PROPOSED TRANSNET FREIGHT RAIL NEW BRIGHTON SWARTKOPS SECURITY WALL

FINAL BASIC ASSESSMENT REPORT

DEA REFERENCE NUMBER: 14/12/16/3/3/1/1299

Prepared for:

TRANSNET

TRANSNET FREIGHT RAIL

Prepared by:

EOH Coastal & Environmental Services

Coastal & Environmental Services
PORT ELIZABETH
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November 2015

This Report should be cited as follows*: Final Basic Assessment Report for the proposed Transnet Freight Rail New Brighton Swartkops Security Wall*, EOH Coastal & Environmental Services (Pty) Ltd, November 2015, Port Elizabeth.

INTRODUCTION

EOH Coastal and Environmental Services (Pty) Ltd (CES) was appointed by Transnet Freight Rail to conduct a Basic Environmental Impact Assessment for the proposed construction of a 6 km concrete security wall from the New Brighton shunting yard to Swartkops in Port Elizabeth, NMBM.

DETAILS AND EXPERTISE OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

According to regulation 23(2) of the EIA regulations (2010), "*A basic assessment report must…. include-*

a) Details of –
  i. The EAP who prepared the report; and
  ii. *The expertise of the EAP to carry out basic assessment procedures*"

In fulfilment of the above-mentioned legislative requirement, as well as Section 18 of the EIA Regulations (2010), which states that, "*an EAP must have expertise in conducting environmental impact assessments, including knowledge of the Act, these Regulations and any guidelines that have relevance to the proposed activity*", provided below are the details of the Environmental Assessment Practitioner (EAP) who prepared this Basic Assessment Report, as well as the expertise of the individual members of the study team.

DETAILS OF THE EAP

EOH Coastal and Environmental Services (CES)
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Expertise of the EAP

Kim Brent (*Report Production***)**
Kim is an Environmental Consultant with CES and is based in Port Elizabeth. Kim holds a BSc degree with majors in Botany and Geography as well as a BSc (Hons) degree, both from NMMU. Her honours year focussed on Environmental impact assessments, environmental management and Geographic Information systems. Kim's research projects in her honours year focussed on Plant physiology and Biological factors of the Velddrif Solar Saltworks. Kim's interests include Basic assessments, Environmental impact assessments, Environmental management plans, Environmental auditing, Geographic information systems and Botanical assessments. Kim has over 4 years' experience in the consultancy environment.

Additional Team Members

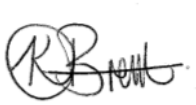
Dr Chantel Bezuidenhout (*Reviewer*)
Principal Environmental Consultant, holds MSc and PhD degrees in Botany (estuarine ecology) and a BSc degree in Botany and Geography from NMMU. Chantel's main focus is estuarine ecology and she has done extensive work on 13 systems from the Orange River Mouth in the Northern Cape to the Mngazi Estuary in the Transkei. As a result she has been involved in a number of ecological reserve determination studies including the Kromme,

Seekoei and Olifants systems. Chantel has been an Environmental Consultant for approximately 5.5 years and as such has been focused on environmental management and impact assessment. Chantel is well versed in environmental legislation and has been involved in number of environmental impact assessments and management plans in South Africa, Zambia and Madagascar. She is currently employed in the Grahamstown office of CES.

Mr Lungisa Bosman – *Public Participation Process and Liaison with the I&APs,*
Mr Bosman holds a Bachelor of Social Science (1993) from U.C.T, with majors in Public Administration & Sociology, and a Post Graduate Diploma in Organisation and Management. Lungisa has twelve years of consulting experience specifically involved in public participation and community engagement. He is currently a senior consultant at EOH Coastal & Environmental Services with a lot of experience in EIAs especially Social Impact Assessments and Public Consultation. He has been involved in a number of projects in South Africa and other Africans countries like Malawi and Mozambique. Some of the projects where he has brought his social facilitation skills to bear include the Malawi Monazite Mine, Chibuto CSL mine project, Kynsna N2 Highway, Wildcoast N2 Toll Road and a number of wind farm projects and smaller basic assessments

Company profile
CES is one of the largest specialist environmental consulting firms in southern Africa. Established in 1990, and with offices in Grahamstown, Port Elizabeth, Cape Town, Johannesburg and East London, we primarily specialise in assessing the impacts of development on the natural, social and economic environments. CES's core expertise lies in the fields of environmental impact assessment, strategic environmental assessment, environmental management plans, environmental management systems, environmental risk assessment, environmental auditing and monitoring, integrated coastal zone management, social impact assessment and state of environment reporting. In addition to adhering to all relevant national legislative requirements, which we are often required to review and summarise for specific projects, acquisition of equity funding from the majority of financial institutions demands that developments must meet certain minimum standards that are generally benchmarked against the Policies and Performance Standards of the International Finance Corporation, and the World Bank Operational Directives and Policies. The quality of our work has been acknowledged by international lenders such as the World Bank and the International Finance Corporation. Provided above are abbreviated *curriculum vitae* (CVs) of each of the team members involved in the Basic Assessment studies for the proposed development.

ENVIRONMENTAL ASSESSMENT PRACTITIONER DECLARATION OF INDEPENDENCE

Basic Assessment for the Proposed Transnet Freight Rail New Brighton Swartkops Security Wall, Nelson Mandela Bay Municipality	
Role on Study Team	**Declaration of independence**
Report reviewer	I **CHANTEL BEZUIDENHOUT** declare that I am an independent consultant and have no business, financial, personal or other interest in the proposed development of Transnet Freight Rail, application or appeal in respect of which I was appointed other than fair remuneration for work performed in connection with the activity, application or appeal. There are no circumstances that compromise the objectivity of my performing such work. **SIGNATURE:** 
Report production	I **KIM BRENT** declare that I am an independent consultant and have no business, financial, personal or other interest in the proposed development of Transnet Freight Rail, application or appeal in respect of which I was appointed other than fair remuneration for work performed in connection with the activity, application or appeal. There are no circumstances that compromise the objectivity of my performing such work. **SIGNATURE:** 

environmental affairs
Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

(For official use only)

File Reference Number:	
Application Number:	
Date Received:	

Basic assessment report in terms of the Environmental Impact Assessment Regulations, 2010, promulgated in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended.

Kindly note that:

1. This **basic assessment report** is a standard report that may be required by a competent authority in terms of the EIA Regulations, 2010 and is meant to streamline applications. Please make sure that it is the report used by the particular competent authority for the activity that is being applied for.
2. This report format is current as of **1 September 2012**. It is the responsibility of the applicant to ascertain whether subsequent versions of the form have been published or produced by the competent authority
3. The report must be typed within the spaces provided in the form. The size of the spaces provided is not necessarily indicative of the amount of information to be provided. The report is in the form of a table that can extend itself as each space is filled with typing.
4. Where applicable **tick** the boxes that are applicable in the report.
5. An incomplete report may be returned to the applicant for revision.
6. The use of "not applicable" in the report must be done with circumspection because if it is used in respect of material information that is required by the competent authority for assessing the application, it may result in the rejection of the application as provided for in the regulations.
7. This report must be handed in at offices of the relevant competent authority as determined by each authority.
8. No faxed or e-mailed reports will be accepted.
9. The signature of the EAP on the report must be an original signature.
10. The report must be compiled by an independent environmental assessment practitioner.
11. Unless protected by law, all information in the report will become public information on receipt by the competent authority. Any interested and affected party should be provided with the information contained in this report on request, during any stage of the application process.
12. A competent authority may require that for specified types of activities in defined situations only parts of this report need to be completed.
13. Should a specialist report or report on a specialised process be submitted at any stage for any part of this application, the terms of reference for such report must also be submitted.

14. Two (2) colour hard copies and one (1) electronic copy of the report must be submitted to the competent authority.
15. Shape files (.shp) for maps must be included on the electronic copy of the report submitted to the competent authority.

SECTION A: ACTIVITY INFORMATION

Has a specialist been consulted to assist with the completion of this section?	YES	NO **X**

If YES, please complete the form entitled "Details of specialist and declaration of interest" for the specialist appointed and attach in Appendix I.

1. PROJECT DESCRIPTION

a) Describe the project associated with the listed activities applied for

EOH Coastal & Environmental Services (CES) have been appointed by Transnet Freight Rail (TFR) to apply for an Environmental Authorization (EA) in terms of the NEMA EIA Regulations (2010) for the proposed construction of a 6 km concrete security wall from the New Brighton yard to Swartkops in Port Elizabeth. This application will entail the production of a Basic Assessment Report and Environmental Management Program.

The need for the security wall came about when the Qaqawuli informal settlement began encroaching on TFR's property which not only resulted in financial losses due to theft and vandalism, but also poses a safety threat to dwellers of the informal settlement due to the proximity of the site to railway lines.

The scope of the engineering works includes the construction of a hollow core concrete security wall.. This type of wall is a thick, pre-fabricated reinforced concrete wall. Panel thickness varies from 120-150mm, depending on the client requirement, and the wall height can vary from 2.4 – 3m, again depending on client requirement. It is poured and cured at the factory, transported to site and set in upright supports and poured concrete foundations. The panels are placed by crane and cannot be removed by hand due to size and weight.

In terms of the Environmental Impact Assessment Regulations, 2010, made under section 24(5) of the Act and published in Government Notice R.543 in Government Gazette 33306 of 18 June 2010 the following activities are subject to an assessment – Listing Notice 1 Activity 11, 18 and Listing Notice 3, Activity 16 (Details in section (b) below)

The proposed security wall will be constructed in close proximity to a coastal marsh occurring on the site and occurs within the Estuarine Functional Zone.

b) Provide a detailed description of the listed activities associated with the project as applied for

Listed activity as described in GN R.544, 545 and 546	Description of project activity
GN R544, Listing Notice 1 – 18 June 2010 Activity 11: The construction of: (iii) bridges (xi) infrastructure or structures covering 50 square metres or more where such construction occurs within a watercourse or within 32 metres of a watercourse, measured from the edge of a	The construction is in excess of 100m^2 and is within 32 m of the watercourse/wetland.

watercourse, excluding where such construction will occur behind the development setback line.	
GN R544, Listing Notice 1 – 18 June 2010 Activity 18: The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock or more than 5 cubic metres from: (iv) the littoral active zone, an estuary or a distance of 100 metres inland of the high water mark of the sea or an estuary, whichever distance is the greater but excluding where such infilling, depositing dredging, excavation, removal or moving; (a) is for maintenance purposes undertaken in accordance with a management plan agreed to by the relevant environmental authority; or (b) occurs behind the development setback line.	Infilling or depositing of material of more than 5 m^3 will occur during the construction phase.
GN R544, Listing Notice 1 – 18 June 2010 Activity 16: Construction or earth moving activities in the sea, an estuary, or within the littoral active zone or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater, in respect of – (vi) infrastructure covering 50 square metres or more but excluding (a) if such construction or earth moving activities will occur behind a development setback line; or (b) where such construction or earth moving activities will occur within existing ports or harbours and the construction or earth moving activities will not increase the development footprint or throughput capacity of the port or harbour; (c) where such construction or earth moving activities is undertaken for purposes of maintenance of the facilities mentioned in (i)-(vi) above; or (d) where such construction or earth moving activities is related to the construction of a port or harbour, in which case activity 24 of Notice 545 of 2010 applies.	A portion of the wall constructed falls within the Swartkops Estuarine floodplain.

2. FEASIBLE AND REASONABLE ALTERNATIVES

"alternatives", in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to—

(a) the property on which or location where it is proposed to undertake the activity;
(b) the type of activity to be undertaken;
(c) the design or layout of the activity;
(d) the technology to be used in the activity;
(e) the operational aspects of the activity; and
(f) the option of not implementing the activity.

Describe alternatives that are considered in this application as required by Regulation 22(2)(h) of GN R.543. Alternatives should include a consideration of all possible means by which the purpose and need of the proposed activity (NOT PROJECT) could be accomplished in the specific instance taking account of the interest of the applicant in the activity. The no-go alternative must in all cases be included in the assessment phase as the baseline against which the impacts of the other alternatives are assessed.

The determination of whether site or activity (including different processes, etc.) or both is appropriate needs to be informed by the specific circumstances of the activity and its environment. After receipt of this report the, competent authority may also request the applicant to assess additional alternatives that could possibly accomplish the purpose and need of the proposed activity if it is clear that realistic alternatives have not been considered to a reasonable extent.

