REGISTRATION AND COMMENT SHEET:

APPLICATION TO RECTIFY UNLAWFUL COMMENCEMENT OR CONTINUATION OF LISTED ACTIVITIES IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NO 107 OF 1998) ON A PART OF THE FARM CANFORD CLIFFS NO.133, FREE STATE PROVINCE.

Please complete and return as soon as possible, but no later than 6 October 2021 to:

Mr. Rowan van Tonder, PO Box 40541, Moreleta Park, 0044

Tel: (012) 997 4742 | Fax: (012) 997 0415 | e-mail: rowan@recservices.co.za

---

Title Ms Initials TJ Surname Hartslief

Organisation/Firm/Position/Nature of Involvement in the project e.g., property owner:

Property Owner

Street / Physical Address:

Savannah 65 Woolridge, Vaal Eden, Parys, Free State 9585

Postal address:

1 Paulsen Street, Parys, Free State 9585

Postal Code: 9585

Telephone Work: 073-326-0735 Telephone Home: 073-326-0735

Cell phone: 073-326-0735 Fax:

E-mail: tess@dullies.com

COMMENTS:

It would be useful if you could answer the questions below but please feel free to provide any comments you would like to raise. Please continue on additional paper if required.

1. What are the primary concerns faced by you/your community or our organization with regards to the development?

Comments to Follow

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Tuesday, October 12, 2021 9:25 AM
To: Rowan van Tonder
Cc: Ruan Fouche; Tess; Carlos Serrao; aubrey.austin13@gmail.com; Renee de Jong Hartslief; Cale Hartslief; famfou@absamail.co.za; Arnold Mathibe; jako@ldsw.co.za; Helen Rees; Boitumelo Nkwadipo; djesie.info@gmail.com; pieter@recservices.co.za; admin1@eapasa.aserv.co.za
Subject: Re: Wagyu Feedlot S24G: Ref: S24G/4(i),27,12/20/05: Typing error corrected

Good Morning Rowan

1. We are advised that your 'typing error" (as you call it) renders your entire process thus far -null and void because:

1.a. You have unilaterally changed the KEY component of your application — THE APPLICANT —who you now say is SOETVELDE FEDLOT CC.
Is that another typing error ?

1.b. No information whatsoever is provided about the NEW applicant —whoever it actually is- such as, shareholders, directors ,Company REG Number, registered office?

1.c. Your "typing error" renders all our research and investigation into RICA MEATS Pty Ltd a waste of our time.

1.d.. We are NOW further advised by your Mr Van Der Merwe that you- REC SERVICES- did NOT submit an application to the FS DESTEA as previously indicated in your document.
You told us in your "background" document and subsequent emails that you REC-SERVICES had not only submitted a 24(G) application to the FS DESTEA but were waiting on
them to give YOU —REC SERVICES-- permission to provide us with a copy of the application . Was this a "typing error" as well?

1.e. You advise us that an application may well have been made to FS DESTEA under reference REF: S24G/4(i), 27,12/20/05 by some "other" undisclosed
EAPASA practitioner. You refuse to tell us who made this application??

1.d. The signboard outside the property says "WAGYU BEEF" and the Reference refers to WAGYU FEEDLOT as such it would seem the application
is in the name of WAGYU? Or is that yet another "typing error" when you now refer to it as "WAGYU FEEDLOT S24G"? ?

2. We have copied the EAPASA on this email and ask them to assist us with required EAPASA protocols in this regard- assuming you are registered with EAPASA?

3. REC SERVICES point blank refuse to provide us with a copy of any application for Feedlot on Soetvelde.by Wagyu or Soetvelde or ? to FS DESTEA
We ONCE AGAIN request a copy of the 24(G) Application — sending us a copy has NOTHING to do with any DEPARTMENT -as its a public document
and is at the core of this entire matter.

4. Under these circumstances we would request that you rectify your notification accordingly —re advertise --- and repost notices ---as required.

We are well aware that REC may feel that as the 30 day comments period has lapsed and REC SERVICES may be inclined to ignore this email.
Please do not do that.

YOUR "typing error" as opened the right for us to respond -and in any event all this correspondence will be submitted to the relevant authorities in due course
as part of the public participation process.

Thank you
Bob Hartslief

On 11 Oct 2021, at 15:36, Rowan van Tonder <rowan@recservices.co.za> wrote:

To Whom It May Concern,

A typing error was detected in the BID and accordingly corrected. None of the information in the rest of the document of the BID changed, just the following:

- On page 1 in paragraph A: RICA MEATS (PTY) LTD. was corrected to SOETVELDE FEDLOT CC.

Thank you.

Kind Regards/Groete,

ROWAN VAN TONDER
Environmental Assessment Practitioner
SACNASP(Pri.Sci.Nat): 119204 | B. Sc. Environmental Science | B. Sc. (Hons) Physi
Geography | M.Sc. Botany

<image001.jpg>

t: 0129974742 f: 0866190994 c: 0828794218
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2nd Floor, Rubenstein Office Park,
566 Rubenstein Drive, Moreleta Park, 0181
† www.recservices.co.za

<BID Wagyu.doc>

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Wednesday, October 6, 2021 1:02 PM
To: Rowan van Tonder
Cc: Ruan Fouche; Tess; Carlos Serrao; aubrey.austin13@gmail.com; Renee de Jong Hartslief; Cale Hartslief; famfou@absamail.co.za; Arnold Mathibe; jako@ldsw.co.za; Helen Rees; Boitumelo Nkwadipo; djesie.info@gmail.com
Subject: Re: Sect 24 G application --FEEDLOT NGWATHE/ FEZILE DABI
Attachments: Submission .docx; Untitled attachment 00003.htm

Good afternoon Rowan

You obviously are ignoring our requests. We remain unsure why that is.

As a result, we the I&AP,s on this mail, cannot render any meaningful comments and/or questions on your application.

We have however set down as asked by you, questions, and comments in the attached document.

Thank you
Bob Hartslief

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Tuesday, October 5, 2021 7:35 AM
To: Rowan van Tonder
Cc: Ruan Fouche; Tess; Carlos Serrao; aubrey.austin13@gmail.com; Renee de Jong Hartslief; Cale Hartslief; famfou@absamail.co.za; Arnold Mathibe; jako@ldsw.co.za; Helen Rees; Boitumelo Nkwadipo; djesie.info@gmail.com
Subject: Re: Sect 24 G application --FEEDLOT NGWATHE/ FEZILE DABI
Attachments: 24 G Application .docx; Untitled attachment 00021.htm

Good Morning Rowan and Pieter

Today is the 5th October

I would suggest that you are rendering the 24 G process you have initiated for your client nul and void by not supplying us information.

YOU SAID: We will visit you to explain — this never happened.

YOU SAID: According to the Dept. the S24G Application form that was submitted

WE ASKED: Please provide us with a copy of this application form you submitted

YOU SAID: According to the Dept. the S24G Application form that was submitted is not a public document

WE ASK: We disagree —which ask which department is saying this ?

YOU SAY: NOTHING

We all have google and we find that the process of getting approval for an illegal feedlot is complex and that BEFORE proceeding
your client has to pay a fine —see attached.

1. e) In terms of the provisions of section 24G of NEMA, the applicant must pay an administrative fine up to a maximum of R5 million before the MEC/Competent Authority decides on the application.
2. f) The applicant must within 14 days of receipt of the determination of the quantum of the fine, ensure that all registered interested and affected parties are notified of the determination of the quantum of the fine, including the reasons and provided with access to the determination.

Has your client paid such a fine?

No purpose is served looking into and commenting on all that is required in a 24G application
Sections A to Section G as we have NO IDEA if your client has complied with these Sections or not?
See attached

That all said

What would you like us to comment on exactly ?
The document you provided us with is a general information document with out much detail.

Yours
Bob Hartslief

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Monday, October 4, 2021 6:31 PM
To: Rowan van Tonder; lijacobs@environment.gov.za; MRakgogo@environment.gov.za
Cc: Ruan Fouche; Tess; Carlos Serrao; aubrey.austin13@gmail.com; Renee de Jong Hartslief; Cale Hartslief; famfou@absamail.co.za; Arnold Mathibe; jako@ldsw.co.za; Helen Rees
Subject: Re: Sect 24 G application --FEEDLOT NGWATHE/ FEZILE DABI

Good Morning Rowan AND Liesel and Advocate Rakgogo

I have addressed this mail to the people in the National Department of Environment we in Vaal Eden have had previous dealings with.

I request that you PLEASE direct this inquiry about a Sect 24 G application to the relevant persons with your Department

Thank you

ROWAN VAN TONDER TELLS US with regard to our request to him see his Section 24G application:

We are currently waiting on the department's reply/advice to your request.

What reply/advice are you wanting from "the Department"?

Therefore on a point of clarification Rowan please advise us as a matter of urgency:

1.Have you submitted an application to the National Department of Environmental affairs?

2. What is it that you have asked "the department" to reply to or advise you on that they have NOT replied to?

3. Who in "the Department" have you asked for advise?

The ACT says and I quote:

6. Unless protected by law, all information contained in an application will become public information on receipt by the competent authority

THEREFORE THE QUESTION AS TO WHETHER AN APPLICATION HAS BEEN SUBMITTED (OR NOT) HAS RELEVANCE

6. . Please note that, unless exemption has been granted in terms of the National Exemption Regulations published under GN R994 in GG 38303 of 8 December 2014,
7. any Interested and Affected Party should be provided with the information contained in and attached to this Application Form as well as any subsequent information submitted.

We believe the law is quite clear and as I&AP's (as we all have properties and investments in close proximity to the Unlawful Feedlot) we are entitled to have sight of the application.
which, given your response you seem to imply you have done.

Rowan

As the deadline for submissions from I&AP's on this matter is 6th October your prompt response would be appreciated so we can complete our objections.

Many thanks

Bob Hartslief
072 632 4147

Section 24G Application Form for the consequences of unlawful commencement or continuation of a listed activities in terms of the:

1. National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended.
2. The National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008)

On 01 Oct 2021, at 07:30, Rowan van Tonder <rowan@recservices.co.za> wrote:

We are currently waiting on the department's reply/advice to your request.

Kind Regards/Groete,

ROWAN VAN TONDER
Environmental Assessment Practitioner
SACNASP(Pri.Sci.Nat): 119204 | B. Sc. Environmental Science | B. Sc. (H
Geography | M.Sc. Botany

t: 0129974742 f: 0866190994 c: 0828794218
P.O. Box 40541, Moreleta Park, 0044
2nd Floor, Rubenstein Office Park,
566 Rubenstein Drive, Moreleta Park, 0181
† www.recservices.co.za

From: Ruan Fouche <dundeefarm.mgr@gmail.com>
Sent: Thursday, September 30, 2021 3:30 PM
To: Tess <tess@dullies.com>
Cc: Rowan van Tonder <rowan@recservices.co.za>; Philip Hartslief <bobh@dullies.com>; Carlos Serrao <megaphasecarlos@gmail.com>; aubrey.austin13@gmail.com; Renee de Jong Hartslief <renee@bundunet.com>; Cale Hartslief <calehartslief66@gmail.com>; famfou@absamail.co.za
Subject: Re: Sect 24 G application

Good day Mnr van Tonder,

With regards to the below email sent from Tess hartslief regarding the obligation to supply an affected party/ parties with the submitted S24G Application document should it be requested, I will again ask that you send us the document at your earliest convenience so that we may thoroughly prepare our response on the background document.

