversity Impact Assessment
- Aquatic Biodiversity Impact Assessment
- Hydrology Assessment
- Noise Impact Assessment
- Traffic Impact Assessment
- Geotechnical Assessment
- Socio-Economic Assessment
- Plant Species Assessment
- Animal Species Assessment

As per part of the Notice of Intent (NOI) and Site Sensitivity Verification Report (SSVR)compiled and submitted for the proposed project, the following specialist assessments as identified by the Web-based Screening Tool have not been undertaken for this proposal:

- Agricultural Impact Assessment
  Based on the location of the proposed development and the zoning of the proposed development site being Industrial Zone II, an Agricultural Impact Assessment will not be undertaken. The zoning and the proposed land use is in line with the land uses of the surrounding area, where the feasibility of identifying land suitable for rainfed agriculture is illogical. After the submission of the NOI, the DEA&DP indicated that an Agricultural Compliance Statement would be required for the proposed development.
- Noise Impact Assessment
  Based on the surrounding land uses, and the distance of the proposed development from residential/habitable dwellings, it is not anticipated that noise will be a significant impact of the proposed development. The anticipated noise impacts (which would include general noises, similar to that of a filling station), has been evaluated as general nuisance in light of the surrounding land use activities as part of the Environmental Impact Assessment. Should additional noise be generated during the construction phase of the proposed development, this will not exceed the thresholds of the relevant norms and standards and the mitigation measures of all anticipated impacts have been addressed in the EMPr as provided In Appendix H. It is not anticipated that the proposed development will generate additional traffic during the operational phase. The DEA&DP agreed with the conclusion that no noise impact assessment would be required.
- Socio-Economic Assessment
  As the proposed development will service only registered users (i.e. people from the road – general road users will not be able to use the refuelling facility), limited impact on the filling stations within a 5 km radius would be anticipated. Further Socio-economic impacts will be introduced and discussed in the Basic Assessment Report. As part of the authorisation process to be followed, a detailed description of the socio-economic situation of the area has been provided to describe the impacts of the proposed works on the road users from a socio-economic perspective. The Environmental Impact Assessment has also been approached in alignment with the principles of the Need and Desirability Guidelines, DEA, 2017 (as detailed in Section E below as well as Appendix K) and has evaluated the feasibility of the proposed works in light of the current socio-economic situation of the municipality. As part of their responses to the NOI, the DEA&DP agreed with the conclusion that no Socio-Economic assessment would be required.

Table 2. Specialist studies conducted in response to the findings of the DEA Screening Tool and based on the findings of the Site Sensitivity Verification Report compiled in terms of the NOI.

Study	Specialist	Sensitivity theme aiming to be addressed
Agricultural Compliance Statement	Johann Lanz	Agricultural Sensitivity
Aquatic Biodiversity Impact Assessment	Confluent (Pty) Ltd	Aquatic Biodiversity
Animal Species Compliance Statement	Cossyphia (Pty) Ltd	Animal Species
Terrestrial Biodiversity and Plant Assessment	Confluent (Pty) Ltd	Terrestrial Biodiversity Plant Species
Archaeological and Palaeontological Survey and NID	ASHA Consulting (Pty) Ltd	Archaeological and Cultural Sensitivity Palaeontology Sensitivity
Geohydrological and Geotechnical Assessment	Terra GeoTechnical	Geotechnical Hydrology

Traffic Motivation Letter	Element Consulting Engineers	Traffic

As indicated in the NOI, the following protocols holds relevancy to the proposed development:

- Site sensitivity verification requirements where a specialist assessment is required but no specific assessment protocol has been prescribed.
- Protocol for the specialist assessment and minimum report content requirements for environmental impacts on terrestrial biodiversity.
- Protocol for the specialist assessment and minimum report content requirements for environmental impacts on aquatic biodiversity.
- Protocol for the specialist assessment and minimum report content requirements for environmental impacts on terrestrial plant species.
- Protocol for the specialist assessment and minimum report content requirements for environmental impacts on terrestrial animal species.
- Protocol for the specialist assessment and minimum report content requirements for environmental impacts on agricultural impact.

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.**
Activity 14 of Listing Notice 1 of 2014, as amended (GNR 327 of 2017)	*The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 m³.*	The proposed development will see to the installation of a dangerous good storage facility with a combined storage capacity of 482 m³. **This activity will therefore be applicable to the proposed project.**
Activity 27 of Listing Notice 1 of 2014, as amended (GNR 327 of 2017)	*The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for –* *(i) The undertaking of a linear activity; or* *(ii) maintenance purposes undertaken in accordance with a maintenance management plan.*	The site was cleared prior to the Applicant's acquisition of the development area (August 2022). In March 2023 it was noted that vegetation species indigenous to the region were present on site. These species are also declared species of conservation concern. As a result of the clearance of vegetation of the site, the site has been left vulnerable to an Acacia infestation (concentrated to the north of the proposed development site). At current the extent of the SCC is limited to the northern reaches of the proposed development site however, a period of time will pass prior to the commencement of the construction phase (allowing for the reinstatement of the indigenous vegetation). **This activity will therefore be applicable to the proposed project.**
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.
Activity 2 of Listing Notice 3 of 2014, as amended (GNR 324 pf 2017)	*The development of reservoirs, excluding dams, with a capacity of more than 250 cubic metres.* *i) Western Cape:* *ii) In areas containing indigenous vegetation;*	The proposed development will see to the development of two (2) 370kℓ (370 cubic metres) reservoirs, which will have a cumulative capacity of 740 cubic metres. The site was cleared prior to the Applicant's acquisition of the development area (Site clearance took place in August 2022 and the client acquired the site in September 2022). In March 2023 it was noted that vegetation species indigenous to the region were present on site. These species are also declared species of conservation concern (VU). As a result of the clearance of vegetation of the site, the site has been

		left vulnerable to an Acacia infestation (concentrated to the north of the proposed development site). At current the extent of the SCC is limited to the northern reaches of the proposed development site however, a period of time will pass prior to the commencement of the construction phase. **This activity will therefore be applicable to the proposed project.**
Activity 12 of Listing Notice 3 of 2014, as amended (GNR 324 of 2017)	*The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.* *(i)Western Cap:* *(i) Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;* *(ii) Within critical biodiversity areas identified in bioregional plans;* *(iii) Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;* *(iv) On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or* *(v) On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.*	The proposed development will have an area of 1.8 ha (17 991 m^2) and will be in an area identified as a critical biodiversity area in terms of the Western Cape biodiversity spatial plan (2017). The proposed development is furthermore not located in a threatened ecosystem identified in terms of the NEMBA: Revised Ecosystem List (2022). Even though the site was cleared prior to the Applicant's acquisition of the development area (August 2022), in March 2023 it was noted that vegetation species indigenous to the region were present on site. **This activity will therefore be applicable to the proposed project.**
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.
No activities in relation to the NEM:WA holds relevance to the proposed project.		

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.
No activities in relation to the NEM:AQA holds relevance to the proposed project. The storage capacities of the proposed development will not exceed the minimum threshold of the amended listed activities promulgated in terms of the NEM:AQA (Act No. 39 of 2004) (GNR 893 of 2013).		

The proposed development falls within Category 2 (Petroleum Industry, the production of gaseous and liquid fuels as well as petrochemicals from crude oil, coal, gas or biomass) of the listed activities presented in the revised list of listed activities. As per Subcategory 2.4 (Storage and Handling of Petroleum Products), the threshold for petroleum products storage tanks and product transfer facilities specifically relate to permanent immobile liquid storage tanks larger than 1 000 cubic meters cumulative tankage capacity at the site. For the purpose of the proposed development, the combined capacity will be 482 cubic meters. The cumulative storage capacity of the proposed development's tank farm will not exceed the legislated threshold at any point in the foreseeable future.

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

The preferred alternative will see to the construction of a truck stop and associated infrastructure with the following major components including, but will not be limited to:

- A diesel storage area (with observation wells) with a combined capacity of 482 m^3.
- A service station building (which will include a canteen, sanitation facilities [for both men and women]).
- A washing facility.
- A number of parking areas aimed at accommodating both single and double wagon trucks.
- An administrative area.
- A guardhouse.

In addition to these structures, the layout plans have been created in such a way so as to incorporate a future building (located toward the North-Eastern corner of the site). This building will be aimed toward providing additional services to the clients using the proposed facilities.

The detailed description of the layout plan of the preferred alternative has been provided in Section B of this report.

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.

The proposed development will be located on a portion of land owned by the developer (Mr. Johannes Pretorius) through a company named J.L.P. Properties (Pty) Ltd. The site has been Zoned as Industrial Zone II and is located within the designated Industrial area of Mossel Bay Local Municipality. As per the Municipality's Land Uses Scheme (2021), the site may be used for the purpose of a Truck Stop, should special consent use be obtained from the municipality. Such Consent Use was obtained in January 2023. Therefore, the proposed development is in line with the existing land use rights of the property and no further Town planning procedures would be required for the purpose of authorising the proposed development.

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.

In addition to the Consent use Approval obtained from the Municipality, a wholesale permit in support of the proposed development has been obtained from the Department of Mineral Resources and Energy (DMRE).

Beyond these approvals, no other approvals have been issued for the proposed development site. No approvals in terms of the NEMA have been obtained for the proposed development as yet.

The approvals obtained in terms of the Municipal Land Use Scheme and the Petroleum Products Act are both in line with the activities proposed for the site.

4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.

According to the Western Cape Provincial Spatial Development Framework (PSDF, 2014), the provincial strategies have been aimed towards achieving six strategic objectives which includes:

- Give spatial expression to the national (i.e. NDP) and provincial (i.e. OneCape 2040) development agendas;
- Serve as basis for coordinating, integrating and aligning 'on the ground' delivery of national and provincial departmental programmes;
- Support municipalities to fulfil their Municipal Planning mandate in line with the national and provincial agendas; and
- Communicate government's spatial development intentions to the private sector and civil society.

These agendas will be forwarded by the following spatial principles:

- Spatial justice;
- Sustainability and resilience;
- Spatial Efficiency;
- Accessibility; and
- Quality and liveability.

In order to deliver on the Western Cape Government's (WCG) strategic objects, a Provincial Spatial Agenda has been developed. This Agenda is summarised as follows:

- Growing the Western Cape Economy in Partnership with the Private Sector, non-governmental and community based organisations;
- Using infrastructure investment as primary lever to bring about the required urban and rural spatial transitions;

- Improving oversight of the sustainable use of the Western Cape's spatial assets.

The objective of the proposed development aligns with the strategic objectives of the Provincial SDF (PSDF, 2014) as the project (proposed by a company which forms part of the Private Sector) will add to the Western Cape's Economy as a whole. The proposed development will cater directly to the logistics sector (and in turn the consumer sector) as it would aim to provide registered customers travelling along the N2-highway and servicing the internal reaches of the province with an exclusive, safe and equal opportunity, rest stop that is conveniently located within Mossdustria (the Industrial Node of Mossel Bay). The project will be located on a portion of land specifically zoned for Industrial purposes (with truck stop and truck stop accommodation being allowed through a consent use process). As these facilities will cater to users already making use of the road network, and based on the findings of the consulting road engineers, no additional works to the existing road (provincial and local) infrastructure would be required. Therefore, the proposed development aims to make use of existing assets to facilitate the growth economy (local and provincial).

4.2	The Integrated Development Plan of the local municipality.

The MIDP (2023/24 Review) identifies five focus areas for the purpose of the implementation of the 5-year IDP. The focus areas aim to be in line with the CROW strategy and aims to place focus on the growth of Governance, Economy, Safety, Social Regeneration and Environmental Health. The Mossel Bay Municipality is cognizant of the National and Provincial Policy development directives and has as such also aligned its development strategy to these while pursuing its constitutional mandates. The Municipal Key Performance Areas (KPA's) and Strategic Objectives set the strategic tone and pave the direction for future developments, investments and public/private partnership interventions. These KPA's which holds relevance to the proposed development include:

- KPA 2 - Spatial Development and Environment;
- KPA 3 - Community Safety and Security;
- KPA 5 - Economic Development and Tourism;

The proposed development falls in line with the Strategic Objectives and KPA's of the Local Municipality as the project aligns objectives and demarcations of the Municipal Land Use Scheme (2021) (KPA2), as the site has been zoned for Industrial purposes with consent use available (for Truck Stops and Truck Stop Accommodation) for specific proposed land uses. The proposed development will take cognisance of the potential environmental impacts that could be seen as a result of the on-site activities and infrastructure (such as dust impacts, pollution by hazardous substances, etc (KPA3). All impacts will be evaluated in great detail in the Environmental Impact Phase of the proposed development through which an Environmental Management Programme (EMPr) will also be included for approval by the department. The EMPr will also be circulated to the Local Municipality in order to ensure that all internal departments have deemed the EMPr as satisfactory in terms of the Municipal By-Laws and Planning Documents. The proposed development will be subject to a strict security process, that aims to ensure the safety of not only the people using the facilities, but also the properties surrounding the proposed development site.

Due to Mossel Bay being a major destination and rest stop, the proposed development will add to the economic stance of the surrounding area, specifically within the tertiary sectors as identified in the IDP (2022-2027, 2023/24 Review). The Tertiary Sectors to be impacted would be the "Wholesale & Retail trade, catering & accommodation" and the "Transport, Storage and Communication" Sector (KPA5).

4.3.	The Spatial Development Framework of the local municipality.

The Mossel Bay Spatial Development Framework/Environmental Management Framework (MSDF/EMF, 2022) was compiled with a number of key development plans taken into consideration. These included but were not limited to the National Development Plan 2030 (NDP, 2017), the National Spatial Development Framework (NSDF, 2022), the Spatial Planning and Land Use Management, 2013 (Act No. 16 of 2013), the NEMA (Act 107 of 1998), and the NEMA EMF Regulations, 2010 (EMF Regulations). The proposed development will be located within the industrial node of Mossdustria which forms part of the Economic Infrastructure of the Local Municipality. Mossel Bay/ Mossdustria is located within a Priority Urban Functional Region as identified in the Provincial Strategic Plan 2019-2024.

According to the Mossel Bay Spatial Development Framework (MSDF, 2022), four industrial and commercial nodes have been identified within the municipality. These include the Mossel Bay Central Business District (CBD), Mossdustria, Voorbaai and the Port of Mossel Bay. These form the economic infrastructure of the Municipality. Mossdustria originated due to Mossgas' estabilishment in the late 1980's to ensure oil and gas security for the government at that time. Mossdustria industrial area was developed by the Municipality to house service industries for the oil and gas industry. Since PetroSA (which took over Mossgas after 1994) has ceased the production of gas products, huge amounts of job losses are expected. The Mossdustria area has been classified as an Industrial Expansion Zone in the MSDF with the Municipality providing all services (including electricity, water, sewerage, roads, stormwater and waste removal services) in the area.

4.4.	The Environmental Management Framework applicable to the area.

The proposed development site is located within the Urban Area of the Mossel Bay Municipality. As such, Mossdustria and all erven plotted within its boundaries have been zoned as Industrial Zone II and have been properly identified as part of the Environmental Management Framework (MSDF and EMF, 2022) of the Municipality. The proposed development will not infringe on any areas of conservation concern as determined by the EMF. The site will be used in line with the requirements Municipal Land Use Scheme (2021). The proposed development is located approximately 230 m North-West of the closest designated Open Space Area as determined by the municipal SDF and EMF (2022). Limited works are allowed in this area and should further works be required within this area; the impacts of such works must be determined by means of an Environmental Authorisation process. The proposed development will not have a direct impact on the open space area as identified by the SDF/EMF (2022).

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

Comments from relevant authorities and or specialists will be included after the 30-day Post-application Public Participation Process has been undertaken as prescribed in Sub-Regulation 19 of the NEMA EIA Regulations of 2014, as amended (GNR 326 of 2017).

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

According to the Western Cape Biodiversity Spatial Planning (WCBSP) (2017), the proposed development is partially overlain by a terrestrial critical biodiversity area (CBA's).

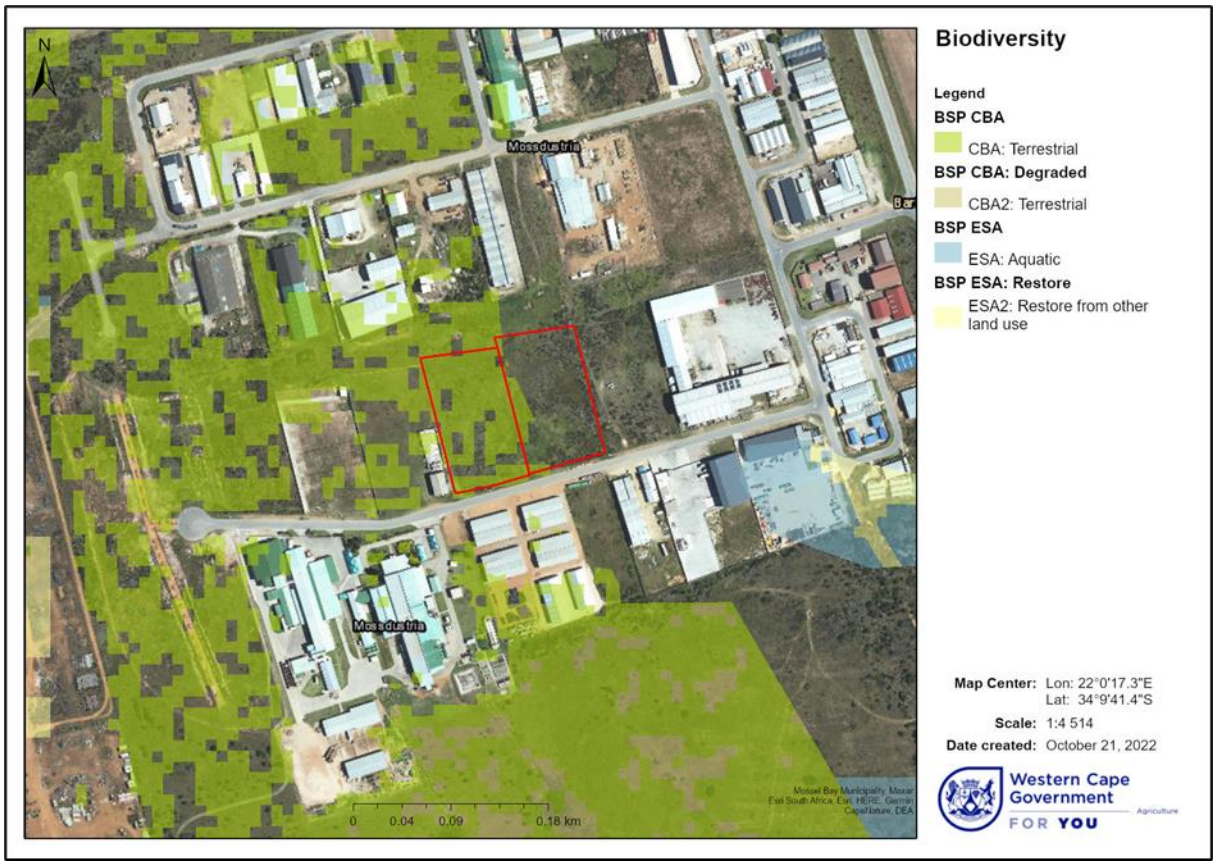


Figure 3. Sensitive features identified in terms of the Western Cape Spatial Biodiversity Plan (2017).

According to the SANBI website (as accessed on 12 May 2023), the primary purpose of mapping the CBAs and ESAs is to guide decision-making about where best to locate development. It should inform land-use planning, environmental assessment and authorisations, and natural resource management, by a range of sectors whose policies and decisions impact on biodiversity. It is the biodiversity sector's input into multi-sectoral planning and decision-making processes. The proposed project located within such a CBA and ESA's. The description of the CBA located within the proposed project area is an area in a natural condition that is required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. The objective of this CBA is to maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

In conclusion, the proposed project has the potential to impact upon the following areas directly and indirectly in terms of the Western Cape Spatial Biodiversity Plan (2017):

- "Other Natural Areas" - defined as areas that are not currently identified as a priority, but retain most of their natural character and perform a range of biodiversity and ecological infrastructure functions. Although not prioritised, they are still an important part of the natural ecosystem. The objective when managing areas such as this is to: minimize habitat and species loss and ensure ecosystem functionality through strategic landscape planning. Offers flexibility in permissible land-uses, but some authorisation may still be required for high-impact land-uses.
- "CBA1 (Critical Biodiversity Areas)"- defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

According to the available data for the area, the proposed development will not intercept any protected areas in terms of the National Environmental Management: Protected Areas Act of 2003 (NEM:PAA) (Act 57 of 2003). The nearest declared Protected Areas in terms of the NEM:PAA is the Attakwaskloof Nature Reserve, located approximately 25 km north of the proposed development, with the Mossel Bay Seal Island Nature Reserve, a CapeNature Reserve (2022), located approximately 10 km East of the proposed development site.

According to the National Vegetation Map 2018 (as updated in 2021), the dominant indigenous vegetation type for the site is mapped as North Langeberg Sandstone Fynbos which has an ecological threat status of Least Threatened (NEMBA, 2022). North Langeberg Sandstone Fynbos is a type of tall dense high rainfall form of fynbos shrubland rich in species of Erica, Proteaceae and Restionaceae (Cape Reeds) (Milton-Dean, 2011). Mucina & Ruthorford (2006) describe the vegetation of North Langeberg

to be asteraceous fynbos on lower slopes. According to the Western Cape Biodiversity Spatial Plan (2016), the Muscadel Riviere Ecosystem type has a threat status of Critically Endangered whereas the Eastern Little Karoo has an Ecosystem threat status of Vulnerable. The vegetation communities form part of the Rainshadow Valley Karoo and the Inland Saline Vegetation Bioregions, respectively. Vlog's vegetation description has identified the proposed development area as the Mesic Mosaic Proteoid Fynbos, which forms part of the Renosterveld biome.

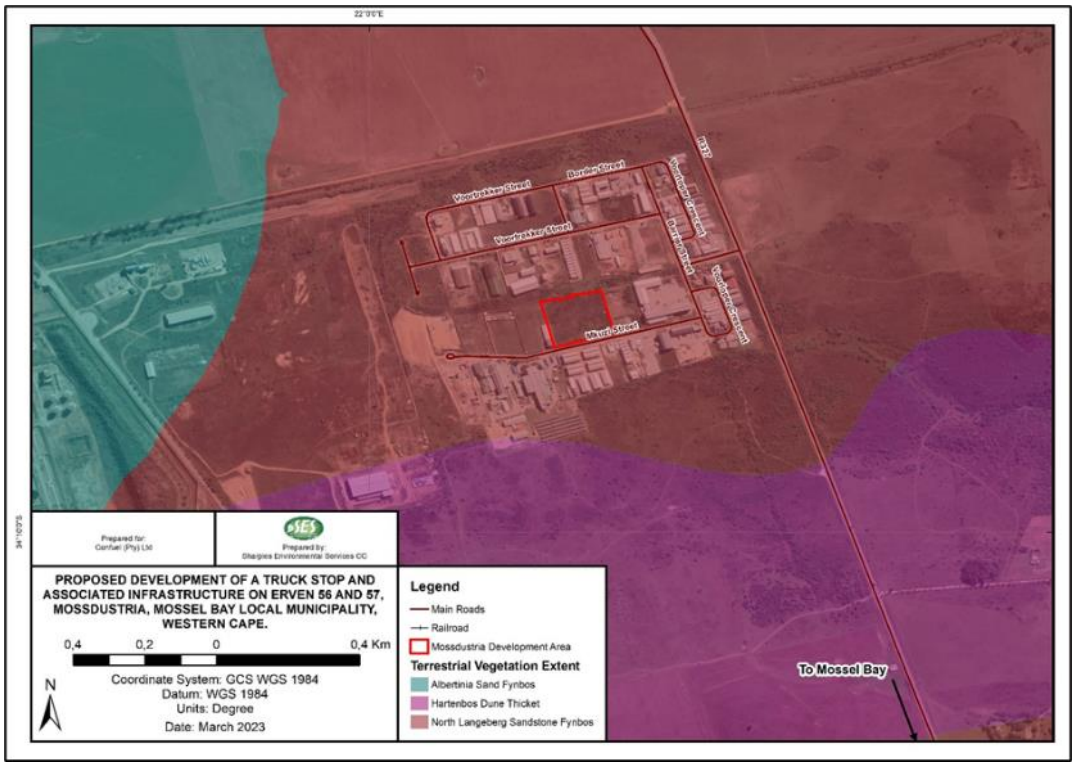


Figure 4. Vegetation community types identified in terms of the National Biodiversity Assessment (2018, as amended).

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

The ICMA does not hold any relevance to the proposed project as the proposed works are located approximately 39 km from the High-Water Mark (HWM).