The identification of alternatives should be in line with the Integrated Environmental Assessment Guideline Series 11, published by the DEA in 2004. Should the alternatives include different locations and lay-outs, the co-ordinates of the different alternatives must be provided. The co-ordinates should be in degrees, minutes and seconds. The projection that must be used in all cases is the WGS84 spheroid in a national or local projection.

a) Site alternatives

Alternative 1 (preferred alternative)		
Description	Lat (DDMMSS)	Long (DDMMSS)
For public safety Transnet Freight Rail has decided to construct a security wall around the existing station and lines to prevent public thoroughfare. The development proposal is site specific and thus no other site will be suitable for the proposed activity. No other site alternatives were thus considered.	33^{0}53'51.00" S	25^{0}36'33.82" E
Alternative 2		
Description	Lat (DDMMSS)	Long (DDMMSS)
N/A		
Alternative 3		
Description	Lat (DDMMSS)	Long (DDMMSS)

In the case of linear activities:

Alternative:	**Latitude (S):**	**Longitude (E):**
Alternative S1 (preferred)		
• Starting point of the activity	[redacted]	[redacted]
• Middle/Additional point of the activity	[redacted]	[redacted]
• End point of the activity	[redacted]	[redacted]
Alternative S2 (if any)		
• Starting point of the activity	[redacted]	[redacted]
• Middle/Additional point of the activity	[redacted]	[redacted]
• End point of the activity	[redacted]	[redacted]
Alternative S3 (if any)		
• Starting point of the activity	[redacted]	[redacted]
• Middle/Additional point of the activity	[redacted]	[redacted]
• End point of the activity	[redacted]	[redacted]

For route alternatives that are longer than 500m, please provide an addendum with co-ordinates taken every 250 meters along the route for each alternative alignment.

In the case of an area being under application, please provide the co-ordinates of the corners of the site as indicated on the lay-out map provided in Appendix A.

b) Lay-out alternatives

Alternative 1 (preferred alternative)		
Description	Lat (DDMMSS)	Long (DDMMSS)
The layout of the proposed wall is highly dependent on the locality of the site. As the requirement for the wall is to keep the public from entering the site unauthorised and due to the existing location of the site, no other layout alternatives are available. The location of the wall cannot be moved as the site is surrounded by informal and industrial development. The proposed layout is the preferred and only layout alternative.	33^{0}53'51.00" S	25^{0}36'33.82" E
Alternative 2		
Description	Lat (DDMMSS)	Long (DDMMSS)
N/A		
Alternative 3		
Description	Lat (DDMMSS)	Long (DDMMSS)

c) Technology alternatives

Alternative 1 (preferred alternative)
As the main purpose of the construction of the wall is to prevent the public from unauthorised access, the only feasible technology alternative is the use of robust, cost effective materials such as concrete. Due to the high desire for access to or cross the rail reserve, most types of security walls are not suitable, For example, pre-fabricated walls, steel palisade fences or even concrete palisades are either vandalised (broken through) or removed (stolen).

In this instance the Hollow Core concrete wall is suitable as it can be poured and cured at the factory and installed on site vs the steel core concrete wall which must be united from both sides. The Hollow Core wall is generally resistant to normal vandalism and can last up to approximately 5 years before any major maintenance is required. This wall type is a thick, pre-fabricated reinforced concrete wall. Panel thickness varies from 120-150mm thick depending on the client requirement and wall height can vary from 2.4 – 3m, again depending on client requirement. It is poured and cured at the factory, transported to site and set in upright supports and poured concrete foundations. The panels are placed by crane and cannot be removed by hand due to size and weight.
Alternative 2
N/A
Alternative 3
[redacted]

d) Other alternatives (e.g. scheduling, demand, input, scale and design alternatives)

Alternative 1 (preferred alternative)		
Construction of a concrete wall. Steel spikes will be bolted along the length of the wall to prevent the public and surrounding communities from climbing over it and entering the TFR property.	33^{0}53'51.00" S	25^{0}36'33.82" E
Alternative 2		
[redacted]		
Alternative 3		
[redacted]		

e) No-go alternative

The No-go alternative implies that the construction of the wall does not occur. If this is the case, the possibility of accidental fatalities could occur due to lack of public concern for safety. People will continue to ignore warning signs and cross the railway lines. There have also been a number of cases of theft on the Transnet grounds as well as armed robberies of the Transnet employees by persons commuting, generally via foot or bicycles, through the Transnet yard. This will continue and may lead to serious injury or death of employees should the development not proceed. A small portion of the site that falls within the Swartkops Estuarine floodplain will not be disturbed should the no-go alternative be the preferred alternative. It should however be noted that this area has already been disturbed and shows signs of degradation directly as a result of thoroughfares as well as a result of disturbance due to increasing development. On a daily basis these areas are used as thoroughfares.

Paragraphs 3 – 13 below should be completed for each alternative.

3. PHYSICAL SIZE OF THE ACTIVITY

a) Indicate the physical size of the preferred activity/technology as well as alternative activities/technologies (footprints):

Alternative:	**Size of the activity:**
Alternative A1[1] (preferred activity alternative)	m^2
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

or, for linear activities:

Alternative:	**Length of the activity:**
Alternative A1 (preferred activity alternative)	7000 m
Alternative A2 (if any)	m
Alternative A3 (if any)	m

b) Indicate the size of the alternative sites or servitudes (within which the above footprints will occur):

Alternative:	**Size of the site/servitude:**
Alternative A1 (preferred activity alternative)	N/A m^2
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

4. SITE ACCESS

Does ready access to the site exist?	YES **X**	NO
If NO, what is the distance over which a new access road will be built		m

Currently access to the area can be gained from the Old Grahamstown road from the east or from various internal roads from the New Brighton Informal settlement to the west.

Describe the type of access road planned:

Include the position of the access road on the site plan and required map, as well as an indication of the road in relation to the site.

5. LOCALITY MAP

An A3 locality map must be attached to the back of this document, as Appendix A. The scale of the locality map must be relevant to the size of the development (at least 1:50 000. For linear activities 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:

[1] "Alternative A.." refer to activity, process, technology or other alternatives.

- an accurate indication of the project site position as well as the positions of the alternative sites, if any;
- indication of all the alternatives identified;
- closest town(s;)
- road access from all major roads in the area;
- road names or numbers of all major roads as well as the roads that provide access to the site(s);
- all roads within a 1km radius of the site or alternative sites; and
- a north arrow;
- a legend; and
- locality GPS co-ordinates (Indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should have at least three decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS84 spheroid in a national or local projection).

6. LAYOUT/ROUTE PLAN

A detailed site or route plan(s) must be prepared for each alternative site or alternative activity. It must be attached as Appendix A to this document.

The site or route plans must indicate the following:

- the property boundaries and numbers of all the properties within 50 metres of the site;
- the current land use as well as the land use zoning of the site;
- the current land use as well as the land use zoning each of the properties adjoining the site or sites;
- the exact position of each listed activity applied for (including alternatives);
- servitude(s) indicating the purpose of the servitude;
- a legend; and
- a north arrow.

7. SENSITIVITY MAP

The layout/route plan as indicated above must be overlain with a sensitivity map that indicates all the sensitive areas associated with the site, including, but not limited to:

- watercourses;
- the 1:100 year flood line (where available or where it is required by DWA);
- ridges;
- cultural and historical features;
- areas with indigenous vegetation (even if it is degraded or infested with alien species); and
- critical biodiversity areas.

The sensitivity map must also cover areas within 100m of the site and must be attached in Appendix A.

All maps have been included in Appendix A and the relevant specialists reports.

8. SITE PHOTOGRAPHS

Colour photographs from the centre of the site must be taken in at least the eight major compass directions with a description of each photograph. Photographs must be attached under Appendix B to

this report. It must be supplemented with additional photographs of relevant features on the site, if applicable.

9. FACILITY ILLUSTRATION

A detailed illustration of the activity must be provided at a scale of at least 1:200 as Appendix C for activities that include structures. The illustrations must be to scale and must represent a realistic image of the planned activity. The illustration must give a representative view of the activity.

10. ACTIVITY MOTIVATION

Motivate and explain the need and desirability of the activity (including demand for the activity):

1. Is the activity permitted in terms of the property's existing land use rights?	YES **X**	NO	Please explain
The property owner has a right to protect their property and possessions.			
2. Will the activity be in line with the following?			
(a) Provincial Spatial Development Framework (PSDF)	YES **X**	NO	Please explain
Based on the MSDF (2009) the proposed site is situated in an area classified as railway and station. The property is directly bordered by industrial areas, areas planned for housing developments and critical biodiversity zones. The proposed activity will not in interfere with any of the planned developments set out in the MSDF in the area.			
(b) Urban edge / Edge of Built environment for the area	YES **X**	NO	Please explain
The development is located within the urban edge.			
(c) Integrated Development Plan (IDP) and Spatial Development Framework (SDF) of the Local Municipality (e.g. would the approval of this application compromise the integrity of the existing approved and credible municipal IDP and SDF?).	YES **X**	NO	Please explain
The proposed development does not compromise the integrity of the IDP or SDF of NMBM.			
(d) Approved Structure Plan of the Municipality	YES **X**	NO	Please explain
The proposed development does not contravene any approved structural plans for the NMBM.			
(e) An Environmental Management Framework (EMF) adopted by the Department (e.g. Would the approval of this application compromise the integrity of the existing environmental management priorities for the area and if so, can it be justified in terms of sustainability considerations?)	YES **X**	NO	Please explain
The proposed development does not contravene any EMF conditions adopted by the Department.			

(f) Any other Plans (e.g. Guide Plan)	YES **X**	NO	Please explain
As the proposed site falls within the Estuarine Functional Zone and consequently under the coastal protection zone (coastal wetlands) the following guideline document is relevant: Integrated Management Plan: Swartkops Estuary And The Swartkops River Valley And Aloes Nature Reserves (2011). The site does not occur within any of the outline Estuarine Management zones, but does occur within the 1:100 year floodline as well as in the 1000 m (1 km) Coastal Protection Zone buffer area (Refer to maps in Appendix A). This management plan indicates the following in terms of development within these areas: • No additional development (structures) on the floodplain (coastal protection zone; 1:100 year flood line) for safety reasons and sense of place. • All activities within these zones should be regulated as per the Integrated Coastal Management Act (ICMA). It is anticipated that the construction of a wall will not be significantly impacted on by a flood even should this occur.			
3. Is the land use (associated with the activity being applied for) considered within the timeframe intended by the existing approved SDF agreed to by the relevant environmental authority (i.e. is the proposed development in line with the projects and programmes identified as priorities within the credible IDP)?	YES	NO **X**	Please explain
The proposed development is not a priority development in terms of any IDP, but it is a priority for ensuring the safety and wellbeing of Transnet employees against attack and robbery.			
4. Does the community/area need the activity and the associated land use concerned (is it a societal priority)? (This refers to the strategic as well as local level (e.g. development is a national priority, but within a specific local context it could be inappropriate.)	YES **X**	NO	Please explain
At a local level it is a priority in terms of safety and security for both neighbouring communities as well as TFR. TFR's Operating Licence from Railway Safety Regulator compels it to ensure 3rd party safety as well. i.e. ensure its operations does not results with fatalities and thus this activity will ensure compliance with this policy.			
5. Are the necessary services with adequate capacity currently available (at the time of application), or must additional capacity be created to cater for the development? (Confirmation by the relevant Municipality in this regard must be attached to the final Basic Assessment Report as Appendix I.)	YES **X**	NO	Please explain
No additional services or capacity is required for the development to take place.			