Thank you.

On Wed, Sep 29, 2021 at 9:35 AM Tess <tess@dullies.com> wrote:

> Good day Mr van Tonder,
>
> I have attached the Sect 24 G Application document as per the Department of Environmental Affairs.
> Kindly take note of point 9, which states:
>
> 9. Unless protected by law, all information contained in and attached to this application form may become public information on receipt by the competent authority. Upon request, any interested and affected party must be provided with the information contained in and attached to this application form.
>
> Multiple parties copied in this email have requested the information contained in and attached to your clients application form, as we are interested and affected parties.
>
> Please could you provide us with the completed application form from your client?
>
> Thanks
> <image002.png>

From: Rowan van Tonder <rowan@recservices.co.za>
Organisation: REC Services
Date: Wednesday, 29 September 2021 at 09:08
To: 'Ruan Fouche' <dundeefarm.mgr@gmail.com>, 'Philip Hartslief' <bobh@dullies.com>
Cc: 'Carlos Serrao' <megaphasecarlos@gmail.com>, <aubrey.austin13@gmail.com>, 'Renee de Jong Hartslief' <renee@bundunet.com>, Tess <tess@dullies.com>, 'Cale Hartslief' <calehartslief66@gmail.com>, 'Arnold Mathibe' <mathibea@destea.gov.za>,

<seekoeis@destea.gov.za>
Subject: RE: Sect 24 G application

Dear Mr. Fouche,

According to the Dept. the S24G Application form that was submitted is not a public document and can not be commented upon. Most of the relevant information, from the application form, was included in the BID everyone received.

Kind Regards/Groete,

<image003.jpg>

ROWAN VAN TONDER
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SACNASP(Pri.Sci.Nat): 119204 | B. Sc. Environmental Science | B. Sc. (H
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From: Ruan Fouche <dundeefarm.mgr@gmail.com>
Sent: Wednesday, September 29, 2021 8:31 AM
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Cc: Rowan van Tonder <rowan@recservices.co.za>; Carlos Serrao <megaphasecarlos@gmail.com>; aubrey.austin13@gmail.com; Renee de Jong Hartslief <renee@bundunet.com>; Tess <tess@dullies.com>; Cale Hartslief <calehartslief66@gmail.com>; Arnold Mathibe <mathibea@destea.gov.za>; seekoeis@destea.gov.za
Subject: Re: Sect 24 G application

Good day Mr. van Tonder,

as requested by Mr. Hartslief, please supply a copy of the S24G application that you submitted to the department as a matter of urgency. We are still awaiting this document requested on 22 September 2021 and cannot formulate our final response and comments on your background document which, to say the least, contains very vague and incomplete information.

Please assist in this regard.

Regards,

Ruan Fouché

On Wed, Sep 22, 2021 at 1:20 PM Philip Hartslief <bobh@dullies.com> wrote:

> Good day Rowan
>
> In preparation of our formal concerns/objections to you ---as IAP's--- it would be

helpful to know:

1. If your client has completed the attached document.
If this has been done, having sight of that document would assist us in formulating our objections.

2. Has your client undertaken any environmental impact assessments covering but not limited to:

- 2.1 Noise
- 2.2 Traffic
- 2.3 Air/water pollution

3. Is your client a member of SAFA —the South African Feedlot Association ?

Please advise accordingly.

Regards
Bob Hartslief
072 632 4147

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Sunday, October 3, 2021 9:12 AM
To: Rowan van Tonder; Boitumelo Nkwadipo
Cc: Ruan Fouche; Tess; Carlos Serrao; aubrey.austin13@gmail.com; Renee de Jong Hartslief; Cale Hartslief; famfou@absamail.co.za; Arnold Mathibe; jako@ldsw.co.za; Helen Rees
Subject: Re: Sect 24 G application --FEEDLOT NGWATHE/ FEZILE DABI

Good Morning Rowan AND Boitumelo

ROWAN YOU TELL US:

> We are currently waiting on the department's reply/advice to your request.

What reply/advice are you wanting from "the Department"?

I have included — Boitumelo Nkwadipo in on this mail as she is in the Office of the FS MEC of DESTEA Mr. Makalo Mohale
The head of Department of the FS DESTEA is Dr. Nokwequ

Therefore on a point of clarification Rowan please advise us as a matter of urgency:

1.Have you submitted an application to the Free State Department of Environmental affairs?

2. What is it that you have asked "the department" to reply to or advise you on that they have NOT replied to?

3. Who in "the Department" have you asked?

The ACT says and I quote:

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THEREFORE THE QUESTION AS TO WHETHER AN APPLICATION HAS BEEN SUBMITTED (OR NOT) HAS RELEVANCE

6. . Please note that, unless exemption has been granted in terms of the National Exemption Regulations published under GN R994 in GG 38303 of 8 December 2014,
7. any Interested and Affected Party should be provided with the information contained in and attached to this Application Form as well as any subsequent information submitted.

We believe the law is quite clear and as I&AP's (as we all have properties and investments in close proximity to the Unlawful Feedlot) we are entitled to have sight of the application.
which, given your response you seem to imply you have done.

Me Boitumelo -please bring this to the attention of Dr. Nokwequ and please ask him to advise me if the Free State DESTEA has received any application from
REC Environmental Consultants under Section 24(G) for and on behalf of Soetvelde ???

Also if REC Consultants have asked "the department" to reply to a question or advise on some matter?

Rowan

As the deadline for submissions from I&AP's on this matter is 6th October your prompt response would be appreciated so we can complete our objections.

Many thanks

Bob Hartslief
072 632 4147

Section 24G Application Form for the consequences of unlawful commencement or continuation of a listed activities in terms of the:

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

On 01 Oct 2021, at 07:30, Rowan van Tonder <rowan@recservices.co.za> wrote:

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<image001.jpg>

ROWAN VAN TONDER
Environmental Assessment Practitioner
SACNASP(Pri.Sci.Nat): 119204 | B. Sc. Environmental Science | B. Sc. (Hons) Physi
Geography | M.Sc. Botany

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2nd Floor, Rubenstein Office Park,
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† www.recservices.co.za

From: Ruan Fouche <dundeefarm.mgr@gmail.com>
Sent: Thursday, September 30, 2021 3:30 PM
To: Tess <tess@dullies.com>
Cc: Rowan van Tonder <rowan@recservices.co.za>; Philip Hartslief <bobh@dullies.com>; Carlos Serrao <megaphasecarlos@gmail.com>; aubrey.austin13@gmail.com; Renee de Jong Hartslief <renee@bundunet.com>; Cale Hartslief <calehartslief66@gmail.com>; famfou@absamail.co.za
Subject: Re: Sect 24 G application

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Thank you.

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> <image002.png>
>
> ---
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> **Organisation:** REC Services
> **Date:** Wednesday, 29 September 2021 at 09:08
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> **Cc:** 'Carlos Serrao' <megaphasecarlos@gmail.com>, <aubrey.austin13@gmail.com>, 'Renee de Jong Hartslief' <renee@bundunet.com>, Tess <tess@dullies.com>, 'Cale Hartslief' <calehartslief66@gmail.com>, 'Arnold Mathibe' <mathibea@destea.gov.za>, <seekoeis@destea.gov.za>
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> <image003.jpg>
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> **ROWAN VAN TONDER**
> **Environmental Assessment Practitioner**
> **SACNASP(Pri.Sci.Nat): 119204 | B. Sc. Environmental Science | B. Sc. (Hons) Phys Geography | M.Sc. Botany**
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Cc: Rowan van Tonder <rowan@recservices.co.za>; Carlos Serrao <megaphasecarlos@gmail.com>; aubrey.austin13@gmail.com; Renee de Jong Hartslief <renee@bundunet.com>; Tess <tess@dullies.com>; Cale Hartslief <calehartslief66@gmail.com>; Arnold Mathibe <mathibea@destea.gov.za>; seekoeis@destea.gov.za
Subject: Re: Sect 24 G application

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Please assist in this regard.

Regards,

Ruan Fouché

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>
> 1. If your client has completed the attached document.
> If this has been done, having sight of that document would assist us in formulating our objections.
>
> 2. Has your client undertaken any environmental impact assessments covering but not limited to:
> 2.1 Noise
> 2.2 Traffic
> 2.3 Air/water pollution
>
> 3. Is your client a member of SAFA —the South African Feedlot Association ?
>
> Please advise accordingly.
>
> Regards
> Bob Hartslief
> 072 632 4147

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Wednesday, September 22, 2021 1:20 PM
To: Rowan van Tonder
Cc: Carlos Serrao; aubrey.austin13@gmail.com; Renee de Jong Hartslief; Tess; Cale Hartslief; Ruan Fouche
Subject: Re: Sect 24 G application
Attachments: S24G_applicationform2016 (1).doc

Good day Rowan

In preparation of our formal concerns/objections to you ---as IAP's--- it would be helpful to know:

1. If your client has completed the attached document.
If this has been done, having sight of that document would assist us in formulating our objections.

2. Has your client undertaken any environmental impact assessments covering but not limited to:
    2.1 Noise
    2.2 Traffic
    2.3 Air/water pollution

3. Is your client a member of SAFA —the South African Feedlot Association ?

Please advise accordingly.

Regards
Bob Hartslief
072 632 4147

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Monday, September 20, 2021 10:26 AM
To: Tess; Cale Hartslief
Cc: Rowan van Tonder
Subject: Fwd: [Tiny Scanner] Doc 20 Sep 2021, 10:10
Attachments: Doc 20 Sep 2021, 10_10.pdf; Untitled attachment 00137.htm

Tess and Cale
Register as owners of Savannah and send to
rowan@recservices.co.za

At Bottom say —concerns to follow

Begin forwarded message:

From: Bob Hartslief <bobh@dullies.com>
Subject: [Tiny Scanner] Doc 20 Sep 2021, 10:10
Date: 20 September 2021 at 10:25:00 SAST

To: Bob Hartslief <bobh@dullies.com>

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Monday, September 20, 2021 10:12 AM
To: Rowan van Tonder
Subject: Helen Rees registering as IAP
Attachments: Doc 20 Sep 2021, 10_09.pdf; Untitled attachment 00132.htm

Helle Rowan

Helens email is

Helen@jordanadvertising.com

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Monday, September 20, 2021 10:08 AM
To: Rowan van Tonder
Subject: Registration as an IAP : P Hartslief
Attachments: Doc 20 Sep 2021, 10_03.pdf; Untitled attachment 00127.htm

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Friday, September 17, 2021 7:25 AM
To: Rowan van Tonder
Cc: Tess; cale Hartslief; Helen Rees; mgobidolo.za@gmail.com
Subject: Re: Application to rectify UNLAWFUL commencement of listed activities on CANFORD CLIFSS N0 133.
Attachments: S24G_applicationform2016 (1).doc; Untitled attachment 00004.txt

Good Morning Mr Van Tonder

1. We have contacted National Department of Environment and were sent the attached self explanatory document.

   Has your client completed such an application ?

