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SITE SENSITIVITY VERIFICATION AND AGRICULTURAL COMPLIANCE STATEMENT FOR PROPOSED CASTLE TO HYDRA OVERHEAD TRANSMISSION LINE NEAR DE AAR, NORTHERN CAPE PROVINCE

Report by Johann Lanz

15 May 2022

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EXECUTIVE SUMMARY

The key findings of this study are:

- The loss of future agricultural production potential resulting from the proposed development is totally insignificant in the context of the agricultural environment. This is because an insignificantly small amount of land will be excluded from agricultural production and that land has very limited production potential, anyway.
- The conclusion of this assessment is that the proposed development will have insignificant agricultural impact and will therefore be acceptable in terms of its impact on the agricultural production capability of the site.
- The only potential source of impact is minimal disturbance to the land (erosion and topsoil loss) during construction (and decommissioning). Land disturbance can be completely and fairly easily mitigated through generic mitigation measures. However, farmers frequently complain that these impacts occur because the EMPr is not adequately implemented.
- From an agricultural impact point of view, it is recommended that the development be approved.

1 INTRODUCTION

Environmental authorisation is being sought for the proposed construction and operation of the Castle to Hydra overhead transmission line near De Aar, Northern Cape Province (see location in Figure 1). In terms of the National Environmental Management Act (Act No 107 of 1998) (NEMA), an application for environmental authorisation requires an agricultural assessment, in this case an Agricultural Compliance Statement.

Johann Lanz was appointed as an independent agricultural specialist to conduct the agricultural assessment. The objective and focus of an agricultural assessment is to assess whether or not the proposed development will have an unacceptable agricultural impact, and based on this, to make a recommendation on whether or not it should be approved.



Figure 1. Locality map of the proposed overhead line corridor east of De Aar.

The purpose of including an agricultural component in Environmental Authorisation is to ensure that South Africa balances the need for development against the need to ensure the conservation of the natural agricultural resources, including land, required for agricultural production and national food security. The aim of the agricultural protocol of NEMA is primarily to preserve the agricultural production potential of scarce arable land by ensuring that development does not exclude agricultural production from such land or impact it to the extent that the crop production potential is reduced. However, this proposed development poses zero threat to arable land and almost no threat to grazing land (see impact assessment section).

2 **PROJECT DESCRIPTION**

The project consists of a single- or double-circuit 132kV-400kV overhead transmission line (OHL) to connect the authorised Castle Wind Energy Facility (WEF) to the existing Hydra Main Transmission Substation (MTS), near De Aar. Associated infrastructure will include permanent access/service tracks (where no existing roads exist) as well as temporary laydown areas and site camps that will be rehabilitated after construction.

Because of the insignificant agricultural impact of electrical grid infrastructure, it is not necessary to consider the detail of the design and layout of the development in this assessment. It would have insignificant agricultural impact, regardless of its design and layout.

3 TERMS OF REFERENCE

The terms of reference for this study is to fulfill the requirements of the *Protocol for the specialist assessment and minimum report content requirements of environmental impacts on agricultural resources* gazetted on 20 March 2020 in GN 320 (in terms of Sections 24(5)(A) and (H) and 44 of NEMA, 1998).

The level of agricultural assessment required in terms of the protocol for this development is an Agricultural Compliance Statement because the site is of less than high agricultural sensitivity on the screening tool and the development is a linear activity.

The terms of reference for an Agricultural Compliance Statement, as stipulated in the protocol, are listed below, and the section number of this report which fulfils each stipulation is given after it in brackets.

- 1. The Agricultural Compliance Statement must be prepared by a soil scientist or agricultural specialist registered with the South African Council for Natural Scientific Professions (SACNASP) (Appendix 1).
- 2. The compliance statement must:
 - 1. be applicable to the preferred site and proposed development footprint;
 - 2. confirm that the site is of "low" or "medium" sensitivity for agriculture (Section 7); and
 - 3. indicate whether or not the proposed development will have an unacceptable impact on the agricultural production capability of the site (Section 9.6).