6. Is this development provided for in the infrastructure planning of the municipality, and if not what will the implication be on the infrastructure planning of the municipality (priority and placement of services and opportunity costs)? (Comment by the relevant Municipality in this regard must be attached to the final Basic Assessment Report as Appendix I.)	YES	NO **X**	Please explain
This is not a municipal project and will have no effect on infrastructure planning of the municipality.			
7. Is this project part of a national programme to address an issue of national concern or importance?	YES	NO **X**	Please explain
The proposed development is purely for safety and security concerns. TFR's Operating Licence from Railway Safety Regulator compels it to ensure 3rd party safety as well. i.e. ensure its operations does not results with fatalities and thus this activity will ensure compliance with this policy.			
8. Do location factors favour this land use (associated with the activity applied for) at this place? (This relates to the contextualisation of the proposed land use on this site within its broader context.)	YES **X**	NO	Please explain
The security wall is needed for this particular property.			
9. Is the development the best practicable environmental option for this land/site?	YES **X**	NO	Please explain
The wall is the best option available to keep the general public out of the Transnet property, ensuring the safety and security of all parties. This also enables the proponent to maintain their infrastructure in a safe secure environment. TFR's Operating Licence from Railway Safety Regulator compels it to ensure 3rd party safety as well. i.e. ensure its operations does not results with fatalities and thus this activity will ensure compliance with this policy.			
10. Will the benefits of the proposed land use/development outweigh the negative impacts of it?	YES **X**	NO	Please explain
As the proposed site is situated in an already transformed and developed area, the need for this activity will outweigh the negative impacts should all mitigation measures and recommendations be adhered to. With mitigation all impacts are rated low.			
11. Will the proposed land use/development set a precedent for similar activities in the area (local municipality)?	YES	NO **X**	Please explain
The statement is not applicable to this proposed development.			
12. Will any person's rights be negatively affected by the proposed activity/ies?	YES	NO **X**	Please explain
The intention of the activity is to ensure the security and safety of all interested and affected parties associated with the proposed development. The development will occur entirely within the property boundaries of Transnet.			

13. Will the proposed activity/ies compromise the "urban edge" as defined by the local municipality?	YES	NO **X**	Please explain
The proposed development is situated within the urban edge but does not cross the urban edge. The location and functionality of the urban edge will thus not be compromised.			
14. Will the proposed activity/ies contribute to any of the 17 Strategic Integrated Projects (SIPS)?	YES	NO **X**	Please explain
The proposed activity is not of national importance and is also not classified as a Strategic Integrated Project as defined by the National Development Plan (2011).			
15. What will the benefits be to society in general and to the local communities?			Please explain
The proposed activity will ensure that the safety of the neighbouring community and other public members that use this area as a thoroughfare is secured by preventing the unauthorised access through this area. This will ultimately reduce injuries to the local communities as a result of this unauthorised use of the area as a thoroughfare.			
16. Any other need and desirability considerations related to the proposed activity?			Please explain
The proposed activity will benefit the Proponent in that it will assist in allowing safe maintenance of infrastructure. This will also reduce vandalism as the site access will be controlled and reduce the number of injuries. TFR's Operating Licence from Railway Safety Regulator compels it to ensure 3rd party safety as well. i.e. ensure its operations does not results with fatalities and thus this activity will ensure compliance with this policy.			
17. How does the project fit into the National Development Plan for 2030?			Please explain
The project does not form a strategic part of the NDP 2030.			
18. Please describe how the general objectives of Integrated Environmental Management as set out in section 23 of NEMA have been taken into account.			
The general objectives of integrated environmental management is to: "(a) *promote the integration of the principles of environmental management set out in section 2 into the making of all decisions which may have a significant effect on the environment;* *(b) identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage, the risks and consequences and alternatives and options for mitigation of activities, with a view to minimising negative impacts, maximising benefits, and promoting compliance with the principles of environmental management set out in section 2;* *(c) ensure that the effects of activities on the environment receive adequate consideration before actions are taken in connection with them;* *(d) ensure adequate and appropriate opportunity for public participation in decisions that may affect the environment;* *(e) ensure the consideration of environmental attributes in management and decision making which may have a significant effect on the environment; and* *(f) Identify and employ the modes of environmental management best suited to ensuring that a particular activity is pursued in accordance with the principles of environmental management set out in section 2*".			

The general objectives of Integrated Environmental Management has thus been taken into account though the following aspects:

- The proponent appointed a qualified Environmental Practitioner (EAP) to ensure that the requirements of NEMA have been met.
- A comprehensive public participation process (PPP) has been conducted. The Draft Basic Assessment Report (DBAR) and Final Basic Assessment Report (FBAR) will also be subjected to PPP which will be supported by newspaper adverts, notification letters and emails. This effectively allows the public with the appropriate opportunity to raise any concerns relating to this activity.
- Wetland delineation was conducted to assess the direct impact of the activity on these environments.
- The objectives of NEMA have also been taken into consideration by means of assessing various alternatives; assessing direct as well as indirect impacts and by prescribing various mitigation measures to minimise these impacts.

19. Please describe how the principles of environmental management as set out in section 2 of NEMA have been taken into account.

A Wetland delineation was conducted to address any potential impacts on the sensitive environment in and around the Transnet property, specifically the identified one wetland occurring within 500m from the proposed activity and one coastal marsh area (in the estuarine floodplain) within the property boundaries (Attached as Appendix D1).

A comprehensive public participation programme has been undertaken in the spirit of community and stakeholder involvement and integrated environmental management.

11. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

List all legislation, policies and/or guidelines of any sphere of government that are applicable to the application as contemplated in the EIA regulations, if applicable:

Title of legislation, policy or guideline	Applicability to the project	Administering authority	Date
National Environmental Management Act (Act 107 of 1998) National Environmental Management second amendment Act (Act 30 0f 2013)	EIA Regulations Listing Notices The activity triggers a listed activity as set out by the Act.	DEA	1998/2013
National Environmental Management: Protected Areas Act (Act 57 of 2003) National Environmental Management: Protected Areas Amendment Act (Act 31 of 2004).	There are wet areas (coastal marsh) on site and one wetland within 500m of the site.	DEA	2003/2004
National Environmental Management: Biodiversity Act (Act 10 of 2004)	The protection of biodiversity including species	DEA	2004

	of conservation concern as listed in the Act		
National Water Act (Act 36 of 1998)	There is one wetland within 500m of the site.	DWS	1998
National Environmental Management: Waste Act (Act 59 of 2008)	Ensure waste management is in accordance with this act	DEA	2008
Nature and Environmental Conservation Ordinance (No 19 of 1974).	Should any species listed in accordance with this act be found to occur on site, permits will be required for their removal	DEDEAT	1974
Guidelines published to assist with interpretation of the EIA regulations		DEA	2006 & 2010
Municipal By-laws			
Nelson Mandela Bay, Spatial Development Framework			2009
Metropolitan Open Space System			2009
Eastern Cape Biodiversity Conservation Plan			2007
Subtropical Thicket Ecosystem Programme			2006
Integrated Management Plan: Swartkops Estuary and The Swartkops River Valley And Aloes Nature Reserves.	The site occurs within the estuarine functional zone.	DEA: OCEANS AND COASTS	2011
Integrated Coastal Management Act (24 of 2008)	Part of the site falls within the floodplain of the Estuary	DEA: OCEANS AND COASTS	2008
National Estuarine Management protocol	Part of the site falls within the floodplain of the Estuary	DEA: OCEANS AND COASTS	2013

12. WASTE, EFFLUENT, EMISSION AND NOISE MANAGEMENT

a) Solid waste management

Will the activity produce solid construction waste during the construction/initiation phase?	YES **X**	NO
If YES, what estimated quantity will be produced per month?		Limited

How will the construction solid waste be disposed of (describe)?

Solid waste produced during the construction phase of the proposed development will primarily consist of building rubble and litter (e.g. plastic, glass, etc.). All construction waste will be disposed of at a registered and licensed waste disposal site. The waste will be removed with trucks at regular intervals. Where possible, construction waste will be re-used and/or recycled. Contractors will need to provide copies of waste manifests to Transnet in order to prove the legal disposal of waste material.

Where will the construction solid waste be disposed of (describe)?

The waste will be transferred to a registered waste disposal site. Both Aloes and Koedoeskloof waste landfill sites are situated in relatively close proximity to the site.

Will the activity produce solid waste during its operational phase?	YES	NO **X**
If YES, what estimated quantity will be produced per month?		m^3

How will the solid waste be disposed of (describe)?

N/A

If the solid waste will be disposed of into a municipal waste stream, indicate which registered landfill site will be used.

N/A

Where will the solid waste be disposed of if it does not feed into a municipal waste stream (describe)?

N/A

If the solid waste (construction or operational phases) will not be disposed of in a registered landfill site or be taken up in a municipal waste stream, then the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

Can any part of the solid waste be classified as hazardous in terms of the NEM:WA?	YES	NO **X**

If YES, inform the competent authority and request a change to an application for scoping and EIA. An application for a waste permit in terms of the NEM:WA must also be submitted with this application.

Is the activity that is being applied for a solid waste handling or treatment facility?	YES	NO **X**

If YES, then the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA. An application for a waste permit in terms of the NEM:WA must also be submitted with this application.

b) Liquid effluent

Will the activity produce effluent, other than normal sewage, that will be disposed of in a municipal sewage system?	YES	NO **X**
If YES, what estimated quantity will be produced per month?		m^3
Will the activity produce any effluent that will be treated and/or disposed of on site?	YES	NO **X**

If YES, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

Will the activity produce effluent that will be treated and/or disposed of at another facility?	YES	NO **X**

If YES, provide the particulars of the facility:

Facility name:	N/A
Contact person:	

Postal address:			
Postal code:			
Telephone:		**Cell:**	
E-mail:		**Fax:**	

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

N/A

c) Emissions into the atmosphere

Will the activity release emissions into the atmosphere other that exhaust emissions and dust associated with construction phase activities?	YES	NO **X**
If YES, is it controlled by any legislation of any sphere of government?	YES	NO **X**

If YES, the applicant must consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.
If NO, describe the emissions in terms of type and concentration:

There is a possibility that dust will be generated during the construction phase, particularly during high wind conditions. This can effectively be controlled by:

- Regular watering of the site
- All work must stop during high wind conditions
- Construction vehicles must adhere to speed limits.
- If fine building materials/sands are to be transported at the back of trucks, they must be adequately covered.

Vehicle exhaust emissions from construction vehicles can be minimised by ensuring that all vehicles are properly equipped and serviced.

d) Waste permit

Will any aspect of the activity produce waste that will require a waste permit in terms of the NEM:WA?	YES	NO **X**

If YES, please submit evidence that an application for a waste permit has been submitted to the competent authority

e) Generation of noise

Will the activity generate noise?	YES **X**	NO
If YES, is it controlled by any legislation of any sphere of government?	YES	NO **X**

If YES, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.
If NO, describe the noise in terms of type and level:

Noise generated during the construction phase will be mostly from heavy machinery and other construction related activities. The following mitigation measures will ensure that noise created during construction is negligible:

- All construction vehicles must be in sound working order and meet the necessary noise level requirements.
- Restrict construction times to working and daylight hours (6am to 6pm on weekdays, 6am to 1pm on Saturdays, no work on Sundays or Public holidays) only to minimize noise pollution.
- The normal municipal by-laws with regards to noise control must apply.

Noise will not be generated during the operational phase.

13. WATER USE

Please indicate the source(s) of water that will be used for the activity by ticking the appropriate box(es):

Municipal	Water board	Groundwater	River, stream, dam or lake	Other	The activity will not use water **X**

If water is to be extracted from groundwater, river, stream, dam, lake or any other natural feature, please indicate the volume that will be extracted per month:	0 litres
Does the activity require a water use authorisation (general authorisation or water use license) from the Department of Water Affairs?	YES / NO **X**

If YES, please provide proof that the application has been submitted to the Department of Water Affairs.

The Department of Water and Sanitation as well as DEA: Oceans and Coasts were consulted in order to determine the requirement for a Water use Licence. Email correspondence between CES and DWS as well as between CES and Oceans and Coasts are included in Appendix E of this report. It was confirmed that no Water use Licence will be required and the Department of Oceans and Coasts provided comment on the Draft Basic Assessment, which has been included in the relevant sections in the report as well as in Appendix E (Comments and Response trail) of this report.

As the proposed site occurs within the Estuarine Functional zone and all coastal marshes occur within the Coastal Protection Zone, the DEA: Oceans and Coasts are the mandating authority. To date, we have not yet received any instructions from DEA: Oceans and Coasts in regards to any specific requirements that they may have in regards to the coastal march. In addition to this, it should be noted that there is a second wetland within 500m of the proposed development site. This wetland is divided from the site by the old Grahamstown road, thus the EAP is of the opinion there would be no impact on the flow requirements for this wetland. Further discussions with DWS will be required in this regard.