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.

No changes were seen between the screening tool report submitted as part of the Application form and that submitted as part of the Draft Basic Assessment Report.

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

The proposed development will be located on two vacant properties within the Mossdustria Industrial Area. The proposed land use is in alignment with the acceptable land uses set out in the Municipal Land Use Scheme (2021). Due to the location of the affected properties, and the proximity to other industry in the area, the proposed development will not make use of open space for the purpose of "Open Space" use in terms of the Municipal Land Use By-Law. For the purpose of optimising land use in terms of the intended land use, the property will be fenced off (by means of ClearVu fencing and brick-walls) and all activities will be confined to the proposed development site. Under no circumstances will the proposed activities be allowed to impinge on the open space (zoned as Transport Zone II) on the adjacent property (Erf 4) (Figure 5).

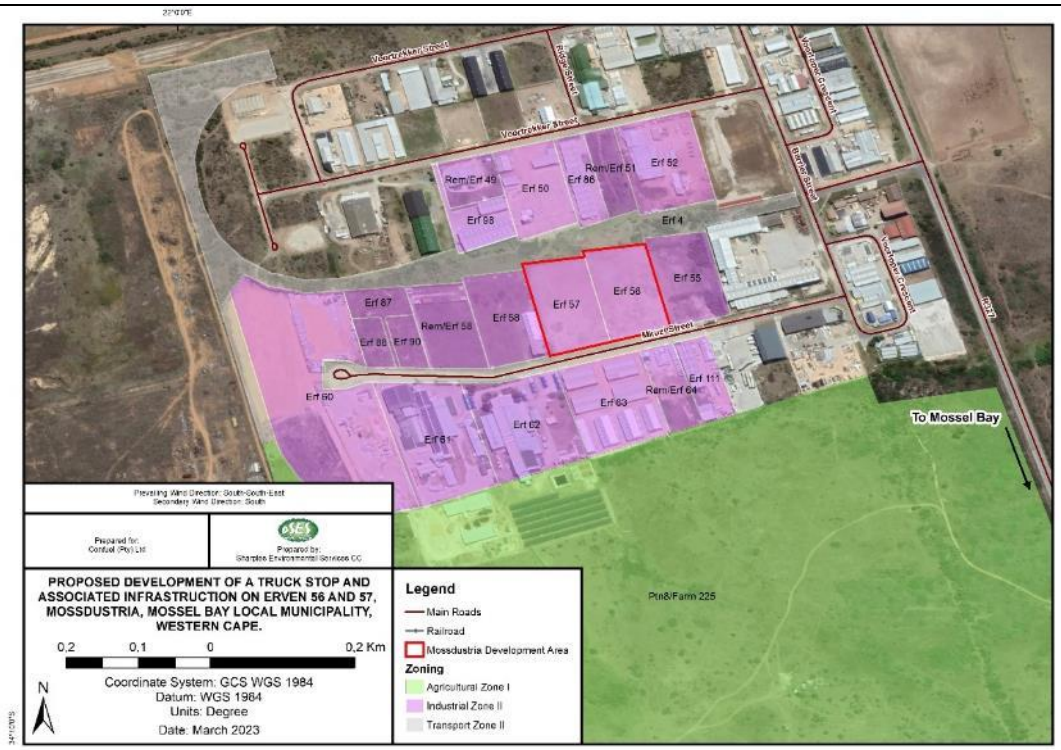


Figure 5. Zoning map of the proposed development footprint and the surrounding areas.

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

As indicated above, the entirety of the Mossdustria development area has formalised Municipal services which are aimed toward providing reliable sewer, water, stormwater and electricity connections to the properties. The proposed development will make use of the existing connection opportunities (in terms of services). No other existing resources and infrastructure is available on site.

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).

The confirmation of services will be provided as part of the Final Basic Assessment Report.

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.

The following Needs and Desirability description has been done in alignment with the DEA&DP's guideline on Need and Desirability (DEA&DP, 2013), the alignment with the Sustainability principles, and the Guidelines on Need and Desirability (DEA, 2017).

The Need and Desirability Guideline of 2017 explains that the need and desirability is determined by considering the broader community's needs and interests as reflected in a credible IDP, SDF and EMF for the area, and as determined by the EIA. It is further also highlighted that society in general should improve the efficiency and responsibility with which we use resources, and improve on the level of integration of social, economic, ecological and governance systems. The need and desirability therefore need to illustrate how a development integrates the socioeconomic, ecological and political aspect in a beneficial manner.

As described in the Guidelines on Need and Desirability (DEA&DP, 2013; DEA, 2017), relates to the nature, scale and location of proposal where the *need* can be translated to time (in other words would the time of this proposal be considered the right time to commence with said proposal), and the desirability can be translated to the place (is the proposal located in the correct place for the proposed activities). Through these considerations, it can be determined whether a proposal would be considered to be in alignment with the sustainability principles as well as the National Development Plan 2030 (NDP 2030)'s principles toward the transitioning to an environmentally sustainable, low-carbon economy. This BAR strives to answer the questions on Need and Desirability as posed in the relevant guidelines for the purpose of due consideration of both the biophysical and the socio-economic environments.

This section strives to answer the answers set out in the Needs and Desirability guideline (DEA, 2017; DEA&DP, 2013)

Toward "securing ecological sustainable development and use of natural resources"

The proposed development is located in the North Langeberg Sandstone Fynbos vegetation type (an ecosystem which has not been identified as a protected ecosystem in terms of the Revised National List of Ecosystems that are Threatened and in need of Protection promulgated in 2022 in terms of the NEM:BA (Act 10 of 2004)). Although the site has been classified as a Critical Biodiversity Area and Other Natural Areas in terms of the Western Cape Biospatial Plan (2017), it was found that the site does not meet the criteria for it to be classified as a CBA1. According to the Aquatic WCBSP (2017) regime, there is an aquatic Ecological

Support Area approximately 235m East of the proposed development site, similarly the National Wetland Map 5 also identified this resource as a wetland, however, based on the findings of the specialist, it was confirmed that this feature would not be considered a wetland.

The According to the respective specialist studies conducted for the proposed development site, the impact of the proposed development on the following resources are of low concern:

- Aquatic Biodiversity resources.
- Terrestrial biodiversity.
- Heritage resources.
- Palaeontological resources.
- Geohydrological resources.
- Agricultural resources.
- Animal species resources.

During the investigations conducted by the various specialist, the only features of biophysical concern that was raised, was the presence of the plant Species of Conservation Concern (SCC), *Hermannia lavandulifolia* (VU), identified on site. A permit from CapeNature for the impacting upon this species will be required. This must be followed by a search and rescue operation prior to the commencement of activities on site. Furthermore, although the site ecological importance (SEI) of the site was determined to be of Low to Very Low significance, because the entirety of the proposed development site will be required to be cleared, the significance of loss of habitat was determined to be Moderate.

The impact assessment, including the methodology used to determine the impacts of the proposed development on the various resources has been included as Section H.

In order to follow the risk-averse approach, the appointed specialists determined the current gaps in their knowledge. These gaps have been described in the Section J2. The risk associated with these gaps in knowledge is the possibility of not identifying all of the sensitive receptors (specifically from a plant species perspective) that could be present on site. To mitigate this, it has been required that a search and rescue operation must be implemented prior to site establishment and the commencement of works.

Toward "promoting justifiable economic and social development"

The proposed project will see to the development of a truck stop (including a fuel filling area) and associated infrastructure on Erven 56 and 57 of Mossdustria. The proposed development will see to the installation of a fuel storage farm with a combined capacity of 482 m^3. The proposed facilities will also include the installation of a wash bay, an administrative area, 2 x reservoirs with a combined capacity of 740kℓ and parking areas to accommodate both male and female truck drivers. The proposed development site will operate under the protection of a security team managed under a strict policy in order to protect the users of the facility as well as the area immediately surrounding the proposed facility.

The proposed development will aim to service clients only registered with the Applicant's client network. Therefore, only companies and associated drivers registered with the Applicants management network will be granted access to the proposed facilities. The facilities will not be open access, in other words, no uncontrolled off-the-street access will be permitted. The facilities will not be available for use by regular light motor vehicles. The only access by such vehicles will be into the administrative area of the proposed development.

The motivation for the proposed development is deeply rooted in the positive socio-economic impacts that these facilities would have on not only a local scale (during construction phase), but also on a regional scale. As there is a desperate need for a well-managed formalised truck stop that is located away from any residential areas, that is easily accessible by truckers and can be used by both male and female truckers. According to Arrive Alive (as accessed on 2 June 2023), based on a research study done by Nelisiwe Magubane & Mala Ramanna from the Interdisciplinary Accident Research Centre of KwaZulu -Natal on the topic "Truck Drivers and Road Crashes in South Africa", it was found that 39% of problems that results from trucking related incidents are fatigue related.

The proposed development location aligns with the Mossel Bay SDF (2022) and the Municipal Land Use Scheme (2021).

Mossdustria was developed by the Municipality to house service industries for the oil and gas industry. This was largely controlled by PetroSA after 1994. According to the Mossel Bay SDF (2022), the PetroSA gas field does not deliver processable volumes of gas any longer. As a result of PetroSA not producing gas products in the Mossel Bay industry, this area has seen many job losses. In line with the Mossel Bay SDF, one of the objectives is to ensure job creation in well-located areas close to existing high-density residential areas. The proposed site is approximately 10 minutes away from residential areas located towards the South-East (Dana Bay) and East (Mossel Bay) from the proposed development site. The proposed development will allow for an increase in employment opportunities during its construction and operational phases:

- The proposed project will provide a number of temporary employment opportunities during the construction phase of the development. These opportunities will involve a number of individuals with varying degrees of skill sets (unskilled, semi-skilled, skilled). The skills taught during the time employed on site can be transferred to future employment opportunities.
- During the operational phase of the proposed development, a number of permanent and temporary employment opportunities will be created as a result of the proposed development. These opportunities will range from general admin and facility management opportunities, to filling island attendees, wash bay crew and security guards (the latter will be outsourced to a security company in the area).

it was found that the proposed development is located within proximity (approximately 5 km radius) to the following existing filling stations:

Table 3. Filling stations within proximity to the proposed development site.

No.	Filling Station Name	Expected Main Target Market	Oil-Supplier	Accessibility to Heavy Moving Vehicles	Distance from development site (as the crow flies)	Distance from development site (en-route)
1	TotalEnergies Petroport Mossel Bay	Commuters travelling along the N2-highway	TotalEnergies	Very Accessible	3 km	3.9 km
2	Engen Mossel Bay 1 Stop	Commuters travelling along the N2-highway	Engen	Very Accessible	3.7 km	5.1 km
3	Four One Nine Dana Bay Service Station	Residents of Dana Bay	Caltex	Limited Accessibility	5.3 km	9.7 km

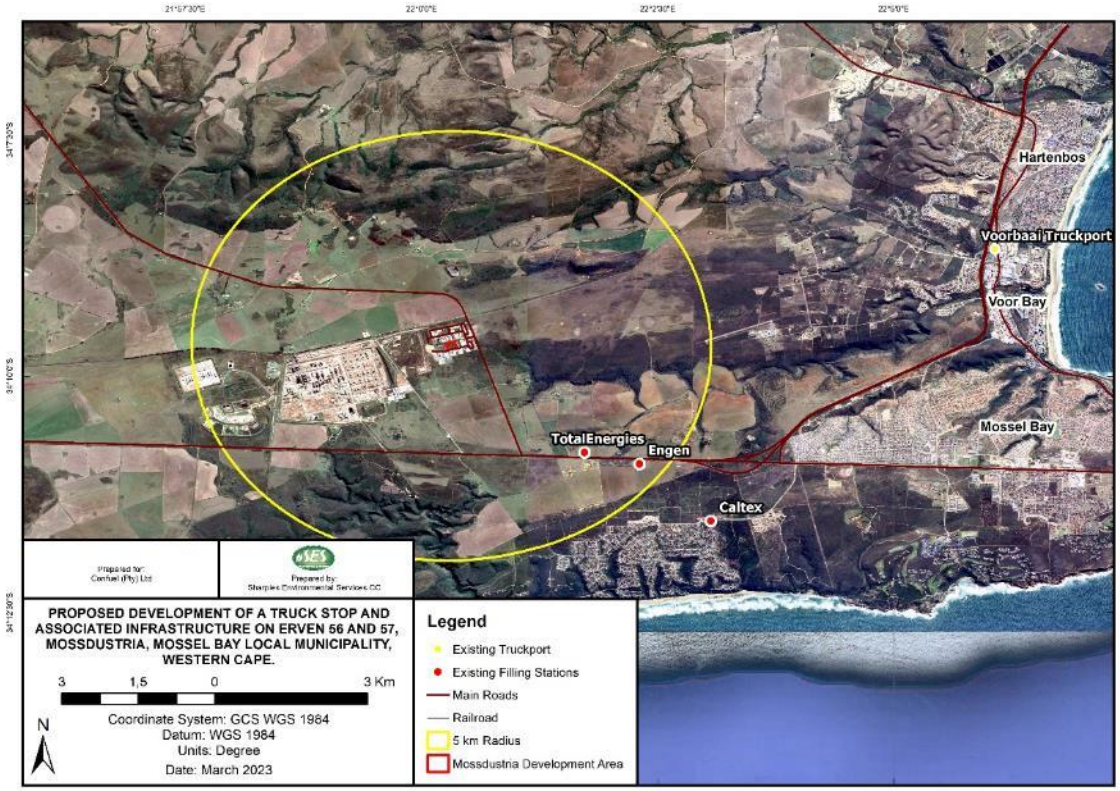


Figure 6. Existing Filling stations within proximity (5 km) to the proposed development site. Additionally, the nearest Truck Stop relative to the proposed development is also indicated.

According to the desktop assessment, the Voorbaai Truckport is the nearest existing truckport located within proximity to the proposed development site, however, this facility does not accommodate safe overnighting opportunities for the truckers. This site is located approximately 8.9 km East (as the crow flies) from the proposed development site and is serviced by the Shell Oil Supply Company located on the property directly adjacent thereto.

In order to ensure that a risk averse approach in terms of the socio-economic impact of the proposed development has been taken, the following has been determined:

- A traffic impact consultant has been approached to determine the impact of the proposed development on the adjacent road network. It was found that no significant impacts will be seen and no further upgrades to the existing infrastructure will be required.
- The proposed development aligns with the Municipal Land use Scheme, the objectives of the Provincial SDF, the Municipal SDF and the Municipal IDP.

In order to obtain a clear indication of the socio-economic structure of the area and to obtain insight on the concerns from the public (regarding the proposed activities), a thorough Post-Applicaiton Public Participation Process (PPP) will be undertaken. This

PPP will be in line with Regulation 41 of the EIA Regulations of 2014, as amended. Comments received will be incorporated into this report prior to submission of the Final BAR.

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.

The following public participation procedures were proposed for the purpose of the proposed project. Based on the demographics analysis (as accessed through Census information) of the Mossel Bay Local Municipality and specifically Mossdustria, it was found that 91.0% of the population is Afrikaans speaking, 6 % speaks English and 3 % speaks other languages. Therefore, the following documents will be made available in Afrikaans and English:

- Executive summary of the Draft Basic Assessment Report;
- All Site Notice(s); and
- All other forms of notifications (such as emails)

This plan aims to be in line with Regulations 40 to 44 of the EIA Regulations of 2014, as amended (GNR 326 of 2017):

Table 4. Public Participation Planning for the proposed project.

Public participation requirement based on the EIA Regulations of 2014, as amended (GNR 326 of 2017)		Proposed implementation
40(1)	The public participation process (PPP) to which the (a) basic assessment report and EMPr was subjected to must give all potential or registered interested and affected parties, including the competent authority, a period of at least 30 days to submit comments on each of the basic assessment report, EMPr, scoping report and environmental impact assessment report.	The following Public Participation Timeframes are proposed for this proposal: • A 30-day PPP timeframe in June/July 2023 which will allow all parties with time to lay comment/show interest on the Draft BAR. It will be in this phase of the proposal that all the requirements of Sub-regulation 41 will be implemented. • Throughout the PPP, Regulations 42 and 43 will be adhered to and the necessary documents (proof of Public Participation) will be included in the submission of the Final BAR.
41(1)	This regulation only applies in instances where adherence to the provisions of this regulation is specifically required.	As per Sub-Regulation 19(1)(a), a 30-day PPP period is required prior to the submission of the Final BAR.
41(2)	The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of an application or proposed application which is subjected to public participation by -	
41(2)(a)	fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of— (i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and (ii) any alternative site;	Two Notice boards (one in Afrikaans and another in English) in line with Sub-regulation 41(3) and 41(4) will be erected on site. Both will be erected along the boundary of the site bordering Mkuze Street. As no alternative sites are being proposed for this proposal, no additional site posters are required.
41(2)(b)	giving written notice, in any of the manners provided for in section 47D of the Act, to— (i) the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken and to any alternative site where the activity is to be undertaken; (ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be	All occupiers and landowners of the properties adjacent to the proposed development site will be notified of the proposal. This will be done in the form of cell phone communications (including WhatsApp broadcasts), email, postal addresses or physical letter drops (where no other contact details have been made available to the EAP). The I&AP register, including all surrounding landowners adjacent to the proposed project site, authorities, organs of state and other affected parties will be compiled and submitted as part of the Final Basic Assessment Report.

	undertaken and to any alternative site where the activity is to be undertaken; (iii) the municipal councillor of the ward in which the site and alternative site is situated and any organisation of ratepayers that represent the community in the area; (iv) the municipality which has jurisdiction in the area; (v) any organ of state having jurisdiction in respect of any aspect of the activity; and (vi) any other party as required by the competent authority;	
41(2)(c)	Placing an advertisement in- (i) one local newspaper; or (ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	As only one local municipality will be affected by the proposed project, an English advertisement will only be placed in the local newspaper, The *Mossel Bay Advertiser,* which was deemed accessible to the public.
41(2)(d)	placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official Gazette referred to in paragraph (c)(ii).	
41(2)(e)	using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to— (i) illiteracy; (ii) disability; or (iii) any other disadvantage.	All notifications and external communications (as stipulated above) will be available in Afrikaans and English in order to reach the greatest audience possible. In addition to these measures, notifications will be placed on Facebook and LinkedIn to notify the broader public of the availability of the Draft BAR. A hard copy of the Draft BAR will be made available for review at the Mossel Bay Library (99 Marsh St, Mossel Bay Central) for the duration of the 30-day PPP.

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

The section above indicates the measures implemented on site. Similarly, these measures speak directly to the contents of the EIA Regulations of 2014, as amended, as well as the Application form submitted for the proposed development. However, in addition to the procedures as stipulated in Section F1 above, this Pre-Application BAR has been circulated to the following Organs of State:

Table 5. Organs of State approached for the purpose of the proposed project.

State Department/Organ of State	Contact Person	Contact Details
DEADP: Development Management Region 3	Dorien Wraith	Dorien.Wrieth@westerncape.gov.za
	Admin	DEADPEIAAdmin.George@westerncape.gov.za
DEA&DP: Pollution Management	Mr. A McClelland	arabel.mcclelland@westerncape.gov.za
Breede-Gouritz CMA	Mr. C Abrahams	cabrahams@bgcma.co.za
CapeNature: Land use – Landscape Easte	Mr. C Fordham	cfordham@capenature.co.za
	Ms. M Simons	msimons@capenature.co.za
Heritage Western Cape	Ms. S Barnardt	Stephanie.Barnardt@westerncape.gov.za
WCG: Department of Forestry	Ms. M Koen	Mkoen@environment.gov.za
	Mr. C van der Walt	corvdw@elsenburg.com

WCG: Department of Agriculture	Mr. B Laymen	brandonl@elsenburg.com
WCG: Transport and Public Works	Mr. X Smuts	Xander.smuts@westerncape.gov.za
	Dr. H Wolff	Herman.wolff@westerncape.gov.za
South African Civil Aviation Authority	Ms. L Stroh	strohL@caa.co.za
	Ms. E Shogola	ShogoleE@caa.co.za
Garden Route District Municipality Executive Manager: Community Services	Ms. C Africa	cafrica@gardenroute.gov.za
Garden Route District Municipality: Health and Environmental Services	Mr. J Compion	jcompion@gardenroute.gov.za
Garden Route District Municipality Executive Manager: Planning and Economic Development	Mr. L Menze	info@gardenroute.gov.za
Garden Route District Municipality Executive Manager: Roads Services	Mr. J.G. Daniels	info@gardenroute.gov.za
Garden Route District Municipality: District Waste Management	Mr. M Hubbe	morton@edendm.co.za
Mossel Bay Municipality: Municipal Manager	Colin Puren	mmoffice@mosselbay.gov.za
Mossel Bay Municipalty: Director Infrastructure Services	Dick Naidoo	dnaidoo@mosselbay.gov.za
Mossel Bay Municipality: Director Planning & Economic Development	Carel Venter	cventer@mosselbay.gov.za
Ward Councillor – Ward 7	Cllr. WS Botha	wbotha@mosselbay.gov.za
Mossel Bay Public Library (CJ	William Clayton	wclauyton@mosselbay.gov.za

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

Proof of notification will be included in the Final BAR.

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

Proof of public participation will be included in the Final BAR.

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

Proof of public participation will be included in the Final BAR. All correspondence will be included in Appendix F of the Final 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 summary of the comments received and the professional team's responses thereto will be populated and provided upon conclusion of the Public Participation Process of the Draft 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).

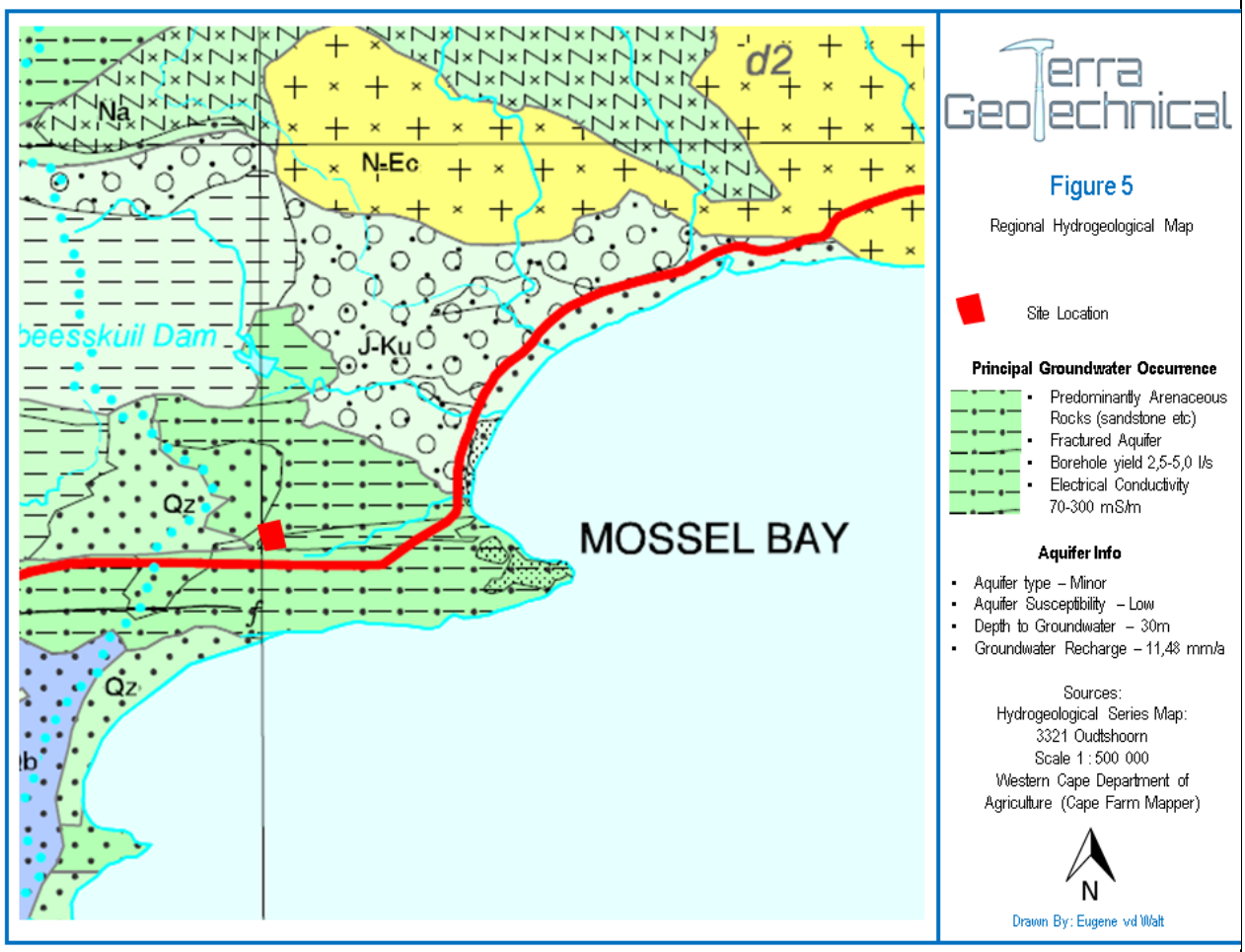
SECTION G: DESCRIPTION OF RECEIVING ENVIRONMENT

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.		
Terra Geotechnical (Mr. Eugene van der Walt, Registered with SACNASP, SAIEG and NHBRC)			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		

The Geotechnical investigations indicated that the proposed development will be located on a fractured aquifer that predominantly consists of arenaceous rocks (sandstone, feldspathic sandstone, arkose, and sandstone becoming quartzitic in places with, an average yield potential of 0.5-2.0 ℓ/s.