- 3. The Agricultural Compliance Statement must contain, as a minimum, the following information:
 - details and relevant experience as well as the SACNASP registration number of the soil scientist or agricultural specialist preparing the statement including a curriculum vitae (Appendix 1);
 - 2. a signed statement of independence by the specialist (Appendix 2);
 - a map showing the proposed development footprint (including supporting infrastructure) with a 50 m buffered development envelope, overlaid on the agricultural sensitivity map generated by the screening tool (Figure 2);
 - confirmation from the specialist that all reasonable measures have been taken through micro-siting to avoid or minimize fragmentation and disturbance of agricultural activities (Section 9.4);
 - a substantiated statement from the soil scientist or agricultural specialist on the acceptability, or not, of the proposed development and a recommendation on the approval, or not of the proposed development (Section 9.6);
 - 6. any conditions to which this statement is subjected (Section 11);
 - in the case of a linear activity, confirmation from the agricultural specialist or soil scientist, that in their opinion, based on the mitigation and remedial measures proposed, the land can be returned to the current state within two years of completion of the construction phase (Section 9.5);
 - 8. where required, proposed impact management outcomes or any monitoring requirements for inclusion in the EMPr **(Section 10)**; and
 - 9. a description of the assumptions made and any uncertainties or gaps in knowledge or data (Section 5).

4 METHODOLOGY OF STUDY

4.1 Methodology for assessing the agro-ecosystem

This report adheres to the process and content requirements of the gazetted agricultural protocol as outlined in Section 3 above. As per the requirement, the assessment was based on a desktop analysis of existing soil and agricultural potential data for the site.

The following sources of information were used:

• Soil data was sourced from the land type data set, of the Department of Agriculture, Forestry and Fisheries (DAFF). This data set originates from the land type survey that was conducted from the 1970's until 2002. It is the most reliable and comprehensive national database of soil information in South Africa and although the data was collected some time ago, it is still entirely relevant as the soil characteristics included in the land type data do not change within time scales of hundreds of years.

- Land capability data was sourced from the 2017 National land capability evaluation raster data layer produced by the DAFF, Pretoria.
- Field crop boundaries were sourced from Crop Estimates Consortium, 2019. *Field Crop Boundary data layer, 2019*. Pretoria. Department of Agriculture, Forestry and Fisheries.
- Rainfall and evaporation data was sourced from the SA Atlas of Climatology and Agrohydrology (2009, R.E. Schulze) available on Cape Farm Mapper.
- Grazing capacity data was sourced from the 2018 DAFF long-term grazing capacity map for South Africa, available on Cape Farm Mapper.
- Satellite imagery of the site and surrounds was sourced from Google Earth.

5 ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE OR DATA

There are no specific assumptions, uncertainties or gaps in knowledge or data that affect the findings of this study.

6 APPLICABLE LEGISLATION AND PERMIT REQUIREMENTS

Power lines require the registration of a servitude for each farm portion crossed. In terms of the Subdivision of Agricultural Land Act (Act 70 of 1970) (SALA), the registration of a power line servitude requires written consent of the Minister unless either of the following two conditions apply:

- 1. if the servitude width does not exceed 15 metres; and
- 2. if Eskom is the applicant for the servitude.

If one or both of these conditions apply, then no agricultural consent is required. The second condition is likely to apply, even if another entity gets Environmental Authorisation for and constructs the power line, but then hands it over to Eskom for its operation. Eskom is currently exempt from agricultural consent for power line servitudes.

Rehabilitation after disturbance to agricultural land is managed by the Conservation of Agricultural Resources Act (Act 43 of 1983) (CARA). A consent in terms of CARA is required for the cultivation of virgin land. Cultivation is defined in CARA as "any act by means of which the topsoil is disturbed mechanically". The purpose of this consent for the cultivation of virgin land is to ensure that only land that is suitable as arable land is cultivated. Therefore, despite the above definition of cultivation, disturbance to the topsoil that results from the construction of a renewable energy facility and its associated infrastructure does not constitute cultivation as it is understood in CARA.

This has been corroborated by Anneliza Collett (Acting Scientific Manager: Natural Resources Inventories and Assessments in the Directorate: Land and Soil Management of the Department of Agriculture, Land Reform and Rural Development (DALRRD)). The construction and operation of the facility will therefore not require consent from the Department of Agriculture, Land Reform and Rural Development in terms of this provision of CARA.

7 SITE SENSITIVITY VERIFICATION

In terms of the gazetted agricultural protocol, a site sensitivity verification must be submitted that:

- confirms or disputes the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.;
- 2. contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity.

However, the verification of agricultural sensitivity of the power line route has very little relevance to this assessment because the agricultural impacts of a power line are insignificant in such an agricultural environment, regardless of the level of agricultural sensitivity of the land which it traverses.