14. ENERGY EFFICIENCY

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

None

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

N/A

SECTION B: SITE/AREA/PROPERTY DESCRIPTION

Important notes:

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

Section B Copy No. (e.g. A): [ ]

2. Paragraphs 1 - 6 below must be completed for each alternative.

3. Has a specialist been consulted to assist with the completion of this section? YES | NO **X**

If YES, please complete the form entitled "Details of specialist and declaration of interest" for each specialist thus appointed and attach it in Appendix I. All specialist reports must be contained in Appendix D.

Property description/physical address:

Province	Eastern Cape
District Municipality	Cacadu District Municipality
Local Municipality	Nelson Mandela Metropolitan Municipality
Ward Number(s)	15 and 60
Farm name and number	RE/125
Portion number	RE/125
SG Code	C05900360000012500000

Where a large number of properties are involved (e.g. linear activities), please attach a full list to this application including the same information as indicated above.

Current land-use zoning as per local municipality IDP/records:

Industrial

In instances where there is more than one current land-use zoning, please attach a list of current land use zonings that also indicate which portions each use pertains to, to this application.

Is a change of land-use or a consent use application required? YES | NO **X**

1. GRADIENT OF THE SITE

Indicate the general gradient of the site.

Alternative S1:

Flat	1:50 – 1:20 **X**	1:20 – 1:15	1:15 – 1:10	1:10 – 1:7,5	1:7,5 – 1:5	Steeper than 1:5

Alternative S2 (if any):

Flat	1:50 – 1:20	1:20 – 1:15	1:15 – 1:10	1:10 – 1:7,5	1:7,5 – 1:5	Steeper than 1:5

Alternative S3 (if any):

Flat	1:50 – 1:20	1:20 – 1:15	1:15 – 1:10	1:10 – 1:7,5	1:7,5 – 1:5	Steeper than 1:5

2. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site:

2.1 Ridgeline		2.4 Closed valley		2.7 Undulating plain / low hills	
2.2 Plateau		2.5 Open valley	**X**	2.8 Dune	
2.3 Side slope of hill/mountain		2.6 Plain		2.9 Seafront	

3. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

Is the site(s) located on any of the following?

	Alternative S1:		**Alternative S2 (if any):**		**Alternative S3 (if any):**	
Shallow water table (less than 1.5m deep)	YES **X**	NO	YES	NO	YES	NO
Dolomite, sinkhole or doline areas	YES	NO **X**	YES	NO	YES	NO
Seasonally wet soils (often close to water bodies)	YES **X**	NO	YES	NO	YES	NO
Unstable rocky slopes or steep slopes with loose soil	YES	NO **X**	YES	NO	YES	NO
Dispersive soils (soils that dissolve in water)	YES	NO **X**	YES	NO	YES	NO
Soils with high clay content (clay fraction more than 40%)	YES	NO **X**	YES	NO	YES	NO
Any other unstable soil or geological feature	YES	NO **X**	YES	NO	YES	NO
An area sensitive to erosion	YES	NO **X**	YES	NO	YES	NO

If you are unsure about any of the above or if you are concerned that any of the above aspects may be an issue of concern in the application, an appropriate specialist should be appointed to assist in the completion of this section. Information in respect of the above will often be available as part of the project information or at the planning sections of local authorities. Where it exists, the 1:50 000 scale Regional Geotechnical Maps prepared by the Council for Geo Science may also be consulted.

4. GROUNDCOVER

Indicate the types of groundcover present on the site. The location of all identified rare or endangered species or other elements should be accurately indicated on the site plan(s).

Natural veld - good condition[E]	Natural veld with scattered aliens[E] **X**	Natural veld with heavy alien infestation[E]	Veld dominated by alien species[E]	Gardens
Sport field	Cultivated land	Paved surface **X**	Building or other structure **X**	Bare soil

If any of the boxes marked with an "[E] "is ticked, please consult an appropriate specialist to assist in the completion of this section if the environmental assessment practitioner doesn't have the necessary expertise.

Vegetation classification

1. Regional Scale

The Subtropical Thicket Ecosystem Programme (STEP) of 2006 classifies the vegetation on site as Colchester Strandveld, Motherwell Karroid Thicket and Estuarine vegetation (See maps in Appendix A)**.**

Colchester Strandveld is a dune thicket mosaic type consisting of thicket clumps typical to Algoa dune thicket. The matrix is a shrubland dominated by Honey-thorn (*Lycium cinereum*) with an abundance of grass such as quick grass (*Cynodon dactylon*). Thicket clumps are usually poorly developed with few shrubs such as *Azima tetracantha, Chrysanthemoides monilifera, Lycium ferocissimum, Nylandtia spinosa, Rhus crenata, Sideroxylon inerme and Zygophyllum morgsana*. The reason for the paucity of the Thicket clumps is unknown, but it may have been the favourite feeding ground of large herbivores such as Buffalo and Hippo. Colchester Strandveld is classified as Vulnerable (VU).

Motherwell Karroid Thicket is also a Valley thicket mosaic type. This unit is restricted to usually deep, red, loamy- to clayey soils, derived from the Alexandria and Bluewater Bay formations. It occurs mostly just above the floodplains of the local rivers and it is easily recognised by an abundance of *Pteronia incana*, often in combination with other karroid shrubs such as *Felicia filifolia*. Fynbos elements are absent. STEP (2006) describes this vegetation type as thicket clumps that contain species typical of Sundays Valley Thicket and they occur in a matrix of succulent karoo. Soon after fire, rooigras (*Themeda triandra)* becomes dominant in this unit. Under these conditions this unit can be recognised from Mosaic with Grassland by the absence of *Rhus pyroides*. It harbours a rich component of geophytes and succulents, many of which are rare or localised endemics such as *Apodolirion macowanii*, *Aloe bowiea* and *Euphorbia meloformis.* It also seems to be the favoured habitat of several tortoise species, *e.g*. Parrot-beak Tortoise and Angulate Tortoise. This vegetation type is classified as Endangered (EN).

Wetlands are permanently, seasonally or tidally inundated by water, and their component plants are adapted to tolerate these harsh conditions. Floodplain/ Estuarine vegetation consists of dwarf succulent shrublands and is dominated by species of *Sarcocornia* and *Limonium. Bassia diffusa* is invariably present as is the grass, *Sporobolus virginicus. Spartina maritima* may form pure swards in places. Floodplain/Estuarine vegetation is classified as Critically Endangered (CR).

2. Local Scale

NMBM MOSS (2009) classifies the vegetation of the site as Colchester Strandveld, Motherwell Karroid Thicket and Swartkops Saltmarsh (See maps in Appendix A).

Colchester Strandveld is a subtropical thicket vegetation type consisting of thicket clumps in a matrix of shrubland (MOSS, 2009). This vegetation type is present on aeolianite/calcareous sandstone/sand. Approximately 43.4% if the intact vegetation remains.

Motherwell Karroid Thicket is also a Sundays Valley thicket mosaic type and in the subtropical thicket biome. This vegetation type as thicket clumps that contain species typical of Sundays Valley Thicket and they occur in a matrix of succulent karoo, dominated by asbossie (*Pteronia incana*). Rooigras (*Themeda triandra)* becomes dominant soon after fire. Characteristic species include local endemic succulents such as *Euphorbia meloformis.* This unit is restricted to usually deep, red, loamy- to clayey soils, derived from the Alexandria and Bluewater Bay formations and is classified by MOSS (2009) as Endangered (EN). This vegetation type require 40% or more of the remaining vegetation to be conserved as set out by MOSS (2009).

Salt marshes comprise of emergent herbs, grasses or low shrubs that occur in soils that are inundated and drained by tidal action. They are highly productive ecosystems, and have primary productivity rates comparable with coral reefs and tropical forests in certain areas. Species diversity of salt marshes is poor, mostly because of the specialised environment and high salt conditions which create an uninhabitable environment. Marsh plants are important inorganic and organic nutrient sources for estuarine ecosystems, although the extent of tidal flushing is important in determining how much of the nutrient is released to the water column. The ecological function and physical stability of marshes are easily disrupted by factors such as interference with the tidal exchange of water, reclamation or infilling, pollution, dredging or trampling by vehicles or animals. The Swartkops Salt Marsh requires 100 % of its remaining habitat to be conserved (MOSS, 2009). The original extent of this vegetation unit is recorded as approximately 2147.2 ha, with habitat loss currently recorded as 41.1 %. Approximately 1264.8 ha of this bioregion remain within the Nelson Mandela Metropolitan Municipal Area and it is therefore classified as Critically Endangered (CR).

5. SURFACE WATER

Indicate the surface water present on and or adjacent to the site and alternative sites?

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

If any of the boxes marked YES or UNSURE is ticked, please provide a description of the relevant watercourse.

Two wet areas were observed on and within 500m of the site. One wet area has been classified as a Wetland (mandate of the Department of Water and Sanitation). This wetland is situated on the eastern side of Old Grahamstown road and within 500m of the proposed new security wall (Figure 1). The other wet area is within the Estuarine floodplain and thus classified as a coastal marsh (mandate of the DEA: Oceans and coasts). Based on the 6 levels of the National Wetland Classification System, these systems are typical of Inland and Estuarine Systems (Level 1), within the Eastern Coastal Belt Ecoregion (Level 2), associated with floodplains that were in the past un-channelled (Level 4). Several channels have been dug over the years within the study area to deal with stormwater management and potential flooding issues within the area.
The Swartkops estuary and saltmarsh is situated adjacent and in close proximity to the proposed site.
A permanent wetland is found to the east of the most northerly point of the site (approximately 330 m away).
The proposed site falls within the Estuarine Functional Zone and subsequently under the coastal protection zone (coastal wetlands). The site does not occur within any of the outlined Estuarine Management zones, but does occur within the 1:100 year floodline as well as in the 1000 m (1 km) Coastal Protection Zone buffer area.
Based on the 6 levels of the National Wetland Classification System, these systems are typical of Inland and Estuarine Systems (Level 1), within the Eastern Coastal Belt Ecoregion (Level 2), associated with floodplains that were in the past un-channelled (Level 4).
Several channels have since been dug within the study area, which are assumed to deal with stormwater management and possible flooding.

6. LAND USE CHARACTER OF SURROUNDING AREA

Indicate land uses and/or prominent features that currently occur within a 500m radius of the site and give description of how this influences the application or may be impacted upon by the application:

Natural area **X**	Dam or reservoir	Polo fields
Low density residential	Hospital/medical centre	Filling station **H X**
Medium density residential **X**	School **X**	Landfill or waste treatment site
High density residential	Tertiary education facility	Plantation
Informal residential**A X**	Church	Agriculture
Retail commercial & warehousing **X**	Old age home	River, stream or wetland **X**
Light industrial **X**	Sewage treatment plant**A X**	Nature conservation area
Medium industrial **AN X**	Train station or shunting yard **N X**	Mountain, koppie or ridge
Heavy industrial **AN X**	Railway line **N X**	Museum **X**
Power station	Major road (4 lanes or more) **N**	Historical building
Office/consulting room **X**	Airport **N**	Protected Area
Military or police base/station/compound	Harbour	Graveyard
Spoil heap or slimes dam**A**	Sport facilities **X**	Archaeological site
Quarry, sand or borrow pit	Golf course	Other land uses (describe)

If any of the boxes marked with an "N "are ticked, how will this impact / be impacted upon by the proposed activity?

The applicant is Transnet and therefore the railway line, shunting yard and train station will be positively impacted.

If any of the boxes marked with an "An" are ticked, how will this impact / be impacted upon by the proposed activity? Specify and explain:

Industries occurring within 500m of the site will not be impacted on by this activity as it does not directly affect these industries. The area may experience increase in road traffic due to construction vehicles however this will be minimum and short term. .

If any of the boxes marked with an "H" are ticked, how will this impact / be impacted upon by the proposed activity? Specify and explain:

In terms of the nearby Petrol station, the increase in traffic as a result of the construction phase may increase use of the petrol station if these vehicles use this facility. These impacts will be relevant to the construction phase.

Does the proposed site (including any alternative sites) fall within any of the following:

Critical Biodiversity Area (as per provincial conservation plan)	YES **X**	NO
Core area of a protected area?	YES	NO **X**
Buffer area of a protected area?	YES **X**	NO
Planned expansion area of an existing protected area?	YES	NO **X**
Existing offset area associated with a previous Environmental Authorisation?	YES	NO **X**
Buffer area of the SKA?	YES	NO **X**

If the answer to any of these questions was YES, a map indicating the affected area must be included in Appendix A.