A fractured aquifer is an aquifer in which groundwater is stored and flows through fractures, joints, cracks, faults and other discontinuities in hard rock bodies.

The regional groundwater quality, classified by electrical conductivity (EC), range between 70 – 300 mS/m. This is considered to be "good to moderate" quality with respect to drinking water standards.

Based on the information provided by the Western Cape Department of Agriculture (utilizing Cape Farm Mapper V 2.7), the aquifer vulnerability is classified as "low" to surface based contaminants. Depth to groundwater is approximately 30 m with a groundwater recharge rate of approximately 11.48 mm/a.

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.

According to the inputs received from the Geotechnical Investigations Report, two boreholes were used to evaluate the groundwater resource within proximity to the proposed development. These boreholes are located within 2.5 km of the proposed development footprint, with only one located within 1 km (925 m) from the development site. These boreholes have been depicted in Figure 7.

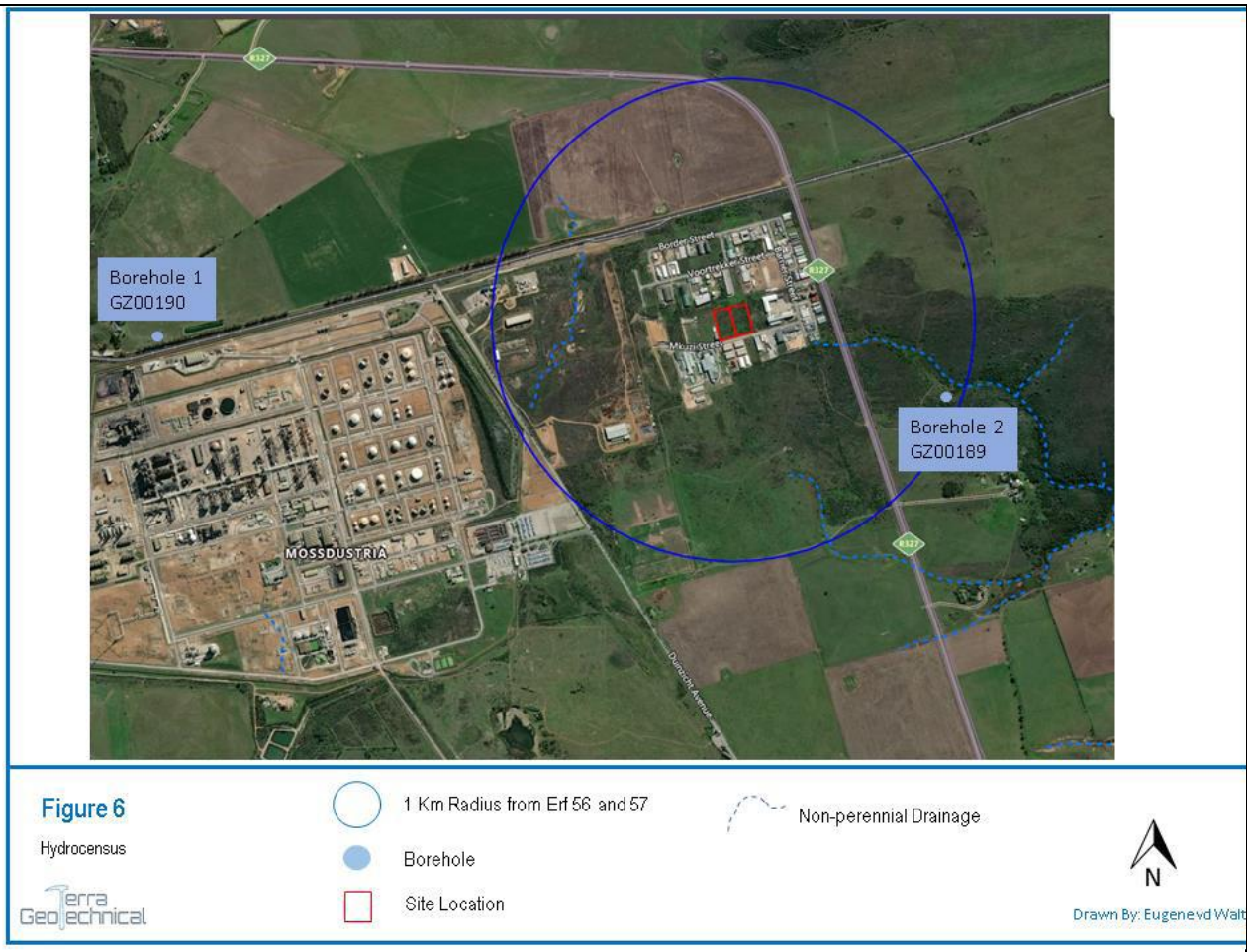


Figure 7. Locations of boreholes used for the evaluation of the groundwater quality of the water within proximity to the site.

The following summary of the field data analysis was received:

- Both boreholes are currently equipped with submersible pumps and in use for the abstraction of groundwater for use in basic farming operations (livestock and irrigation). Borehole GZ00190 (BH1) also supplies water to an adjacent concrete batching plant.
- It was possible to measure the static groundwater level only at Borehole GZ00189 (BH2), located approximately 925m downstream of the site. Static water level within the borehole measured at 14 m below ground level.
- Samples were taken of groundwater abstracted from both boreholes (i.e.: downstream and upstream of the proposed development) and submitted to the relevant water laboratories for testing. The samples were taken directly from the discharge pipe, and thus represents the water being utilized from these boreholes. The following results were obtained:
    - **Borehole GZ00190 (Borehole 1)**
        - The water is deemed of Dangerous quality with regard to the South African drinking water standards. This is due to the high Chloride value of 1205 mg/l. The water also exhibits high Electrical Conductivity and Sodium counts.
        - BTEX-N (benzene, toluene, ethylbenzene and xylene – compounds that occur naturally in crude oil) were not found in the sample.
    - **Borehole GZ00189 (Borehole 2)**
        - The water is deemed of Marginal quality with regard to the South African drinking water standards. This is due to the moderate Chloride value of 336 mg/l.
        - BTEX-N compounds were not found in the sample.

According to the Geotechnical investigations, the groundwater of the proposed development site flows in a south-easterly direction towards the non-perennial drainage channel located towards the East-Southeast of the site.

Based on the information available with regards to the proposed development area (in its entirety), the natural depth of the groundwater 30.23 meters below ground level with a groundwater recharge value ranging between 11.48 and 12.13 mm per annum. The Electrical Conductivity of the site ranges between 150 and 370 mS/m. The proposed development site does not lie within an area of strategic importance as the nearest Strategic Water Source Area (SWSA) is located approximately 21 km north of the proposed development footprint.

Therefore, should the recommendations of the geotechnical report/geohydrological investigations be implemented on site, no adverse impacts will be exercised on the groundwater resources in the area.

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.		
Aquatic Biodiversity Theme: Confluent (Pty) Ltd. (SACNASP Reg: 114084)			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		

Based on the findings of the Site Visit conducted on 15 March 2023, it was indicated that the entirety of both properties had been cleared of vegetation and recovery had just started to take place. Recent rains had resulted in water pooling in a small, shallow depression on Erf 57. The presence of some isolated Cyperus sp. suggests that water may collect here fairly regularly. Formation of this depression is however likely to be associated with the clearing and grading of the site. The small depression was very sparsely vegetated and there was no indication of a well-established hydrophilic plant community indicative of permanent or seasonal water saturation. Soil was heavily compacted (augering of the soil profile was not possible) which presumably results in the periodic accumulation of water in the depression following rainfall.

Figure 8. Photographs showing view of the site to the south (top left) and north (top right), the shallow depression filled with water following a period of heavy rainfall (bottom left and right).

In addition, analysis of historical imagery found no evidence of the presence of any historical wetland features on site. The depression is therefore not considered to be a natural wetland or watercourse. There were no other topographical or vegetation indicators indicating the presence of a watercourse on either of the two properties.

No natural freshwater features were identified within the footprint of the property. The closest confirmed aquatic feature is mapped as a channelled valley-bottom wetland (located outside of the perimeter of the Mossdustria complex to the south-east), but given the very flat topography of the area (i.e. no associated valley slopes), the wetland area is more consistent with a drainage line that has developed wetland features due to inputs of stormwater derived from the industrial complex. This watercourse (which is not considered a natural wetland) is located approximately 235 m away from the proposed development (Figure 9).

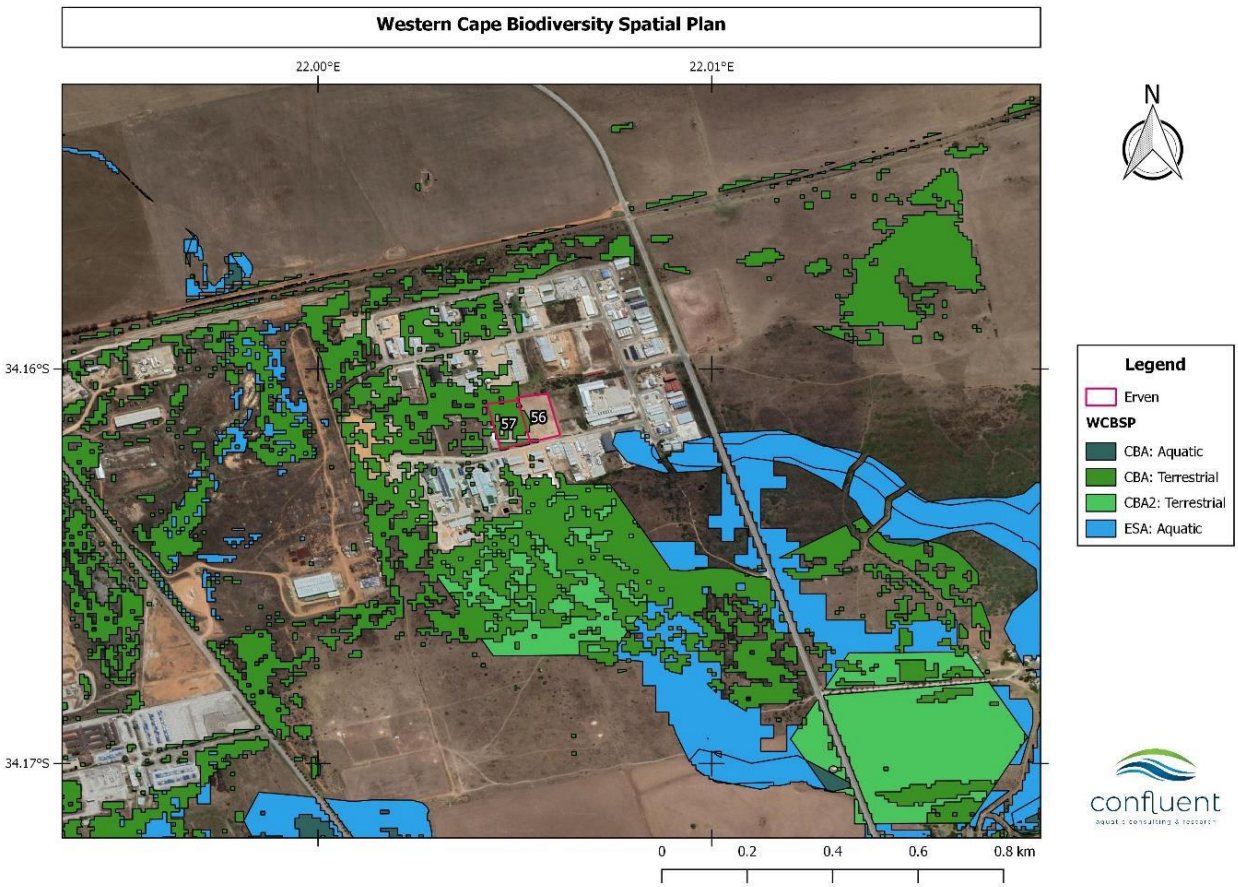


Figure 9. Map of the properties in relation to the Western Cape Biodiversity Spatial Plan (WCBSP) indicating the drainage line located approximately 235 m away from the proposed development site.

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.		
Section 63 of the ICMA does not hold any relevance to the proposed development as no activities linked to the coastal zones are going to be applied in terms of the EIA Regulations of 2014, as amended, as promulgated under the NEMA.			
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
Due to the distance of the proposed development from any known estuaries, no estuary management plans had an influence on the proposed project.			
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.		
Due to the distance of the proposed development from any known estuaries, the HWM and the coastal protection zones, none of the features identified had an influence on the proposed project.			

4. BIODIVERSITY

4.1.	Were specialist studies conducted?	**YES**	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		

To evaluate the Terrestrial landscape of the receiving environment, the following specialists were appointed:
Terrestrial Biodiversity and Plant Species: Confluent Environmental (Pty) Ltd
Animal Species: Cossypha Ecological (Robyn Phillips)

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.

In order to inform the terrestrial biodiversity of the proposed development site, the following geospatial databases were used by the respective specialists:

Other Biodiversity Information Datasets
The whole of Mossdustria is mapped as North Langeberg Sandstone Fynbos, which is not a Red Listed ecosystem according to the Revised National List of Ecosystems that are Threatened and in Need of Protection (Dayaram et al., 2019; Mucina & Rutherford, 2006; NEM:BA Act, 2022). This ecosystem type is found only in the Western Cape and occurs over a broad altitude range (100 to 1800 m). The vegetation is mainly characterised by proteoid and restioid fynbos. Asteraceous fynbos is also found at lower altitudes. The Vlok vegetation map suggests that the proposed development site is at a transition between Petrosa Fynbos-Renosterveld and Proteus Fynbos-Renoster-Thicket. Currently the site represents disturbed vegetation that is just starting to recover following the clearance of vegetation from the entire site in late 2022.

National Freshwater Ecosystem Priority Areas (NFEPA) map
Aquatic biodiversity within the site has been identified as Very High on the basis that the site falls within a Freshwater Ecosystem Priority Area (FEPA). River FEPAs achieve biodiversity targets for river ecosystems and threatened/near-threatened fish species and were identified in rivers that are currently in a good condition (A or B ecological category). Their FEPA status indicated that they should remain in a good condition in order to contribute to national biodiversity goals and support sustainable use of water resources (Nel et al., 2011).

For river FEPAs, the whole sub-quaternary (or quinary) catchment is identified as a FEPA, although the FEPA status applies to the actual river reach within such a sub-quaternary catchment. The shading of the whole sub-quaternary catchment indicates that the surrounding land and catchment area needs to be managed in a way that maintains the good ecological condition of the river reach.

From the perspective of SQC 9292, the main unnamed river reach for which a FEPA status was assigned runs south of the Petro SA refinery into the Indian Ocean (Figure 10). This river originates from within the refinery and runs south towards the coast and the Indian Ocean.

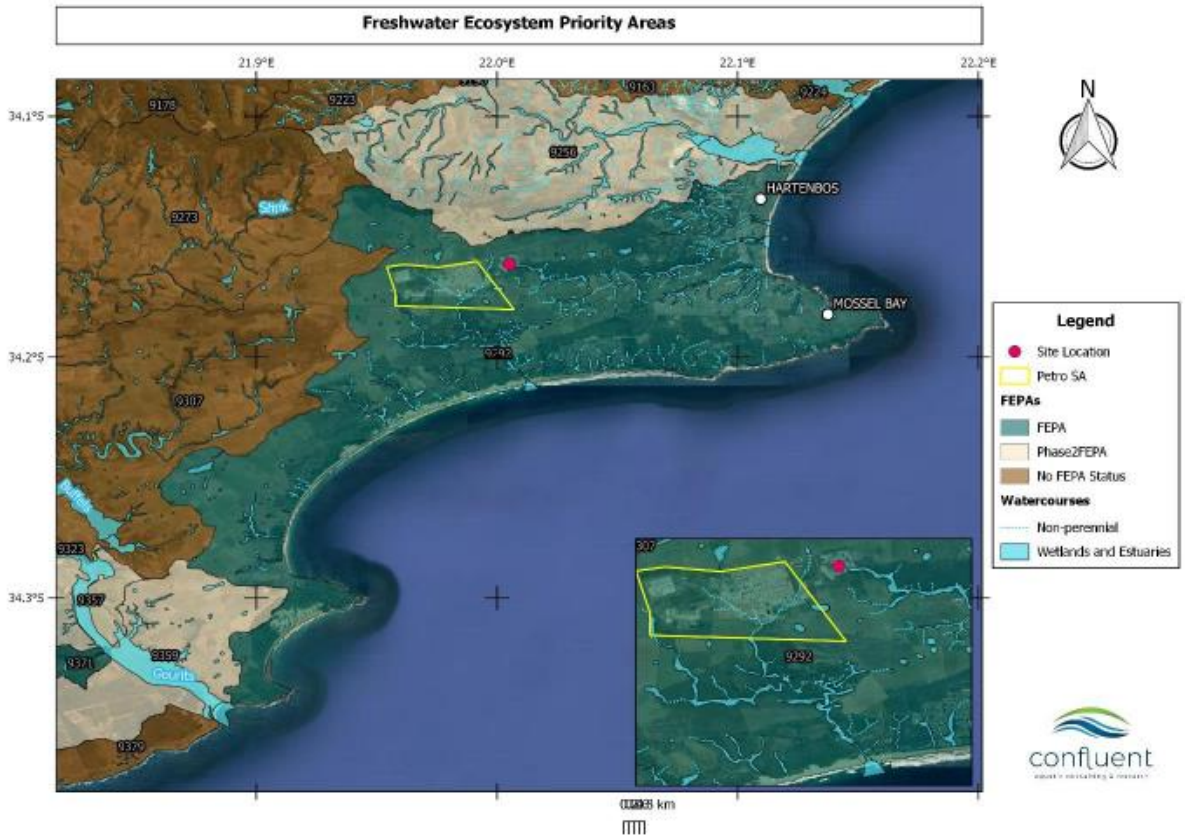


Figure 10. Freshwater Ecosystem Priority Areas (NFEPAs) identified within proximity to the proposed development.

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.

According to the Terrestrial Biodiversity and Plant Species Assessment undertaken for the proposed development (Confluent (Pty) Ltd), the proposed development site is located within the a Critical Biodiversity Area (CBA) 1 and Other Natural Areas (ONAs) as mapped as part of the Western Cape Biodiversity Spatial Plan (WCBSP, 2017) (Figure 11).

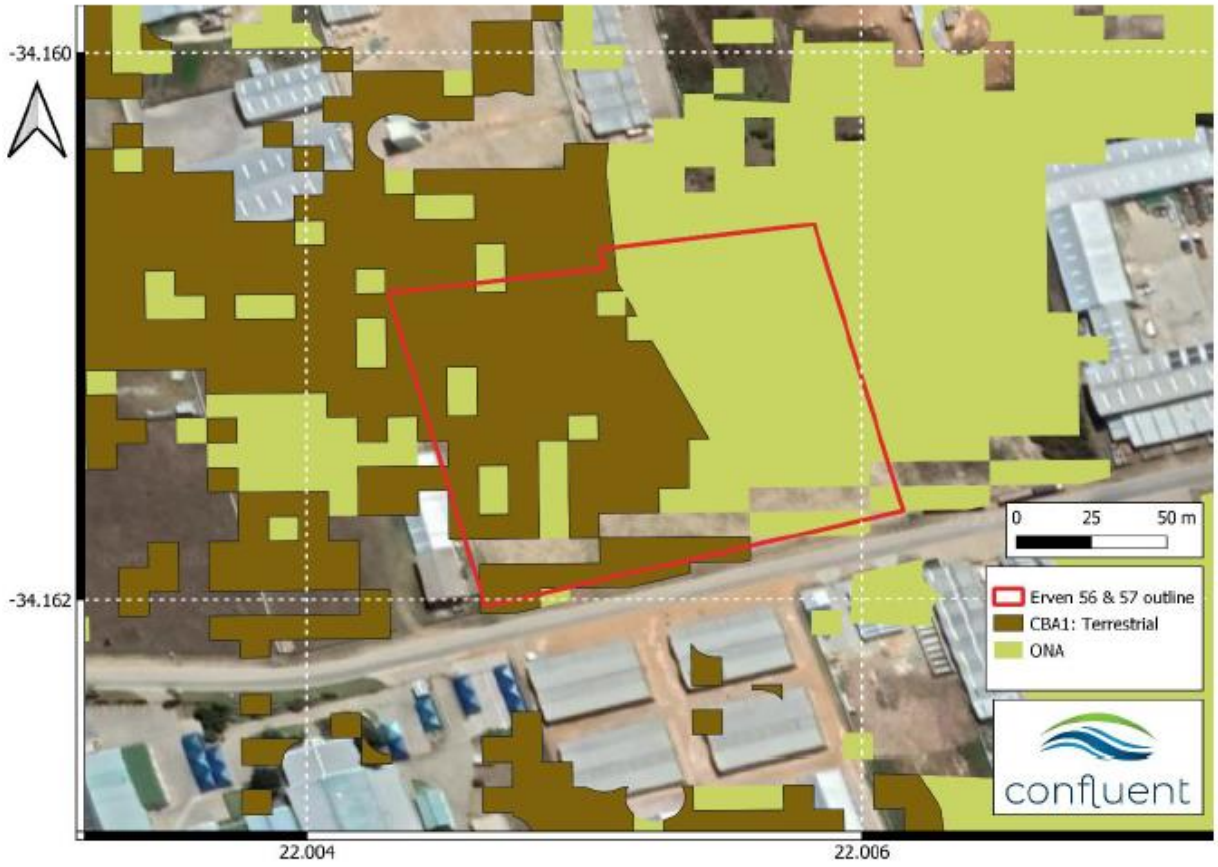


Figure 11. The Western Cape Biodiversity Spatial Plan mapping for the proposed development site.

Table 6. WC BSP (2017) Descriptions of areas demarcated within the project footprint.

Classification	Description	
Critical Biodiversity Area 1	Definition	Areas in a natural condition. Required to meet biodiversity targets for species, ecosystems or ecological processes and infrastructure.
	Objective	Maintain in a natural or near-natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.
Other Natural Areas	Definition	These areas retain most of their natural character and perform biodiversity and ecological infrastructure functions but have not been prioritised in the current Western Cape Biodiversity Spatial Plan.
	Objective	Minimise habitat and species loss to ensure ecosystem functionality through strategic landscape planning. Some flexibility in permissible land uses, but authorisation may still be required for high impact uses.

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.

Terrestrial Biodiversity and Plant Species Theme

The proposed development in Mossdustria covering Erven 56 & 57 is mapped as a CBA1 and ONA area by the WC BSP.

- A total of 67 species were recorded on the site during the site visit conducted on the 15th of March 2023, of which one was a **species of conservation concern** (SCC), *Hermannia lavandulifolia*. Many of the species that were regenerating on the site are native to the North Langeberg Sandstone Fynbos, which is the vegetation type mapped for the site according to the 2018 updated National Vegetation Map of South Africa.
- Most of the site is currently dominated by graminoids, with some indigenous and endemic species scattered in between.
- The botanical sensitivity of the site, as identified by the protocols, is High because of the presence of *Hermannia lavandulifolia*. The SEI calculations for the ground truthed vegetation of site is not the same as the protocol defined sensitivity.
- Given the location of the site, and the past disturbance and infestation by IAPs, the receptor resilience for the site is high, meaning it will likely remain in a modified state and has little potential for rehabilitation. The following alien invasive species of specific concern (due to their Category 1b status in terms of the NEMBA) were found on site: *Cirsium vulgare, Echium plantagineum, Acacia cyclops, Acacia saligna, Cenchrus clandestinus, Datura stramonium* and *Verbena bonariensis*.
- Furthermore, the land is in the middle of an industrial complex and has little functional integrity as it is already isolated from the larger natural areas outside of Mossdustria.
- *H. lavandulifolia* is a very common and widespread SCC, listed under the IUCN criterion A only, which means that this development will have a insignificant negative effect on the conservation targets of this species. This SCC would likely have been lost from the site over time, even if no development took place, because it is
    - in the middle of an industrial area, and
    - because even though it seems to thrive in slight disturbance, it will not persist in a modified / disturbed area indefinitely.
- The edges of the site have a very low SEI, as these areas are prone to reinvasion by IAPs and experience other negative edge effects, while the SEI for the rest of the site is considered low (see).
- The interpretation of the SEI result is given in below, i.e., that the habitat will struggle to recover and that activities of a medium to high impact are acceptable on the site.