2. If your client has done so could we please receive a copy of the application ?

3. Is your client a member of South African Feedlot Association ?

Thanks
Regards
BobH

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Monday, September 13, 2021 9:50 AM
To: Rowan van Tonder
Subject: Re: Application to rectify UNLAWFUL commencement of listed activities on CANFORD CLIFSS N0 133.

Thanks Rowan

> On 13 Sep 2021, at 09:31, Rowan van Tonder <rowan@recservices.co.za> wrote:
>
> Dear Bob (all CC),
>
> See attach the BID for you to register and also be able to give comments if needed. Registration form will have the closing date.
>
> No companies needed from our side. You may approach anyone you like.
>
> Kind Regards/Groete,
>
>
> ROWAN VAN TONDER
> Environmental Assessment Practitioner
> SACNASP(Pri.Sci.Nat): 119204 | B. Sc. Environmental Science | B. Sc.
> (Hons) Physical Geography | M.Sc. Botany
>
> t: 0129974742 f: 0866190994 c: 0828794218 P.O. Box 40541, Moreleta
> Park, 0044 2nd Floor, Rubenstein Office Park,
> 566 Rubenstein Drive, Moreleta Park, 0181 † www.recservices.co.za
>
>
>
> -----Original Message-----
> From: Bob Hartslief <bobh@dullies.com>
> Sent: Monday, September 13, 2021 8:27 AM
> To: Rowan van Tonder <rowan@recservices.co.za>
> Cc: Tess <tess@dullies.com>; cale Hartslief
> <calehartslief66@gmail.com>; Helen Rees
> <helen@jordanadvertising.co.za>; mgobidolo.za@gmail.com
> Subject: Re: Application to rectify UNLAWFUL commencement of listed activities on CANFORD CLIFSS N0 133.
>
> Morning Rowan
> What is the closing date for our written objections?
>
> Could you please provide us a list of the professional companies you will be engaging so we do not approach the same.
>
> Please also send us any further information relative to this application as we have none.
>
> Thank you
> Bob Hartslief
>
> Sent from my iPhone

>
>> On 13 Sep 2021, at 08:04, Rowan van Tonder <rowan@recservices.co.za> wrote:
>>
>> Dear Philip (all CC),
>>
>> See attach the BID for you to register and also be able to give comments if needed.
>>
>> Kind Regards/Groete,
>>
>>
>> ROWAN VAN TONDER
>> Environmental Assessment Practitioner
>> SACNASP(Pri.Sci.Nat): 119204 | B. Sc. Environmental Science | B. Sc.
>> (Hons) Physical Geography | M.Sc. Botany
>>
>> t: 0129974742 f: 0866190994 c: 0828794218 P.O. Box 40541, Moreleta
>> Park, 0044 2nd Floor, Rubenstein Office Park,
>> 566 Rubenstein Drive, Moreleta Park, 0181 † www.recservices.co.za
>>
>>
>>
>> -----Original Message-----
>> From: Philip Hartslief <bobh@dullies.com>
>> Sent: Sunday, September 12, 2021 10:58 AM
>> To: rowan@recservices.co.za
>> Cc: Tess <tess@dullies.com>; cale Hartslief
>> <calehartslief66@gmail.com>; Helen Rees
>> <helen@jordanadvertising.co.za>; mgobidolo.za@gmail.com
>> Subject: Application to rectify UNLAWFUL commencement of listed activities on CANFORD CLIFSS N0 133.
>>
>> Good day Mr. Van Tonder
>>
>> We would like to register as interested an affected parties (IAP'S) with regards to the above mentioned application.
>>
>> Bob Hartslief
>> Helen Rees
>> Tess Hartslief
>> Cale Hartslief
>> Jim Sithole and 8 others
>> Dimakatso Moekoena and three others.
>>
>> Please advise the deadline for us to lodge our objections to your application and to where they should be addressed?
>>
>> Thanks
>> Bob Hartslief
>> Savannah
>>
>> <BID Wagyu.doc>
>
> <BID Wagyu.doc>

Rowan van Tonder

From: Philip Hartslief <bobh@dullies.com>
Sent: Sunday, September 12, 2021 10:58 AM
To: rowan@recservices.co.za
Cc: Tess; cale Hartslief; Helen Rees; mgobidolo.za@gmail.com
Subject: Application to rectify UNLAWFUL commencement of listed activities on CANFORD CLIFSS N0 133.

Good day Mr. Van Tonder

We would like to register as interested an affected parties (IAP'S) with regards to the above mentioned application.

Bob Hartslief
Helen Rees
Tess Hartslief
Cale Hartslief
Jim Sithole and 8 others
Dimakatso Moekoena and three others.

Please advise the deadline for us to lodge our objections to your application and to where they should be addressed?

Thanks
Bob Hartslief
Savannah

Attention: REC Services: Mr Rowan van Tonder / Mr Pieter van der Merwe

03 October 2021

COMMENTS AND OBJECTIONS TO THE SECTION 24G RECTIFICATION APPLICATION BY SOETVELDE FEEDLOT CC / RICA MEATS (PTY) LTD ON A PART OF THE FARM CANFORD CLIFFS NO. 133, FREE STATE PROVINCE (REF NO. 24G/4(i),27,12/20/05)

Firstly, I would like to indicate that I strongly object to this application for rectification of the illegal Soetvelde Feedlot. The reasons for my objection are given below:

- The illegal feedlot is located in very close proximity, approximately 380 meters from our house. It was also erected 20 meters from our fence line, in direct violation of the National health Act 61 of 2003. The smell from the illegal feedlot is a severe odour nuisance to us. We are unable to open our windows and doors. We are also losing lodging rental income as guests are not willing to stay over due to the smell.
- Dust generated at the illegal feedlot causes a nuisance to us and is a serious health hazard.
- The prevalence of flies and maggots has increased exponentially since the illegal feedlot was constructed and it is unbearable. We need to spend vast amounts of money in order to deter flies and maggots at our house and amongst our livestock. Since the illegal feedlot became operational, we had to constantly use pesticides in our livestock camps and shelters. We had to dose all farm animals' numerous times for bacterial, parasitic and worm infections.
- Diseases being carried over to our livestock from the illegal feedlot, resulting in veterinary bills and the death of our animals, which has a negative impact upon our livelihoods.
- According to our knowledge, there has been a misrepresentation of information in the Background Information Document for this project. The illegal feedlot does not only obtain its water from boreholes, but instead illegally abstracts water from surface water sources, the Kromellenboogspruit.
- To our knowledge, waste from the illegal feedlot is disposed in a watercourse.
- The sensitivity of the site in terms of the National Screening Tool Report:
    - The site is situated within a Critical Biodiversity Area 2
    - The site is situated within a Focus Area for land-based protected areas expansion
    - The site is situated within a Vulnerable ecosystem (Soweto Highveld Grassland)
    - The site is situated within 5km from the following Protected Areas, as contained in the Protected Areas Register: Savannah Game Ranch (National Protected Area); Carry Blaire Bird Sanctuary; Klein Paradys Bird Sanctuary; Vechthoek Private Nature Reserve.
    - The site is situated within the Ngwathe Environmental Management Framework.

The Background Information Document has indicated that a Phase 1 Heritage Impact Assessment will be undertaken as part of the application. Only conducting this one specialist study is completely inadequate for this application. Even though the illegal feedlot is already in existence, it needs to be determined what the impact of the construction of the illegal feedlot was on the sensitive environment of the area (the sensitivities have been mentioned previously). We insist on the following

specialist studies being undertaken as part of this application, in line with the Screening Tool Report for a feedlot development at the location of this project:

- Landscape/Visual Impact Assessment
- Terrestrial Biodiversity Impact Assessment
- Aquatic Biodiversity Impact Assessment
- Hydrological Assessment
- Traffic Impact Assessment
- Socio-Economic Assessment
- Ambient Air Quality Impact Assessment
- Plant Species Assessment
- Animal Species Assessment
- Impact Assessment in terms of flies and maggots as a result of the feedlot and their impact on surrounding residences and livestock
- Climate Change Impact Assessment as methane from cattle plays a significant role in the Greenhouse Effect and Global Climate Change

We also insist on a public meeting being arranged once all the specialist studies have been undertaken and before the end of the public review period for the Environmental Impact Assessment Report in order for the specialists to present their findings to the public in a manner that everyone can understand. This will enable all Interested and Affected Parties to also ask questions and submit well-informed comments on the Environmental Impact Assessment Report and associated specialist studies.

Please can the EAP also confirm the following:

1. Whether we have been added to the Register of Interested and Affected Parties. This was not confirmed in the EAP's responding email after I submitted my competed Registration Form.
2. Please provide us with a copy of the Section 24G Rectification Application Form. This has been requested numerous times and has not been provided to us yet. In the DETEA Application for Rectification Form: NEMA Section 24G, on page 1 of the form the following is stated: "8. Unless protected by law, all information contained in and attached to this application form may become public information on receipt by the competent authority. Upon request, any interested and affected party must be provided with the information contained in and attached to this application form". We can therefore not understand why there has been a delay in the EAP providing us with a copy of the application form.
3. Please provide us with a copy of the Public Participation Plan for this application, considering the COVID 19 lockdown situation that we are in.
4. Please provide us with a copy of the approval of the Public Participation Plan by the Competent Authority for this application.
5. How many cattle are currently being kept at the illegal feedlot?
6. What is the current capacity of the illegal feedlot?
7. At what density are the cattle kept at the illegal feedlot?

8. What waste streams are generated at the illegal feedlot and what happens to each waste stream?
9. What are the volumes of each waste stream that is generated per annum?
10. Where does contaminated stormwater runoff and/or wastewater go?
11. How much wastewater/sludge is generated by the illegal feedlot per annum?
12. What stormwater management measures are in place at the illegal feedlot?
13. Does the illegal feedlot or property have a Water Use Licence or Registration? If so, can we please be provided with a copy of the Licence/Registration documents? If not, why does the property not have a Water Use Licence or Registration?
14. How much water is used by the illegal feedlot per annum?
15. How much water is stored at the illegal feedlot?
16. Section 4.2 of the Background Information Document refers to the construction of storage facilities, railing and enclosures for Pens, feeding and water infrastructure. Please elaborate on what the storage facilities are for and what the water infrastructure entails?
17. Section 5 of the Background Information Document refers to a Treatment Process. Please explain what this is.
18. Page 6 of the Background Information Document refers to a "proposed development". This is not applicable as this is a Rectification application.
19. Please provide us with a list of the Organs of State, Municipalities and other stakeholders that have been informed of this application.
20. Is there an abattoir on the property? If not, is such a facility proposed?
21. Is there a Rendering Facility on the property? If not, is such a facility proposed?
22. Is there a Tannery on the property? If not, is such a facility proposed?
23. What is the procedure in case of a disease outbreak at the illegal feedlot?
24. Please confirm the Management Zone of the Ngwathe Environmental Management Framework in which the site is located and whether a feedlot is compatible with the relevant Management Zone.
25. Please supply a list of all Specialist Services and/ or Stakeholders that will participate in the process by providing expert opinions and/ or perform any of the assessments as per our request for mandatory assessments to be conducted.