Please refer to Appendix A.4

7. CULTURAL/HISTORICAL FEATURES

Are there any signs of culturally or historically significant elements, as defined in section 2 of the National Heritage Resources Act, 1999, (Act No. 25 of 1999), including Archaeological or paleontological sites, on or close (within 20m) to the site? If YES, explain:	YES	NO **X**
	Uncertain	

If uncertain, conduct a specialist investigation by a recognised specialist in the field (archaeology or palaeontology) to establish whether there is such a feature(s) present on or close to the site. Briefly explain the findings of the specialist:

No archaeological heritage remains, features, or sites were observed within the proposed area for the construction of the Transnet Freight Rail New Brighton – Swartkops Security Wall. It must be noted that the investigation was limited to the surface as well as the exposed and disturbed surface areas and in most areas archaeological visibility was obscured by heavily dense transformed grass vegetation cover. Exposed surface areas, for example, internal gravel roads, footpaths, and eroded areas were investigated for possible archaeological heritage remains. The area has been heavily disturbed by the construction and maintenance of the existing walls and fences as well as the buildings and the railway lines.

Based on the findings of this specialist assessment, no authorisation will be required in terms of the National Heritage Resources Act.

Will any building or structure older than 60 years be affected in any way?	YES	NO **X**
Is it necessary to apply for a permit in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999)?	YES	NO **X**

If YES, please provide proof that this permit application has been submitted to SAHRA or the relevant provincial authority.

8. SOCIO-ECONOMIC CHARACTER

a) Local Municipality

Please provide details on the socio-economic character of the local municipality in which the proposed site(s) are situated.

Level of unemployment:

In 2011, Statistics South Africa completed a survey that revealed a 36.6% unemployment rate in the Nelson Mandela Bay Municipality. This was almost a 10% decrease since the 2001 survey which showed a result of 46,4%.

Economic profile of local municipality:

According to ECSECC (Eastern Cape Socio Economic Consultative Council), the GDP growth rate for the Nelson Mandela Bay Municipality was 2,1% in 2010 and the GDP per capita R52 147. The largest economic sectors in the Nelson Mandela Metro are manufacturing, finance, community services and transport. Community services, trade and manufacturing sectors are the sectors that create the most employment in the metro.

Level of education:

Only 12% of the NMBM's youth has received a higher education, while 30.5% only completed matric and 3% has had no form of schooling at all.

b) Socio-economic value of the activity

What is the expected capital value of the activity on completion?	R 3 000 000	
What is the expected yearly income that will be generated by or as a result of the activity?	N/A	
Will the activity contribute to service infrastructure?	YES	NO **X**

Is the activity a public amenity?	YES / NO **X**
How many new employment opportunities will be created in the development and construction phase of the activity/ies?	None. Transnet Freight Rail, will utilize their own employees from the rail network department to complete the works.
What is the expected value of the employment opportunities during the development and construction phase?	R0
What percentage of this will accrue to previously disadvantaged individuals?	N/A
How many permanent new employment opportunities will be created during the operational phase of the activity?	N/A Transnet Freight Rail, will utilize their own employees to complete the works.
What is the expected current value of the employment opportunities during the first 10 years?	N/A
What percentage of this will accrue to previously disadvantaged individuals?	N/A

9. BIODIVERSITY

Please note: The Department may request specialist input/studies depending on the nature of the biodiversity occurring on the site and potential impact(s) of the proposed activity/ies. To assist with the identification of the biodiversity occurring on site and the ecosystem status consult http://bgis.sanbi.org or BGIShelp@sanbi.org. Information is also available on compact disc (cd) from the Biodiversity-GIS Unit, Ph (021) 799 8698. This information may be updated from time to time and it is the applicant/ EAP's responsibility to ensure that the latest version is used. A map of the relevant biodiversity information (including an indication of the habitat conditions as per (b) below) and must be provided as an overlay map to the property/site plan as Appendix D to this report.

a) Indicate the applicable biodiversity planning categories of all areas on site and indicate the reason(s) provided in the biodiversity plan for the selection of the specific area as part of the specific category)

Systematic Biodiversity Planning Category				**If CBA or ESA, indicate the reason(s) for its selection in biodiversity plan**
Critical Biodiversity Area (CBA) **X**	Ecological Support Area (ESA)	Other Natural Area (ONA)	No Natural Area Remaining (NNR)	CBA (T2) – Endangered vegetation types identified through the ECBCP systematic conservation assessment

b) Indicate and describe the habitat condition on site

Habitat Condition	Percentage of habitat condition class (adding up to 100%)	Description and additional Comments and Observations (including additional insight into condition, e.g. poor land management practises, presence of quarries, grazing, harvesting regimes etc).
Natural	0%	The only portions with vegetation (be it indigenous or alien invasive) is that between the railway lines and on the edges of the property. The area is heavily disturbed due to the primary function of the property and due to use of the area as a thoroughfare.
Near Natural (includes areas with low to moderate level of alien invasive plants)	0%	
Degraded (includes areas heavily invaded by alien plants)	15%	
Transformed (includes cultivation, dams, urban, plantation, roads, etc)	85%	The proposed wall surrounds the Transnet Rail shunting yard and train station.

c) Complete the table to indicate:

(i) the type of vegetation, including its ecosystem status, present on the site; and
(ii) whether an aquatic ecosystem is present on site.

Terrestrial Ecosystems		Aquatic Ecosystems						
Ecosystem threat status as per the National Environmental Management: Biodiversity Act (Act No. 10 of 2004)	Critical	Wetland (including rivers, depressions, channelled and unchanneled wetlands, flats, seeps pans, and artificial wetlands)			Estuary		Coastline	
	Endangered **X**							
	Vulnerable							
	Least Threatened	YES **X**	NO	UNSURE	YES **X**	NO	YES	NO **X**

d) Please provide a description of the vegetation type and/or aquatic ecosystem present on site, including any important biodiversity features/information identified on site (e.g. threatened species and special habitats)

Two wet areas were observed on and within 500m of the site. One wet area has been classified as a Wetland (mandate of the Department of Water and Sanitation). This wetland is situated on the eastern side of Old Grahamstown road and within 500m of the proposed new security wall (Figure 1). The other wet area is within the Estuarine floodplain and thus classified as a coastal marsh (mandate of the DEA: Oceans and coasts). Based on the 6 levels of the National Wetland Classification System, these systems are typical of Inland and Estuarine Systems (Level 1), within the Eastern

Coastal Belt Ecoregion (Level 2), associated with floodplains that were in the past un-channelled (Level 4). Several channels have been dug over the years within the study area to deal with stormwater management and potential flooding issues within the area.

Figure 1: Freshwater wetland situated approximately 330 m east of the project site (Opposite Old Grahamstown road).

Plant species associated with all wetland types found in the study area included the following facultative types, i.e. plants that occur in wetlands 60-99% of the time, some of these included the following:

- *Ficinia lateralis*
- *Juncus kraussii*
- *Phragmites australis*
- *Cyperus obtusiflorus var. obtusiflorus*
- *Centella asiatica*
- *Typha capensis*
- *Salicornia meyeriana*

The Department of Water and Sanitation as well as DEA: Oceans and Coasts were consulted in order to determine the requirement for a Water use Licence. Email correspondence between CES and DWS as well as between CES and Oceans and Coasts are included in Appendix E of this report. It was confirmed that no Water use Licence will be required and the Department of Oceans and Coasts provided comment on the Draft Basic Assessment, which has been included in the relevant sections in the report as well as in Appendix E (Comments and Response trail) of this report.

As the proposed site occurs within the Estuarine Functional zone and all coastal marshes occur

within the Coastal Protection Zone, the DEA: Oceans and Coasts are the mandating authority. To date, we have not yet received any instructions from DEA: Oceans and Coasts in regards to any specific requirements that they may have in regards to the coastal march. In addition to this, it should be noted that there is a second wetland within 500m of the proposed development site. This wetland is divided from the site by the old Grahamstown road, thus the EAP is of the opinion there would be no impact on the flow requirements for this wetland. Further discussions with DWS will be required in this regard.

SECTION C: PUBLIC PARTICIPATION

1. ADVERTISEMENT AND NOTICE

Initial registration period		
Publication name	The Herald Newspaper	
Date published	10 February 2015	
Site notice position	**Latitude**	**Longitude**
	33°53'58.88" S	25°36'36.27" E
Date placed	10 February 2015	
Public review of DBAR and notification of public meeting		
Publication name	The Herald Newspaper	
Date published	26 May 2015	

Include proof of the placement of the relevant advertisements and notices in Appendix E1.

2. DETERMINATION OF APPROPRIATE MEASURES

Provide details of the measures taken to include all potential I&APs as required by Regulation 54(2)(e) and 54(7) of GN R.543.

Key stakeholders (other than organs of state) identified in terms of Regulation 54(2)(b) of GN R.543:

Title, Name and Surname	**Affiliation/ key stakeholder status**	**Contact details (tel number or e-mail address)**
Mrs Jenny Rump	Swartkops Trust	Zwartkopsconservancy@iafrica.com
Provincial and Local Government departments		
Surrounding landowners		
Occupiers of surrounding land		

A comprehensive I&AP database with contact details is attached in Appendix E

Include proof that the key stakeholder received written notification of the proposed activities as Appendix E2. This proof may include any of the following:

- e-mail delivery reports;
- registered mail receipts;
- courier waybills;
- signed acknowledgements of receipt; and/or

- or any other proof as agreed upon by the competent authority.

In order to inform the public of the proposed project and to invite members of the public to register as Interested and Affected Parties (I&APs), the proposed project was advertised in the Herald Newspaper. A site notice was also placed on the site boundary and Background Information Documents (BIDs) distributed to the Landowner, surrounding landowners and other identified I&APs. Notification emails have been sent out to relevant parties. On submission of the DBAR to DEA, another set of emails was sent out to all I&APs and the relevant authorities in order to notify them of the availability of the DBAR for public review and in order to notify them of the scheduled public meeting. A notification advert was also placed in the Herald Newspaper on 26 May 2015 indicating the review period and details of the public meeting.

3. ISSUES RAISED BY INTERESTED AND AFFECTED PARTIES

During the ward councillor meeting with ward committee of Ward 15 a number of issues were raised and are summarised as follows

Summary of main issues raised by I&APs	Summary of response from EAP
Reduction of Crime: The committee members were supportive of the security as they believe the wall will reduce crime in the area of the railway lines as criminals currently wait for people who are crossing the rail line going to sand from work and rob them of their belongings. They also believe that the current Transnet structures in the area are also used as hideouts for criminals.	Noted
Employment Opportunities: The issues of employment of local people were raised. The ward committee members were concerned about how employment opportunities will be created during the construction of the wall. They mentioned that they have certain protocols they follow when there are job opportunities available and they would like Transnet to follow the same process so as not cause conflict within the communities.	Noted
Business opportunities: The members asked whether there will be any opportunities for small contractors to work on the project.	They were informed that at this stage it is not clear whether Transnet will employ outside contractors to construct the security wall or the construction will be done internally by Transnet
Structure of the Wall: One of the concerns by the ward committee members is about the materials to be used when constructing the wall. They mentioned that the wall must be strong so that people cannot break through it as it has been done to other protective walls and fences.	The type of wall was discussed and the members were informed that it is unlikely that a wall of this nature will be vandalised in order to allow thoroughfare.
Has all affected wards been contacted?	Yes a meeting was arranged with the ward councillor and the committee of Ward 60 but no one attended. A copy of the presentation (as per

	the request of the councillor) was left with secretary at the Wesley Community Hall.

On 29 July 2015, the Eastern Cape Department of Economic Development, Environmental Affairs & Tourism (DEDEAT) provided comment on the Draft Basic Assessment Report. A number of issues were raised and have been responded as per the table below. The original letter from the department is included in the Public Participation Report attached to the Final Basic Assessment in Appendix E.