Agricultural sensitivity, as used in the national web-based environmental screening tool, is a direct function of the capability of the land for agricultural production. The general assessment of agricultural sensitivity that is employed in the national web-based environmental screening tool, identifies all arable land that can support viable crop production, as high (or very high) sensitivity. This is because there is a scarcity of arable production land in South Africa and its conservation for agricultural use is therefore a priority. Land which cannot support viable crop production is much less of a priority to conserve for agricultural use, and is rated as medium or low agricultural sensitivity.

It is important to recognise that the agricultural sensitivity of land, in terms of a particular development, is not only a function of the screening tool sensitivity, but is also a function of the severity of the impact which that development poses to agriculture. This is not recognised in the screening tool classification of sensitivity. So, for example, the sensitivity of an agricultural environment to overhead power lines is not what the screening tool classifies the sensitivity as, because most agricultural environments have a very low sensitivity to overhead power lines because these have negligible agricultural impact, regardless of the agricultural production potential of the land that they cross (see Section 9). Therefore, in the context of the development of overhead power lines, almost no land can be considered to have high sensitivity for impacts on

agricultural resources.

The screening tool classifies agricultural sensitivity according to only two independent criteria – the land capability rating and whether the land is used for cropland or not. All cropland is classified as at least high sensitivity, based on the logic that if it is under crop production, it is indeed suitable for it, irrespective of its land capability rating.

The screening tool sensitivity categories in terms of land capability are based upon the Department of Agriculture's updated and refined, country-wide land capability mapping, released in 2016. The data is generated by GIS modelling. Land capability is defined as the combination of soil, climate and terrain suitability factors for supporting rain fed agricultural production. It is an indication of what level and type of agricultural production can sustainably be achieved on any land, based on its soil, climate and terrain. The higher land capability values (≥8 to 15) are likely to be suitable as arable land for crop production, while lower values are only likely to be suitable as non-arable grazing land.

A map of the proposed substation and power line, overlaid on the screening tool sensitivity, is given in Figure 2. As noted above, the screening tool sensitivity of the power line corridors is irrelevant to agricultural impact. Because none of the land is classified as cropland, agricultural sensitivity is purely a function of land capability. The land capability of the corridor on the screening tool is predominantly 5, which translates to a low agricultural sensitivity, but it varies from 1 (low sensitivity) to 7 (medium sensitivity).

The predominantly low agricultural sensitivity, as identified by the screening tool, is confirmed by this assessment. The motivation for confirming the sensitivity is that the climate data (low rainfall of approximately 285 mm per annum and high evaporation of approximately 1,500 mm per annum) proves the area to be arid, and therefore of limited land capability. A land capability of 5 and consequent low agricultural sensitivity is entirely appropriate for this land which is totally unsuitable for dryland crop production.

This site sensitivity verification verifies the entire site as being of less than high agricultural sensitivity and predominantly of low agricultural sensitivity. The required level of agricultural assessment is therefore confirmed as an Agricultural Compliance Statement.

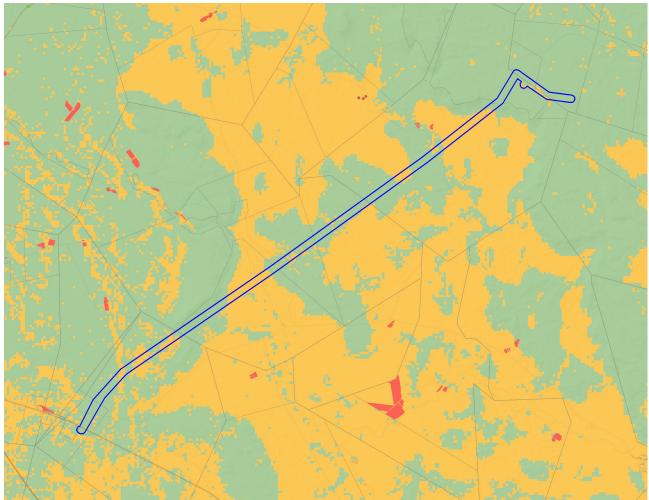


Figure 2. The proposed corridor (dark blue outline) overlaid on agricultural sensitivity, as given by the screening tool (green = low; yellow = medium; red = high).