We also insist that the application form be amended. Google Earth satellite images, given below, confirm that the illegal feedlot was expanded upon since its construction. Activity 39 of Listing Notice 1 must be included in the application, especially as the administrative fine of the Section 24G application is based, amongst others, on the number of Listed Activities that were undertaken without an Environmental Authorisation.

2018 Google Earth image

2020 Google Earth image

2021 Google Earth image

REGISTRATION AND COMMENT SHEET:

APPLICATION TO RECTIFY UNLAWFUL COMMENCEMENT OR CONTINUATION OF LISTED ACTIVITIES IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NO 107 OF 1998) ON A PART OF THE FARM CANFORD CLIFFS NO.133, FREE STATE PROVINCE.

Please complete and return as soon as possible, but no later than 6 October 2021 to:

Mr. Rowan van Tonder, PO Box 40541, Moreleta Park, 0044

Tel: (012) 997 4742|Fax: (012) 997 0415|e-mail: rowan@recservices.co.za

---

Title Dr. Initials PJ Surname Fouché

Organisation/Firm/Position/Nature of Involvement in the project e.g., property owner:
Neighboring Property Owner

Street / Physical Address:
Farm Dundee, S 1052, Vaal Eden, Parys 9585

Postal address:
PO Box 1630, Sasolburg

Postal Code: 1947

Telephone Work: (016) 9760966 Telephone Home: _____

Cell phone: 082 578 3660 Fax: _____

E-mail: dundeefarm.mgr@gmail.com.
Famfou@absamail.co.za.

COMMENTS:

It would be useful if you could answer the questions below but please feel free to provide any comments you would like to raise. Please continue on additional paper if required.

1. What are the primary concerns faced by you/your community or our organization with regards to the development?

Comments will be provided in due course. We reserve our right to submit comments

on the section 24G application.

2. Are there additional role-players whom we should involve in the process? If yes, please state their names, contact numbers and organisation and / or position.

Mnr. RF Fouché - Land User. 0824906805.
Ruanfouch.rf@gmail.com
Mev. A Fouché - Co-owner. 0823388339.
Mej. A. van Eeden - Land user. 0623008576.
Aveprivate@gmail.com.

Thank you for your participation

Mev. R. Swanepoel - Occupant. 0828270171.

Mnr. D. Swanepoel - Occupant. 076 801 1527.

Mej. L. Fouché - Occupant. 071 641 8743.

Mnr. A. Pick - Occational occupant. 079 511 7365.

Mev. H. Kloppers - Occational occupant. 082 312 5495.

Mnr. C. Geel - Occational occupant. 083 938 2222.

Adv. L. Visser - Occational occupant - 064 909 1118.

Dr. J. de Beer - Occational occupant. 083 626 5205

Mnr. J de Jager - Occational occupant. 083 616 6080.

Mnr. F Roos - Occational occupant. 082 498 5400.

Dr. C van der Merwe - Land User. 083 477 7277.

Rowan van Tonder

From: Ruan Fouche <dundeefarm.mgr@gmail.com>
Sent: Monday, October 18, 2021 9:02 AM
To: Rowan van Tonder; famfou@absamail.co.za
Cc: Philip Hartslief; pieter@recservices.co.za
Subject: Re: Wagyu Feedlot S24G: Ref: S24G/4(i),27,12/20/05: Typing error corrected

Good day Mnr. van Tonder,

Please explain to me, while we are waiting for the document:

Who is the responsible authority/ person that is in possession of this document?

As per the document and its requirements, surely you are conducting your EIA, including all specialist studies, on the information provided within this document. How is it possible that you do not have the document or at least a copy of this?

Who submitted the original application? REC Services, or Soetvelde Feedlots, or Mnr. Nico van Tonder in his own capacity, or Wagyu Feedlots, or Rica Meats? Is there another stakeholder not mentioned above that originally submitted this application?

Your soonest response on the above will be appreciated.

Regards,

Ruan Fouché

On Mon, Oct 18, 2021 at 7:27 AM Rowan van Tonder <rowan@recservices.co.za> wrote:

> Hi Ruan,
>
> We will let you know as soon as it is available.
>
> Kind Regards/Groete,

REC SERVICES
ENVIRONMENTAL CONSULTANTS

ROWAN VAN TONDER

Environmental Assessment Practitioner

SACNASP(Pri.Sci.Nat): 119204 | **B. Sc.** Environmental Science | **B. Sc. (Hons)** Physical Geography | **M.Sc.** Botany

t: 0129974742 f: 0866190994 c: 0828794218

P.O. Box 40541, Moreleta Park, 0044

2nd Floor, Rubenstein Office Park,

566 Rubenstein Drive, Moreleta Park, 0181

† www.recservices.co.za

From: Ruan Fouche <dundeefarm.mgr@gmail.com>
Sent: Sunday, October 17, 2021 12:26 PM
To: Philip Hartslief <bobh@dullies.com>
Cc: Rowan van Tonder <rowan@recservices.co.za>; pieter@recservices.co.za
Subject: Re: Wagyu Feedlot S24G: Ref: S24G/4(i),27,12/20/05: Typing error corrected

When are we getting the S24G application document as requested Mnr van der Merwe?

On Fri, 15 Oct 2021 at 12:03, Philip Hartslief <bobh@dullies.com> wrote:

> In your capacity as an independent neutral Professional -your lack of co-operation in regard to our legitimate queries is regretted.
>
> > On 15 Oct 2021, at 11:56, <pieter@recservices.co.za> <pieter@recservices.co.za> wrote:
> >
> > Dear Philip,
> >
> > Thank you for your comments. The comments will addressed in the EIR Report that will be available for comments in due course, as will be notified of its availability.
> >
> > Regards,

PIETER VAN DER MERWE

Director

B. Sc. (Hons) Geography (Environmrntal Management) | B. Sc. (Hons) Botany

c: 0824127571 t: 0129974742 fax: 0866190994

P.O. Box 40541, Moreleta Park, 0044

2nd Floor, Rubenstein Office Park,

566 Rubenstein Drive, Moreleta Park, 0181

info@recservices.co.za † www.recservices.co.za

From: Philip Hartslief <bobh@dullies.com>
Sent: 12 October 2021 09:25
To: Rowan van Tonder <rowan@recservices.co.za>
Cc: Ruan Fouche <dundeefarm.mgr@gmail.com>; Tess <tess@dullies.com>; Carlos Serrao <megaphasecarlos@gmail.com>; aubrey.austin13@gmail.com; Renee de Jong Hartslief <renee@bundunet.com>; Cale Hartslief <calehartslief66@gmail.com>; famfou@absamail.co.za; Arnold Mathibe <mathibea@destea.gov.za>; jako@ldsw.co.za; Helen Rees <helen@jordanadvertising.co.za>; Boitumelo Nkwadipo <nkwadipob@destea.gov.za>; djesie.info@gmail.com; pieter@recservices.co.za; admin1@eapasa.aserv.co.za
Subject: Re: Wagyu Feedlot S24G: Ref: S24G/4(i),27,12/20/05: Typing error corrected

Good Morning Rowan

1. We are advised that your ’typing error” (as you call it) renders your entire process thus far -null and void

because:

1.a. You have unilaterally changed the KEY component of your application — THE APPLICANT —who you now say is SOETVELDE FEDLOT CC.

Is that another typing error ?

1.b. No information whatsoever is provided about the NEW applicant —whoever it actually is- such as, shareholders, directors ,Company REG Number, registered office?

1.c. Your "typing error" renders all our research and investigation into RICA MEATS Pty Ltd a waste of our time.

1.d.. We are NOW further advised by your Mr Van Der Merwe that you- REC SERVICES- did NOT submit an application to the FS DESTEA as previously indicated in your document.

You told us in your "background" document and subsequent emails that you REC-SERVICES had not only submitted a 24(G) application to the FS DESTEA but were waiting on

them to give YOU —REC SERVICES-- permission to provide us with a copy of the application . Was this a "typing error" as well?

1.e. You advise us that an application may well have been made to FS DESTEA under reference REF: S24G/4(i), 27,12/20/05 by some "other" undisclosed

EAPASA practitioner. You refuse to tell us who made this application??

1.d. The signboard outside the property says "WAGYU BEEF" and the Reference refers to WAGYU FEEDLOT as such it would seem the application

is in the name of WAGYU? Or is that yet another "typing error" when you now refer to it as "WAGYU FEEDLOT S24G"? ?

2. We have copied the EAPASA on this email and ask them to assist us with required EAPASA protocols in this regard- assuming you are registered with EAPASA?

3. REC SERVICES point blank refuse to provide us with a copy of any application for Feedlot on Soetvelde.by Wagyu or Soetvelde or ? to FS DESTEA

We ONCE AGAIN request a copy of the 24(G) Application — sending us a copy has NOTHING to do with any DEPARTMENT -as its a public document

and is at the core of this entire matter.

4. Under these circumstances we would request that you rectify your notification accordingly —re advertise ---and repost notices ---as required.

We are well aware that REC may feel that as the 30 day comments period has lapsed and REC SERVICES may be inclined to ignore this email.

Please do not do that.

YOUR "typing error" as opened the right for us to respond -and in any event all this correspondence will be submitted to the relevant authorities in due course

as part of the public participation process.

Thank you

Bob Hartslief

On 11 Oct 2021, at 15:36, Rowan van Tonder <rowan@recservices.co.za> wrote:

To Whom It May Concern,

A typing error was detected in the BID and accordingly corrected. None of the information in the rest of the document of the BID changed, just the following:

- On page 1 in paragraph A: RICA MEATS (PTY) LTD. was corrected to SOETVELDE FEDLOT CC.

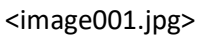
Thank you.

Kind Regards/Groete,

ROWAN VAN TONDER

Environmental Assessment Practitioner

SACNASP(Pri.Sci.Nat): 119204 | B. Sc. Environmental Science | B. Sc. Geography | M.Sc. Botany



t: 0129974742 **f:** 0866190994 **c:** 0828794218

P.O. Box 40541, Moreleta Park, 0044

2nd Floor, Rubenstein Office Park,

566 Rubenstein Drive, Moreleta Park, 0181

† **www.recservices.co.za**

<BID Wagyu.doc>

Rowan van Tonder

From: Renee de Jong Hartslief <renee@bundunet.com>
Sent: Monday, September 6, 2021 8:02 AM
To: Rowan van Tonder
Subject: Re: Wagyu Feedlot S24G: Background Information Document (BID) - Notification

Good morning Rowan,
Trust you had a good weekend?
I did receive a phone call from Pieter and sent him the following SMS:
" Hi Pieter,

I didn't find the printed copy at my gatehouse but I did receive an email, thanks.

Did you get hold of Lapa Manzi?