<table>
<tr><td colspan="3">Draft Basic Assessment Report:</td></tr>
<tr><td>Why did the Applicant apply for EA in terms of the 2010 and not the 2014 Regulations?</td><td colspan="2">The application was submitted to DEA in October 2014, thus the project is to be completed under the 2010 regulations.</td></tr>
<tr><td>Provide a detailed description of the Listed Activities: 18 June 2010.</td><td colspan="2"><table>
<tr><td>Listed activity as described in GN R.544, 545 and 546</td><td>Description of project activity</td></tr>
<tr><td>GN R544, Listing Notice 1 – 18 June 2010
Activity 11:

The construction of:
(iii) bridges
(xi) infrastructure or structures covering 50 square metres or more

where such construction occurs within a watercourse or within 32 metres of a watercourse, measured from the edge of a watercourse, excluding where such construction will occur behind the development setback line.</td><td>The construction is in excess of 100m^2 and is within 32 m of the watercourse/wetland.
The proposed property falls within the 1:100 year floodline of the Swartkops Estuary as well as within the floodplain. Please refer to Appendix A4: Sensitivity Map and Appendix A2: Locality map</td></tr>
<tr><td>GN R544, Listing Notice 1 – 18 June 2010
Activity 18:

The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock or more than 5 cubic metres from:

(iv) the littoral active zone, an estuary or a distance of 100 metres inland of the highwater mark of the sea or an estuary, whichever</td><td>Infilling or depositing of material of more than 5 m^3 will occur during the construction phase in the floodplain of the Swartkops Estuary.</td></tr>
</table></td></tr>
</table>

		distance is the greater but excluding where such infilling, depositing dredging, excavation, removal or moving; (a) is for maintenance purposes undertaken in accordance with a management plan agreed to by the relevant environmental authority; or (b) occurs behind the development setback line.	
		GN R544, Listing Notice 1 – 18 June 2010 Activity 16: Construction or earth moving activities in the sea, an estuary, or within the littoral active zone or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater, in respect of – (vi) infrastructure covering 50 square metres or more but excluding (a) if such construction or earth moving activities will occur behind a development setback line; or (b) where such construction or earth moving activities will occur within existing ports or harbours and the construction or earth moving activities will not increase the development footprint or throughput capacity of the port or harbour; (c) where such construction or earth moving activities is undertaken for purposes of maintenance of the facilities mentioned in (i)-(vi) above; or (d) where such construction or earth moving activities is related to the construction of a port or harbour, in which case activity 24	A portion of the wall constructed falls within the Swartkops Estuarine floodplain.

	of Notice 545 of 2010 applies.
Regulations published in terms of NEMA describe Listed Activities. Of what relevance is the Second Amendment Act?	According to the 2014 regulations the following listed activities will be triggered: GNR 983 Activity 12: The development of infrastructure exceeding 100 square meters within 32 meters of a watercourse (a portion of the security wall falls within the floodplain of the Swartkops Estuary). GNR 983 Activity 17: Development in an estuary in respect of buildings of 50 square meters or more. GNR 983 Activity 19: The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock or more than 5 cubic metres from an estuary.
The National Environmental Management Biodiversity Act would make provision for protection of wetlands. What is the NEM: PA Amendment Act?	Noted. The NEM:BA has been included in Section 11 of the Final BAR. The NEM: PA was amended in 2004 in order "*to amend the National Environmental Management: Protected Areas Act, 2003, to provide for the application of that Act in relation to national parks and marine protected areas; and to provide for matters connected therewith".* This was included for the sake of completion.
A number of pieces of legislation and policy documents were excluded, for example, the National Waste Act and the Nature and Environmental Conservation Ordinance (No 19 of 1974).	Noted, this has been included in Section 11 of the Final BAR.
Solid waste management: Contractors must provide Transnet with copies of waste manifests to prove legal disposal of waste.	Noted, this has been included in Section 12(a) of the Final BAR.
Noise Pollution: Working times: 06:00 to 18:00 on week days; 06:00 to 13:00 on Saturdays; no work on Sundays and Public holidays.	Noted, this has been included in Section 12(e) of the Final BAR.
Water Use: What progress was made with the WULA?	The Department of Water and Sanitation as well as DEA: Oceans and Coasts were consulted in order to determine the requirement for a Water Use Licence. Email correspondence between EOH CES and DWS as well as between CES and Oceans and Coasts are included in Appendix E of the Final BAR. It was confirmed that no Water use Licence will be required and Oceans and Coasts provided comment on the Draft Basic Assessment, which has been included in this comments and response trail in the sections below. As the proposed site occurs within the Estuarine Functional zone and all coastal marshes occur within the Coastal Protection Zone, the DEA: Oceans and Coasts are the mandating authority. However, it should be noted that there are 2 systems on site (1) coastal marsh as indicated to be directly affected by the proposed development and (2) a wetland system on the eastern side of Grahamstown Road (the proposed project site is on the western side of Grahamstown road). This wetland thus does not fall within the development footprint, however it does occur within 500 m of the proposed site. Further discussions will thus be required with DWS in regards to the requirements for the second wetland, however it is highly unlikely to be impacted on by the proposed development as it is

	separated from it by Grahamstown Road.
Terrestrial biodiversity impacts: Smoking should preferably not be permitted. If it is it must be in a designated area in the presence of a fire extinguisher.	Noted, this mitigation measure has been included in Section D1: Terrestrial biodiversity impacts.
Impacts of archaeological sites: The ECHRA should also be notified	The specialist conducting the heritage assessment found no archaeological heritage remains at the proposed site. Nonetheless, the report has been uploaded to the SAHRIS website.
Environmental Impact Statement: The Department agrees with this Statement.	Noted.
Environmental Impact Statement: The Department agrees with this recommendation. However, the ECO should be on site on a daily basis.	The Environmental Impact Statement in the Final Basic Assessment Report has been changed to recommend that the ECO be on site on a daily basis.
Wetland Assessment	
4. Present Ecological State and conservation importance: Were the AIS Regulations published in terms of NEM: BA consulted?	Yes, all species listed on the AIS will be removed within the construction footprint and disposed of at a registered waste facility.
6. Conclusions and Recommendations:	
• Vehicles and mechanical plant should not be serviced on site but at a service provider in the Metro.	Noted, this mitigation measure has been included in Section D1: Impact on the aquatic environment.
• Concrete should not be mixed on site but be provided by a service provider.	Noted, this mitigation measure has been included in Section D1: Impact on the aquatic environment.
• It is agreed that all the construction camps (presumed the site office as no workers should be accommodated on site), lay down and storage areas should be outside the 50m buffer.	Noted.
6. Conclusions and Recommendations: Any transgression of legislation this Department has the mandate to enforce will be investigated by the Compliance and Enforcement Section.	Noted.
Impact Assessment	
Waste Management: Contractors must provide	Noted, this mitigation measure has been included in Section D1: Waste Management.

Transnet with copies of waste manifests to prove legal disposal of waste.	
Mitigation: No fires should be permitted on site. Gas can be provided for cooking.	Noted, this mitigation measure has been included in Section D1: Terrestrial biodiversity impacts.
Environmental Management Programme	
4.4.2 Site Preparation and Clearing of Vegetation 1 ii: Fuel should not be stored on site. Vehicles and plant can be refuelled from a bowser.	Noted and included.
4.4.2 Site Preparation and Clearing of Vegetation 1 iii & 4.4.6 Waste Management (b) 1: Concrete should not be mixed on site but be provided by a service provider	Noted and corrected.
4.4.3 Stockpiling of Topsoil 1: Stockpiles should not exceed 1.5 m in height	Noted and corrected.
4.4.6 Waste Management (a) 1,5,6 and 7, (b) 3 & 4.4.7 Material Use, Handling and Transport (a) 1: Contractors must provide Transnet with copies of waste manifests to prove legal disposal of waste.	Noted and included.
4.4.6 Waste Management (b) 2: This would apply to small quantities of cement; otherwise to be provided by a service provider	Noted and corrected.
4.4.6 Waste Management (b) 6:	
• Grey water must be disposed of at a licenced WWTW and not on site.	Noted and corrected.
• Contractors must provide Transnet with copies of waste manifests to prove legal disposal.	Noted and included.
4.4.6 Waste Management (b) 9: One toilet / 15 individuals.	Noted and corrected.
4.4.6 Waste Management (b) 14: Sanitary bins to be provided for women	Noted and included.

4.4.7 Material Use, Handling and Transport (a) 4: Construction vehicles to always be parked over drip trays; mechanical plant to be operated in drip trays.	Noted and included.
4.4.7 Material Use, Handling and Transport (c) 2: Vehicles and mechanical plant should not be repaired / serviced on site but a service provider in the Metro.	Noted and included.
4.4.7 Noise Dust Control 1: Working hours: Weekdays: 06:00 to 18:00; Saturdays: 06:00 to 13:00; not on Sundays and public holidays	Noted and included.
4.4.7 Noise Dust Control 2: Trucks to be covered with tarpaulins at all times.	Noted and included.
4.4.12 Noise Dust Control 4: A contact telephone number should be displayed at a conspicuous place for complaints to be lodged after hours.	Noted and included.
4.4.14 Fire Prevention 2: Preferably no smoking if allowed in designated areas with fire hydrants.	Noted and included.

On 19 October 2015, the applicant received comment from The Department of Environmental Affairs (Branch Oceans & Coasts (O&C): Chief Directorate: Integrated Coastal Management (ICM). A number of issues were raised and have been responded as per the table below. The original letter from the department is included in the Public Participation Report attached to the Final Basic Assessment in Appendix E.

The Department has identified issues and sections that need to be considered in terms of the Integrated Coastal Management Act, 2008 (Act No. 24 of 2008), which are summarized below:	
(a) Section 13 of the ICM Act, which addresses how issued relating to access to the coastal public property should be dealt with	Noted. Access to the development will be via Grahamstown Road and existing access to the Transnet properties. The general public will only be excluded from the Transnet property, not from the coastal area in general. Section 13(2) of the Act makes provision for this as it states: "*This section does not prevent prohibitions or restrictions on access to, or the use of, any part of coastal public property (c) in the interest of the whole community".* The proposed security wall aims to eliminate and at the very least drastically reduce foot traffic through the Transnet property where the very nature of operations on site

	could lead to injury or death. In addition to this the wall is also be designed to prevent easy access to Transnet facilities and equipment that is being vandalised and stolen. The activity has been highlighted as need for safety and maintenance reasons and will not be in conflict with surrounding land uses.
(b) Section 15 of the ICM Act, which states the measures affecting erosion and accretion within the coastal zone.	It is unlikely that the proposed security wall will result in erosion and/or accretion within the coastal zone as it is (a) situated in excess of 1 km from the high water mark and (b) An industrial area as well as a main arterial road (Grahamstown Road) is situated between the property and the coast.
(c) Section 58 of the ICM Act, which addresses the duty to avoid causing adverse effects on coastal environment. It promotes assessing, avoiding and minimizing adverse effects.	Strict mitigation measures have been included in both the BAR and the EMPr to ensure that no pollution of the coastal zone will occur as a result of the construction of the proposed security wall.
(d) Section 63 of the ICM Act, which deals with issues which the competent authority must take into consideration when dealing with environmental authorisations for coastal activities	Noted.
(e) According to the draft Basic Assessment Report, the development is proposed to occur in the Estuarine Functional Zone of the Swartkops Estuary and as a result, the impacts of the development are deemed significantly negative in terms of loss of wetland areas and associated estuarine vegetation. The report indicates that there is no alternative site for the proposed development and the aquatic biodiversity impacts with mitigation will be moderate. However, it is recommended that during the	Noted. The following mitigation measure has been included in the EMPr: “work areas must be clearly demarcated during the construction of the proposed security wall. All activities outside these demarcated areas must be strictly prohibited.”

construction footprint/work areas must be clearly demarcated to avoid further impacts. Also within the Environmental Management Plan, provide the Department with the construction plan.	
(f) The reports provided legislation, policies and guidelines that have been taken into consideration for the EIA application; however, the National Environmental Management: Integrated Coastal Management Act (No 24 of 2008), the National Estuarine Management Protocol and the draft Integrated Swartkops Estuarine Management Plan were not listed.	These have been included in Section 11 of the Final BAR.
(g) Additionally, consider Chapter 4 of the Protocol that stipulates the Standards for Estuarine Management: Section 4.1 and Section 4.5. These principles must be considered for this EIA application.	A number of mitigation measures has been included in the Final BAR in order to mitigate the impact of the proposed security wall on the estuary.
(h) For driving in the Coastal Zone, for any reason during the construction phase and operational phase, Regulation 6 of the National Environmental Management Act: Control of use of vehicles in the coastal zone (GN Regulation 1399 of 21 December 2001), which deals with issues when person have an intention to drive on the coastal zone. Please Contact: smbethe@environment.gov.za. Tel	Noted. Access to the site is available via Grahamstown Road as well as existing access roads on the Transnet properties.