8 BASELINE DESCRIPTION OF THE AGRO-ECOSYSTEM

The agricultural production potential of the site is completely constrained by the aridity of the climate (low rainfall of approximately 285 mm per annum and high evaporation of approximately 1,500 mm per annum (Schulz, 2009)). As a result the agricultural land use is limited to grazing. Grazing of both sheep and game is the dominant agricultural land use in the area. Grazing capacity of the site is fairly low at 20 hectares per large stock unit (DAFF, 2018). There is no cultivation in the corridor. In the surrounding area the little cultivation that there is, is confined to small, isolated patches of pasture or fodder crops around farmsteads.

9 ASSESSMENT OF AGRICULTURAL IMPACT

9.1 General

An agricultural impact is a temporary or permanent change to the future production potential of

land. The significance of the agricultural impact is directly proportional to the extent of the change in production potential. If a development will not change the future production potential of the land, then there is no agricultural impact.

The proposed electrical grid infrastructure has insignificant agricultural impact for two reasons:

- There is no loss of future agricultural production potential under transmission lines because all agricultural activities that are viable in this environment, can continue completely unhindered underneath transmission lines. The direct, permanent, physical footprint of the development that has any potential to interfere with agriculture, including a service track below the lines, is insignificantly small within an agricultural environment of large farms with low density grazing.
- The affected land has very limited agricultural production potential, anyway.

The only sources of impact is minimal disturbance to the land (erosion and topsoil loss) during construction (and decommissioning). Land disturbance can be completely and fairly easily mitigated through generic mitigation measures included in the EMPr. However, farmers frequently complain that these impacts occur because the EMPr is not adequately implemented.

There is likely to be some nuisance disturbance to agricultural activities during construction. A common complaint from farmers is that gates are left open by contractors. However nuisance disturbances are highly unlikely to translate into a change in agricultural production and therefore do not constitute an agricultural impact as defined in the first paragraph of this section.

9.2 Cumulative impact

The cumulative impact of a development is the impact that development will have when its impact is added to the incremental impacts of other past, present or reasonably foreseeable future activities that will affect the same environment. It is important to note that the cumulative impact assessment for a particular project, like what is being done here, is not the same as an assessment of the impact of all surrounding projects. The cumulative assessment for this project is an assessment only of the impacts associated with this project, but seen in the context of all surrounding impacts. It is concerned with this project's contribution to the overall impact, within the context of the overall impact. But it is not simply the overall impact itself.

The most important concept related to a cumulative impact is that of an acceptable level of change to an environment. A cumulative impact only becomes relevant when the impact of the proposed development will lead directly to the sum of impacts of all developments causing an acceptable level of change to be exceeded in the surrounding area. If the impact of the development being assessed does not cause that level to be exceeded, then the cumulative impact associated with that development is not significant.

The potential cumulative agricultural impact of importance is a regional loss of future agricultural production potential. The defining question for assessing the cumulative agricultural impact is this:

What level of loss of future agricultural production potential is acceptable in the area, and will the loss associated with the proposed development, when considered in the context of all past, present or reasonably foreseeable future impacts, cause that level in the area to be exceeded?

There are a number of renewable energy developments that are leading to loss of agricultural grazing land in the area. However, because this overhead line itself leads to insignificant agricultural land loss, its cumulative impact must also logically be insignificant. It therefore does not make sense to conduct a more formal assessment of the development's cumulative impacts as per DFFE requirements for cumulative impacts. Many times more electricity grid infrastructure than currently exists, or is currently proposed, can be accommodated before acceptable levels of change in terms of loss of production potential are exceeded. In reality the landscape in this environment could be covered with power lines and agricultural production potential would not be affected.

Due to the considerations discussed above, the cumulative impact of loss of future agricultural production potential can confidently be assessed as not having an unacceptable negative impact on the area. In terms of cumulative impact, the proposed development is therefore acceptable and it is therefore recommended that it be approved.

9.3 Impacts of the no-go alternative

The no-go alternative considers impacts that will occur to the agricultural environment in the absence of the proposed development. There is no agricultural impact of the no-go option. Therefore, the extent to which the development (insignificant impact) and the no-go alternative will impact agricultural production are more or less equal, which results in there being, from an agricultural impact perspective only, no preferred alternative between the development and the no-go. However, the no-go option would prevent the proposed development from contributing to the environmental, social and economic benefits associated with the development of renewable energy in South Africa.