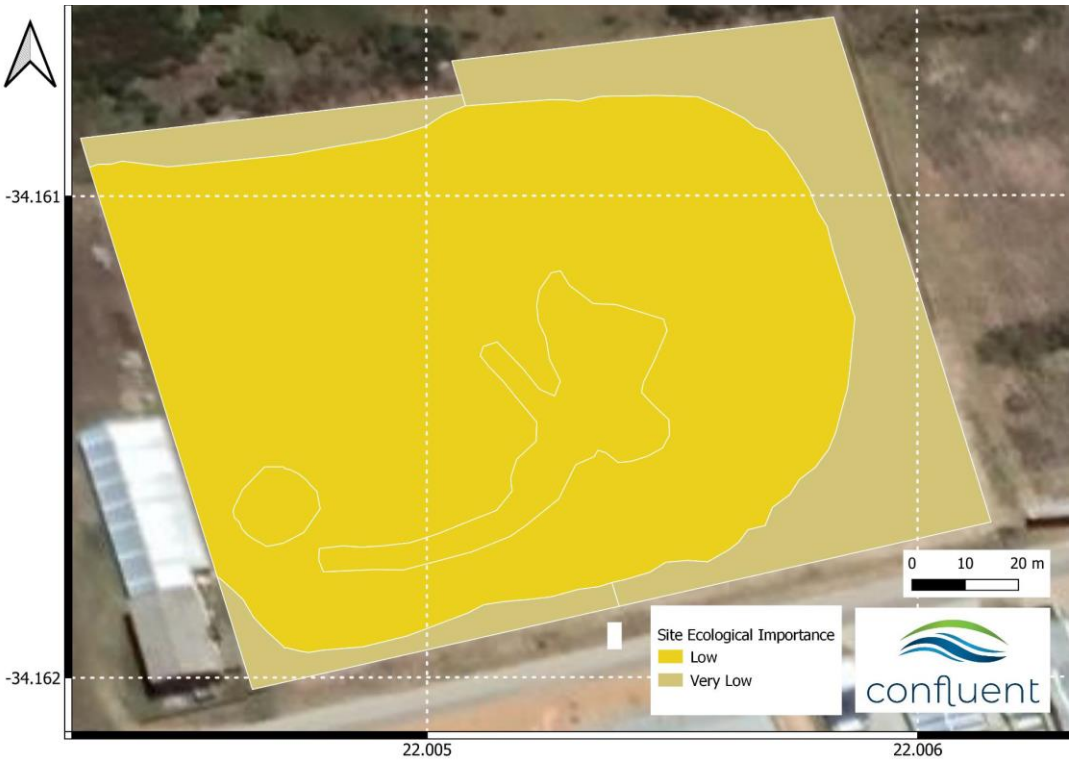


Figure 12. Site Ecological Importance as determined by the vegetation specialist.

Agricultural Theme

The site is classified as medium agricultural sensitivity by the screening tool. This has been confirmed by this assessment, because of the agricultural production potential and current agricultural land use, and the site is verified by this assessment as being of medium agricultural sensitivity.

Although there are soil constraints (depth, drainage, low water holding capacity) on the site's agricultural production potential, it is primary constrained by being non-agricultural land in an industrial area. For this reason, the site will never be utilised for agricultural production and its potential is therefore assessed here as very low.

An agricultural impact is a change to the future agricultural production potential of land. This is primarily caused by the exclusion of agriculture from the footprint of the development. The significance of an agricultural impact is a direct function of the following three factors:

1. the size of the footprint of land from which agriculture will be excluded (or the footprint that will have its potential decreased)
2. the baseline production potential (particularly cropping potential) of that land
3. the length of time for which agriculture will be excluded (or for which potential will be decreased).

In this case, the site is non-agricultural land within an industrial area. The development will cause no loss of agricultural production potential. The focus of an agricultural assessment is to determine whether the proposed development will result in a significant loss of land that has economically viable future cropping potential. Due to the lack of agricultural potential of the land loss in this case, there is no loss of viable future cropland.

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.

The proposed development is not located within the any protected areas listed in terms of the National Environmental Management: Protected Areas Act (Act No. 57 of 2003). The nearest declared Protected Areas in terms of the NEM:PAA is the Attakwaskloof Nature Reserve, located approximately 25 km north of the proposed development, with the Mossel Bay Seal Island Nature Reserve, a CapeNature Reserve (2022), located approximately 10 km East of the proposed development site.

4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.

The site visit was conducted on the 3rd of April 2023 by *Cossypha Ecological (Robyn Phyllips)* following a desktop analysis of the proposed development site.

During the site visit it was determined, as the site was recently cleared (prior to October 2022), the site would be considered to by highly disturbed. The site is mostly comprised of patches of bare ground and secondary patchy vegetation, scattered with common indigenous and alien grasses and shrubs. Faunal activity on the site was very low with only common and generalist birds and small mammals recorded. Some of the species recorded on the site included Barn Swallow *Hirundo rustica*, Karoo Prinia *Prinia maculosa*, Cape Bulbul *Pycnonotus capensis*, and Common Mole-Rat *Cryptomys hottentotus*. No faunal SCC were recorded during the site surveys.

Figure 13. Proposed development site with patches of bare ground and disturbed secondary vegetation.

The site does not provide sustainable habitat for fauna due to its disturbed and fragmented / isolated nature being surrounded by industrial land uses such as warehouses, and roads, and is highly unlikely to support any individuals or populations of faunal SCC.

5. GEOGRAPHICAL ASPECTS

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
As the terrain is a levelled surface, no geographical aspects will be affected.

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.		
ASHA Consulting – Jayson Orton (Cultural Heritage and Archaeological Specialist) Barry Millsteed (Palaeontology Specialist)			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
In accordance with Section 38 of National Heritage Resources Act, 1999 (Act No. 25 of 1999), the project needs to be evaluated by an appropriate specialist and the relevant heritage department needs to be informed of the project. Subsequent to the site visits conducted by the Cultural and Landscape Heritage Consultant and the Palaeontological Consultant, respectively, it was found that the project would have a low impact on all heritage resources. The submitted NID has been attached as Appendix G of this BAR. The final comment from HWC has been received. This comment indicates that the Heritage Resources authority has no objection toward the proposed development and no further Heritage impact assessment would be required for the purpose of authorising the proposed development. As a precaution, a *Chance of Find Protocol* has been provided as part of the Environmental Management Programme (EMPr).			

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.

According to the Notice of Intent to Develop as submitted by the Heritage Specialist (Submitted: 8 May 2023), the site holds the following features:

Places, buildings, structures, and equipment of cultural significance

No structures are present and none seem to have ever been present close to the site historically. Sporadic farms of heritage significance undoubtedly occur in the surrounding area. No impacts are expected.

Landscapes and natural features of cultural significance

The wider landscape has aesthetic value but the development is proposed within an existing industrial area. No impacts are expected.

Archaeological Resources

The wider area is well known for the scatters and, in rare instances, deposits of Early (ESA) and Middle (MSA) Stone Age archaeological materials that occur on the southern coastal plain. Late Stone Age (LSA) materials may also occur but are less likely in this context. Famous sites in the area include the various shelters of the Pinnacle Point Complex (Jacobs 2010; Marean 2010) and the Cape St. Blaize Cave at Mossel Bay (Goodwin & Malan 1935; Keller 1970) which have all yielded important Middle Stone Age (MSA) Deposits. Early Stone Age (ESA) artefacts are routinely recorded in agricultural lands but their distribution varies massively. In some place artefacts are absent, but in others they can be dense. Nilssen (2006) worked very close to the study area and reported ESA artefacts. He also found ESA artefacts along the N2 to the southeast of the study area, including large numbers collected from trenching excavations (Nillsen 2009). Amongst these were a number of Acheulean handaxes. Although the site has been levelled. It is expected that this will, in fact, provide a good opportunity to determine the likelihood of subsurface artefact-bearing gravel being present.

The site visit (and geotechnical report) showed that there is a clay substrate with no suggestion of Enon Formation gravels. No artefacts were seen. The many small rock fragments on the surface are suggestive of a fill brought in to cover the clay that was revealed by grubbing. The neighbouring site to the east has a clean soil surface free of any rock fragments and assumed to original. It is thus concluded that this site does not have any archaeology on it, although isolated artefacts could still be present but would be of zero significance.

Palaeontological Resource

The site is indicated on the SAHRIS Palaeosensitivity map as being high sensitivity. A specialist palaeontological opinion was thus sought for this project in order to have an informed opinion. This was compiled by Barry Millsteed. Citing the geotechnical report, Millsteed notes that the soil profile is in excess of 1m deep across the entire site and that the soil consists of an anthropogenic horizon at the top, followed by a clay horizon and then a residuum composed of weathered sandstone cobbles and sand and clay. These deposits are suggested to have no palaeontological potential. It is evident that sensitive bedrock is much deeper down than any depth that will be penetrated by the proposed development (note that the fuel tanks will be above ground) and that impacts to fossils will thus not occur.

Graves and burial grounds

There is always a very small chance of unmarked human burials, but in this instance, where the site has been levelled. It is likely that any graves present would have already been exposed. Graves are thus not expected.

8. SOCIO/ECONOMIC ASPECTS

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

According to the 2021 Socio-Economic Profile (WCG, 2021): Mossel Bay has the second largest population in the Garden Route District Municipality with a population size of 96 114 (in 2021). According to the forecasts of the Western Cape Department of Social Development, the population is expected to reach 96 885 by 2023.

According to the 2021 Socio-Economic Profile (WCG, 2021) for the Mossel Bay Local Municipality, the Municipality's population gender breakdown will be relatively evenly split between male (45 654, 47.5 per cent) and female (50 460, 52.5 per cent). With an estimated population growth rate of 0.5% in 2022 and 0.3% in 2023, the estimated population site of the Municipality is 96 885. For 2023, the split is anticipated to be 46 078 (47.56 per cent) and 50 807 (52.44 per cent) for males and females respectively.

According to the 2022-2027 5th Generation Integrated Development Plan (MLM, 2022) (At the time of the compilation of this BAR, the Draft 2023 Revision of the IDP of the Municipality was under review), the majority of Mossel Bay's population is concentrated between the ages of 20 to 39, which is possibly reflective of an influx of young working professionals into the region (increased employment opportunities as a result of positive economic growth in the region). It is also noticeable that the population numbers in the older age categories remain relatively high in comparison to other districts. This trend can be attributed to the fact that Mossel Bay and its surrounding areas remain a popular retirement destination.

It is estimated that the Municipal Area had approximately 30 015 households in 2021 and the population density in the same year was 48 people per square kilometre. This is the third most populated municipal area (in terms of population density) in the district (surpassed only by Bitou and Knysna.

According to the 2022 revision of the IDP (Fifth generation Municipal IDP 2022-2027), approximately 52.8% of the households within the Municipality falls in the Low-income bracket, 17.4% of which have no income. Less than 50% of households fall
within the middle to higher income categories, split between 39,2% in middle income group (R38 201 – R307 600) and 8.1% in the higher income group (R307 601 – R2 457 601+). The intensity of poverty, i.e., the proportion of poor people that are below the poverty line decreased from 43,5% in 2011 to 43% in 2016.

The IDP also indicates that the dependency ration of Mossel Bay Municipality is expected to see an increase in the dependency ratio from 55.4 in 2021 to 56.6 in 2025. According to the 2021 Socio-Economic Profile (WCG, 2021) of the Municipality, the dependency ratio for 2023 was predicted to be 56.6%.

For the purpose of the proposed development the EAP has included the review of the Safety and Security statistics for the local Municipality as this would be of concern in terms of management in the operational phase of the proposed development.

As described in the IDP for the Municipality, the ***murder*** rate in the area remained quite constant throughout the last 3 review periods, with the 45 murders occurring in the 2020/2021 time period. This is high, especially considering the murder rate in the district showed a steady decrease over the last 3 review periods.

The number of ***Sexual offences*** (including the association within the municipality showed a steady decrease since the 2018/19 review period up until the 2020/21 review period, with 91 offences recorded in the 2020/21 review period. This reflects the trend seen in the number of sexual offences in the district over the last three review periods.

Drug-related offences have halved in during the last three review periods, with 1 034 offences recorded during the 2018/19 review period and 505 recorded for the 2020/21 review period. A similar trend was seen on a district scale. As noted in the IDP, evident that the law enforcement agencies are implementing effective methods to fight against this crime.

Regarding ***Driving under the influen***ce (DUIs), the occurrences thereof has seen a steep decrease in the last three review periods, with the lowest reading observed in the 2020/21 (176 DUIs recoded). Although generally lower, the ratio per 100 000 individuals in the municipality is remains very high when compared to the district scale. In the 2020/21 review period, 12 fatal car crashes were recorded, and 15 road user fatalities were recorded. Both of these parameters have seen a decrease since the 2018/19 review period. The occurrence of residential **burglaries** stabilised during the 2019/20 // 2020/20 review periods. With 2020/21 seeing 759 occurrences in 2020/21.

Community safety and security forms an integral part of the IDP, where this forms one of the Key Performance Areas of the Municipality. This is in line with the Municipal Systems Act 32 of 2000. Accordingly, the Local Municipality has undergone organization restructuring, wherein a new directorate was established, Community Safety. To ensure that Mossel Bay Municipality focusses on the community's priority concerns for action in Community Safety, the Council has agreed to develop a Community Safety Plan.

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

During the construction phase of the proposed development, a number of temporary labour opportunities will be made available to facilitate the building of the proposed facilities. The employment opportunities to be created will include the requirement of unskilled, semi-skilled and professional labourers. It will be the aim of the Developer to promote transferable skills in order to ensure that the labourers acquired skills that can be used for future employment opportunities.

During the operational phase of the proposed development, permanent employment opportunities will be created. These opportunities will include predominantly the provision of employment opportunities in the following fields: administrative opportunities, filling station attendants and security guards.

As part of the socio-economic contribution of the proposed development, the project strives to provide truckers with a haven during their travels to and from their delivery destinations. The proposed development will also empower women truck drivers to journey longer distances as the facilities will cater specifically to them as well.

Therefore, the aim of the proposed facility is to propose equality amongst the trucking community in terms of services provided to them. Because the trucking companies registered with the Applicant's existing services are not limited to a specific area (geographically speaking), the proposed development would have a positive economic influence not only on a local scale (where job opportunities are created for the local community), but also on a regional scale, where the commuters of the logistics industry are provided with a safe area, outside of the residential area, within close proximity to the N2-Highway, allowing for longer travel distances (and therefore further distribution networks).

The anticipated capital expenditure as a result of the construction phase of the proposed development will be R 25 000 000.

Based on the findings of the traffic impact compliance statement (Element Consulting Engineers), no further upgrades to the existing road works will be required (from a capacity and a designing aspect).

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

Where possible, local labour and Small Micro and Medium Enterprises (SMMEs) will be utilised for the purpose of fulfilling the requirements of the construction phase activities.

During the operational phase of the proposed development, there are a number of components to take into consideration, amongst these, recycling of waste will be a major contributor to the upliftment of the area. Where possible, SMME's will be approached to conduct the waste management activities of the site (under the supervision of the facilities manager in order to comply with the Waste Management Plan compiled for the proposed development).

Furthermore, as described in point 8.2, during the operational phase of the proposed development, a number of permanent employment opportunities will be created. These opportunities will include predominantly the provision of employment opportunities in the following fields: administrative opportunities, filling station attendants and security guards.

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.

Construction phase

During the construction phase of the proposed development, temporary impacts to people's health and well-being would be expected as a result of increased movement within proximity of the proposed development footprint (thereby the occupiers of Mkuze Street will be affected. This will lead to a temporary (short-medium) negative impact on the 'sense of place' of place. Concerns regarding the security and safety impact to be seen as a result of the construction phase can be partially mitigated by on-site management measures.

Operational phase

Following the construction phase, the visual aspect of the site will no longer be of concern, as the site's land use will align with that of the surrounding land uses (as the proposed development site and all developed surrounding properties have been zoned as Industrial Zone II. Consent Use for the proposed land use has already been obtained from the Local Municipality. In furtherance to the potential visual impacts which may be seen as a result of the proposed development's operational phase, is the implementation of dust suppression measures (including regular dust monitoring in line with the relevant Air Quality Regulations) determined as part of the planning and design phase of the proposed development. The mitigation (in terms of design) has been included in the project description and the mitigation measures of the in the Impact Assessment section of this Basic Assessment Report.

The proposed development's operational phase will see to added concerns regarding the community safety issues that could arise from the presence of a truck stop within proximity to a number of other industries. Typical negative aspects associated with a truck stop includes:

- Increased crime rate in an area;
- Increased risk of accidents along the road due to indiscriminatory driving by truckers;
- Increased occurrences of sex workers in the area;
- Increased vandalism of buildings within proximity;
- Increased sexual offence rates;
- Increased fire risk; and
- Depreciation of property values.

The risks identified can, by means of a series of strict mitigation measures (including on site protocols and design phase activities), be mitigated to such a degree that the proposed development will have a negligible impact on the properties immediately surrounding the proposed development. All impacts have been assessed and addressed in Section I of this report.

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.

The preferred property and site alternative for the proposed project is for the development to occur on Erf 56 and erf 57 of Mossdustria, Mossel Bay Local Municipality, Garden Route District Municipality.

The preferred alternative will see to the construction of a truck stop and associated infrastructure with the following major components including, but will not be limited to:

- A diesel storage area (with observation wells) with a combined capacity of 482 m^3.
- A service station building (which will include a canteen, sanitation facilities [for both men and women]).
- A washing facility.
- A number of parking areas aimed at accommodating both single and double wagon trucks.
- An administrative area.
- A guardhouse.

In addition to these structures, the layout plans have been created in such a way so as to incorporate a future building (located toward the North-Eastern corner of the site. This building will be aimed toward providing additional services to the clients using the proposed facilities.

The detailed description of the layout plan of the preferred alternative has been provided in Section B of this report.

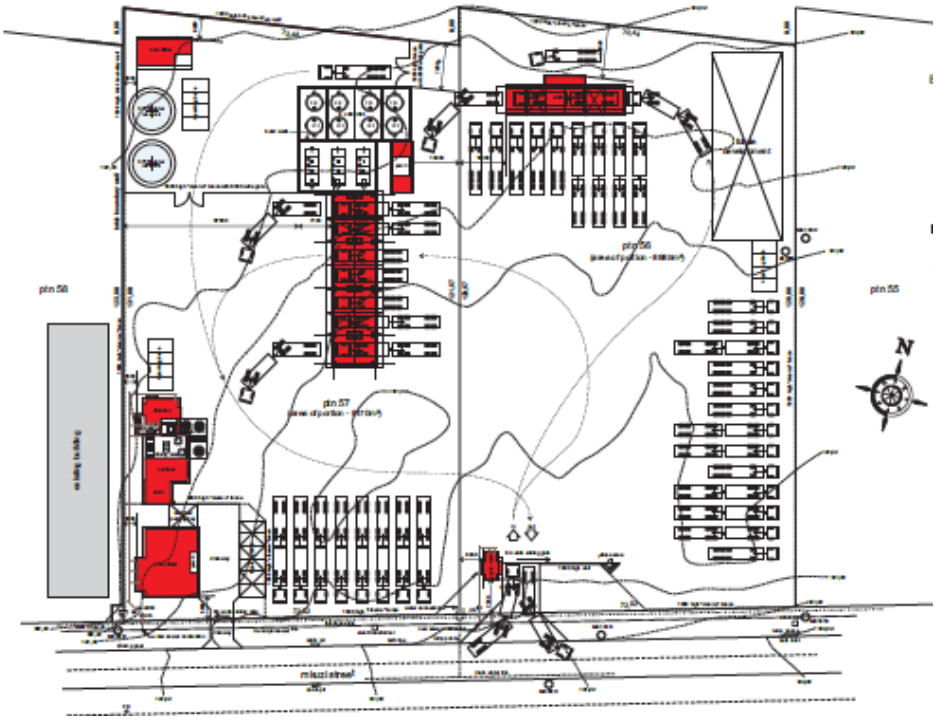


Figure 14. Site layout plan for the proposed truck stop and associated infrastructure on Erf 56 ad 57 in Mossdustria.

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

No property/location alternatives were explored for the purpose of establishing these facilities.

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

The site selection matrix was not used for this project, as only one location was proposed for the proposed development.

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

A number of site layouts were considered to inform the Site Development Plan. Each layout aimed to provide added security measures and additional provisions. Most notably, the development considered a site alternative which saw the inclusion of a larger diesel storage area. Ultimately, the feasibility of the development of such a large storage area was disputed and the decision was made to adopt a lower tankage in order to allow the project team the opportunity to evaluate the operational feasibility of the proposed facility first.

In the quest to providing future additional services for all users of the facilities, the layout was amended in order to accommodate all the features as described in the sections above.

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

Based on the following, no other properties were considered for the purpose of the proposed truck stop development:

- The properties in question were bought specifically for the purpose of developing a truck stop in this area.
- The properties are both zoned as Industrial Zone II, and with special consent use obtained from the Municipality, a site zoned as such can be used as a Truck Stop. The beforementioned application has been lodged with the Municipality and has been subsequently approved.
- The location of the proposed development site is ideally located due to the distance from the nearest residential areas of Mossel Bay and Dana Bay, therefore, reducing the typical impacts associated with truck stops on these areas.
- The proposed site is also ideally located in relation to the N2-highway, providing a much-needed service to the logistics industry utilising the N2 as a primary passageway. Although there are numerous filling stations located along the N2-highway that accommodates trucks, very few of them provides a safe haven for the truckers (both male and female) to refresh and rest at.

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

Positive

- Provision of a truck stop facility, allowing a safe resting place for all truckers and invertedly safeguarding the residential areas from the formation of illegal truck stops
- Control of alien invasive species on site (and during construction the alien invasive species within the 2m disturbance strip will be maintained).
- Uplifting vacant land within the Mossdustria area
- Providing an economic boost to not only the Mossdustria area, but also the Mossel Bay area, as the project aims to deliver a service to the logistics sector.
- Upliftment of local labour

Negative

- Temporary impact associated with the construction phase activities (i.e. noise, visual impacts of construction, dust);
- Potential habitat fragmentation due to the transformation of an undeveloped area to a developed area.
- Potential loss of species of concern

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

Provide a description of the preferred activity alternative.

No activity alternatives were considered. The properties were bought with the intent to develop a truck stop on these properties.

Provide a description of any other activity alternatives investigated.

No activity alternatives were considered. The properties were bought with the intent to develop a truck stop on these properties.

Provide a motivation for the preferred activity alternative.

No activity alternatives were considered. The properties were bought with the intent to develop a truck stop on these properties.

Provide a detailed motivation if no activity alternatives exist.

No activity alternatives were considered. The properties were bought with the intent to develop a truck stop on these properties.

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

Positive

- Provision of a truck stop facility, allowing a safe resting place for all truckers and invertedly safeguarding the residential areas from the formation of illegal truck stops;
- Providing an economic boost to not only the Mossdustria area, but also the Mossel Bay Municipal area, as the project aims to deliver a service to the logistics sector.
- Upliftment of local labour through the provision of temporary and permanent employment opportunities during the construction and operational phases respecitively.

Negative

- Increase in potential nuisances

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.

Provide a description of any other design or layout alternatives investigated.
Provide a motivation for the preferred design or layout alternative.
Provide a detailed motivation if no design or layout alternatives exist.
List the positive and negative impacts that the design alternatives will have on the environment.

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:
Provide a description of any other technology alternatives investigated.
Provide a motivation for the preferred technology alternative.
Provide a detailed motivation if no alternatives exist.
List the positive and negative impacts that the technology alternatives will have on the environment.

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

Provide a description of the preferred operational alternative.
Provide a description of any other operational alternatives investigated.
Provide a motivation for the preferred operational alternative.
Provide a detailed motivation if no alternatives exist.
List the positive and negative impacts that the operational alternatives will have on the environment.

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 option of the proposed development is that the construction and operation of the proposed development to not go forth and the status quo of the proposed development site remains as is. No formalised facility is provided to the male and female truckers of the logistics industry. Therefore, the influences of fatigued drivers will continue to be seen on the National Road. Additionally, in order to seek rest, trucker will continue to make use of residential areas and informal rest stops along the roads in order to get much needed rest. This sees that there will be no change to the security risks associated with having truckers within vicinity to residential areas. Additionally, as these truckers tend to carry cargo of high value, not having a well-lit, fenced off area to house their wagons poses a security threat their industry as well.