021 819 2442	
1. The Branch Oceans and Coasts has no objection to the proposed project, subject to the applicant ensures that above mentioned and the following conditions and recommendations have been taken into consideration in order to minimize and mitigate impacts in the coastal zone:	Noted.
• The applicant is advised to take note of the dynamics of our coast and that of the estuary and the need to plan accordingly to avoid coastal erosion or degradation to the estuary during the construction phase of the wall.	Noted and agreed.
• The Contractor shall restrict all the activities, materials, equipment and personnel to within the area specified, and shall restrict the activities to only those areas that are necessary to undertake the works	Noted. The following mitigation measure has been included in the EMPr: "*work areas must be clearly demarcated during the construction of the proposed security wall. All activities outside these demarcated areas must be strictly prohibited.*"
• Measures to control illegal dumping of construction waste must be put in place as this may results in pollution to the surface water run-off	Noted. The following mitigation measures have been included in the EMPr: 1 Scavenger proof waste bins should be provided at regular intervals throughout the site camp including any sub-contractor camps. 2 Bins shall be emptied regularly and the accumulated waste disposed of at a recognised disposal site. Documentary confirmation of the location and status of the disposal site to be used must be obtained from the local municipality (municipal manager's office). 3 Burning or burying of any waste is not permitted. 4 The site is to be checked for litter daily. All litter should be collected regularly and

	deposited in the waste bins. 5 Non-reusable building material is to be treated as waste and disposed of at an appropriately permitted disposal site. 6 Cement aggregates should be collected and disposed of at an appropriately permitted disposal site. 7 Used cement bags and containers which held hazardous materials or substances are to be collected into a dedicated hazardous waste container/containment area and disposed of appropriately at a registered hazardous waste disposal site. 8 Contractors are to provide copies of waste manifests in order to prove legal waste disposal.
• The applicant must ensure that the construction and operational environmental management plan is adhered at all times and understood by all the contractors on site.	Noted and agreed.
• The Contractor shall control the movement of all vehicles including that of the suppliers so that they remain on designated routes as the estuary still have some indigenous species that attract the birds.	Noted, the following mitigation measure is included in the EMPr: *"Construction vehicles are to be permitted only within the demarcated construction site or on existing roads. No-go areas are to be avoided."*
• All building materials should be stored in appropriately bonded areas such that there will be no runoff from these areas towards sensitive systems and should be removed after construction.	Noted.
• Empty cement bags must be collected	Noted, the following mitigation measure is included in the EMPr: " *Used cement bags and containers*

from the construction area by the end of every day.	*which held hazardous materials or substances are to be collected into a dedicated hazardous waste container/containment area and disposed of appropriately at a registered hazardous waste disposal site."*
• Rubble shall be temporarily stockpiled in a waste skip or a central stockpile	Noted, the following mitigation measure is included in the EMPr: "*Non-reusable building material is to be treated as waste and disposed of at an appropriately permitted disposal site."*
• The Contractor shall designate a permanent onsite employee as the Environmental Officer who shall be responsible for undertaking a daily site inspection to monitor compliance with this Specification.	This has been included as a recommendation into the Final BAR.
• The Contractor shall erect and maintain information boards in the position, quantity, design and dimensions specified by the engineer to ensure people do not come near the site during the inserting of the wall.	The following mitigation measures have been included in the EMPr: The Contractor shall be responsible for the protection of the public, and public property, from any dangers associated with construction activities, and for the safe and easy passage of pedestrians and traffic in areas affected by project activities. Any excavated area, spoil sites and other obstructions or excavations shall be suitably barricaded and/or demarcated with hazard tape. The Contractor should ensure that hazards and warning signs are erected at problem sites, and that they are maintained. The contractor shall have an emergency phone numbers/ contact details list displayed at the contractor's camp in an easily visible area.
• The Contractor shall take all reasonable measures to limit erosion and sedimentation due to the construction activities.	The following mitigation measures have been included in the EMPr: The Contractor is to provide a method statement on erosion control showing clearly how cleared surfaces and stormwater will be managed on site during construction and rehabilitation.

	Where necessary, anti-erosion measures shall be implemented. Areas where erosion is likely (e.g. steep slopes [gradient > 6%], areas cleared of topsoil, and topsoil stockpiles) should be monitored to allow for timely response in the event of erosion. Erosion should be managed or prevented throughout the construction process. In the event of erosion the contractor shall be held financially responsible for necessary rehabilitation.
• No structures must be placed or constructed in the coastal zone without an authorization from the responsible authority.	No construction activities will take place within the proposed property boundaries without an Environmental Authorisation from DEA.
Kindly note that the department reserves the right to revise our initial comments and we may request further information based on any additional information that might be received. Therefore, you are advised to submit any future development proposals via the address provided below. This should include both a hard copy and an electronic copy. All future correspondence and documentation must be submitted to our office for the attention to the Chief Director: ICM using the following contact details:	Noted.

4. COMMENTS AND RESPONSE REPORT

The practitioner must record all comments received from I&APs and respond to each comment before the Draft BAR is submitted. The comments and responses must be captured in a comments and response report as prescribed in the EIA regulations and be attached to the Final BAR as Appendix E3.

5. AUTHORITY PARTICIPATION

Authorities and organs of state identified as key stakeholders:

Authority /Organ of State	Contact person (Title, Name & Surname)	Tel No	Fax No	e-mail	Postal address
DEDEA	Mr Andries Struwig	0415085800	0415085865	Andries.Struwig@dedea.gov.za	P/Bag X5001; Greenacres P.E., 6001
DWS	Mr Joseph Jacobs	0415864884	0865472500	jjacobs@dwa.gov.za	P/Bag X6041; P.E., 6000
NMBM	Mr J. Mkosana			j.mkosana@mandelametro.gov.za	
NMBM – Ward 15 Councillor	Mr K. Frans	0724062501		Ward15@mandelametro.gov.za	
NMBM – Ward 60 Councillor	Ms N. E. Gana	0848743858 0414612749	0414612700	-	8 Kustar Street Wells Estate PORT ELIZABETH 6211

Include proof that the Authorities and Organs of State received written notification of the proposed activities as appendix E4.

In the case of renewable energy projects, Eskom and the SKA Project Office must be included in the list of Organs of State.

N/A

6. CONSULTATION WITH OTHER STAKEHOLDERS

Note that, for any activities (linear or other) where deviation from the public participation requirements may be appropriate, the person conducting the public participation process may deviate from the requirements of that sub-regulation to the extent and in the manner as may be agreed to by the competent authority.

Proof of any such agreement must be provided, where applicable. Application for any deviation from the regulations relating to the public participation process must be submitted prior to the commencement of the public participation process.

A list of registered I&APs must be included as appendix E5.

Copies of any correspondence and minutes of any meetings held must be included in Appendix E6.

SECTION D: IMPACT ASSESSMENT

The assessment of impacts must adhere to the minimum requirements in the EIA Regulations, 2010, and should take applicable official guidelines into account. The issues raised by interested and affected parties should also be addressed in the assessment of impacts.

1. IMPACTS THAT MAY RESULT FROM THE PLANNING AND DESIGN, CONSTRUCTION, OPERATIONAL, DECOMMISSIONING AND CLOSURE PHASES AS WELL AS PROPOSED MANAGEMENT OF IDENTIFIED IMPACTS AND PROPOSED MITIGATION MEASURES

Provide a summary and anticipated significance of the potential direct, indirect and cumulative impacts that are likely to occur as a result of the planning and design phase, construction phase, operational phase, decommissioning and closure phase, including impacts relating to the choice of site/activity/technology alternatives as well as the mitigation measures that may eliminate or reduce the potential impacts listed. This impact assessment must be applied to all the identified alternatives to the activities identified in Section A(2) of this report.

Activity	Impact summary	Significance	Proposed mitigation
Alternative 1 (preferred alternative)			
Planning and Design Phase The planning and design phase would include all activities which were undertaken prior to the commencement of construction. On site activities may include site surveying and inspections relevant to the design and final layout of the structure. These will all be low intensity, temporary activities and as such no significant impacts have been identified for this phase.	***Direct impacts:*** No direct impacts were identified.		
	Indirect impacts: No indirect impacts were identified.		
	Cumulative impacts: No cumulative impacts were identified.		
Construction Phase	***Direct impacts:*** <u>Dust generation</u> There is a possibility that dust will be generated during the construction phase, particularly during high wind conditions. . Trenching for wall foundations,	Moderate Negative	*All earthworks must stop during high wind conditions.* *Trench excavations should not take place on extremely windy days.* *Construction vehicles must adhere to speed limits.* *If fine building materials/sands are to be transported at the back of trucks, they must be adequately covered.*

Activity	Impact summary	Significance	Proposed mitigation
	stockpiled material and transport of material may create dust if not properly managed.		*All stockpiled material needs to be covered or wet down to avoid the creation of dust.* ***With mitigation measures in place, this impact can be reduced to a low negative rating.***
	<u>Noise pollution</u> It can be expected that there will be an increase in noise levels during the site preparation and construction phase. The increase in noise will be associated with the operation of construction vehicles and equipment. Noise pollution could potentially be a nuisance to neighbouring businesses and residents.	Low negative	*All construction vehicles must be in sound working order and meet the necessary noise level requirements.* *Restrict construction times to working and daylight hours (6am to 6pm on weekdays, 6am to 1pm on Saturdays and no work on Sundays or Public holidays) only to minimise noise pollution.* *The normal municipal by-laws with regards to noise control must apply.* *Machinery should be fitted with the required mufflers, and notice given to surrounding residents prior to the commencement of construction.* ***With mitigation measures in place, this impact will become negligible.***
	<u>Worker and public health and safety</u> Non-adherence to danger signs and construction activity limits by the construction team and the general public could lead to loss of property, injury or loss of life.	Moderate negative	*Workers shall comply with all regulations as stipulated in the Occupational Health and Safety Act.* *Warning signs must be put up to warn the public of the potential dangers of a construction site.* *All staff should be equipped with PPE* ***With mitigation measures in place, this impact can be reduced to a low negative rating.***
	<u>Waste management</u> It is anticipated that the proposed development will	Moderate Negative	*Prior to commencement of construction a comprehensive waste management plan must be developed by the contractor and*

Activity	Impact summary	Significance	Proposed mitigation
	produce solid waste in the form of building rubble such as excavated soil, excess concrete, etc. and general waste such as litter during the construction phase. Failure to provide adequate sanitation facilities for the workforce may result in runoff transferring contaminants into the surrounding environment, estuarine floodplain and wetland areas.		*its contents shall be communicated to all site staff.* *The waste management plan shall include specifications for the minimisation of the amount of waste produced and the re-use of as much of the material as possible before disposing of waste off-site.* *Litter must be controlled during construction – adequate bins must be made available on site at all times. These must be made scavenger proof and must be emptied on a regular basis.* *Due to the nature of the activities the ablution facilities at the Transnet building will be utilised and no additional ablution facilities will be required.* *Contaminated wastewater must be managed by the contractor to ensure existing water resources on the site are not contaminated.* *All wastewater from general activities shall be collected and removed from the site for appropriate disposal at a licensed waste handling facility.* *Construction materials stored at the camp site must be secured – i.e. plastics must be covered to prevent being blown off site. Skips must be regularly emptied and must be covered.* *Any hazardous materials, such as hydrocarbons, paint and thinners that need to be stored on site must be done so under lock and key.* *Contractors must provide copies of waste manifests to Transnet in order to prove the legal disposal of the waste.* ***With mitigation measures in place, this impact can be reduced to a low negative rating.***