9.4 Micro-siting to minimize fragmentation and disturbance of agricultural activities

The agricultural protocol requires confirmation that all reasonable measures have been taken through micro-siting to minimize fragmentation and disturbance of agricultural activities. However, the agricultural uniformity and low agricultural potential of the environment, means that the exact positions of all infrastructure will make no material difference to agricultural impacts and disturbance.

9.5 Confirmation of linear activity impact

The protocol requires confirmation in the case of a linear activity, that the land can be returned to the current state within two years of completion of the construction phase. It is hereby confirmed that the land under the overhead power line route can be returned to the current state within two years of construction.

9.6 Impact assessment and statement

An Agricultural Compliance Statement is not required to formally rate agricultural impacts. It is only required to indicate whether or not the proposed development will have an unacceptable impact on the agricultural production capability of the site. It must provide a substantiated statement on the acceptability, or not, of the proposed development and a recommendation on the approval, or not of the proposed development.

Nevertheless, it is hereby confirmed that the agricultural impact of the proposed development is insignificant.

The conclusion of this assessment is that the proposed development will have an insignificant and therefore acceptable impact on the future agricultural production potential of the site. This is because:

- There is no loss of future agricultural production potential under transmission lines because all agricultural activities that are viable in this environment, can continue completely unhindered underneath transmission lines. The direct, permanent, physical footprint of the development that has any potential to interfere with agriculture, including a service track below the lines, is insignificantly small within an agricultural environment of large farms with low density grazing.
- The affected land has very limited agricultural production potential, anyway.

Therefore, from an agricultural impact point of view, it is recommended that the development be approved.

10 ENVIRONMENTAL MANAGEMENT PROGRAMME INPUTS

There are no additional mitigation measures required, over and above what has already been included in the Generic EMPr for overhead electricity transmission and distribution infrastructure as per Government Notice 435, which was published in Government Gazette 42323 on 22 March 2019.

11 CONCLUSIONS

The conclusion of this assessment is that the proposed development will have insignificant agricultural impact and will therefore be acceptable in terms of its impact on the agricultural production capability of the site. This is substantiated by the facts that the loss of agricultural production potential resulting from the development is insignificant because of the insignificant amount of land excluded from agricultural production and because of the land's very limited production potential.

The only sources of impact minimal disturbance to the land (erosion and topsoil loss) during construction (and decommissioning). Land disturbance can be completely and fairly easily mitigated through generic mitigation measures.

From an agricultural impact point of view, it is recommended that the development be approved.

The conclusion of this assessment on the acceptability of the proposed development and the recommendation for its approval is not subject to any conditions.

12 **REFERENCES**

Crop Estimates Consortium, 2019. *Field Crop Boundary data layer, 2019*. Pretoria. Department of Agriculture, Forestry and Fisheries.

Department of Agriculture Forestry and Fisheries (DAFF), 2018. Long-term grazing capacity map for South Africa developed in line with the provisions of Regulation 10 of the Conservation of Agricultural Resources Act, Act no 43 of 1983 (CARA), available on Cape Farm Mapper. Available at: https://gis.elsenburg.com/apps/cfm/

Department of Agriculture, Forestry and Fisheries, 2017. National land capability evaluation raster data layer, 2017. Pretoria.

Schulze, R.E. 2009. SA Atlas of Climatology and Agrohydrology, available on Cape Farm Mapper.

Available at: https://gis.elsenburg.com/apps/cfm/

APPENDIX 1: SPECIALIST CURRICULUM VITAE

Johann Lanz Curriculum Vitae							
Education							
M.Sc. (Environmental Geochemistry)	University of Cape Town	1996 - 1997					
B.Sc. Agriculture (Soil Science, Chemistry)	University of Stellenbosch	1992 - 1995					
BA (English, Environmental & Geographical Science)	University of Cape Town	1989 - 1991					
Matric Exemption	Wynberg Boy's High School	1983					

Professional work experience

I have been registered as a Professional Natural Scientist (Pri.Sci.Nat.) in the field of soil science since 2012 (registration number 400268/12) and am a member of the Soil Science Society of South Africa.