I have questions:
1. WHY is Nico applying for this now?
2. What is the current owner planning to do if this is approved, and
3. How will this impact our roads, pollution (air, water, visual, sound etc)?
4. The current owner has done nothing to mitigate wild fires - which is a concern.

Regards,
Renee Hartslief"

Would you please be so kind as to answer these questions so I can complete the form correctly?

Warm regards,
Renee

On Fri, 03 Sep 2021 at 16:35, Rowan van Tonder <rowan@recservices.co.za> wrote:

> To Whom It May Concern (Rene),
>
> Find attach the BID for the:
>
> **APPLICATION TO RECTIFY UNLAWFUL COMMENCEMENT OR CONTINUATION OF LISTED ACTIVITIES IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NO 107 OF 1998) ON A PART OF THE FARM CANFORD CLIFFS NO.133, FREE STATE PROVINCE.**
>
> The public participation process has started on Friday 3 September 2021. If you want to register and give your comments on this application process please see the registration form at the back of the BID.
>
> Kind Regards/Groete,

ROWAN VAN TONDER

Environmental Assessment Practitioner

SACNASP(Pri.Sci.Nat): 119204 | B. Sc. Environmental Science | B. Sc. (Hons) Physical Geography | M.Sc. Botany

t: 0129974742 f: 0866190994 c: 0828794218

P.O. Box 40541, Moreleta Park, 0044

2nd Floor, Rubenstein Office Park,

566 Rubenstein Drive, Moreleta Park, 0181

† www.recservices.co.za

--

Sent from Gmail Mobile Renee de Jong Hartslief +27 71 448-4332

APPENDIX 3F

LIST OF STAKEHOLDER & REGISTERED I&APS

REC SERVICES
ENVIRONMENTAL CONSULTANTS

APPLICATION TO RECTIFY UNLAWFUL COMMENCEMENT OR CONTINUATION OF LISTED ACTIVITIES IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NO 107 OF 1998) ON A PART OF THE FARM CANFORD CLIFFS NO.133, FREE STATE PROVINCE REF.: S24G/4(i),27,12/20/05		
LIST OF STAKEHOLDERS AND I&APS		
State Department	Contact Person	Postal/Physical address
Ngwathe Local Municipality Municipal Manager	Mr. BW Kannemeyer Tel: (056) 816 2700 Fax: (056) 811 2046 E-mail: jordaanr@ngwathe.co.za / magautal@ngwathe.co.za	Liebenburg street Parys Postal Address: PO Box 359 Parys 9585
Ngwathe Local Municipality Ward: 7	Cllr Rapuleng Mahloko Tel: 078 646 9466 Fax: (056) 811 2046 E-mail: jordaanr@ngwathe.co.za / magautal@ngwathe.co.za	Liebenburg street Parys Postal Address: PO Box 359 Parys 9585
Dept. Water and Sanitation	W Grobler Tel (W): 051 405 9000 E-mail: groblerw@dws.gov.za & khorommbik@dws.gov.za	C/o East Burger and Charlotte Maxeke Streets 2nd floor Bloem Plaza Building Bloemfontein Private Bag X 528 Bloemfontein 9300
Department of Sport Arts Culture and	Ntando PZ Mbatha Heritage Coordinator	www.sahra.org.za/sahris/about/sahris

Recreation - Heritage FS	Tel: 051 410 4750 Fax: 086 401 0431 Cell: 074 945 3255 Email: Mbatha.npz@sacr.fs.gov.za	
Interested and Affected parties:		
Contact Person	**Contact Details**	**Postal/Physical address**
Bob Hartslief Helen Rees Tess Hartslief Cale Hartslief Jim Sithole and 8 others Dimakatso Moekoena and three others. Savannah Game & River Retreat	Tel: 072 632 4147 Email: bobh@dullies.com	Farm Woolridge 65 Code: 9585
HT Reese Resident at Savannah Game & River Retreat	Tel: 082 376 3885 Email: helen@jordanadvertising.co.za	Farm Woolridge 65 Code: 9585
Renee Hartslief Property owner: Savannah Game & River Retreat	Tel: 072 632 4147 Email: bobh@dullies.com	Farm Woolridge 65 Code: 9585
TJ Hartlief Property owner: Savannah Game & River Retreat	Tel: 073 326 0735 Email: tess@dullies.com	Savannah Farm 65 Woolridge Vaal Eden Parys Free State 9585 1 Paulsen Street Parys Free State 9585
Ruan Fouché	Cell: 082 578 3660 Email: dundeefarm.mgr@gmail.com	Landowner - Farm Dundee 383

	Additional persons added by Ruan Fouché: RF Fouché (land user): Cell: 082 490 6805 Email: Ruanfouch.rf@gmail.com A Fouché (co-owner): Cell: 082 338 8339 A van Eden (land user): Cell: 062 300 8576 Email: aveprivate@gmail.com R. Swanepoel (occupant): Cell: 082 827 0171 D. Swanepoel (occupant): Cell: 076 801 1527 L Fouché (occupant): Cell: 071 641 8743 A. Piek (occasional occupant): Cell: 079 511 7365 H. Kloppers (occasional occupant): Cell: 082 312 5495 C. Geel (occasional occupant): Cell 083 938 2222 L. Visser (occasional occupant): Cell: 064 909 1118 J. de Beer (occasional occupant): Cell: 083 626 5205 J. de Jager (occasional occupant): Cell: 083 616 6080 F. Roos (occasional occupant): Cell: 082 498 5400 C. van der Merwe (land user): Cell: 083 477 7277	
Carlos Serrao Landowner	Cell: 083 653 2780 Email: megaphasecarlos@gmail.com	Farm Estrela

Danie Otto Executive: Southern African Operations Digby Wells Environmental	Mobile +27 (0) 82 399 9315 Office +27 (0) 11 789 9495 Fax +27 (0) 11 789 9498 Email: danie.otto@digbywells.com	Turnberry Office Park Grosvenor Rd Bryanston Johannesburg 2191

APPENDIX 3G

COMMENTS AND RESPONSES REPORT

REC SERVICES
ENVIRONMENTAL CONSULTANTS

APPLICATION TO RECTIFY UNLAWFUL COMMENCEMENT OR CONTINUATION OF LISTED ACTIVITIES IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NO 107 OF 1998) ON A PART OF THE FARM CANFORD CLIFFS NO.133, FREE STATE PROVINCE

REC SERVICES
ENVIRONMENTAL CONSULTANTS

COMMENTS AND RESPONSE SHEET

I&AP/ Contact Details	Comments	Response
Bob Hartslief Helen Rees Tess Hartslief Cale Hartslief Jim Sithole and 8 others Dimakatso Moekoena and three others. Property owner: Savannah Game & River Retreat Farm Woolridge 65 Code: 9585 Tel: 072 632 4147 Email: bobh@dullies.com	1. The future of our Private Nature Reserve. 2. We have contacted National Department of Environment and were sent the attached self-explanatory document. Has your client completed such an application? 3. If your client has done so, could we please receive a copy of the application? 4. Is your client a member of South African Feedlot Association? 5. Has your client undertaken any environmental impact assessments covering but not limited to: 2.1 Noise 2.2 Traffic 2.3 Air/water pollution 6. Is your client a member of SAFA —the South African Feedlot Association? 7. How many cattle this year? 8. Next year how many? 9. Hours of operation? 10. Disposal of foetuses	1. Noted. 2. Yes, one for the province, Free State DESTEA. 3. The EIR will be made available very soon. 4. No. Due to the fact that there are less than 500 cattle in the feedlot. 5. Yes. See the EIR. No noise, traffic, or air impact assessment needed for this an agricultural entity. Water impact assessment will be included in the WULA, which is in process. 6. No, not present. 7. Just below 500 herd of cattle in the feedlot. 8. To be determined by market forces and the design capacity of the feedlot. 9. Feedlots are 24 hour operations, although feed milling is a 5 to 8 hours of activity. 10. The purpose of the feedlot is to bring the animals up to the required and suitable weight. And that is the sole purpose. No foetuses will occur in the feedlot. 11. Unknown if any hormone are used and no impact on the surrounding environment will occur. 12. Urine is mixed with the manure on the floor base of the feedlot and will be removed from the feedlot mixed with the manure on a frequent basis through sound

	11. What hormones will be used? 12. How will urine be contained 13. How many staff? 14. Where will they be housed? 15. Compliance with IDP. 1. We are advised that your 'typing error" (as you call it) renders your entire process thus far-null and void because: 1.a. You have unilaterally changed the KEY component of your application — THE APPLICANT —who you now say is SOETVELDE FEEDLOT CC. Is that another typing error? 1.b. No information whatsoever is provided about the NEW applicant —whoever it actually is- such as, shareholders, directors, Company REG Number, registered office? 1.c. Your "typing error" renders all our research and investigation into RICA MEATS Pty Ltd a waste of our time. 1.d. We are NOW further advised by your Mr Van Der Merwe that you- REC SERVICES- did NOT submit an application to the FS DESTEA as previously indicated in your document.	feedlot management. A certain small fraction of that will mix with the surface runoff that will drain to the retention pond in a highly diluted form. 13. In the order of 4 people. 14. Off site, except for the farm manager who is resident on the farm. 15. Yes. Noted, but not making the application null and void. All title blocks in public participation documentation refer to SOETVELDE FEEDLOT CC. At this stage in the application process the details of the new owner is not specifically relevant, as the application is lodge in the name of SOETVELDE FEEDLOT CC, with owner Nico van Tonder. We kindly apologised for the typing error that caused a waste of time. This must have been misunderstanding as the original application form to DESTEA was submitted by a previous consultant. We have been appointed to take over the application process. The case officer of DESTEA indicated that it is not part of the process to provide the application form to the I&APs. However, the information contained in the application form is conveyed in even more detail in the EIR now submitted for comments. It was Earth Ties Environmental Services (Pty) ltd.

	You told us in your "background" document and subsequent emails that you REC-SERVICES had not only submitted a 24(G) application to the FS DESTEA but were waiting on them to give YOU —REC SERVICES-- permission to provide us with a copy of the application . Was this a "typing error" as well?	The Site Notice indicate the applicant name as Soetvelde Feedlot CC. The term wagyu refers to the cattle breed.
	1.e. You advise us that an application may well have been made to FS DESTEA under reference REF: S24G/4(i), 27,12/20/05 by some "other" undisclosed EAPASA practitioner. You refuse to tell us who made this application??	Noted. EAPASA registration process and deadline are not finilised at this stage.
	1.d. The signboard outside the property says "WAGYU BEEF" and the Reference refers to WAGYU FEEDLOT as such it would seem the application is in the name of WAGYU? Or is that yet another "typing error" when you now refer to it as "WAGYU FEEDLOT S24G"?	The case officer of DESTEA indicated that it is not part of the process to provide the application form to the I&APs. This document is now made available for comments according to the stipulate in the regulations, as the application.
	2. We have copied the EAPASA on this email and ask them to assist us with required EAPASA protocols in this regard- assuming you are registered with EAPASA?	We have followed the correct process and will not re-advertise.
	3. REC SERVICES point blank refuse to provide us with a copy of any application for Feedlot on Soetvelde, by Wagyu or Soetvelde or to FS DESTEA? We ONCE AGAIN request a copy of the 24(G) Application — sending us a copy has NOTHING to do with any DEPARTMENT -as its a public document and is at the core of this entire matter.	
	4. Under these circumstances we would request that you rectify your notification accordingly —re advertise --- and repost notices ---as required.	