Activity	Impact summary	Significance	Proposed mitigation
	<u>Terrestrial biodiversity impacts</u> The terrestrial vegetation is heavily transformed and consists of mostly non-indigenous species. The floristic value of the site is considered low.	Moderate Negative	*Work areas must be clearly demarcated (either with danger tape or any other clearly marked signage) so that construction workers limit their impact to these areas alone.* *All construction vehicles must stay on single demarcated access tracks, should additional access tracks be required these will need to be rehabilitated post construction.* *Should any undisturbed areas outside of the immediate construction area be disturbed and or impacted upon by the contractor, the contractor will be liable for rehabilitation of these areas.* *No open fires must be allowed on site.* *All construction staff must receive training on environmentally safe work methods.* *Smoking should only be allowed within designated smoking areas.* *Fire extinguishers should be readily available in all areas designated for smoking.* *All alien vegetation within the development footprint should be cleared and removed from site.* ***With mitigation measures in place, this impact can be reduced to a low negative rating.***

Activity	Impact summary	Significance	Proposed mitigation
	Traffic Impacts: During the construction phase construction vehicles will be utilizing the existing road network; this may result in the impeding of traffic and damage to existing roads. Increased construction traffic volumes create a potential for an increase in collisions, particularly at intersections, between construction vehicles and public vehicles or pedestrians.	Low Negative	*As far as possible, construction vehicles must not utilize public roads during peak hours* *Apart from standard law enforcement measures such speed enforcement, road worthiness of construction vehicles should be checked and vehicles should be checked for overloading* *Flag staff should also regularly patrol areas especially on site to prevent on-site incidents.* ***With mitigation measures in place, this impact can be reduced to a negligible rating.***
	Impacts on Archaeological sites: It is highly unlikely that objects or features of cultural or historical significance will be found in the area due to the disturbed nature of the site. The specialist conducting the heritage assessment found no archaeological heritage remains at the proposed site.	Low Negative	*Should any archaeological or cultural sites or objects be located during the construction of the proposed development or any associated infrastructure, it should immediately be reported to the National Heritage Council as well as the ECPHRA. Failure to report a site or object of archaeological and/or cultural significance is a contravention of the National Heritage Act (Act No. 25 of 1999).* *All construction site staff should be briefed to immediately report any sites or objects, which are located during the construction of the facility. In the event of finding what appears to be an archaeological site or a cultural and/or historic site or object, work should be terminated until a qualified archaeologist or historian can examine the item or find.*

Activity	Impact summary	Significance	Proposed mitigation
			With mitigation measures in place, this impact can be reduced to a negligible rating.
	<u>Impact on the aquatic environment:</u> <u>Impacts on the estuarine functional zone (coastal marsh area)</u> The project footprint, with or without mitigation would result in the loss of some of the wet areas within the study area	High Negative	*Where possible wet areas should be avoided by realigning the security wall in these areas.* *Work areas must be clearly demarcated with danger tape so that construction workers limit their impact to these areas alone.* *All construction vehicles must stay on single demarcated access tracks* *Rehabilitation should be undertaken in a progressive manner. Re-vegetation of the disturbed areas with indigenous material should be undertaken as soon as construction activities at an individual site have been completed.* *Vehicles and mechanical plant where possible must not be serviced on site but rather at a relevant service provider within the Metro.* *If possible, concrete should not be mixed on site.* ***With mitigation measures in place, this impact can be reduced to a moderate negative rating.***
	<u>Impact on the aquatic environment:</u>	No Impact	N/A

Activity	Impact summary	Significance	Proposed mitigation
	Impacts on the freshwater wetland east of the site The freshwater wetland is situated approximately 330 m east of the project site. As the site is already disconnected from this system by Old Grahamstown road, it is anticipated that the project would not have any impact on this system and its functionality.		
	Indirect impacts: No indirect impacts were identified.		
	Cumulative impacts: Social impacts: A risk to people safety as a result of crossing the Transnet property is already in existence. This risk may increase as a result of construction activities on site. However, this impact is considered to be in the short term and can be mitigated by ensuring that the construction site is appropriately demarcated and warning signage erected. nd that adequate signage is in place at all times. This impact is considered to be of moderate significance before mitigation and moderate significance after mitigation.		
Operational Phase	***Direct impacts:*** <u>Increased safety and security</u> The aim of the wall is to eliminate and at the very least drastically reduce foot traffic through the Transnet property where the very nature of operations on site could lead to injury or death. In addition to this the wall is also designed to prevent easy access to Transnet facilities and equipment that is being vandalised	High positive	*No further mitigation is required as this is a positive impact.*

Activity	Impact summary	Significance	Proposed mitigation
	and stolen. The wall will address these issues and reflects a positive impact on the surrounding community and Transnet.		
	Indirect impacts: No indirect impacts were identified.		
	Cumulative impacts: No cumulative impacts were identified.		
Decommissioning and Closure Phase	***Direct impacts:*** The proposed development can be considered permanent and no decommissioning will be undertaken in the foreseeable future. Potential impacts were therefore not assessed for the decommissioning or closure of the facility.	Not assessed	
	Indirect impacts: N/A		
	Cumulative impacts: N/A		
No-go option			
Planning and Design Phase	***Direct impacts:*** No direct impacts were identified.		
	Indirect impacts: No indirect impacts were identified.		
	Cumulative impacts: No cumulative impacts were identified.		
Construction Phase	***Direct impacts:*** No direct impacts were identified.		
	Indirect impacts: No indirect impacts were identified.		
	Cumulative impacts: No cumulative impacts were identified.		
Operational Phase	***Direct impacts:*** <u>Safety and security</u> The safety of the surrounding community and the	High Negative	*Transnet shall increase their security detail to protect their assets on site.* *In addition this construction of the*

Activity	Impact summary	Significance	Proposed mitigation
	security of Transnet assets will continue to be compromised in the absence of a security wall.		*security wall will significantly mitigate this impact.*
	Indirect impacts: No indirect impacts were identified.		
	Cumulative impacts: No cumulative impacts were identified.		
Decommissioning and Closure Phase	***Direct impacts:*** Not applicable to no development taking place.		
	Indirect impacts: Not applicable to no development taking place.		
	Cumulative impacts: Not applicable to no development taking place.		

2. ENVIRONMENTAL IMPACT STATEMENT

Taking the assessment of potential impacts into account, please provide an environmental impact statement that summarises the impact that the proposed activity and its alternatives may have on the environment after the management and mitigation of impacts have been taken into account, with specific reference to types of impact, duration of impacts, likelihood of potential impacts actually occurring and the significance of impacts.

If suggested mitigation measures are implemented, it is unlikely that the proposed development will create any long-term negative impacts of high significance. On the contrary, the Activity aims to eliminate and at the very least drastically reduce foot traffic through the Transnet property where the very nature of operations on site could lead to injury or death. In addition to this the wall is also be designed to prevent easy access to Transnet facilities and equipment that is being vandalised and stolen. The activity has been highlighted as need for safety and maintenance reasons and will not be in conflict with surrounding land uses.

The following criteria and methodology was adopted to evaluate the significance of potential impacts of the proposed development activities on its environment.

Table 1 Criteria used to determine the significance ratings

Criteria	Description
Spatial extent	The extent of impact describes the region in which the impact will be experienced: • Site specific • Local (< 2km from site) • Regional (within 30km of the site) • National

Intensity or Magnitude of impact	The intensity describes the magnitude or size of the impact: • High: Natural and/or social functions and/or processes are severely altered • Medium: Natural and/or social functions and/or processes are notably altered • Low: Natural and/or social functions and/or processes are negligibly altered
Duration	The duration is the time frame in which the impact will be experienced: • Temporary (<1 year) • Short term (1 to 6 years) • Medium term (6 to 15 years) • Long term (15 - 30 years) • Permanent
Probability	The probability of the impact occurring: • Improbable (little or no chance of occurring) • Probable (< 50% chance of occurring) • Highly probable (50% - 90% chance of occurring) • Definite (>90% chance of occurring)

Method for Rating of Impacts

Class	Description
Significance	• High: impacts of high magnitude locally for longer than 6 years and/or regionally and beyond. The impact results in major alterations to the environment even if effective mitigation measures are implemented and will have an influence on decision-making. • Medium: impacts of moderate magnitude locally to regionally in the short term. The impact results in medium alterations to the environment and can be reduced or eliminated by the implementation of effective mitigation measures. • Low to very low: impacts will be localised and temporary. Impacts result in minor alterations to the environment and can easily be alleviated by the implementation of effective mitigation measures. • No impact: a potential concern or impact, which, upon evaluation, is found to have no significant impact at all.
Status	The status is the overall effect on the environment: • Positive - a 'benefit' • Negative - a 'cost' • Neutral
Confidence	The degree of confidence in predictions based on available information and specialist knowledge: • Low • Medium • High

Impacts during the planning and design phase with effective mitigation in place

Alternative A (preferred alternative)

Direct impacts: None

Indirect impacts: None

Cumulative impacts: None

Alternative B

No alternatives other than the no-go alternatives were presented.

Alternative C

No alternatives other than the no-go alternatives were presented.

No-go alternative (compulsory)

Direct impacts:
No direct impacts.
Indirect impacts:
No indirect impacts.
Cumulative impacts
No cumulative impacts.

Impacts during the construction phase with effective mitigation in place

Alternative A (preferred alternative)

Please refer to impact section above, which refer to both impacts before and after mitigation.

Alternative B

No alternatives other than the no-go alternatives were presented.
No alternatives other than the no-go alternatives were presented.

No-go alternative (compulsory)

Direct impacts:
No direct impacts
Indirect impacts:
No indirect impacts.
Cumulative impacts
No cumulative impacts.

Impacts during the operational phase with effective mitigation in place

Alternative A (preferred alternative)

Direct impacts:
Please refer to impact section above, which refer to both impacts before and after mitigation.
Indirect impacts:
No indirect impacts were identified.
Cumulative impacts:
No cumulative impacts were identified.

Alternative B

No alternatives other than the no-go alternatives were presented.

Alternative C

No alternatives other than the no-go alternatives were presented.

No-go alternative (compulsory)

Direct impacts:

Direct impacts refer to the security of the local community that is currently being compromised as a result of easy access to the Transnet property. With sufficient mitigation measures in place, i.e. the construction of the security wall, the impact can be reduce to negligible as the local community will not be able to access the property.

Indirect impacts:
No indirect impacts were identified.
Cumulative impacts:
No cumulative impacts were identified.

Impacts during the decommissioning phase with effective mitigation in place

It is highly unlikely that the wall will be decommissioned. Potential impacts were therefore not assessed for the decommissioning or closure of the facility. Potential impacts may therefore have to be assessed closer to the time when social and physical conditions in and around the site may have changed significantly to its present state.

SECTION E. RECOMMENDATION OF PRACTITIONER

Is the information contained in this report and the documentation attached hereto sufficient to make a decision in respect of the activity applied for (in the view of the environmental assessment practitioner)?	YES **X**	NO

If "NO", indicate the aspects that should be assessed further as part of a Scoping and EIA process before a decision can be made (list the aspects that require further assessment).

N/A

If "YES", please list any recommended conditions, including mitigation measures that should be considered for inclusion in any authorisation that may be granted by the competent authority in respect of the application.

The work should be conducted with the utmost care and due consideration of the EMPr attached to this application.

Due to the presence of wet areas on and within 500 m from the site, an Environmental Control Officer should be on site on a daily basis to ensure that conditions of the EMPr are adhered to, until activities that may affect these systems are complete.

All mitigation measures mentioned in this report should be included in the authorisation.

Based on the environmental impact statement in this application and the possibility of mitigating all negative environmental impacts to at least low significance, the EAP recommends that a positive environmental authorisation be granted.

Is an EMPr attached?	YES **X**	NO

The EMPr must be attached as Appendix G.

The details of the EAP who compiled the BAR and the expertise of the EAP to perform the Basic Assessment process must be included as Appendix H.

If any specialist reports were used during the compilation of this BAR, please attach the declaration of interest for each specialist in Appendix I.

Any other information relevant to this application and not previously included must be attached in Appendix J.

KIM BRENT

NAME OF EAP

SIGNATURE OF EAP

DATE

SECTION F: APPENDIXES

The following appendixes must be attached:

Appendix A: Maps

Appendix B: Photographs

Appendix C: Facility illustration(s)

Appendix D: Specialist reports (including terms of reference)

Appendix E: Public Participation

Appendix F: Impact Assessment

Appendix G: Environmental Management Programme (EMPr)

Appendix H: Details of EAP and expertise

Appendix I: Specialist's declaration of interest

Appendix J: Additional Information