Soil & Agricultural Consulting Self employed

2002 - present

Within the past 5 years of running my soil and agricultural consulting business, I have completed more than 170 agricultural assessments (EIAs, SEAs, EMPRs) in all 9 provinces for renewable energy, mining, electrical grid infrastructure, urban, and agricultural developments. I was the appointed agricultural specialist for the nation-wide SEAs for wind and solar PV developments, electrical grid infrastructure, and gas pipelines. My regular clients include: Zutari; CSIR; SiVEST; SLR; WSP; Arcus; SRK; Environamics; Royal Haskoning DHV; ABO; Enertrag; WKN-Windcurrent; JG Afrika; Mainstream; Redcap; G7; Mulilo; and Tiptrans. Recent agricultural clients for soil resource evaluations and mapping include Cederberg Wines; Western Cape Department of Agriculture; Vogelfontein Citrus; De Grendel Estate; Zewenwacht Wine Estate; and Goedgedacht Olives.

In 2018 I completed a ground-breaking case study that measured the agricultural impact of existing wind farms in the Eastern Cape.

Soil Science Consultant Agricultural Consultors International (Tinie du Preez) 1998 - 2001

Responsible for providing all aspects of a soil science technical consulting service directly to clients in the wine, fruit and environmental industries all over South Africa, and in Chile, South America.

Contracting Soil ScientistDe Beers Namaqualand MinesJuly 1997 - Jan 1998

Completed a contract to advise soil rehabilitation and re-vegetation of mined areas.

Publications

- Lanz, J. 2012. Soil health: sustaining Stellenbosch's roots. In: M Swilling, B Sebitosi & R Loots (eds). Sustainable Stellenbosch: opening dialogues. Stellenbosch: SunMedia.
- Lanz, J. 2010. Soil health indicators: physical and chemical. *South African Fruit Journal*, April / May 2010 issue.
- Lanz, J. 2009. Soil health constraints. *South African Fruit Journal*, August / September 2009 issue.
- Lanz, J. 2009. Soil carbon research. *AgriProbe*, Department of Agriculture.
- Lanz, J. 2005. Special Report: Soils and wine quality. *Wineland Magazine*.

I am a reviewing scientist for the South African Journal of Plant and Soil.



APPENDIX 2: DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

(For official use only)

File Reference Number: NEAS Reference Number: Date Received:

DEA/EIA/

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

PROPSED CASTLE TO HYDRA OVERHEAD TRANSMISSION LINE NEAR DE AAR, NORTHERN CAPE PROVINCE

Kindly note the following:

- This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
- This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at https://www.environment.gov.za/documents/forms.
- A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
- All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
- All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

Departmental Details

Postal address: Department of Environmental Affairs, Attention: Chief Director: Integrated Environmental Authorisations, Private Bag X447, Pretoria, 0001

Physical address: Department of Environmental Affairs, Attention: Chief Director: Integrated Environmental Authorisations, Environment House, 473 Steve Biko Road, Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at: Email: EIAAdmin@environment.gov.za

1. SPECIALIST INFORMATION

Specialist Company Name:	Johann Lanz – Soil Scienti	st				
B-BBEE	Contribution level (indicate 1 to 8 or non- compliant)	4	Percent Procure recognit	ment	100%	
Specialist name:	Johann Lanz					
Specialist Qualifications:	M.Sc. (Environmental Geochemistry)					
Professional	Registered Professional Natural Scientist (Pr.Sci.Nat.) Reg. no. 400268/12					
affiliation/registration:	Member of the Soil Science Society of South Africa					
Physical address:	1a Wolfe Street, Wynberg, Cape Town, 7800					
Postal address:	1a Wolfe Street, Wynberg, Cape Town, 7800					
Postal code:	7800		Cell:	082 927 9		
Telephone:	082 927 9018		Fax:	Who still	uses a fax? I don't	
E-mail:	johann@johannlanz.co.za					

2. DECLARATION BY THE SPECIALIST

I, Johann Lanz, declare that -

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may Signature of the Specialis compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report Johann Lanz Soil Scientist (sole proprietor) relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the Signature of the Commissioner of Oaths competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and

I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Ae

Signature of the Specialist

Johann Lanz - Soil Scientist (sole proprietor)

Name of Company: 00 D7 Date

Details of Specialist, Declaration and Undertaking Under Oath

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, Johann Lanz, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

Name of Company 04/2022 J. MULLER 619058-8 CAPTAIN

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STATION COMMANDER	
2022 -04- 0 4	
STASIEBEVELVOEDER WYNBERG	
SOUTH AFRICAN POLICE SERVICE	