Additionally, the economic benefits of capital contributions to infrastructure and socio-economic benefits of the employment opportunities to be created during the construction and operational phases, respectively, of the proposal will not be seen.

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.

No other feasible alternatives currently exist for the proposed development. Although a greater storage capacity of the diesel farm was once considered, it was decided that the need for a larger storage capacity will be determined once (if approved) the proposed development is operational, only then will the feasibility of expansion be able to be determined.

No other operational, technology or activity alternatives were considered,

The proposed development site (both properties) was purchased with the intention to develop a truck stop. The sites were chosen due to their proximity to the N2-Highway and their Zoning (Industrial Zone II). Land Use Consent for the proposed works, for the proposed layout, and a wholesale licence has been obtained for the proposed development. All sensitivities of the site point towards the proposed land use of the site being favourable, with the implementation of the mitigation measures proposed by the specialists.

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

The preferred activity, site and location alternative for the proposed site is the truck stop facility on Erven 56 and 57 of Mossdustria, to be equipped with the following structures amongst others:

- A diesel storage area (with observation wells) with a combined capacity of 482 m^3.
- A service station building (which will include a canteen, sanitation facilities [for both men and women]).
- A washing facility.
- A number of parking areas aimed at accommodating both single and double wagon trucks.
- An administrative area.
- A guardhouse.

The proposed development site has been zoned as Industrial Zone II in terms of the Mossel Bay Municipality Land Use Scheme and Consent Use has been obtained.

The preferred layout alternative has been presented in Figure 15.

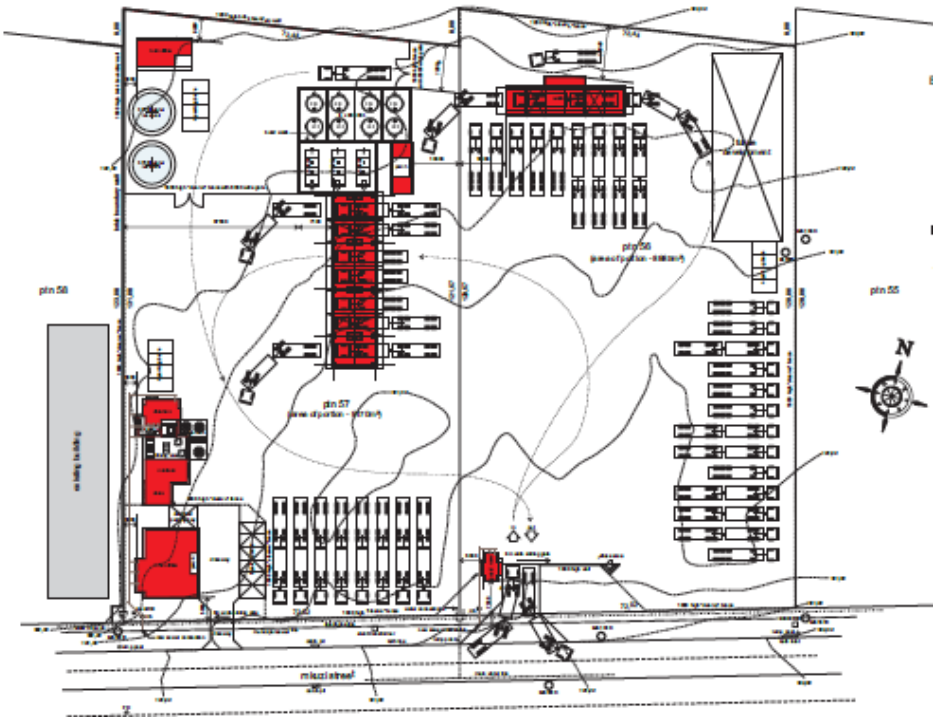


Figure 15. Preferred site layout plan for the proposed truck stop and associated infrastructure on Erf 56 ad 57 in Mossdustria.

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).
Based on the information provided by the various appointed specialists, the conclusion was reached that no-go areas were not applicable within the proposed development site. The area beyond the property boundaries were however adopted as the no-go areas for the proposed development. Except for the areas where construction works would be required for the purpose of the services connections and the construction of the access ways. These works will be confined to Mkuze Street (the southern boundary of the site).

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 assessment criteria utilised in this environmental impact assessment is based on, and adapted from, the Guideline on Impact Significance, Integrated Environmental Management Information Series 5 (Department of Environmental Affairs and Tourism (DEAT), 2002) and the Guideline 5: Assessment of Alternatives and Impacts in Support of the Environmental Impact Assessment Regulations (DEAT, 2006).

The impacts have henceforth been determined through the following parameters:

- The **extent** of the anticipated impact.
- The **duration** for which the impact will be exercised.
- The **probability** of occurrence of the anticipated impact.
- The **significance** of the anticipated impact.
- How **reversible** the anticipated impact would be.
- How **mitigable** the anticipated impact would be.
- The **degree of loss** of the resources.
- The **cumulative impact** of the anticipated aspect.
- The significance of the **consequence** of the aspect.

Determination of the Extent (Scale)	
Site specific	On site or within 100m of the site boundary, but not beyond the property boundary
Local	The impacted area includes the whole or a measurable portion of the site and property, 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	
Temporary	The impact will be limited to the construction phase
Short term	The impact will either disappear with mitigation or will be mitigated through a natural process in a period shorter than 8 months after the completion of the construction phase.
Medium term	The impact will last up to the end of the construction phase, where after it will be entirely negated in a period shorter than 3 years after the completion of construction activities.
Long term	The impact will continue for the entire operational lifetime of the development, but will be mitigated by direct human action or by natural processes thereafter.
Permanent	This is the only class of impact that will be non-transitory. Such impacts are regarded to be irreversible, irrespective of what mitigation is applied.

Determination of Probability	
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 impact 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 impact 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.
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 with the overall context of the project, is considered to be a fatal flow in the project proposal.

Determi9nation of Reversibility	
Completely Reversible	The impact is reversible with implementation of minor mitigation measures
Partly Reversible	The impact is partly reversible but more intensive 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 is reversible with implementation of minor mitigation measures
Can be partly mitigated	The impact is partly reversible but more intense mitigation measures
Can be barely mitigated	The impact is unlikely to be reversed even with intense mitigation measures
Not able to mitigate	The impact is irreversible, and no mitigation measures exist.

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 marginal loss of resources.
Significant loss of resources	The impact will result in 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.

Determination of Consequence significance	
Negligible	The impact would result in negligible to no consequences.
Low	The impact would result in insignificant consequences.
Medium	The impact would result in minor consequences.
High	The impact would result in significant consequences.

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.

Alternative:	**Preferred alternative**	**No-Go Alternative**
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	**Compliance with legislative requirements** The proposed works are subject to a number of approvals and permits from various spheres of the environment. Commencement of activities without all relevant permits/permissions/approvals including registered servitudes, permits to remove specific vegetation, etc. as well as commencing without implementation of specialist recommendations, including search and rescue, and compliance with EMPr pre-construction activities, can result in penalties, time delays and excessive costs. All stemming from poor planning. Climate change considerations need to be addressed at this stage, and where possible, adaption/mitigation measures found to be feasible must be integrated into the final design/planning during construction, and financial provision must be made where necessary.	No change in the status quo
Nature of impact:	Negative	
Extent and duration of impact:	Regional / Medium term	
Consequence of impact or risk:	• Non-compliance with the relevant approvals • Penalties or fines to be issued	
Probability of occurrence:	Low (Improbably)	
Degree to which the impact may cause irreplaceable loss of resources:	Low	
Degree to which the impact can be reversed:	Reversible	
Indirect impacts:	Increased traffic impacts as a result of the status quo of the existing infrastructure.	
Cumulative impact prior to mitigation:	Low	
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:	High	
Degree to which the impact can be managed:	High (can be managed)	
Degree to which the impact can be mitigated:	High (can be mitigated)	
Proposed mitigation:	General mitigation: • Ensure programme of works is planned accordingly and includes recommended measures where necessary, such as implementing search and rescue activities.	

	• Ensure financial allowances are made for the recommended measures, such as search and rescue plans, rehabilitation, etc. • Ensure all relevant permits/licenses/approvals are in place and are valid prior to commencing with works. • Ensure that the Contractor has accepted the approved EMPr and Environmental Authorization (and any other relevant permits/licenses, etc), as a part of their Tender Document, to ensure that they are fully aware of their responsibilities in terms of the implementation of these documents. • Ensure that the Contractor provides method statements for activities intended to be undertaken, and these are checked and approved by the ECO as well as the Engineer. • Inform ECO of planned works ahead, so as to ensure inductions are undertaken timeously. • Involve ECO in selection of site camp location. Climate Change Considerations including adaption, must be integrated into the final design, and mitigation must be integrated into the construction scope of works, where necessary, all financial provision must be made: • Daily assessment of weather conditions should be completed during construction stage, to ensure conditions are viable for labourers to be working outside (ie: temperatures are not excessive). • Potable water should be available for consumption during construction, to keep labourers hydrated. • Implement rainwater capturing system for temporary storage of water to be utilized for washing tools, etc. • Utilize hand sanitizer for washing hands. • Request that labour use their own water bottles, to be filled up, rather than drinking from taps. • Increase fire risk: o Position fire safety equipment at all proposed reservoir sites. o Establish non-smoking signage at all reservoir and pump station sites, to remind maintenance teams that this activity must be avoided. o During development fires should be strictly prohibited, smoking must be discouraged on site. (If the Contractor allows this activity there must be a designated area within the site camp, with an appropriate bin to contain discarded cigarettes, with an appropriately heavy cover, only permitted within the site camp where it can be controlled) No smoking is permitted within the working corridor. o If security is positioned on site, at night, they must be briefed on fire hazard risks.	

	○ During construction and operational activities no uncontrolled fires are allowed. ○ Ensure emergency numbers are readily available with a working cell-phone on site, the foreman responsible the team is to ensure that he has these emergency numbers, and can contact emergency services immediately.	
Residual impacts:	None	
Cumulative impact post mitigation:	Low	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**No significance**	No impact
Potential impact and risk:	**Site establishment and Pre-construction activities** Poor site establishment can lead to long-term issues on site. Failure to appropriately designate working corridors can result in works exceeding the approved assessed footprint, resulting in non-compliance and potentially penalties and delays.	
Nature of impact:	Negative	No change to the status quo of the site
Extent and duration of impact:	Local / Short-medium term	
Consequence of impact or risk:	• Site camp location may create issues and can lead to additional listed activities. • Non-compliance with approved documentation.	
Probability of occurrence:	Low	
Degree to which the impact may cause irreplaceable loss of resources:	Low	
Degree to which the impact can be reversed:	Reversible	
Indirect impacts:	Penalties, fines and time delays	
Cumulative impact prior to mitigation:	Medium	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**Medium-High**	
Degree to which the impact can be avoided:	High	
Degree to which the impact can be managed:	High (can be managed)	
Degree to which the impact can be mitigated:	High (can be mitigated)	
Proposed mitigation:	***General:***	

	• Inform ECO of planned works ahead, so as to ensure inductions are undertaken timeously. • Involve ECO in selection of site camp location. • Ensure all labour and sub-contractors undergo environmental inductions. • Ensure flora permits are in place timeously – allow at least 1 or 2 months before commencement. • Environmental Awareness and training (EAT) – Ensure all labour are informed and plant operators are aware of risks, issues, dos and don'ts and no-go areas. ***Landowners:*** • Notify surrounding landowners/business owners and tendents of the construction programme to ensure that they are aware that construction activity may bring about delays/obstructions as well as ensuring that they are aware of any risks. • Ensure clear signage is erected on the access roads. ***Site Camp Establishment:*** • Ensure site selected is inspected and approved by ECO. • Utilize disturbed or transformed areas for site camp establishment. • Ensure the site camp is positioned on a levelled area and is easily accessible. • Ensure site camp is fenced off with appropriate fencing and shade cloth, to block out activities within. • Ensure access to site is at one point, unless to existing points of entry/exit are identified. • Ensure access onto site is controlled. • Ensure there is 24hr security. • Designate specific areas for specific purpose, including storage areas, machinery storage areas, parking areas, waste disposal areas, etc. • Ensure an Environmental File is established on site that remains on site for the duration of construction, for auditing purposes. This file should contain as a minimum: - Copies of audit reports. - Copies of disposal/cleaning slips related to waste disposal at a registered waste disposal site and from company appointed to clean toilets. - Copies of purchase orders for rehabilitation material etc. - Copies of all approvals, including: Environmental Authorization, EMPr, and any other license/permit/approval. - Incident register. - Complaints register. - Copies of induction registers. • Site must at all times be equipped with a spill-kit. • Plan positioning of Potable Toilets for labour working along the route. • Potable Toilets:	

	- Ensure toilets are positioned on levelled areas and are protected from wind and rain that could result in them blowing over and spilling waste contents. - Ensure toilets are rented from a registered company, with whom arrangements should be made for cleaning of these toilets on a weekly basis. - Disposal slips/cleaning slips from this company must be obtained following every cleaning and must be filed in the Environmental File. - Ensure an adequate quantity of toilets are provided at each working area. • Hazardous substances including oil/fuel etc. should be: - Stored in bunded areas, on hardened/impermeable surfaces, where the barrels/drums/containers are protected from the natural elements. - Appropriate signage indicating hazardous/flammable materials are stored. - A fire extinguisher and contact details for the fire department and other emergency numbers must be positioned in close proximity. - May only be decanted/filled on the aforementioned surfaces. - Must be disposed of as hazardous waste, at an appropriately registered facility. ***<u>Waste Management:</u>*** • Designate areas for temporary waste storage, this area should be: o Protected from wind/rain displacement. o Should be on a levelled surface. o An appropriate number of skips/bins must be made available on site, to accommodate the various types of waste generated. o Ensure weighted covers are positioned on skips/bins, to ensure that animals cannot get into the bins as well as to avoid waste dispersion. o Label bins appropriately. o Ensure that the nearest appropriate waste disposal facility is identified and ensure that disposal is undertaken when waste has reached 75% capacity of the bin/skip. • No waste/excavated soil/ etc. intended to be removed from site may remain on site for more than 90-days. • Ensure waste receptacles are available where works are being undertaken, this can take the form of black bin bags, etc. however it must: • Be sufficient hold the waste without tearing/spilling.	
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**	No impact

CONSTRUCTION PHASE		
Potential impact and risk:	**Impact on Agricultural Resources** Based on the compliance statement provided by the Agricultural Specialist, there will be no significant impact on the Agricultural resources of the area. This is due to the absence of cultivated land within the footprint of the proposed development site.	
Nature of impact:	Negative	No impact
Extent and duration of impact:	Site specific / short term	
Consequence of impact or risk:	Negligible Loss of agricultural resources	
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:	Completely reversible	
Indirect impacts:	None	
Cumulative impact prior to mitigation:	No significance	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**No Significance**	
Degree to which the impact can be avoided:	Avoidable	
Degree to which the impact can be managed:	No management required (high)	
Degree to which the impact can be mitigated:	Can be mitigated (high)	
Proposed mitigation:	Agricultural Specialist recommendation: No mitigation measures proposed. General mitigation: • A minimum footprint approach must be followed for the purpose of the works associated with the proposal.	
Residual impacts:	None	
Cumulative impact post mitigation:	Negligible	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**No Significance**	No impact
Potential impact and risk:	**Archaeological, Cultural and Palaeontological impact:** Although no impacts are expected on the cultural and heritage resources in the area, further confirmation from Heritage Western Cape regarding the anticipated impacts of the proposed development has been obtained.	

Nature of impact:	Negative	No impact
Extent and duration of impact:	Site Specific / permanent	
Consequence of impact or risk:	Loss of palaeontological resources of significance	
Probability of occurrence:	Probable	
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss of resource	
Degree to which the impact can be reversed:	Reversible	
Indirect impacts:	None identified	
Cumulative impact prior to mitigation:	Medium	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**No significance**	
Degree to which the impact can be avoided:	High (Avoidable)	
Degree to which the impact can be managed:	Medium (Can be partially managed)	
Degree to which the impact can be mitigated:	High (Can be mitigated)	
Proposed mitigation:	No mitigation has been proposed by the appointed specialist. <u>*General*</u>: • Should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay.	
Residual impacts:	None	
Cumulative impact post mitigation:	No Significance	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**No Significance**	
Potential impact and risk:	**Aquatic impact: Impact on Aquatic Resources in the area**	
Nature of impact:	Negative	No impact
Extent and duration of impact:	Local / Short term	
Consequence of impact or risk:	Degradation of the aquatic resources within proximity of the proposed development	
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:	Reversible	
Indirect impacts:		
Cumulative impact prior to mitigation:	Low	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**No Significance**	
Degree to which the impact can be avoided:	High (Avoidable)	
Degree to which the impact can be managed:	Medium (Can be managed)	
Degree to which the impact can be mitigated:	High (Can be mitigated)	
Proposed mitigation:	**Aquatic specialist:** No mitigation proposed **General** • All construction vehicles are to remain within road reserves when delivering materials. • Materials and equipment are to be kept in a designated area as determined by the ECO, Contractor and the Consulting Engineer. • No maintenance of vehicles is to be undertaken on-site during the construction phase of the proposed development. • A spill kit is required on site at all times. • All spills and incidents are to be reported to both the Site Manager and the appointed ECO immediately. Furthermore, an incident report must be filled out and kept on site for record keeping purposes.	
Residual impacts:	None	
Cumulative impact post mitigation:	Negligible	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**No Significance**	No impact
Potential impact and risk:	**Botanical Resources impact:** Habitat loss and degradation	
Nature of impact:	Negative	Status Quo of the site remains as is – No impact.
Extent and duration of impact:	Local / Short term	
Consequence of impact or risk:	Consequences associated with this impact: • Fragmentation of habitats and affected species populations. • A general loss of habitat (especially since this site was mapped and planned as part of a CBA1 area).	

	• A loss of variation within sensitive habitats due to fragmentation and the loss of habitat patches. • A shift towards a negative change in the conservation status of the habitat affected by the development. • Increased vulnerability of remaining habitat portions of Mossdustria and elsewhere. • A negative disturbance to the processes that are necessary to maintain biodiversity and ecosystem goods and services. •	
Probability of occurrence:	Definite	
Degree to which the impact may cause irreplaceable loss of resources:	Complete Loss of Resource	
Degree to which the impact can be reversed:	Low	
Indirect impacts:	• Potential health and safety hazards on the site and in the surrounding environment, and the creation of novel habitat that indigenous species cannot survive in, but where exotics and IAPs thrive in. This results from disorganised materials ending up in wrong places and mixing between materials that should not mix. For example, piles of soil from the site mixing with sand sourced elsewhere could lead to an increased likelihood or introducing more IAPs. • Water waste and other construction materials washing into areas where it causes unnecessary erosion, clean-up activities, and therefore causes damage to the environment.	
Cumulative impact prior to mitigation:	Medium-High	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High	
Degree to which the impact can be avoided:	Low (Cannot be avoided)	
Degree to which the impact can be managed:	Low (Cannot be managed)	
Degree to which the impact can be mitigated:	Medium (Can be partly mitigated)	
Proposed mitigation:	***Specialist mitigation measures:*** • Clearing of vegetation outside of the two erven is not permitted. The construction site must be planned and designed before construction starts (Fig. 17), so that areas for equipment and material storage are defined and occur on level ground on the site near site offices. • Ongoing monitoring and clearing of IAPs on the site. • Materials used during construction must be sourced responsibly to minimise the risk of further introductions of new IAPs. No waste dumping or burning is allowed on the site. All material waste is to be collected in bins and transported to a waste disposal facility.	

	• Adequate ablution facilities that are regularly cleaned and maintained on the site, with at least one toilet per ten construction staff. • Areas for resting and lunch is to be clearly indicated on the site. These areas must contain waste disposal bins that are cleaned on a weekly or bi-weekly basis. • Concrete and cement mixing is not to occur near muddy areas. Where mixing of concrete and cement occurs, the area must be bunded or surrounded by an impermeable material to prevent any runoff into the surrounding environment and existing road. • Stockpiles of materials and soil must all be covered by a geotextile or plastic covering, which must also be bunded (e.g., sandbags) when the piles are not in use on the site. This will prevent the material from washing away and contaminating the substrate of the site which likely still contains useful seeds and soil organisms. • The use of filled sandbags can reduce the intensity of water flow over the site in strategic areas where water flow is anticipated to be altered during construction	
Residual impacts:	None	
Cumulative impact post mitigation:	Low	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (-)	No impact
Potential impact and risk:	**Botanical impact:** Impact of construction on SCC The natural habitat of the proposed development site has already been stripped and cleared completely in late 2022. *Hermannia lavandulifolia*, a VU SCC, was recorded as a one of the species in the early successional stages of vegetation regrowth on the site (luckily it seems to thrive in light disturbance). However, these plants will be lost during the construction phase if mitigation measures are not in place to protect this SCC, and to promote a shift to indigenous horticulture and gardening in the Mossel Bay area.	
Nature of impact:	Negative	No impact – Status quo remains as is
Extent and duration of impact:	Site specific / Medium term	
Consequence of impact or risk:	• Fragmentation affects SCC sub-populations. This consequence here is minimal as the erven already form part of a larger disturbed area in Mossdustria. It is really the surrounding near-natural landscape with multiple confirmed SCC that is fragmented by Mossdustria and other similar large developments in the area. • Reduction in the extent of occurrence of SCC. • A general loss of suitable habitat for SCC • A loss of genetic variation within affected SCC stands. • A shift towards a negative change in the conservation status of the SCC and other indigenous species affected by the development. Even if this effect is negligible given the size of the erven to be developed in relation to the widespread and common H. *lavandulifolia*, the combined effect of this development and the many other	

	developments in the Mossel Bay area and beyond will negatively affect the conservation status of species. • A risk of re-invasion of the site by acacias and the consequent permanent loss of H. *lavandulifolia* from even the most minor remaining open spaces on the site.	
Probability of occurrence:	Definite	
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss of resource	
Degree to which the impact can be reversed:	Low	
Indirect impacts:	None	
Cumulative impact prior to mitigation:	Medium-High	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High	
Degree to which the impact can be avoided:	High (Avoidable)	
Degree to which the impact can be managed:	Medium (Can be partially managed)	
Degree to which the impact can be mitigated:	High (Can be mitigated)	
Proposed mitigation:	***Specialist mitigation measures:*** • A plant rescue must be undertaken, with rescued plants being in the care of a relevant indigenous flora horticulturalist. The horticulturalist for the site must be in possession of the appropriate permit from CapeNature to move, sell, buy, donate, receive, cultivate, and sell threatened flora. • Rescued plants are not to be planted in more natural vegetation surrounding Mossdustria, rather they can be kept and cultivated as a reserve for revegetation in other projects where open spaces need rehabilitation with plants indigenous to the area. • The PAOI must be clearly defined using construction netting and/or appropriate fencing, and information boards where necessary. This will prevent impacts on SCC outside of this designated construction area. • Materials used during construction must be sourced and transported responsibly to minimise the risk of further introductions of new IAPs and contamination of the site, and especially the areas surrounding the site. • All staff are to be briefed and informed about the SCC found on the site **and** the potential of the site to support additional SCC. The brief should include highlighting areas that are marked as "no-go" areas on the site.	
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 (-)	No impact
Potential impact and risk:	**Botanical impact:** Impact of construction vehicles on sensitive habitat surrounding the development site Construction vehicles may cause pollution and damage to the environment, habitat, and vegetation present in the landscape around the proposed development. Impacts that arise from construction vehicles are fairly straightforward to mitigate and reduce to a negligible negative impact.	
Nature of impact:	Negative	No impact – Status quo remains as is.
Extent and duration of impact:	Site specific / Short term	
Consequence of impact or risk:	• Unnecessary creation of muddy areas, substrate damage, and pollution of the environment. • Pollution of water, and accumulation of toxic materials in natural and near-natural areas. • An overall reduction in biodiversity	
Probability of occurrence:	Highly probable	
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss of resource	
Degree to which the impact can be reversed:	Can be partially reversed	
Indirect impacts:	None identified	
Cumulative impact prior to mitigation:	Low	
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:	High (Avoidable)	
Degree to which the impact can be managed:	Medium (Can be partially managed)	
Degree to which the impact can be mitigated:	High (Can be mitigated)	
Proposed mitigation:	***Specialist proposed mitigation measures:*** • Before the start of construction on the site, durable materials should be used to fence off areas that fall outside of the Project Area of Influence (PAOI) disturbance strip and clearly show where construction vehicles are allowed and where parking areas are on the site.	