HT Reese Resident at Savannah Game & River Retreat Farm Woolridge 65 Code: 9585 Tel: 082 376 3885 Email: helen@jordanadvertising.co.za	1. Too numerous to mention but will elaborate in due course.	1. Noted.
Renee Hartslief Property owner: Savannah Game & River Retreat Farm Woolridge 65 Code: 9585 Tel: 072 632 4147 Email: bobh@dullies.com	1. WHY is Nico applying for this now? 2. What is the current owner planning to do if this is approved; and 3. How will this impact our roads, pollution (air, water, visual, sound etc)? 4. The current owner has done nothing to mitigate wildfires - which is a concern.	1. We were approach to continue with the application after the application form were submitted by the previous consultant, to DESTEA. 2. The current process is to rectify the current application and REC is not aware of any further adaptations to the existing scenario. 3. This info is made available in the EIR. 4. According the farm manager this is not the case as veld fires is also a threat to the feedlot.
TJ Hartlief Property owner: Savannah Game & River Retreat Savannah Farm 65 Woolridge Vaal Eden Parys Free State 9585 1 Paulsen Street Parys Free State 9585 Tel: 073 326 0735 Email: tess@dullies.com	1. Comments to Follow	1. Noted.
Ruan Fouché	1. Was a Directive issued to the Applicant for	1. No Directive was issued to date.

Landowner - Farm Dundee 383 Cell: 082 578 3660 Email: dundeefarm.mgr@gmail.com famfou@absamail.co.za Additional persons added by Ruan Fouché: RF Fouché (land user): Cell: 082 490 6805 Email: Ruanfouch.rf@gmail.com A Fouché (co-owner): Cell: 082 338 8339 A van Eden (land user): Cell: 062 300 8576 Email: aveprivate@gmail.com R. Swanepoel (occupant): Cell: 082 827 0171 D. Swanepoel (occupant): Cell: 076 801 1527 L Fouché (occupant): Cell: 071 641 8743 A. Piek (occasional occupant): Cell: 079 511 7365 H. Kloppers (occasional occupant): Cell: 082 312 5495 C. Geel (occasional occupant): Cell 083 938 2222 L. Visser (occasional occupant): Cell: 064 909 1118 J. de Beer (occasional occupant): Cell: 083 626 5205 J. de Jager (occasional occupant): Cell: 083 616 6080 F. Roos (occasional occupant): Cell: 082 498 5400 C. van der Merwe (land user): Cell: 083 477 7277	the unlawful construction of the feedlot? If so, can you please provide me with a copy of the Directive? 2. Please provide me with the name and contact details of the official at the Free State Department of Economic, Small Business Development, Tourism, and Environmental Affairs who is responsible for this application? 3. Has a Reference Number been issued for the Section 24G application. If so, please provide me with the reference number. 4. Please confirm the various public participation processes that will be undertaken/applicable to the Section 24G application process? It is our understanding that we have an opportunity to submit initial comments at this stage (until 4 October 2021) and that we will also have an opportunity to submit comments on the draft and final Basic Assessment Reports for the application. Firstly, I would like to indicate that I strongly object to this application for rectification of the illegal Soetvelde Feedlot. The reasons for my objection are given below: 1. The illegal feedlot is located in very close proximity, approximately 380 meters from our house. It was also	2. F.A. Mathibe. Tel: 051 400 4829. Email: mathibea@destea.gov.za 3. 24G/4(i),27,12/20/05 4. It was done. See EIR now available. Noted. 1. The old farm stead is a distance of 470m from the closest point of the feedlot, and is a distance of 470m from the retention pond. The

	erected 20 meters from our fence line, in direct violation of the National health Act 61 of 2003. The smell from the illegal feedlot is a severe odour nuisance to us. We are unable to open our windows and doors. We are also losing lodging rental income as guests are not willing to stay over due to the smell.	establishment of the smaller house/rental lodge was established between May 2019 and July 2020. At that stage the feedlot was already in existence, in the order of June 2018 according to our knowledge.
	2. Dust generated at the illegal feedlot causes a nuisance to us and is a serious health hazard.	2. At the feedlot dust is generated predominantly through the movement of vehicles and it is not a good practice to move cattle or cause movement of cattle extensively so as to not affect the condition of the animals. Dust is generated by farm vehicles transporting feed, and to a very lower frequency livestock. Dust suppression is prominently recommended.
	3. The prevalence of flies and maggots has increased exponentially since the illegal feedlot was constructed and it is unbearable. We need to spend vast amounts of money in order to deter flies and maggots at our house and amongst our livestock. Since the illegal feedlot became operational, we had to constantly use pesticides in our livestock camps and shelters. We had to dose all farm animals' numerous times for bacterial, parasitic and worm infections.	3. The occurrence of the prevalence of flies and maggots with feedlots and in fact all livestock farming is a common phenomenon in agriculture. However, there are a significant number of modernised options and practices, chemically and otherwise. Currently the applicant is implementing chemical control to a significant scale and biological control will be implemented in very near future.
	4. Diseases being carried over to our livestock from the illegal feedlot, resulting in	4. This aspect is noted. The feedlot in itself need to practice strict disease control with the full

	veterinary bills and the death of our animals, which has a negative impact upon our livelihoods.	support of veterinary assistance.
	5. According to our knowledge, there has been a misrepresentation of information in the Background Information Document for this project. The illegal feedlot does not only obtain its water from boreholes, but instead illegally abstracts water from surface water sources, the Kromellenboogspruit.	5. The consultant is not aware of the practise of extracting water from the Kromellenboogspruit.
	6. To our knowledge, waste from the illegal feedlot is disposed in a watercourse.	6. Noted, the consultant is not aware of the practise. It is also unclear of what type of waste is referred too.
	7. The sensitivity of the site in terms of the National Screening Tool Report: The site is situated within a Critical Biodiversity Area 2: o The site is situated within a Focus Area for land-based protected areas expansion o The site is situated within a Vulnerable ecosystem (Soweto Highveld Grassland) o The site is situated within 5km from the following Protected Areas, as contained in the Protected Areas Register: Savannah Game Ranch (National Protected Area); Carry Blaire Bird Sanctuary; Klein Paradys Bird Sanctuary; Vechthoek Private Nature Reserve. o The site is situated within the Ngwathe Environmental	7. This is fully acknowledged. The primary right on theland is farming as it is zoned agriculture. This S24G application in a rectification application and the FS DESTEA will probably take the Screening Report into consideration and their guidance as the CA can be expected. The Screening Tool in itself is a guiding document.

	Management Framework. The Background Information Document has indicated that a Phase 1 Heritage Impact Assessment will be undertaken as part of the application. Only conducting this one specialist study is completely inadequate for this application. Even though the illegal feedlot is already in existence, it needs to be determined what the impact of the construction of the illegal feedlot was on the sensitive environment of the area (the sensitivities have been mentioned previously). We insist on the following specialist studies being undertaken as part of this application, in line with the Screening Tool Report for a feedlot development at the location of this project: ▫ Landscape/Visual Impact Assessment ▫ Terrestrial Biodiversity Impact Assessment ▫ Aquatic Biodiversity Impact Assessment ▫ Hydrological Assessment ▫ Traffic Impact Assessment ▫ Socio-Economic Assessment ▫ Ambient Air Quality Impact Assessment ▫ Plant Species Assessment ▫ Animal Species Assessment ▫ Impact Assessment in terms of flies and maggots as a result of the feedlot and their impact on surrounding residences and livestock ▫ Climate Change Impact Assessment as methane from cattle plays a significant role in the Greenhouse Effect and Global Climate Change We also insist on a public meeting being arranged once all the specialist studies have been undertaken and before the end of the public review period for the Environmental Impact Assessment Report in	It is expected that, following the submission of the information as part of the process required by FS DESTEA, guidance will be provided on the extent/need of specialist studies or not. Thank you for this comment. We note this comment, but one has to take Covid-19 Regulations, protocols and serious health risks into account. Apart from this, guidance is awaited from the CA.

	order for the specialists to present their findings to the public in a manner that everyone can understand. This will enable all Interested and Affected Parties to also ask questions and submit well informed comments on the Environmental Impact Assessment Report and associated specialist studies. Please can the EAP also confirm the following: 1. Whether we have been added to the Register of Interested and Affected Parties. This was not confirmed in the EAP's responding email after I submitted my competed Registration Form. 2. Please provide us with a copy of the Section 24G Rectification Application Form. This has been requested numerous times and has not been provided to us yet. In the DETEA Application for Rectification Form: NEMA Section 24G, on page 1 of the form the following is stated: "8. Unless protected by law, all information contained in and attached to this application form may become public information on receipt by the competent authority. Upon request, any interested and affected party must be provided with the information contained in and attached to this application form". We can therefore not understand why there has been a delay in the EAP providing us with a copy of the application form. 3. Please provide us with a copy of the Public Participation Plan for this application, considering the COVID 19 lockdown situation that we are in. 4. Please provide us with a	1. Yes. 2. Noted. See current EIR that contains all the information. 3. Noted. See current EIR that contains all the information. 4. FS DESTEA works according

	copy of the approval of the Public Participation Plan by the Competent Authority for this application.	somewhat different process in terms of the S24G submissions. In other words no Public Participation Plan was required.
	5. How many cattle are currently being kept at the illegal feedlot?	5. It varies but it is below 500 herd of cattle.
	6. What is the current capacity of the illegal feedlot?	6. The current surface area is in the order of 5 Ha.
	7. At what density are the cattle kept at the illegal feedlot?	7. It varies, but it is more than $20m^2$ per animal.
	8. What waste streams are generated at the illegal feedlot and what happens to each waste stream?	8. No prominent waste streams for the feedlot itself, other than small amount of domestic waste. Empty medicine containers are collected and safely kept and removed by an external contractor. Disposal of domestic waste is often problematic on farms. However it is planned not to burn waste onsite, but rather place domestic waste in waste skips to be removed by a waste contractor. Animal manure is not a waste.
	9. What are the volumes of each waste stream that is generated per annum?	9. The exact volumes is not known but one can mention the fact that the Wagyu beef cattle stays fairly longer in feedlots and the volumes of medicine used is less than other commercial feedlots.
	10. Where does contaminated stormwater runoff and/or wastewater go?	10. Please refer to the Storm Water Management Plan in the EMPr.
	11. How much wastewater/sludge is generated by the illegal feedlot per annum?	11. Sludge is not generated by a feedlot or produced.
	12. What stormwater management measures are in place at the illegal feedlot?	12. Please refer to the Storm Water Management Plan in the EMPr.
	13. Does the illegal feedlot or property have a Water Use Licence or Registration? If so, can we please be provided with a copy of the Licence/Registration documents? If not, why does the property not have a Water Use Licence or Registration?	13. The WULA is in process of being conducted to the knowledge of the consultant, but not through REC Services.
	14. How much water is used by the illegal feedlot per annum?	14. It is 55 litre of water per cattle unit per day.
	15. How much water is stored at the illegal feedlot?	15. 360 000 litre.
	16. Section 4.2 of the	16. The water infrastructure is