	• Shade cloth used as fencing should be hammered into the ground using wooden pegs, and clear signs for "no-go" areas for vehicles should be placed strategically on the site. • For once off deliveries, clear indications on the nearby roads should be put up to guide truck drivers to the construction site, thus avoiding divers getting lost and causing unnecessary disturbance. • Weather reports must be checked daily to avoid heavy machinery and activities requiring a lot of water use on the site during rainy weather. • Following a rainfall event, all construction on the site must cease temporarily. • Sandbags should be available on the site where vehicles are refuelled so that any accidental spills can be contained and stopped quickly. • All construction vehicles should be checked for leaks on a daily basis at the start of each day. Vehicles that have leaks must not be allowed to operate on the site until they have been repaired. • Staff operating earth moving machinery need to be informed that these vehicles may not operate outside of the PAOI.	
Residual impacts:	None	
Cumulative impact post mitigation:	Negligible	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-)	
Potential impact and risk:	**Animal Species Theme**: Impact on Faunal SCC	
Nature of impact:	Negative	No impact – Status quo remains as is
Extent and duration of impact:	Site Specific / Temporary	
Consequence of impact or risk:	Loss of species of concern due to the disturbance of their preferred habitat	
Probability of occurrence:	Low	
Degree to which the impact may cause irreplaceable loss of resources:	No loss to Resource	
Degree to which the impact can be reversed:	Reversible	
Indirect impacts:	Loss of biodiversity	
Cumulative impact prior to mitigation:	Low	
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:	Can be 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:	***Specialist defined mitigation measures:*** • An experienced, independent Environmental Control Officer (ECO) must be appointed to oversee the construction activities and compliance with the EMPr. • During construction, no wild animals may under any circumstance be handled, removed, or be interfered with by construction workers. No wild animals may under any circumstance be hunted, snared, captured, injured, or killed. This includes animals perceived to be vermin, • Alien plant eradication and control must be undertaken throughout the construction and the operational phase.	
Residual impacts:	Loss of habitat for potential SCCs	
Cumulative impact post mitigation:	Low	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-)	No impact
Potential impact and risk:	**Pollution management:** Pollution of hydrocarbons due to spills and leaks	
Nature of impact:	Negative (-)	No impact – Status quo remains as is
Extent and duration of impact:	Site Specific / Short term	
Consequence of impact or risk:	Should hydrocarbon spills occur on site, there is a potential that such spills can contaminate the ground water table, although of poor quality.	
Probability of occurrence:	Low	
Degree to which the impact may cause irreplaceable loss of resources:	Low	
Degree to which the impact can be reversed:	Low	
Indirect impacts:	Groundwater contamination (downstream from the proposed development site).	
Cumulative impact prior to mitigation:	Low	
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:	Avoidable	
Degree to which the impact can be managed:	Can be managed	

Degree to which the impact can be mitigated:	Can be partially mitigated	
Proposed mitigation:	***General:*** • No maintenance of vehicles is to be undertaken on-site during the construction phase of the proposed development. • A spill kit is required on site at all times. • All spills and incidents are to be reported to both the Site Manager and the appointed ECO immediately. Furthermore, an incident report must be filled out and kept on site for record keeping purposes. • All waste products resulting from the proposed construction activities must be kept in a designated, bunded area in the site camp. • All refuelling activities must be located on an impermeable surface. • Drip-trays must be placed underneath all stationary vehicles within the development footprint. ***Geotechnical specialist:*** • A cut off drain that diverts storm water run-off around the site. • An efficient stormwater drainage system must be installed around all structures, roads and parking bays to effectively catch and drain surface water. • A sheet-wash diversion berm should be constructed upslope of the site (i.e.: north of the site) to prevent surface water from entering the site. • A cut off drain that diverts storm water run-off around the site. • All surface areas where vehicle movement will take place (i.e.: roads and parking bays) must be sealed by means of bitumen, concrete paving or a concrete slab, to prevent the infiltration of liquids into the underlying soil. The soil material underlying this layer must be adequately compacted to prevent ingress of liquids through zones of weakness (i.e.: along joints) within the surface seal	
Residual impacts:	None identified	
Cumulative impact post mitigation:	Low	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)	No impact
Potential impact and risk:	**General nuisances:** Noise, dust, and general housekeeping	
Nature of impact	Negative	No impact – Status quo remains as is
Extent and duration of impact:	Site specific / Medium-long term	
Consequence of impact or risk:	• Based on the dry nature of the receiving environment, there is an increased risk of dust pollution impairing the visibility of the area directly within vicinity to the proposed development site.	

	• Should noise not be managed in a sensitive manner on site, complaints may be received by the surrounding land occupiers. • General pollution will occur as a result of a mal-managed site.	
Probability of occurrence:	Improbable	
Degree to which the impact may cause irreplaceable loss of resources:	Unlikely	
Degree to which the impact can be reversed:	Completely reversible	
Indirect impacts:	Poor visibility due to the dispersal of dust Complaints received from surrounding land occupiers due to excessive construction noises.	
Cumulative impact prior to mitigation:	Medium	
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 completely managed	
Degree to which the impact can be mitigated:	Can be completely mitigated	
Proposed mitigation:	*Dust:* • Dust suppression methods, such as non-potable water spraying must be used during the construction phase of the proposed refurbishment project. • Vehicular speed must be controlled at all times, with no indiscriminatory driving permitted by any construction or other vehicles on site. • Should excessive dust be recorded by the appointed ECO, corrective measures must be taken by the construction team. • Where practically possible, the proposed dust suppression measures proposed for dust management (by means of compaction of the in situ soil layer followed by stabilisation) must be done as part of the dust management measures, once the foundations of the buildings on site have been lain. *Noise:* • All construction vehicles must be equipped with muffled reverse sirens (which are to the standard of the Occupational Health & Safety Act (Act 85 of 1993)). • No construction activities are permitted between 17:00 and 7:00 (night time hours). • Construction workers are to always remain within the designated site boundary. • Where possible, eating areas must not be located within the vicinity of the neighbouring buildings. General housekeeping: • A clean site policy must be adopted at all times during the construction phase.	

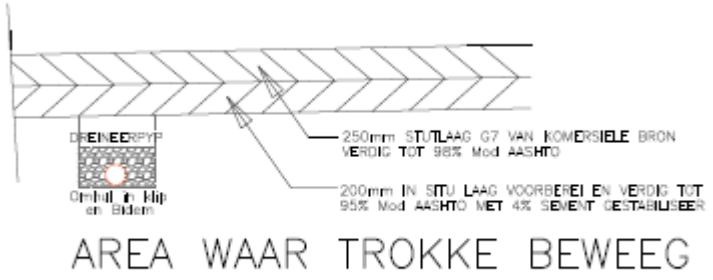
	• Where possible, storage and disposal of waste must take place in a sustainable manner, where clearly marked recycle bins must be provided to workers at the site camp. • Where possible, waste bins must be placed in strategic areas on site so as to limit the amount of waste scattered (due to wind dispersal) on site. • Regular toolbox talks must be held with the construction crew in order to reiterate the importance of maintaining a clean site. • Construction rubble (such as cement bags) must be discarded promptly. • An adequate amount of waste skips must be placed on site. • Waste skips must not be allowed to overflow. • Waste skips must be closed. • Waste skips must be cleared on a weekly bases or as necessary and the waste slips must be provided to the ECO for record keeping purposes.	
Residual impacts:	None	
Cumulative impact post mitigation:	Low-Medium	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)	
Potential impact and risk:	**Road safety**: Traffic Impacts and Road Safety during the construction phase	No impact – Status quo remains as is
Nature of impact	Negative	
Extent and duration of impact:	Local / Medium term	
Consequence of impact or risk:	• More frequent occurrences of traffic incidents due to indiscriminatory driving by delivery vehicles. • Increased traffic volumes due to the proposed construction activities.	
Probability of occurrence:	Definite	
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss to resource	
Degree to which the impact can be reversed:	Barely reversible	
Indirect impacts:	Inconveniences caused to surrounding land owners/business owners.	
Cumulative impact prior to mitigation:	Medium	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High	
Degree to which the impact can be avoided:	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:	General: • A delivery schedule must be arranged so as to ensure that no deliveries are made to the site between 17:00 and 07:00. • Should any deliveries be required outside of these hours, such requirements must be communicated to the site engineer, the ECO and the immediately surrounding business owners/managers. • No alcohol must be permitted on site (by neither the labourers or must be allowed in the horse of the delivery trucks where applicable). • Random breathalyser tests must be undertaken by the security team in order to ensure that no driver under the influence is permitted onto construction areas of the site. • Where drivers test positive for alcohol, where possible, they must be instructed to stop in an allocated area on site, until they are deemed safe to access the construction areas of the site, or be instructed to be collected by a representative of their company. • Such drivers must be reported to the management team of the company for whom they work for and must be further banned from the proposed development area for the remainder of the construction activities.	
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 (-)	**No impact**
Potential impact and risk:	**Socio-economic impacts:** Employment opportunities creation	
Nature of impact	Positive	Negative
Extent and duration of impact:	Local / Long term	Regional / Permanent
Consequence of impact or risk:	Income provision to individuals employed during the construction phase.	No income generated as a result of the construction phase activities
Probability of occurrence:	Definite	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A	Complete loss of resources
Degree to which the impact can be reversed:	N/A	Cannot be reversed.
Indirect impacts:	Quality of life of the labourers would be temporarily uplifted due to the capital influx for households.	No upliftment of the local community takes place. No temporary elevation of the quality of life is seen,
Cumulative impact prior to mitigation:	Medium	High

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High	High
Degree to which the impact can be avoided:	N/A	Low (no avoidance of the impact)
Degree to which the impact can be managed:	Can be completely managed	Low
Degree to which the impact can be mitigated:	N/A	Low
Proposed mitigation:	General • As far as possible, individuals from the local community must be employed. Especially for low to semi-skilled activities. • Skills that are transferable to future employment opportunities must be taught.	No mitigation measures applicable. The proposed development must be approved for this positive impact to be observed.
Residual impacts:	None	None
Cumulative impact post mitigation:	Medium	High
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High (+)	**High (-)**

POST-CONSTRUCTION REHABILITATION / OPERATIONAL ACTIVITIES		
Potential impact and risk:	**Botanical Resource:** Impact on Terrestrial Biodiversity The natural vegetation of the site and Mossdustria is fynbos, which is a fire-driven ecosystem, and fire-return intervals in Mossdustria is non-existent. In small habitat parches that are invaded by IAPs (as is the case in most of Mossdustria), edge effects are exacerbated, and natural vegetation inevitably disappears.	
Nature of impact:	Negative	No impact – No impact on Status Quo
Extent and duration of impact:	Site Specific / Permanent	
Consequence of impact or risk:	• Infestation by alien invasive species during the operational phase of the proposed development. • The effects of edge effects are seen around the site following the conclusion of the construction works.	
Probability of occurrence:	Improbable	
Degree to which the impact may cause irreplaceable loss of resources:	Marginal loss to resource	
Degree to which the impact can be reversed:	Can be reversed	
Indirect impacts:	None	
Cumulative impact prior to mitigation:	Low	
Significance rating of impact prior to mitigation	Low	

(e.g. Low, Medium, Medium-High, High, or Very-High)		
Degree to which the impact can be avoided:	High (Can be avoided)	
Degree to which the impact can be managed:	High (Can be managed)	
Degree to which the impact can be mitigated:	High (Can be mitigated)	
Proposed mitigation:	• Regular effort must be made to keep the site clear of all IAPs, and this is also a requirement by law. • Planting of grass and lawns must be avoided on the site apart from in the open pavers that will be used as parking areas for staff on the site. Here only indigenous grass may be planted, and kikuyu grass (*Cenchrus clandestinus*), a listed invasive species, is banned. • Dumping of garden refuse or leaving stacks of cleared IAP slash in natural and near-natural vegetation is not allowed. Dumping may only occur in designated areas. • General cleanliness and order must be maintained on the site to avoid accidental impacts to the environment. Ensure that there are sufficient bins available on the site, both inside of the offices and on the outside. • Regular maintenance of the diesel tanks on the site. • Trained staff must manage the filling station and washing bay on the site to avoid pollutants running off into the environment.	
Residual impacts:	None	
Cumulative impact post mitigation:	Low	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	No Impact/Negligible	No impact
Potential impact and risk:	**Nuisance and pollution management: Dust, noise, and visual impacts**	
Nature of impact:	Negative	No impact – Status quo of the site remains as is.
Extent and duration of impact:	Local / Permanent	
Consequence of impact or risk:	Should the site not be properly managed, in terms of dust, noise and visual aspects, complaints may be brought forward to the Municipality which could lead to the management team being reprimanded.	
Probability of occurrence:	Improbable	
Degree to which the impact may cause irreplaceable loss of resources:	No loss to resource	
Degree to which the impact can be reversed:	Completely reversible	

Indirect impacts:	• Should dust not be managed adequately on site, this would potentially lead to slightly impaired visual conditions of immediately surrounding area (especially in windy conditions);	
Cumulative impact prior to mitigation:	Low	
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:	High (Avoidable)	
Degree to which the impact can be managed:	High (Can be managed)	
Degree to which the impact can be mitigated:	High (Can be mitigated)	
Proposed mitigation:	**Visual impacts:** • A clean site policy must be implemented throughout the site, with waste bins made available across the site. • A recycling regime (where was is separated into Organic Waste, Plastics and Paper waste, and other waste) must be available at the canteen area. • A complaints register must be always kept on site. • All aspects of the facilities must be kept in a clean and tidy manner. **<u>Dust</u>** • The following layer works have been proposed and are supported as sufficient dust management measures for the proposed development site: o General area: ▪ 200 mm of in situ layer which has been prepared and compacted to 95% Mod ASSHTO, stabilized with 4% cement; ▪ A layer of 250 mm commercially sourced G7 material, compacted to 98% Mod ASSHTO.  	

- Main entrance:
  - A 200 mm in situ layer prepared and compacted to 95% Mod ASSHTO, stabilized with 4% cement;
  - 200 mm commercially sources G7 material, compacted to 95% Mod ASSHTO; covered by
  - 30mm sand layer with an 80 mm cement interlocking pavement.

- Office parking area:
  - A 150 mm in situ layer prepared and compacted to 95% Mod ASSHTO, stabilized with 4% cement;
  - 200 mm commercially sources G7 material, compacted to 95% Mod ASSHTO; covered by
  - 30mm sand layer with a 60 mm cement interlocking pavement.

- During the operational phase of the proposed development, the following dustfall monitoring will be done for a period of 12 months:
  - Four monitoring points must be used for the purpose of monitoring the proposed development site. These monitoring points must be the four corners of the proposed development area.
  - Monthly reports must be compiled by a suitably qualified specialist. The reports must be kept on site and should the Air Quality Officer request access to these report, such access will be granted.

	▪ Should exceedances be recorded during the monitoring period (Non-residential area: 600 <Dustfall rate<1200; where two (2) events of exceedance are acceptable within a year (for not sequential months)), additional adaptive measures must be adopted. ▪ Records must be kept of all dust related complaints received by the surrounding landowners and property occupiers. ▪ The monitoring must be done in accordance with the National Environmental Management: Air Quality Act of 2004 (Act no. 39 of 2004) in terms of the National Dust Control Regulations (GNR 827 of 2013). o Additional measures to be incorporated into the operational phase of the proposed development: ▪ Traffic speed of all persons accessing the site are not to exceed the recommended speed limit of the site. Notice boards of speed limits are to be erected throughout the site (in practical locations). **Noise** • The 'Quiet time' for the truckers must be 10 pm. Therefore, the facilities will not permit any loud speaking or music after 10 pm on any given day. • The site must also be furnished with security staff which must ensure compliance with the facility's "House rules". • Amongst the "House rules", no persons must be permitted to use/consume or sell alcohol on the premises. • No persons from the street must be allowed on site. Only truckers and staff members registered in the systems used on site will be permitted to access the facilities. • All male and female truckers and quarters must be kept separate.	
Residual impacts:	None	
Cumulative impact post mitigation:	Negligible	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible (-)	No impact
Potential impact and risk:	**Health and Safety;** Impact on the surrounding properties	
Nature of impact:	Negative (-)	No impact status quo remains as is.
Extent and duration of impact:	Local / Permanent	
Consequence of impact or risk:	• Increased occurrences of theft, vandalism, sexual offences etc in the area.	
Probability of occurrence:	Probable	
Degree to which the impact may cause irreplaceable loss of resources:	Marginal Loss of Resources	

Degree to which the impact can be reversed:	Can be reversed	
Indirect impacts:	Depreciation of property values	
Cumulative impact prior to mitigation:	Medium-Low	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-Low	
Degree to which the impact can be avoided:	Partially avoidable	
Degree to which the impact can be managed:	Can be partly managed	
Degree to which the impact can be mitigated:	Partly mitigable	
Proposed mitigation:	***General*** • For the purposed of the operational phase of the proposed development, a strictly implemented security detailing must be enforced on site. The security detailing has been attached as a binding document as part of the Environmental Management Programme compiled for the proposed development. However, the following measures provide an summary of the crucial measures to be implemented on site: o ***Security patrols:*** ▪ Regular patrols of the perimeter must be done during the nightshit as per a set timeline, ▪ During patrols, the security officers must inspect the perimeter fence, building doors, windows etc. ▪ Additionally, all lights on the premises must be inspected in order to ensure that all areas are well illuminated. ▪ All patrol security officers must be vigilant of common security risks including burglary, break-ins and theft. All incidents must be reported to the shift and facility management team, and must be captured in the incidents. ▪ Photographic evidence must be collected immediately. ▪ No suspicious vehicle parked outside of the premises may be approached. Should concern be warranted, facility management can be contacted or the panic button can be activated. o ***Access control*** ▪ All truckers using the facilities must have an account opened with the Customer management unit as all truck entry tickets are run through the Aberrant App. ▪ Customers that do not have an account code needs to park one side (inside premises) and report to the admin office to sign up as a client, only then is a driver allowed near the pumps and able to pour in Diesel.	

	▪ Tickets will be issued by security VIA the Aberrant App to drivers to allow access which needs to be given to the petrol attendee who will stamp it out and give a proof of payment slip to the driver which must be given to security to exit. ▪ No trucks will be allowed to enter the site without a customer code or approval from management. ▪ Once the slip has been issued, the security must compare the vehicle registration and the drivers name with the information on the ticket. ▪ Truck Horse not allowed to leave the premises without their trailer and approval needs to be obtained by management if alternative arrangements were made. ▪ Mechanics who work on trucks need approval from management or approval on the Entrance Request WhatsApp group to enter the site. Template has been provided to ensure security completes and sends it on the group for management to approve or decline. o ***Women and Children*** ▪ Females and Children accompanying drivers during the day (not over-nighting) are only allowed entry based on the conditions below: • To pour diesel. • No movement out of the vehicle is allowed. • No parking / overnight sleeping allowed. • No overnighting with a male driver is allowed. • If requested to use the restrooms approval needs to be given by management. • Security needs to accompany the female to the restroom and wait outside to ensure the females safety and to accompany her back to the vehicle. • Children is only allowed to use the restrooms if accompanied with the security and the legal guardian of the children. Approval needs to be given by management first. • No entry is allowed for woman who is in a truck with a driver only in Light Commercial Vehicles. o ***Female Drivers*** ▪ Female drivers must notify management before arrival if they intend to overnight. ▪ Female drivers and their trucks will be kept separate under the strict supervision of security. ▪ Female drivers are only allowed to use any of the facilities or canteen with the supervision of security accompanying them. ▪ Security will wait for the female driver to accompany her back to her truck / vehicle.	

	▪ Female drivers are under no circumstances allowed to roam the site alone. ▪ Female drivers are not allowed near any male driver's trucks. o ***General measures (include but not limited to)*** ▪ NO visitors are allowed for drivers through the small gate. ▪ The small gate must always remain closed and locked. ▪ The small gate is only allowed for security and employees clocking in and out for work. ▪ Security officers will search all employee vehicles when exiting the premises. ▪ All bags, boxes and parcels must be opened and searched. ▪ Before searching commences, the Security Officer will request the staff / visitor whether he/she has anything to declare in his / her possession. ▪ Any unauthorized items must be confiscated immediately and noted in the Occurrence book in red pen. ▪ The alleged transgressor must be detained at the security office and the client and relevant manager must be contacted immediately. ▪ No alcohol will be allowed on site. ▪ No alcohol is allowed with a driver in their truck. ▪ Any alcohol must be confiscated by security IMMEDIATELY. ▪ Security will report any use of alcohol IMMEDIATELY to the manager on shift and to management directly. ▪ Random breathalyser test will be done on drivers by security. ▪ Drivers are not allowed to leave the site per foot, they are only allowed to exit with their truck / vehicle. ▪ Any driver found with alcohol will be escorted from the site and will not be allowed back access without approval from management.	
Residual impacts:	None	
Cumulative impact post mitigation:	Medium	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low	No impact
Potential impact and risk:	**Health and Safety**: Increased vulnerability of the area to fire Under the Major Hazard Installation Regulations of 2022, as promulgated in January 2023, in terms of the OSHA (Act 85 of 1993), the proposed development would classify as a 'Low hazards establishment', based on the anticipated volumes (and tonnage) of dangerous goods to be stored on site. Therefore, should the should the site not be properly managed, there is a potential for harm to people, the environment and property as a result of loss of containment, fire or explosion.	
Nature of impact:	Negative (-)	No impact -Status quo remains as is
Extent and duration of impact:	Local / Project Life	

Consequence of impact or risk:	• Should any fires occur on site, there is a potential of the fire to spread to the adjacent properties. • Should a fire occur on site, there is a potential for the fuel storage areas to go alight and explode once the diesel is heated to flashpoint.	
Probability of occurrence:	Highly unlikely (Improbable)	
Degree to which the impact may cause irreplaceable loss of resources:	Complete Loss of Resource	
Degree to which the impact can be reversed:	Can be barely reversed	
Indirect impacts:	In the event of a fire or explosion on site, this could potentially lead to the unintended damaging (and potential loss of life) of people currently on site and people within the vicinity of the site.	
Cumulative impact prior to mitigation:	Low	
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 mostly avoided	
Degree to which the impact can be managed:	Can be managed	
Degree to which the impact can be mitigated:	Can be partially mitigated	
Proposed mitigation:	**General:** • Appropriate signage must be located in strategic locations on site at all times. • The site must be properly furnished with the required fire fighting equipment for the type of facilities proposed. • The fire management plan must be submitted to the Local Fire Department for approval. • A Major Hazard Installation assessment must be undertaken by an experienced specialist. • As per the requirements of the MHI Regulations of the OSHA (Act No. 85 of 1993), an on-site emergency plan must be compiled and followed at all times inside of the premises. • All firefighting equipment and measures must be to the standards of the Municipal By-Laws and the Occupational Health and Safety Act. • All workers on site must be trained in the procedures to follow in the case of a fire-related emergency on site. • No fires of any kind must be permissible on site during the operational phase of the proposed development areas. • No public smoking areas should be provided to the truckers or personnel on site. • Should such an area be provided, by the facilities manager, the area must be located towards the far south of the proposed development site.	

	• Should any individual be caught smoking near the diesel storage farm, the person must be given a warning or be liable to pay a fine.	
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 (-)	No impact
Potential impact and risk:	**Groundwater impact**: Impact on the quality of the groundwater as a result of the on-site activities	
Nature of impact:	Negative	No impact – Status quo remains as is
Extent and duration of impact:	Local / Long Term	
Consequence of impact or risk:	Should pollutants be allowed to enter into the groundwater during the operation phase of the proposed development, this could potentially impact upon the quality of the water further downstream.	
Probability of occurrence:	Improbable	
Degree to which the impact may cause irreplaceable loss of resources:	Marginal Loss to Resource	
Degree to which the impact can be reversed:	Cannot be reversed	
Indirect impacts:	Contamination of a freshwater resource.	
Cumulative impact prior to mitigation:	Low	
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:	N/A	
Degree to which the impact can be managed:	N/A	
Degree to which the impact can be mitigated:	N/A	
Proposed mitigation:	**General** • A spill kit must be available on site at all times. • Employees must be trained in the proper procedures to follow in the event of a spill/leak incident occurring on site. • All incidents must be reported to the management team. • Grease traps must be maintained as required in order to ensure that lubricants are not allowed to enter the municipal stormwater network. • A bunded area must be available on site for the storage of any hazardous wastes. This includes oil storage containers, rags, collected grease and other lubricants.	

	• Monitoring measures (diesel tank farm monitoring wells) must be installed at the tanks such as a gauging system in order to easily detect any spillages or leaks and an emergency response plan must be available on site at all times, clearly stipulating the emergency procedures to be followed in the event of a spillage/leak of the tank farm infrastructure. • Contingency plans must be compiled for possible spillages of dangerous goods and include details for decontamination and process to be followed. **Specialist recommendations:** • It is recommended that the following actions be taken to obtain the necessary information in order to design a suitable monitoring system for the proposed development: o A monitoring borehole should be drilled on-site, including the installation A monitoring borehole should be drilled on-site, including the installation of a perforated casing throughout the length of the borehole, and the implementation of a steel cap incorporating a small hole through with a bailer can be dropped and the groundwater level measured. The monitoring boreholes should be appropriately designed and constructed. The design of the monitoring wells should be guided by a suitably qualified hydrogeologist o The yield characteristics of this borehole must be determined accurately by means of a pump test. o The results of the testing work will be utilised to determine the characteristics of the underlying groundwater aquifer (including its transmissivity and the groundwater gradient). o All relevant requirements to prevent, monitor and correct spillage as set out in SANS10089-3 should be adhered to as a minimum requirement. o It is recommended that the water quality be monitored on a yearly basis for hydrocarbon pollution.	
Residual impacts:	None	
Cumulative impact post mitigation:	Very Low	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (-)	No impact
Potential impact and risk:	**Socio-economic impact**: Provision of safe trucking facilities to the logistics sector	
Nature of impact:	Positive	Negative
Extent and duration of impact:	Regional / permanent	Regional / permanent
Consequence of impact or risk:	A safe resting and refuelling destination to all truckers (female and male truckers alike) commuting over long distances	The safe, easy to access facility in an appropriately zoned area is not provided

		to the truckers commuting along the N2-Highway
Probability of occurrence:	Definite	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A	Significant Loss to Resource
Degree to which the impact can be reversed:	N/A	Cannot be Reversed
Indirect impacts:	Intervention against the effects of fatigue amongst truck drivers commuting along the N2-Highway.	• Truckers will continue to make use of easily accessible residential area (especially along the fringes of the residential areas) to find a place to overnight. • Safety of male and female truckers cannot be ensured. • Risk of theft and vandalism of cargo due to the inability to provide safe housing especially during long commutes. • Increased possibility of the occurrence of sexual offences, drunk and disorderly driving, increased theft and other truck stop related activities in areas where two or more truckers are located in an unmanaged area. • Should a formalised facility be made available, the management (by law inforcement) of these informal rest spots along the highways and within residential areas will be considered to be more effective.
Cumulative impact prior to mitigation:	Very High	Very High
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very High	Very High
Degree to which the impact can be avoided:	N/A	Cannot be avoided
Degree to which the impact can be managed:	N/A	Can be managed (in the region)
Degree to which the impact can be mitigated:	N/A	Can be partially mitigated
Proposed enhancement/mitigation:	**Possible enhancement measures:**	In order to reduce the negative impacts associated as a result of the absence of

	• Use of the proposed facilities during the operational phase of the proposed development must be encouraged by all cross-country logistics companies commuting along the N2-Highway, with a keen focus on the existing commuters currently making use of the informal resting areas. • As the proposed facilities will eliminate the need for truckers to make use of quiet roadways on the fringes of the residential areas, an effort must be brought forth in terms of the municipal community security directive to guide truckers toward the proposed facility. This will not only enhance the safety of the affected community, but also ensure the safety of the trucker in question.	such a facility, the proposed development must obtain environmental authorisation
Residual impacts:	None	None
Cumulative impact post mitigation:	Very High	Very High
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very High (+)	Very High (-)
Potential impact and risk:	**Socio-economic impact:** Employment opportunities created	
Nature of impact:	Positive	Negative
Extent and duration of impact:	Local-Regional / permanent	Local-Regional / permanet
Consequence of impact or risk:	• The creation of permanent skilled, semi-skilled and unskilled employment opportunities	No benefit of the creation of the employment opportunities will be seen.
Probability of occurrence:	Definite	Definite
Degree to which the impact may cause irreplaceable loss of resources:	N/A	Complete loss of resource
Degree to which the impact can be reversed:	N/A	Cannot be reversed
Indirect impacts:	N/A	No promotion of the regional logistics industry as no safe area at which truckers (male and female alike) can rest and combat the effects of fatigue. Therefore, fewer truckers feel at ease to commute over great distances.
Cumulative impact prior to mitigation:	Medium	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High	Medium-High
Degree to which the impact can be avoided:	N/A	Cannot be avoided
Degree to which the impact can be managed:	N/A	Cannot be managed
Degree to which the impact can be mitigated:	N/A	Can be mitigated

Proposed mitigation:	No mitigation measures applicable	The only mitigation is that the proposed development be approved.
Residual impacts:	None	None
Cumulative impact post mitigation:	Very High	Medium-High
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High (+)	Medium-High (-)

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.

Specialist Company	Specialist Details	Sensitivity of receptors	Summary of findings	Summary of impact management measures that pertains to the design/operation of the proposed development.
HERITAGE AND PALAEONTOLOGICAL OBSERVATIONS				
ASHA Consulting (Pty) Ltd	Jayson Orton (Heritage Consultant) Barry Millsteed (Palaeontological Consultant	Negligible	**Archaeological and Cultural Heritage Theme** From a cultural heritage and landscape perspective, based on the nature of the proposed project and the nature of the receiving environment of the proposed development. **No heritage resources of significance were identified within the site.**	No mitigation measures proposed.
		Negligible	**Palaeontological Theme** According to the SAHRIS Palaeosensitivity map as being of high sensitivity. Based on the findings of the appointed specialist, through the assistance of the geotechnical report, it was determined that the soil profile is in excess of 1m deep across the entire site and that the soil consists of an anthropogenic horizon at the top, followed by a clay horizon and then a residuum composed of weathered sandstone cobbles and sand and clay. These deposits are suggested to have no palaeontological potential. It is evident that sensitive bedrock is much deeper then any depth that will be penetrated by the proposed development (especially since the tank farm will be stationed above ground) and that impacts to fossils will thus not occur.	No mitigation measures proposed.
AQUATIC BIODIVERSITY ASSESSMENT				
Confluent Consulting (Pty) Ltd	James Dabrowski	Negligible	**Aquatic Biodiversity Theme** According to the findings of the aquatic biodiversity specialist, no watercourses (drainage lines/wetlands) were identified on the proposed development site. A small depression was noted on site during the site visit, however the specialist noted that this feature is not considered a wetland, rather it would be a feature that had been developed as a result of the recent clearance of the site, including the rainfall events that occurred prior to the site visit conducted by the specialist, has led to the formation of the feature on site. A drainage line was observed approximately 250m east of the proposed development site. This feature was identified as a wetland by both the NFEPA and the National Wetland Map-5 mapping regime. This was confirmed to not be a wetland by the specialist. Therefore, the proposed site is not located within any watercourses (as defined by the NWA (Act 36 of 1998), or within the regulatory area	No mitigation measures proposed.

			as defined by GN 509 of 2016 promulgated in terms of the NWA (Act 36 of 1998).	
TERRESTRIAL BIODIVERSITY AND PLANT SPECIES ASSESSMENT				
Confluent Consulting (Pty) Ltd	Bianke Fouche	Low	**Terrestrial Biodiversity Theme** The proposed development area is located within the North Langeberg Sandstone Fynbos. This ecosystem type is not an ecosystem which requires to be protected in terms of the Revised National List of Ecosystems which are Threatened and in Need of Protection promulgated under the National Environmental Management: Biodiversity Act (Act 10 of 2004). The site has been described as part of the Critical Biodiversity Area and Other Natural Areas regime in terms of the Western Cape Spatial Biodiversity Plan (2017). However, based on the transformed nature of the site Erven 56 and 57 do not meet the definition for being considered CBA1 areas, as the vegetation on the site is not in a natural condition, and it is not feasible or practical to use these properties to contribute towards the biodiversity targets of the Western Cape. Based on the condition of the vegetation on site, the sensitivity of the site to re-infestation by alien invasive species, and the location of the site (being in an industrial area), the Site Ecological Importance (SEI) was determined to be Low, with the fringes of the site determined as Very Low, as these areas are more prone to infestation by alien invasive plant species.	• The driveways and parking areas for smaller vehicles (not trucks) could be designed with open pavers planted with native graminoids like buffalo grass (*Stenotaphrum secundatum*), quick grass (*Cynodon dactylon*), restios, or sedges. Open pacers should be used instead of impermeable material to allow for more water infiltration which will reduce runoff, and to promote the presence of some native species on the site. There are a number of nearby indigenous nurseries that can be contacted to aid in the planning for using open pavers optimally.  **Figure 16. An illustration of open pavers that can be incorporated into the design of this project for staff parking areas. This is not appropriate for truck parking areas on the site.** • Gardening and any landscaping for the site must be done with species that are native to the area. Any landscaping should be done with someone that has experience in planning indigenous gardens. • A plant rescue must be undertaken, with rescued plants being in the care of a relevant indigenous flora horticulturalist. The horticulturalist for the site must be in possession of the appropriate permit from CapeNature to move, sell, buy, donate, receive, cultivate, and sell threatened flora. • The PAOI must be clearly defined using construction netting and/or appropriate fencing, and information boards where necessary. This will prevent impacts on SCC outside of this designated construction area.
		Very High	**Plant Species Theme** During the site visit only **one** Species of Conservation Concern (SCC) was noted, *Hermannia lavandulifolia*. The establishment of this species' dispersal in the proposed development site follows the site clearance event that took place in 2022. The specialist noted that the this species is one of six species with a likelihood of occurrence in the area. In total, 67 plant species, including the SCC and the alien invasive species, were noted on site during the site visit conducted on the 15th of March 2023. The following alien invasive species of specific concern (due to their Category 1b status in terms of the NEMBA) were found on site: *Cirsium vulgare, Echium plantagineum, Acacia cyclops, Acacia saligna, Cenchrus clandestinus, Datura stramonium and Verbena bonariensis.* The specialist indicated that a permit from CapeNature would be required for impacting on the *Hermannia lavandulifolia* specimens on site. Additionally, an Alien Invasive Species Management Plan must	

			be in place prior to the commencement of the proposed works, if approved.	• All staff are to be briefed and informed about the SCC found on the site and the potential of the site to support additional SCC. The brief should include highlighting areas that are marked as "no-go" areas on the site.
AGRICULTURAL COMPLIANCE STATEMENT				
Johann Lanz	Johann Lanz	Very Low	**Agricultural Theme** An agricultural impact is a change to the future agricultural production potential of land. The significance of the agricultural impact is directly proportional to the extent of the change in production potential. In this case, the site is non-agricultural land within an industrial area. The development will cause no loss of agricultural production potential. and the development will not therefore result in any change to that potential.	No mitigation measures proposed.
ANIMAL SPECIES COMPLIANCE STATEMENT				
Cossypha Ecological	Robyn Phillips	Low	**Animal Species Theme** The site is mostly comprised of patches of bare ground and secondary patchy vegetation, scattered with common indigenous and alien grasses and shrubs. Faunal activity on the site was very low with only common and generalist birds and small mammals recorded. Some of the species recorded on the site included Barn Swallow *Hirundo rustica*, Karoo Prinia *Prinia maculosa*, Cape Bulbul *Pycnonotus capensis*, and Common Mole-Rat *Cryptomys hottentotus*. No faunal SCC were recorded during the site surveys. **No faunal SCC were recorded during the site surveys.**	No mitigation measures were proposed that influences the design and planning aspects of the proposed development.
GEOTECHNICAL AND GEOHYDROLOGICAL ASSESSMENT				
Terra GeoTechnical	Eugene van der Walt	Low	**Geotechnical** During the geotechnical investigation undertaken for the site, it was found that no problems were foreseen for the shallow foundations and deep service trenches up to 2m below ground level. During the investigations, no rock – and/or pedocrete outcrops were encountered. Additionally, no groundwater seepage was encountered. However, pedogenic material (calcified material) was identified across the site, indicating the occurrence of a fluctuating water table or soil moisture evaporation. The sidewalls of the test pits generally remained stable for at least 1 hour. Based on the laboratory testing done, it was found that the clayey alluvium and the reworked residual sandstone, found on site is potentially expansive, and both were deemed moderately compressible. Both material classified as worse than G9-type materials according to the COLTO Classification system and has since	A number of design considerations were suggested in order to mitigate the poor soil condition found on site. These recommendations are considered technical recommendations that will determine the integrity of the buildings. The recommendations specifically relates to the foundations to be used for the proposed development. It is recommended that one of the following foundation types are used for the purpose of the proposed development: • ***Stiffened or cellular raft:*** o Stiffened or cellular raft with articulation joints or lightly reinforced masonry. o Site drainage and plumbing/service precautions. • ***Split Construction:***

			not been recommended for any design layer works under foundations or roads.	o Combination of reinforced brickwork and full movement joints o Suspended floors and fabric-reinforced ground slabs acting independently from the structure. o Site drainage and plumbing/service precautions. • ***Soil Raft:*** o Remove all or part of expansive horizon to 1.0 m beyond the perimeter of the structure and replace with inert backfill, compacted to 93% MOD AASHTO density at -1% to +2% of optimum moisture content. o Normal construction with lightly reinforced strip footings and light reinforcement in masonry. o Site drainage and plumbing/service precautions
		Low	**<u>Geohydrological</u>** According to the inputs received from the Geotechnical Investigations Report, two boreholes were used to evaluate the groundwater resource within proximity to the proposed development. These boreholes are located within 2.5 km of the proposed development footprint, with only one located within 1 km (925 m) from the development site. • Samples were taken of groundwater abstracted from both boreholes (i.e.: downstream and upstream of the proposed development) and submitted to the relevant water laboratories for testing. The samples were taken directly from the discharge pipe, and thus represents the water being utilized from these boreholes. The following results were obtained: o **Borehole GZ00190 (Borehole 1)** ▪ The water is deemed of Dangerous quality with regard to the South African drinking water standards. This is due to the high Chloride value of 1205 mg/l. The water also exhibits high Electrical Conductivity and Sodium counts. o **Borehole GZ00189 (Borehole 2)** ▪ The water is deemed of Marginal quality with regard to the South African drinking	**<u>Mitigation measures proposed:</u>** • A cut off drain that diverts storm water run-off around the site. • An efficient stormwater drainage system must be installed around all structures, roads and parking bays to effectively catch and drain surface water. • A sheet-wash diversion berm should be constructed upslope of the site (i.e.: north of the site) to prevent surface water from entering the site. • All surface areas where vehicle movement will take place (i.e.: roads and parking bays) must be sealed by means of bitumen, concrete paving or a concrete slab, to prevent the infiltration of liquids into the underlying soil. The soil material underlying this layer must be adequately compacted to prevent ingress of liquids through zones of weakness (i.e.: along joints) within the surface seal.

			water standards. This is due to the moderate Chloride value of 336 mg/l.	
TRAFFIC IMPACT STATEMENT				
HC Lourens	Robyn Phillips	Negligible	**Traffic Impact** The following observations were made by the specialist: • The site distances at the access point onto Mkuze Street are excellent in both direction in terms of horizontal and vertical alignments. • Existing traffic volumes are very low and below the expectation for the existing industrial uses in vicinity to the proposed development site. • Based on the fact that the Mossdustria complex has been relatively developed to capacity, the long-term traffic growth is low (<1%) and will eventually reach zero in the long-term. • All trips will be distributed to the N2. • No mitigation measures or road upgrades are required from a capacity or geometrical design perspective. • The proposed development will have a negligible impact on the capacity and Level of Service (LOS) of the adjacent road network during either the morning or afternoon peak hours.	No mitigation measures proposed.

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

Agricultural Specialist
No mitigation required.

Aquatic Specialist
No mitigation required.

Geotechnical and Geohydrological Specialist

- A cut off drain that diverts water run-off around the site.
- An efficient stormwater drainage system must be installed around all structures, roads and parking bays to effectively catch and drain surface water.
- All surface areas where vehicle movement will take place (i.e. roads and parking bays) must be sealed by means of bitumen, concrete paving or a concrete slab, to prevent the infiltration of liquids into the underlying soil. The soil material underlying this layer must be adequately compacted to prevent ingress of liquids through zones of weakness (i.e. along joints) within the surface seal.

Terrestrial Animal Species Specialist

- An experienced, independent Environmental Control Officer (ECO) must be appointed to oversee the construction activities and compliance with the EMPr.
- During construction, no wild animals may under any circumstance be handled, removed, or be interfered with by construction workers. No wild animals may under any circumstance be hunted, snared, captured, injured, or killed. This includes animals perceived to be vermin,
- Alien plant eradication and control must be undertaken throughout the construction and the operational phase.

Terrestrial Biodiversity and Plant Species Specialist

- *Design phase*
  - The driveways and parking areas for smaller vehicles (not trucks) could be designed with open pavers planted with native graminoids like buffalo grass (*Stenotaphrum secundatum*), quick grass (*Cynodon dactylon*), restios, or sedges. Open pacers should be used instead of impermeable material to allow for more water infiltration which will reduce runoff, and to promote the presence of some native species on the site. There are a number of nearby indigenous nurseries that can be contacted to aid in the planning for using open pavers optimally.

Figure 17. An illustration of open pavers that can be incorporated into the design of this project for staff parking areas. This is not appropriate for truck parking areas on the site.

  - Gardening and any landscaping for the site must be done with species that are native to the area. Any landscaping should be done with someone that has experience in planning indigenous gardens.

- *Construction Phase*
  - Clearing of vegetation of the two erven is not permitted. The construction site must be planned and designed before construction starts, so that areas for equipment and material storage are defined and occur on level ground on the site near site offices.

Figure 18. Examples of construction fencing that can be used on site.

  - Ongoing monitoring and clearing of IAPs on site.

- Materials used during construction must be sourced responsibly to minimise the risk of further introductions of new IAPs. No waste dumping or burning is allowed on site. All material waste is to be collected in bins and transported to a waste disposal facility.
- Adequate ablution facilities that are regularly cleaned and maintained on the site, with at least one toilet per ten construction staff.
- Areas for resting and lunch is to be clearly indicated on the site. Theses areas must contain waste disposal bins that are cleaned on a weekly or bi-weekly basis.
- Concrete and cement mixing is not to occur near muddy areas. Where mixing of concrete and cement occurs, the area must be bunded or surrounded by an impermeable material to prevent any runoff into the surrounding environment and existing road.
- Stockpiles of materials and soil must all be covered by a geotextile or plastic covering, which must also be bunded (e.g., sandbags) when the piles are not in use on the site. This will prevent the material from washing away and contaminating the substrate of the site which likely still contains useful seeds and soil organisms.

Figure 19. An example of a protected stockpile (image from: Stormwaterhawaii.com).

- The use of filled sandbags can reduce the intensity of water flow over the site in strategic areas where water flow is anticipated to be altered during construction.

Figure 20. Examples of silt socks placed perpendicular to the flow of water. These reduce the force of water flow, erosion, and can prevent unwanted sedimentation on the site.

- A plant rescue must be undertaken, with rescued plants being in the care of a relevant indigenous flora horticulturalist. The horticulturalist for the site must be in possession of the appropriate permit from CapeNature to move, sell, buy, donate, receive, cultivate, and sell threatened flora.
- Rescued plants are not to be planted in more natural vegetation surrounding Mossdustria, rather they can be kept and cultivated as a reserve for revegetation in other projects where open spaces need rehabilitation with plants indigenous to the area. – **Please see Section I.3. regarding this mitigation.**
- The PAOI must be clearly defined using construction netting and/or appropriate fencing, and information boards where necessary. This will prevent impacts on SCC outside of this designated construction area.
- Materials used during construction must be sourced and transported responsibly to minimise the risk of further introductions of new IAPs and contamination of the site, and especially the areas surrounding the site.
- All staff are to be briefed and informed about the SCC found on the site and the potential of the site to support additional SCC. The brief should include highlighting areas that are marked as "no-go" areas on the site.
- Before the start of construction on the site, durable materials should be used to fence off areas that fall outside of the PAOI disturbance strip and clearly show where construction vehicles are allowed and where parking areas are on the site.
- Shade cloth used as fencing should be hammered into the ground using wooden pegs, and clear signs for "no-go" areas for vehicles should be placed strategically on the site.
- For once off deliveries, clear indications on the nearby roads should be put up to guide truck drivers to the construction site, thus avoiding divers getting lost and causing unnecessary disturbance.

- Weather reports must be checked daily to avoid heavy machinery and activities requiring a lot of water use on the site during rainy weather.
- Following a rainfall event, all construction on the site must cease temporarily.
- Sandbags should be available on the site where vehicles are refuelled so that any accidental spills can be contained and stopped quickly.
- All construction vehicles should be checked for leaks on a daily basis at the start of each day. Vehicles that have leaks must not be allowed to operate on the site until they have been repaired.
- Staff operating earth moving machinery need to be informed that these vehicles may not operate outside of the PAOI.

- *Operational Phase*
  - Regular effort must be made to keep the site clear of all IAPs, and this is also a requirement by law.
  - Planting of grass and lawns must be avoided on the site apart from in the open pavers that will be used as parking areas for staff on the site. Here only indigenous grass may be planted, and kikuyu grass (*Cenchrus clandestinus),* a listed invasive species, is banned.
  - Dumping of garden refuse or leaving stacks of cleared IAP slash in natural and near-natural vegetation is not allowed. Dumping may only occur in designated areas.
  - General cleanliness and order must be maintained on the site to avoid accidental impacts to the environment. Ensure that there are sufficient bins available on the site, both inside of the offices and on the outside.
  - Regular maintenance of the diesel tanks on the site.
  - Trained staff must manage the filling station and washing bay on the site to avoid pollutants running off into the environment.

Traffic Impact Specialist/Engineers
No mitigation/upgrades required.

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.

For the purpose of the proposed development, two mitigation measures as proposed by the specialists will **not** be implemented on site or the implementation thereof is proposed to be modified.

Terrestrial Biodiversity and Plant Species Assessment
"Rescued plants are not to be planted in more natural vegetation surrounding Mossdustria, rather they can be kept and cultivated as a reserve for revegetation in other projects where open spaces need rehabilitation with plants indigenous to the area."

The EAP recommends that instead of safeguarding the plants on site, the plants must be donated to a local indigenous plant nursery for an optimal chance of survival. As the prospects of the development of other properties in the area does not rest in the Applicant's hands, therefore:

- The Applicant will not be involved with the planning of other developments and will therefore not know for how long these plants will be required to be stored and be cared for on-site; and
- The survival of the plants in an environment such as this, even if they are planted in the garden area, cannot be ensured.

Geotechnical and Geohydrological Assessment
"All surface areas where vehicle movement will take place (i.e.: roads and parking bays) must be sealed by means of bitumen, concrete paving or a concrete slab, to prevent the infiltration of liquids into the underlying soil. The soil material underlying this layer must be adequately compacted to prevent ingress of liquids through zones of weakness (i.e.: along joints) within the surface seal.:

Instead of the use of bitumen, concrete paving, or a concrete slab aimed towards the prevention of liquids into the underlying soil bed, it has been proposed to compact the in situ layers to an appropriate density followed by the stabilisation of an imported G7 material. This will be done specifically in the areas where the trucks will be frequenting.

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

Construction phase

- *Traffic*
  - During the construction phase of the proposed development, it is anticipated that there will be more traffic within Mkuze Street as delivery vehicles enter and exist Mossdustria.
  - Further impacts on the traffic management regime will be seen during the formalisation of the access ways into the proposed development site. This impact will be of temporary nature during the construction phase of the proposed development.
  - As workers will be required to make use of their own means of transport, during the construction phase of the proposed development, there will probably be an increase in the amount of public transport providers making use of the road network. As it relates to the proposed works this will be limited to regular peak traffic times (ie. Before and after work hours as construction works typically occur between 07:00 and 17:00).
- *Noise and dust*

- As no blasting on site will be required on site, due the nature of the proposed works on site, the noise and dust impacts will be limited to general construction works (including excavation and building). With proper mitigation, the impacts thereof on the surrounding properties will be limited.

- *General nuisance/safety*
  - During the construction phase of the proposed development, there is a possibility that 'trouble-makers' could enter the area under the guise of being part of construction workers employed by the management team. Although this cannot be completely mitigated at first, once the work force has been established, potential suspicious individuals would be more easily identifiable.
  - During the construction phase of the proposed development, an experienced security company in the area will be appointed to ensure the safety of the site and the equipment located on site.