	Background Information Document refers to the construction of storage facilities, railing and enclosures for Pens, feeding and water infrastructure. Please elaborate on what the storage facilities are for and what the water infrastructure entails?	covered in the WULA, but basically entails the storage of potable water and a 360 000l metal reservoir with piped reticulations to the feedlot. The storage shed houses some farm equipment and feed.
	17. Section 5 of the Background Information Document refers to a Treatment Process. Please explain what this is.	17. In terms of this feedlot no specific treatment is planned, however stormwater generated on the surface of the feedlot that may contain some level of animal manure will drain to the retention pond. Treatment of manure from a feedlot is not common practice in the industry.
	18. Page 6 of the Background Information Document refers to a "proposed development". This is not applicable as this is a Rectification application.	18. Correct. This is a rectification application of an existing facility and therefore the word proposed should not be there.
	19. Please provide us with a list of the Organs of State, Municipalities and other stakeholders that have been informed of this application.	19. This information is in the EIR that is now available. Refer to Appendix 3F.
	20. Is there an abattoir on the property? If not, is such a facility proposed?	20. No and not proposed.
	21. Is there a Rendering Facility on the property? If not, is such a facility proposed?	21. No and not proposed.
	22. Is there a Tannery on the property? If not, is such a facility proposed?	22. No and not proposed.
	23. What is the procedure in case of a disease outbreak at the illegal feedlot?	23. Any disease outbreak in immediately referred to the state veterinarian services, and a consulting vet is contacted to resolve the matter to best practical and responsible means.
	24. Please confirm the Management Zone of the Ngwathe Environmental Management Framework in which the site is located and whether a feedlot is compatible with the relevant Management Zone.	24. The facility falls to the knowledge of the consultants within an agricultural zone of the Ngwathe Environmental Management Framework.
	25. Please supply a list of all Specialist Services and/ or Stakeholders that will participate in the process by providing expert opinions	25. Such a list can be provided based on feedback from FS DESTEA, following the submission of the EIR, as part of the S24G application process.

	and/ or perform any of the assessments as per our request for mandatory assessments to be conducted. We also insist that the application form be amended. Google Earth satellite images, given below, confirm that the illegal feedlot was expanded upon since its construction. Activity 39 of Listing Notice 1 must be included in the application, especially as the administrative fine of the Section 24G application is based, amongst others, on the number of Listed Activities that were undertaken without an Environmental Authorisation.	The expansion of the feedlot can not be included in the application form as listed activity. The reason is that the S24G application is lodged for the status quo conditions from commencement to date and expansion cannot be part of this application as it refers to a planned or future action.
Carlos Serrao Landowner Farm Estrela Cell: 083 653 2780 Email: megaphasecarlos@gmail.com	1. None.	1. None.
Danie Otto Executive: Southern African Operations Digby Wells Environmental Mobile +27 (0) 82 399 9315 Office +27 (0) 11 789 9495 Fax +27 (0) 11 789 9498 Email: danie.otto@digbywells.com	Correspondence follows without prejudice to rights. 1. Please register me as an I&AP. 2. From the onset consider the costs of rehabilitating the illegal feedlot against proceedings to follow. 3. The 24G process cannot be used as a cheaper and shorter process to rectify a process not followed for the ongoing illegal activity. 4. In this light, Savannah Lodge was not given sufficient time and opportunity to scope the EIA as in the proper legal process that should have been followed. Participation should not be seen as agreeing to the process followed to date. 5. The details of the developer and current owner of illegal facility and activity is requested and required.	1. Noted. Registration confirmed. 2. Noted. 3. This comment is noted. 4. This is the EIR document that is now available for 30 days to scope the content and provide comments as an important part of the engagement with I&APs. 5. The details of the current owner is Wilbou Beleggings CC. The developer was the current applicant Soetvelde Feedlot CC.

	6. Your BID refers to comments that the EIA (and EAP) will make to rectify impacts. Comments from the EAP are insufficient and commitments are required by the developer and owner.	6. Correct. The EAP will help discuss relevant impact with the Developer to help rectify possible impact.
	7. Please provide a declaration that REC, you as EAP and EIA team have no relations with and are not related to the developer, owner, future owner and are all independent as required by law.	7. REC has no relations with the owner and future owner and an Affidavit is attached in this EIR in appendix 7.
	8. Provide details of the Critical Biodiversity factors considered and commitments in this regard. This should include species of concern and sensitive landscapes.	8. A Screening Report was downloaded to determine Critical Biodiversity factors. FS DESTEA will guide the way forward.
	9. The BID refers to borehole water use. We have water use requirements of cattle in the area and request volumes of use and National Water Act requirements and commitment in this regard.	9. Unfortunately, REC Services is not in the WULA process. This application process is under way by a deferent entity, and it is expected to contain information regarding volumes used etc.
	10. The illegal facility and activity under investigation will cause contamination of groundwater (see aquifer located just south of facility in an east west orientation and leading directly to the property of Mr. Hartslief).	10. The locality and characteristics of the aquifer refer to is not known to REC Services. Geohydrological and aquifer characteristics form part of the WULA process (submitted to DWS for decision) of which the content is not known to REC Services.
	11. Pathogens will carry disease along the aquifer and groundwater as a pathway from the illegal facility as source to receptors like Savannah Lodge.	11. No comment can be provided on this statement as it would be the field of a specialist independent Geohydrologist.
	12. Nitrate poisoning and death of people and specifically small children is a real risk and threat from this activity and specifically the neighbouring water users.	12. This statement is noted and respected, however in view of REC Services, highly unlikely as it will depend on concentration levels. Just as indication bottled water can have up to 1mg per litre Nitrate. The emission of nitrate by feedlots to toxic levels is not known

		to the consultant.
	13. Eutrophication is a major problem in South Africa and specifically in the Vaal River.	13. Noted. However, the existence of the retention pond is specifically a measure to eradicate eutrophication of drainage ways.
	14. The Human Rights Commission has undertaken various studies in regarding pollution in this region and studies and investigations by the commission are underway.	14. Comment noted.
	15. The use of groundwater at this scale will have a draw down effect. A groundwater study and assessment, including a model and hydro-census needs to be undertaken with input from the onset by neighbours and I&APs.	15. These matters are covered in the WULA, conducted by another entity and therefore no comment can be given by REC Services.
	16. A monitoring programme is also required with input from affected parties, neighbours and I&APs.	16. This comment is noted, and further guidance may be received from FS DESTEA as a possible condition or otherwise.
	17. The health risk from pathogens, the potentially lethal effect of nitrate poisoning and specifically the draw down cone impacts on neighbouring users need to be studied/assessed with input from I&APs and made available.	17. Matters pertaining to groundwater quality and drawdown impacts is subject that would be covered in the WULA. It is the humble opinion of REC Services that the nature and limit scale of this feedlot will not have potential lethal effects on people in terms of nitrate poising.
	18. Provide information on and assess pathogen control and medicinal use, pesticide use etc.	18. Pathogen control and medicinal use is an aspect controlled by the state veterinary services if and when applicable in feedlots.
	19. Provide details and asses impact of animals that die, carcasses, waste streams etc.	19. No prominent waste streams for the feedlot itself, other than small amount of domestic waste. Empty medicine containers are collected and safely kept and removed by an external contractor. Disposal of domestic waste is often problematic on farms. However, it is planned not to burn waste onsite, but rather place

		domestic waste in waste skips to be removed by a waste contractor. Animal manure is not a waste. Animal carcasses are removed from the farm and provided to a nearby cheetah sanctuary. This is done and organised on a formal practice agreed upon.
	20. No slaughtering facilities are mentioned or allowed by law without application.	20. Correct.
	21. How will other pathogens and disease be managed like Foot and Mouth, 'Snotsiekte' (Bovine malignant catarrhal fever), etc.	21. The production of wagyu beef is conducted occurring to a very strict protocol, the CWB protocol. No animals are obtained/purchased from outside auctions and the feedlot services as a quarantine area. The vet involved in Wagyu beef production is Doctor Rick Mapham, who is an authority on feedlots. Day to day monitoring is conducted to monitor any disease occurrence or signs thereof.
	22. How will parasites and pathogen agents like flies, tics, worms, etc be managed and neighbouring communities be protected. Assess and allow IAP input in the process.	22. The occurrence of the prevalence of flies and maggots with feedlots and in fact all livestock farming is a common phenomenon in agriculture. However, there are a significant number of modernised options and practices, chemically and otherwise. Currently the applicant is implementing chemical control to a significant scale and biological control will be implemented in very near future.
	23. Include assessments of wetlands, and surface water with input from neighbours and I&APs including runoff and stormwater management and treatment.	23. There is no wetland onsite, and a stormwater management plan is provided.
	24. From a desktop assessment it seems that the	24. There is no wetland onsite.

	facility is situated in a wetland. National Water Act requirements need to be met and an independent investigation in this regard may follow.	
	25. Noise impact should be assessed by monitoring and modelling and input into the assessment should be allowed by I&APs.	25. The assessment of the operations on the farm revealed that noise impact negligible and not more notable than the usual ambient noise levels on farms.
	26. A visual impact assessment is required with input allowed by I&APs.	26. A visual impact assessment will not be necessary as there is no intrusive structures as one would expect on a normal cattle farm.
	27. The increased traffic, noise and dust and impact on conditions of the roads and other traffic needs to be assessed with input.	27. The feedlot and the associated operation will not cause an increase in traffic other than 3, maximum 4, heavy vehicles per week is anticipated.
	28. Provide details of accommodation and facilities for staff and activities at or near feedlot.	28. Accommodation of staff is on a well organised and formal basis near the feedlot. There is one dwelling for the farm manager
	29. Ensure neighbours and I&APs are consulted and included in the heritage study. Not after, before and during.	29. The FS DESTEA will guide REC Services in this respect if necessary.
	30. The impact of odour should be assessed, again with input and involving receptors, before and during, not after the studies.	30. Odour levels is depending to a considerable extent on the general day to day management of the feedlot. The feedlot is in an agricultural region zoned as such and close to urban environments.
	31. The visual, noise, odour assessments etc are some of the aspects to be assessed when assessing the impact on sense of place with full involvement of I&APs.	31. The FS DESTEA may guide inputs towards visual noise and odour, but it needs to be noted that being a farming entity in a farming area with the owner having a primary right to conduct agriculture, it is not believed that sense of place will in any affect be influenced.
	32. Keep in mind that the current activities in the area	32. The comment is noted. It is acknowledged that

	do not impact on the illegal development and activity, but it impacts the economic activities in the area. The socio-economic impact needs to be assessed, with input from the affected and neighbouring parties.	management/environmental management of the feedlot i.t.o. fly and odour control is regarded as important, not to adversely affect other entities in the area. However, the distance between the feedlot and the river retreat is measured to be in the order of 1.7 to 2km. Taking the prevalent wind direction into account, which is from a western to north-eastern direction, the impact of odours on Savannah should not be regarded as significant. Again, one has to acknowledge the fact the entity is an agricultural practice in an agriculturally zoned land.
	33. The EIA and associated process to be followed needs to include an assessment of the zoning of the area and the IDP and regional planning with the sense of place and economic impacts. Again with input from I&APs.	33. Noted. This is the case. Again, one has to acknowledge the fact the entity is an agricultural practice in an agriculturally zoned land.