Operational phase

- *Traffic*
  - During the operational phase of the proposed development, it is anticipated that there will be increased truck-traffic into the proposed development site. It is anticipated that there will be increased traffic volumes in the evening hours (as the stop is utilised as a rest and refuelling stop) (therefore, a majority of the traffic amounting as a result of the proposed works will be seen between 17:00 and 07:00). This does not mean that there will be no increase in traffic during the normal working hours, however, this is expected to be lower.
- *Dust*
  - Due to the movement of vehicles across the site at all hours of the day, dust managers will be of concern to the surrounding property managers. This has however been mitigated by means of the implemented dust control measures (by means of compaction and stabilisation of the surface). Furthermore, it is proposed that dust monitoring in line with the relevant regulations be done for a period of 12 months in order to determine the effectiveness of the dust control measures proposed for the site.
- *General nuisance / Safety and the resulting depreciation of surrounding property values*
  - Based on past experiences, the following impacts are associated with truck stops:
    - Increased crime rate.
    - Increased rate in sexual offences.
    - Increased vandalism of buildings within proximity.
    - Increased drug and alcohol abuse problems in an area.
  - The Applicant/Developer has compiled a security protocol which sets the standard for the security measures on site. The security protocol aims to mitigate all of the abovementioned aspects. Thereby limiting the impacts of the proposed development's operational activities on the surrounding properties. The measures includes, but is not limited to:
    - Reporting of any suspicious individuals/vehicles within proximity to the proposed development site.
    - No visitors may be received on site by any truck driver.
    - No woman / children may exit a truck's vehicle unless permitted and accompanies by management.
    - Woman truck drivers will overnight in a separate location within the premises from the male truck drivers.
    - No more than 3 individuals may occupy a truck's horse at any one time.
    - No alcohol will be allowed on site.
    - Random breathalyser tests will be done on site.
  - Further measures has been detailed as part of the security detailing provided for the proposed development.

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.

The proposed project aims to achieve a number of the sustainability objectives in terms of the Sustainability Development Goals (SDG) as adopted in 2017 as part of the Envision2030 initiative. The goals detailed in the table below are significant to the proposed development and will be addressed to some extent, while others are not relevant.

Figure 21. Sustainable Development Goals applicable to the proposed development.

Table 7. Description of the applicable Sustainability Goals applicable to the proposed development.

SDGs	Description	Relevance
SDG1	No poverty	During both the construction and operational phases of the proposed development, a number of employment opportunities will be created. As discussed in the sections above, the use of local labourers will be encouraged during the various phases of the proposed development. The proposed development will also provide services to logistics industry and will therefore benefit the local and regional economy as the proposed development will provide a safe, well-managed location for truckers commuting along the N2-Highway.
SDG3	Good Health and well-being	The operational phase of the proposed project aims to provide a safe, well-managed resting facility, which will provide truckers traveling over great distances with a place to rest during long commutes. Not only will this increase the perceived safety of the residential areas (in comparison to if such a facility is not environmentally permitted within the Industrial area, but in a residential area) as truckers do not have to pass through these areas to find a suitable location to overnight, the operational phase will lead to economic upliftment to the local community, but as a result of the security protocols to be followed during the operational phase of the proposed development, the socio-economic impact (in terms of peace of mind) on the surrounding landowners will also be limited.
SDG4	Quality Education	As part of the construction phase of the proposed project, the contractors will be encouraged to teach the workers skills that is transferable to future employment opportunities. Additionally, through the environmental awareness training to be conducted by the independent experienced ECO, the workers will be educated on the importance of the affected environmental receptors as well. During the operational phase of the proposed development, the appointed staff members will also be taught valuable transferable skills
SDG5	Gender equality	Where reasonably possible, woman and men of varying skill levels will be approached for the purpose of completing the construction phase activities for the proposed project. Additionally, the proposed facilities will cater to male and female truckers commuting along the N2-Highway and will therefore indirectly promote equality in the logistics industry.
SDG8	Decent Work and Economic Growth	The proposed project will strive to provide local labourers with an employment opportunity during both the construction and operational phases of the proposed development. Because the proposed facility will not only be targeting local truck drivers, but national commuters along the road, the proposed development is expected to not only promote local economic growth but also regional economic growth (to a certain degree) as a safer commute along the N2-Highway, through the provision of an safe, well-managed resting facility, will provide greater comfort with trucking companies to allow for longer commutes knowing their drivers will be safe and well-rested.
SDG13	Climate Action	As far as reasonably possible, the operational phase of the proposed development will see the implementation of a number of interventions aimed toward the eleviating of the climate change impact of the proposed development. This will predominantly be seen in the smart infrastructure interventions proposed for the proposed development. Where feasibly possible, the developer will be encouraged to make use of solar geysers and other electricity saving interventions for the purpose of the operational phase of the proposed development. The use of diesel generators will be discouraged during the operational phase. Additionally, the Developer will be encouraged to have rainwater harvesting measures available on site in order to reduce the amount of municipal water used on site. Climate change causes an increased effect of extreme weather patterns (whether it be drought or rainfall). The Western Cape is a drought prone province, therefore leading to increased risk of fire. During the construction and operational phases of the proposed development, there must be adequate fire prevention and combating measures installed throughout the site. Where possible, dry-firefighting measures must be used to combat flames. Flooding in is also of great concern. Therefore, proper stormwater management measures must be implemented during both the construction (where required) and operational phases of the proposed development. The proposed development will also be located in an existing industrial area (Mossdustria), an area which, over the last 50 years, has seen a number of large scale clearance events,

		and will therefore not see to the destruction of an existing natural area of pristine condition that functions as a part of the natural ecosystem.
SDG15	Life on Land	Several sensitive themes have been identified within proximity to the development footprint. In order to address these themes adequately, specialists have been appointed to investigate the impacts of the proposed development on the respective themes. A number of mitigation measures toward the minimisation of the potential impacts on the receiving biophysical environment have been provided.

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

No conflicting findings have been described by the various 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.

All impacts and recommendation of the various specialist studies have been integrated into the impact tables as described in Section I of this report, and the attached EMPr. These measures propose to guide the management of the various phases of the project.

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

For the purpose of the proposed project, the Mitigation Hierarchy was considered while determining the best practicable environmental option for the construction and operational phases of the project. Activities related to the proposed development have been considered. Where possible activities have been avoided. Therefore all activities included in the proposal of this development are essential for the successful implementation and operation of this development.

All impacts that could not be avoided, have been investigated to establish mitigation measures to minimize and rectify, where possible or radically reduce the predicted impacts. As all the proposed impacts can be sufficiently reduced in significance, and no residual negative biodiversity impacts will remain, no biodiversity offset was considered for this development.

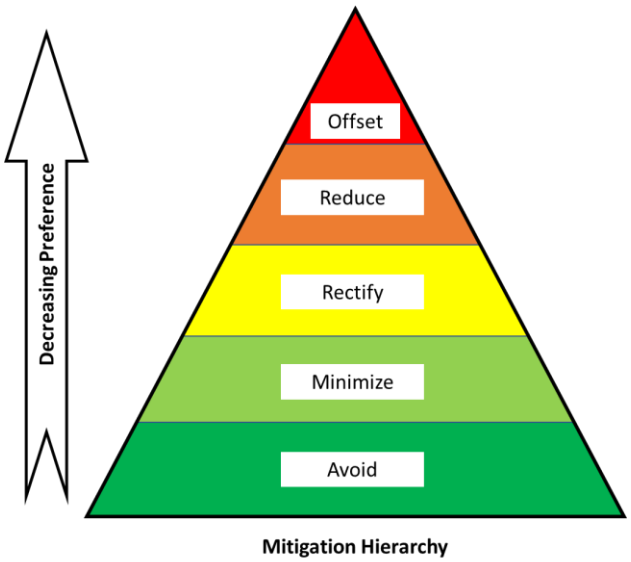


Figure 22. Mitigation hierarchy.

Table 8 describes the mitigation hierarchy approach followed for the purpose of arriving at the best practicable environmental opinion.

Table 8. Mitigation hierarchy descriptions.

Hierarchy level		Description in relation to the proposal
1	Avoid	Although no no-go areas (areas of avoidance) were identified within the proposed development site, the areas outside of the property boundaries are considered no-go areas in terms of construction and operational impacts.
2	Minimise impacts	The recommended mitigation measures of the various specialists in addition to the mitigation measures provided in the EMPr will lead to the minimisation of the impacts of the construction and operational phases of the proposed

		development. Strict mitigation measures apply to the operational phase to minimise the impacts to be seen on the receiving environment as a result of operationally based activities.
3	Rectify	During the construction and operational phases of the proposed development, the developer will be responsible for rectifying any non-compliances and aligning the site's performance with the conditions of the EA and EMPr (once approved). All management plans must be implemented for the life of the project so as to limit the potential negative impacts of the proposed development on the surrounding area.
4	Reduce	Although no no-go areas (areas of avoidance) were identified within the proposed development site, the areas outside of the property boundaries are considered no-go areas in terms of construction and operational impacts.
5	Offset	No offset necessary.

SECTION J: GENERAL

1. ENVIRONMENTAL IMPACT STATEMENT

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

The key findings of this EIA (in the form of a BAR) indicates that the proposed project will have significant positive impacts on the socio-economic aspects of the environment (locally and regionally), whilst having a net low impact on the biophysical and heritage landscape, where negative impacts can be significantly reduced through reasonable and practical mitigation measures, these have been summarised below:

Socio-economic impacts:

- *Positive impacts:*
  - The proposed development will see to the provision of a safe, well-managed truck stop in a conveniently located area that is considered to be a fair distance away from the nearest residential area (Dana Bay). The proposed facilities are considered to be of crucial nature as a formalised facility that is considered safe and easily accessible to the truckers are limited along the N2-Highway route. A facility such as this would afford truckers with the opportunity to gain much needed rest (with peace of mind) during their long commutes.
  - The proposed development will make provisions for both male and female truckers, thereby indirectly promoting equality in the logistics industry.
  - The proposed project will provide a number of temporary employment opportunities during the construction phase of the development. These opportunities will involve a number of individuals with varying degrees of skill sets (unskilled, semi-skilled, skilled). The skills taught during the time employed on site can be transferred to future employment opportunities.
  - During the operational phase of the proposed development, a number of permanent and temporary employment opportunities will be created as a result of the proposed development. These opportunities will range from general admin and facility management opportunities, to filling island attendees, wash bay crew and security guards (the latter will be outsourced to a security company in the area).
  - Labourers will be encouraged to have a more environmentally conscious approach toward executing their tasks on site at all times (by teaching them the impact which an activity can have on the natural areas around them)
- *Negative impacts (all impacts can be mitigated)*
  - During the construction phase of the proposed development, the negative socio-economic impacts rest on the temporary impacts such as noise, dust, traffic (as a result of construction vehicles) and visual impacts as a result of construction activities.
  - During the operational phase of the proposed development, these beforementioned impacts would potentially be prevalent, however, this would be limited to general impacts caused as a result of the operations of a filling station facility.
  - Impacts on the safety and security of the surrounding area as a result of the perceived influences of a truck stop on the area, therefore leading to depreciated property values.

Environmental impacts:

- *Positive impacts:*
  - The proposed development was deemed as acceptable from an agricultural, aquatic, terrestrial biodiversity, animal species, heritage, palaeontological, geotechnical & geohydrological, and a traffic impact perspective.

- From a Plant species perspective, the proposed development would be acceptable, should the appropriate mitigation measures be implemented. Amongst these mitigation measures required, is the requirement of a search and rescue operation for the *Hermannia lavandulifolia* plants on site.
- Dure to the proposed development requiring an Alien Invasive Species Management Plan, the destructive impacts seen as a result of their current presence (and looming threat to reinfest a majority of the site) will be mitigated.

- <u>*Negative impacts:*</u>
  - As the entirety of the site will be developed, there will be a complete loss of the terrestrial vegetation on site. With proper mitigation, the loss of vegetation will be kept within the boundaries of the site.

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)

A map has been included as Appendix B2.

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.

Below is a table of the potential impacts and their significance rating identified:

Impact	Nature	Significance Without Mitigation	Significance with mitigation
Pre-construction / Planning Phase			
Compliance with Legislative Requirements	Negative	Low	No significance
Site establishment and pre-construction activities	Negative	Medium-High	Low
Construction Phase			
Aquatic Resources: Impact on Aquatic Resources	Negative	No significance	No significance
Agricultural Resources: Impact on Agricultural Resources	Negative	Very Low	Very Low
Botanical Resources: Habitat loss and degradation	Negative	Medium-High	Medium
Botanical Resources: Impact of construction on SCC	Negative	Medium-High	Low
Botanical Resources: Construction vehicles on sensitive habitat surrounding the development site	Negative	Medium	Low
Animal Species theme: Impact on faunal SCCs	Negative	Low	No significance
Heritage and Palaeontological Resources: Potential impact	Negative	No significance	No significance
Pollution management: Pollution of hydrocarbons due to spills and leaks	Negative	Low	Low
Visual: Noise, dust, light and general housekeeping	Negative	High	Low
Road safety: Road traffic impacts as a result of the construction works	Negative	Medium-High	No significance
Socio-economic impact: Employment opportunities created	Positive	High	High
Post-Construction / Operational Phase			
Botanical Resource: Impact on Terrestrial Biodiversity	Negative	Low	No significance
Nuisance and pollution management: Dust, noise and visual impacts	Negative	Low	No significance
Health and Safety: Increased vulnerability of the area to fire	Negative	Medium	Low
Groundwater impact: Impact on the quality of the groundwater as a result of the on-site activities	Negative	Low	Low
Traffic Impact: Increased traffic leading into Mossdustria	Negative	No significance	No significance
Socio-economic impact: Impact on the surrounding properties	Negative	Medium-High	Low
Socio-economic impact: Provision of safe trucking facilites to the logistics sector	Positive	Very High	Very High
Socio-economic impact: Employment opportunities created	Positive	Medium-High	Medium-High

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

<u>Construction phase:</u>

- Limited impacts on the receiving environment as a result of construction activities (vegetation, SCCs, water resources).
- Creation of employment opportunities to the local community.
- Reduction of the visual impacts of the proposed construction works on the neighbouring properties/land uses.
- Minimal traffic related inconveniences.

Operational phase:

- No impact on air quality.
- Prevention of contamination of the bio-physical resources in on site and within proximity to the proposed development site.
- The creation of employment opportunities to the local community.
- Promotion of employment opportunities within the logistics industry.
- Creating a safe resting spot for male and female truckers alike.
- No depreciation of neighbouring property values.
- Minimal traffic related inconveniences.

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.

Based on the findings of the specialists, the following conditions (as extrapolated from) by the specialists warrants inclusion into the Environmental Authorisation of the project (if granted):

- Terrestrial Biodiversity and Plant Species Assessment:
  - An Alien Invasive Management Plan must be compiled prior to the commencement of any activities on site. This plan must be implemented during the construction and operational phases of the proposed development.
  - A permit from CapeNature for the removal and relocation of the plant SCC, *Hermannia lavandulifolia*, must be obtained prior to the commencement of any activity on site.
- Geohydrological Assessment:
  - Geohrydological monitoring requirements as proposed by the in the Geotechnical investigations, compiled by *Element Consulting Engineers*, must be adhered to for the timeframes specified by the specialist.

Based on the findings of this EIA process and based on the correspondence received from the various governing bodies, the EAP is of the opinion that the following monitoring and management plans be implemented on site (including the timeframes for which the monitoring is required):

- During the operational phase of the proposed development, the EA holder is to conduct monthly monitoring of the site for a period of 12 months in order to ensure the dust suppression measures implemented are deemed sufficient.
- A Major Hazard Installation Assessment (in line with the Occupational Health and Safety Act) must be undertaken prior to the commencement of the proposed construction activities.

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.

It is the opinion of the EAP that, based on the outcomes of the specialist studies conducted and further potential impacts as identified in this report, the proposed truck stop and associated infrastructure development project located on Erven 56 and 57 in Mossdustria should be approved, with the condition that all mitigation measures presented in this report, the mitigation measures presented by the independent specialists the conditions of the EMPr must be implemented on site.

The following **on-site** features of concern were raised by the various specialists:

- ***Aquatic biodiversity***: No features identified.
- ***Agricultural***: No features identified.
- ***Terrestrial biodivers***ity: No features identified.
- ***Plant Species***:
  - **One** SCC was identified on site.
  - A permit for the removal/relocation of this species must be obtained from CapeNature.
- ***Animal Species***:
  - No SCC were found on site – low potential of SCC to occur on site.
- ***Cultural Heritage***: No features identified.
- ***Palaeontological features***: No features expected to be unearthed as a result of proposed works.
- ***Geohydrological/Geotechnical***: The proposed project is expected to have a low impact on the groundwater and surface water resources in the area.

The following entities have provided comments/approval for the proposed development:

- Mossel Bay Local Municipality – Town Planning: A consent use application has been submitted and approved by the Local Municipality for the proposed land use of the proposed development site.
- Department of Mineral Resources and Energy: A wholesale licence has been obtained for the proposed development.
- Heritage Western Cape: A favourable comment has been received from Heritage Western Cape regarding the proposed development and no further comments are expected.

From an environmental standpoint (biophysical and socio-economic), based on the findings of the specialists, further research done by the EAP and the Security and Management Protocols as brought forth by the Applicant, the proposed development will not have a condemning impact on the receiving environment.

Beyond the measures listed in 2.2, considering that all potential negative impacts can be mitigated to a reasonable measure it must be a condition of Environmental authorisation that the EMPr be implemented, and compliance therewith must be monitored by an experienced ECO.

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

General assumptions:

- It is assumed that all the information provided in this report and on which the report is based is correct and valid at the time receipt thereof.
- It is assumed that the proposed mitigation measures, as listed in this report and the EMPr (Appendix H), will be implemented and adhered to by all the relevant stakeholders involved.
- The study will include every effort to enable public consultation but is limited to the public input which was forthcoming.
- The actual emissions resulting from the proposed development is unknown as this is a pilot plant and thus a gap in knowledge.

Terrestrial Biodiversity and Plant Species Assessment

This assessment is subject to a few assumptions, uncertainties, and limitations, as listed below:

- Only one survey took place during autumn on the 15th of March of 2023. Seasonal and time constraints always play a role in limiting the findings of a terrestrial specialist report.
- Some rare and threatened plant species are difficult to locate and easily overlooked in the field (e.g., succulent species, succulents, and species that occur as individual plants over a large geographical area). The species list for the area is limited to the findings of the one field assessment, as well as past records on iNaturalist and the Plants of Southern Africa (POSA) database for the proposed development site and its surrounding areas.
- Many plant species flower seasonally and are therefore difficult to identify outside of their flowering season. Environmental factors such as the fire regime and level of alien invasion influence the successional stage of the vegetation present at the site, and therefore the species visible at the time of assessment (Cowling et al., 2010; Privett et al., 2001).
- Effort was made to identify possible impacts for the layout and design phase of the project, but it is always possible that some impacts were missed or neglected. The exclusion of important impacts does not mean that they do not exist, and the development always has a duty of care to mitigate negative impacts to the environment.
- Effort was made to identify no-go areas and possible impacts for the layout and design phase of the project, but it is always possible that some impacts were missed or neglected. The exclusion of important impacts does not mean that they do not exist, and the development always has a duty of care to mitigate negative impacts to the environment.

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.

Based on the wording of the triggered listed activities (specifically Listing Notice 1, Activity 14) the EA would be required to be applicable for the duration of the operational aspects of the activity as well (therefore maintaining the standard throughout the life of the activity.

The environmental authorisation for the project will be required for a period of **35 years**:

- Construction phase: 2 years (conservative); and
- Operational phase:
    - When post-construction monitoring requirements should be finalised: 1 year (dust monitoring activities);
    - 35 years will be required for the operational aspects of the proposed development.

Please note that decommissioning of the proposed development does not fall under the scope of this application. Once the Applicant nears the end of life of the operational phase of the proposed development, the appropriate environmental authorisation process will be undertaken.

Should the activity be viable for a period exceeding that which is allowed in the Environmental Authorisation, (if granted), the EA holder must apply for an extension of the EA period.

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.

Construction phase

During the construction phase of the proposed project, no potable water will be used for the purpose of construction activities, such as cement mixing, layer compaction where necessary, and where required to fulfil the mitigation measures (dust suppression methods).

Potable water within the construction site will only be used for drinking water.

Operational phase

During the operational phase of the proposed development, water will be used for the following purposes:

- Sanitation purposes (shower, lavatory, kitchen/canteen facilities).
- At the wash bay for the purpose of operating the wash bay.
- Potable water for drinking purposes.

Where possible water saving interventions will be implemented during the construction and operational activities. Rainwater harvesting (in terms of Schedule 1 activities of the National Water Act (Act No. 36 of 1998)) will also be a preferred measure of obtaining water specifically for the purpose of sanitary (lavatory) provisions and for use at the wash bay.

The site will also be equipped with 2 reservoirs which will serve to be used in the case of emergencies on site.

4. WASTE

Explain what measures have been taken to reduce, reuse or recycle waste.

Construction phase

During construction, the only waste that is expected to be generated will be general construction rubble. For the purpose of containing general waste, bins will be placed in strategic locations on site and waste will be collected and stored within the site camp. An SMME specialising in recycling activities will be approached to remove and sort the waste.

If possible, recycling bins (specifying the type of waste to be stored) will be placed within the site camp, to further the efforts of the waste management team. Where waste skips (or similar waste containing features) are used for the storage of general construction rubble, management of these skips are required. All waste gathered in the waste skips must be discarded at a registered landfill site.

Operational phase

A waste management plan has been compiled and has been attached as part of this BAR. Strict adherence to this management plan is required for all waste types (general and hazardous waste).

The stormwater infrastructure of the site will be managed in a meticulous way so as to prevent any raw stormwater runoff from the wash bay, filling area, tank farm or parking areas from entering into the municipal stormwater network. All stormwater generated on site will be treated by means of a grease trap before entering into the municipal stormwater system.

Companies specialising in recycling hazardous waste (specifically lubricants), for example the Rose foundation, must be used to collect and recycle hazardous waste during the operational phase of the proposed development.

5. ENERGY EFFICIENCY

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

As the country is currently in Emergency State in terms of Electricity, every developer should as much as reasonable limit the potential strain of their development on the National and Municipal Grids. The following energy efficiency measures have been proposed to the Applicant for the purpose of the operational phase of the proposed development:

- As far as reasonably possible, energy saving lights must be the preferred lighting option. Where possible low-energy rechargeable lighting must be used throughout the administrative areas;
- In order to further reduce the strain on the Grid, the applicant is advised to make use of renewable energy sources (such as solar powered geyser solutions).
- Should the abovementioned not be possible, users of the facilities must be encouraged to limit the time spent utilizing the electricity straining infrastructure. This can be done through information boards placed in the common areas.
- Although the facilities will be required to be illuminated in the evening hours, the developer must strive to limit the strain of the illumination requirements during the evening hours.

SECTION K: DECLARATIONS

1. DECLARATION OF THE APPLICANT

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

I……Johan Pretorius……, ID number …940107 509 2081……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:

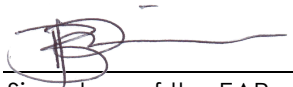
Confuel (Pty) Ltd

Name of company (if applicable):

2. DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I ……Betsy Ditcham……, EAPASA Registration number ……1480…….. 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;



19/06/2023

Signature of the EAP: Date:

Sharples Environmental Services CC

Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

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

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

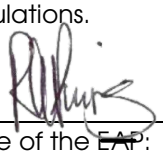
- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity;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



13 June 2023

Signature of the ~~EAP~~ Specialist: Date:

Cossypha Ecological

Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

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

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

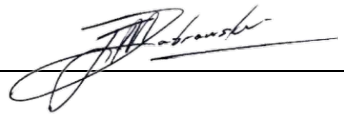
- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; 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: 15 June 2023

Confluent Environmental

Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

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

I Eugene van der Walt, 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.

13/06/2023

Signature of the EAP: Date:

Terra Geotechnical

Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

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

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

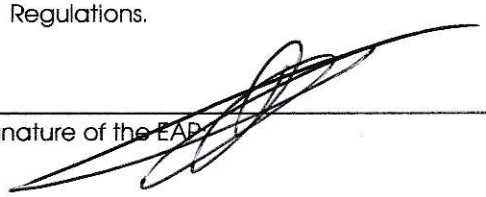
- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity;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

13 JUNE 2023

Date:

ASHA CONSULTING (PTY) LTD

Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

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

I ……Dr. Barry Millsteed……, 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.

13/06/2023

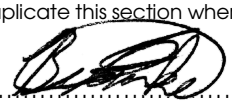
Signature of the EAP: Date:

Barry Millsteed Geological Services (Pty) Ltd

Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

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

I  (Bianke Fouche), 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.

13 June 2023

Signature of the EAP: Date:

Confluent Environmental

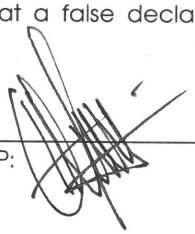
Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

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

I Hannes Lourens, 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: 15/06/2023.

Element Consulting Engineers.

Name of company (if applicable):

ELEMENT CONSULTING ENGINEERS (Pty) Ltd
Registration No: 2001/012268/07

82 Victoria Street, George 6529
PO Box 9962, George, 6530
Tel: +27 44 884 1138, Fax: +27 44 884 1185
Email: hlourens@eceng.co.za

5. 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):