APPENDIX 4

SIGNIFICANCE RATING METHODOLOGY

REC SERVICES
ENVIRONMENTAL CONSULTANTS

THE METHODOLOGY UTILISED IN THE RATING OF SIGNIFICANCE OF IMPACTS

The **Significance** of Environmental Impacts is to be assessed by means of the following method: **Significance is the product of probability** and **severity. Probability** describes the likelihood of the impact actually occurring, and is rated as follows:			
•	Improbable	-	Low possibility of impact to occur either because of design or historic experience. **Rating = 2**
•	Probable	-	Prominent possibility that impact will occur. **Rating = 3**
•	Highly probable	-	Most likely that impact will occur. **Rating = 4**
•	Definite	-	Impact will occur regardless of any prevention measures **Rating = 5**
The severity rating is calculated from the factors given to intensity and duration. Intensity and duration factors are awarded to each impact, as described below. The **Intensity factor** is awarded to each impact according to the following method:			
•	Low intensity	-	Nature and/or man-made functions not affected and a minor impact may occur. **Factor 1**
•	Moderate intensity	-	Environment affected but natural functions and processes can continue though often in a slightly altered manner. **Factor 2**
•	High intensity	-	Environment affected to the extent that natural functions are altered to the extent that it will temporarily or permanently cease. **Factor 3**
Duration is assessed and a *factor* awarded in accordance with the following:			

•	Short term	-	≤ 1 to 5 years **Factor 2**
•	Moderate term	-	5 – 15 years **Factor 3**
•	Long term	-	Impact will only cease after the operational life of the activity, either because of natural process or by human intervention. **Factor 4**
•	Permanent	-	Mitigation, either by natural process or by human intervention, will not occur in such a way or in such a time span that the impact can be considered transient. **Factor 5**

The **severity rating** is obtained from calculating a severity factor, and comparing the severity factor to the rating in the table below, for example:

The Severity factor	Intensity factor X Duration factor 2 X 3 = 6

A Severity factor of 6 (six) equals a Severity Rating of Moderate severity (Rating 3) as per table below:

Severity Ratings

		FACTOR	
	Low Severity (Rating 2)	Calculated values 2 to 4	
	Moderate Severity (Rating 3)	Calculated values 5 to 8	
	High Severity (Rating 4)	Calculated values 9 to 12	
	Very High Severity (Rating 5)	Calculated values 13 to 16 and more	
	Severity factors below 3 indicate no impact		

A Significance Rating is calculated by multiplying the Severity Rating with the Probability Rating:

The significance rating should influence the development project as described below:

•	Low significance (calculated Significance Rating 4 to 6)		
		-	Positive impact and negative impacts of low significance should have no influence on the proposed development project

•	Moderate significance (calculated Significance Rating ≥ 7 to 12)		
		-	Positive impact **Should indicate that the proposed project should be approved**
			Negative impact: Should be mitigated or mitigation measures should be formulated before the proposed project can be approved
•	High significance (calculated Significance Rating ≥ 13 to 18)		
		-	Positive impact: Should points towards a decision for the project to be approved and should be enhanced in final design
			Negative impact: Should weigh towards a decision to terminate proposal, or mitigation should be formulated and performed to reduce significance to at least low significance rating.
•	Very High significance (calculated Significance Rating ≥ 19 to 25 and more)		

APPENDIX 5

SITE PHOTOGRAPHS

REC SERVICES
ENVIRONMENTAL CONSULTANTS

Site Photographs

On site, a set of photos were taken in the 8 wind directions (see image below).

Map where photos were taken:

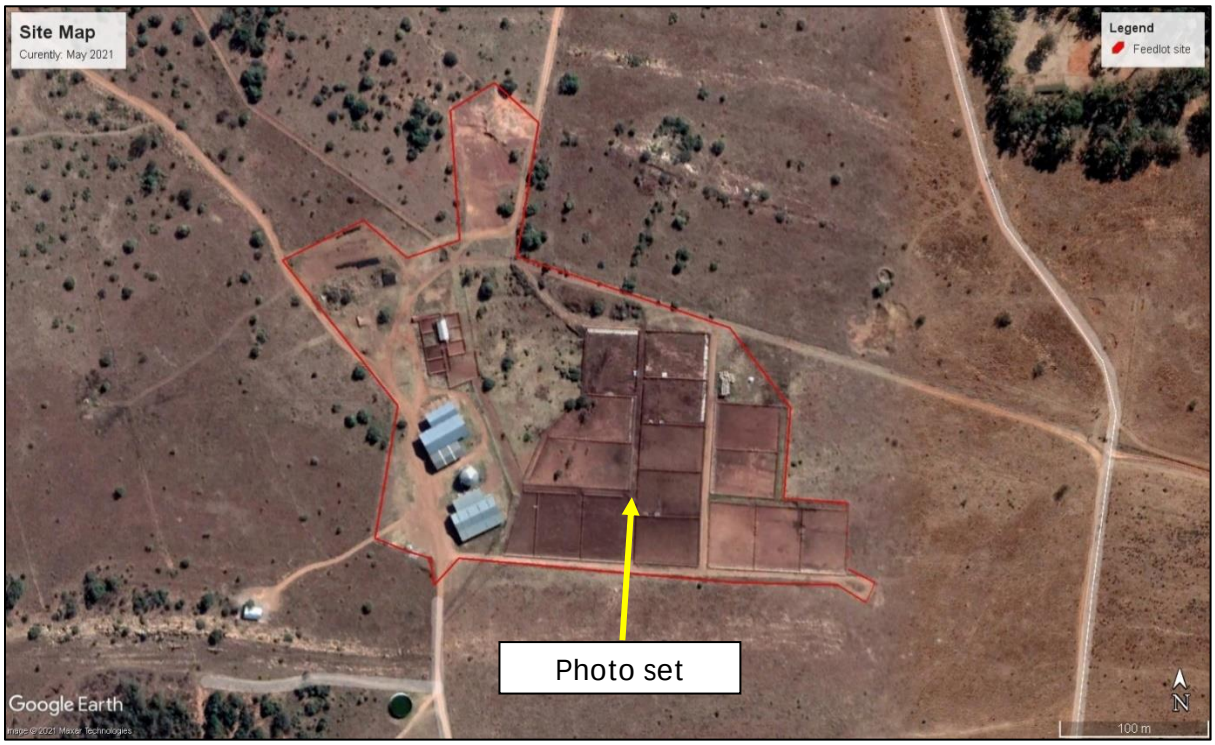
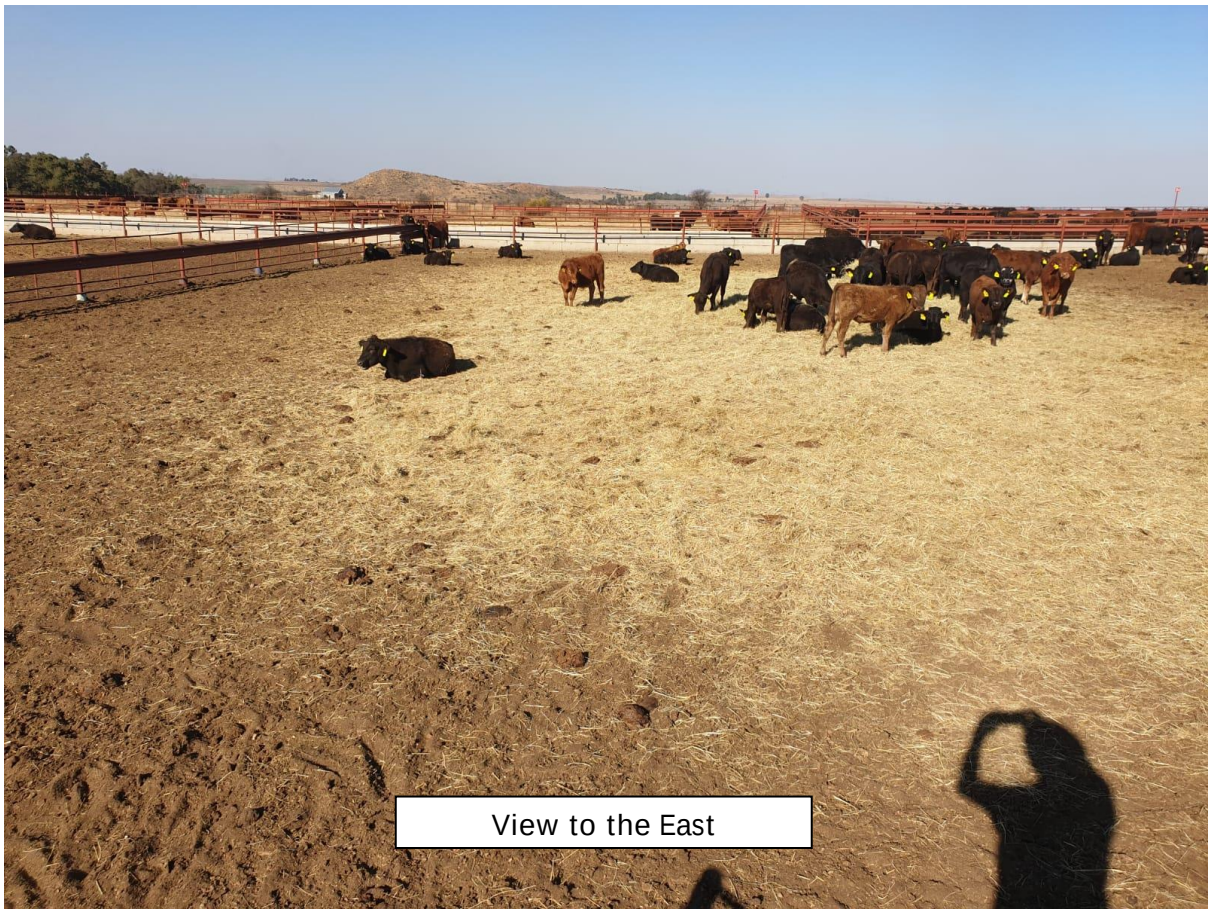


Photo set:

View to the North

View to the Northeast



View to the East

View to the Southeast

View to the South

View to the Southwest

View to the West

View to the Northwest

APPENDIX 6

ENVIRONMENTAL MANAGEMENT PROGRAM

REC SERVICES
ENVIRONMENTAL CONSULTANTS

2nd Floor, Rubenstein Office Park
566 Rubenstein Drive
Moreleta Park, 0181

PO Box 40541
Moreleta Park, 0044

www.recservices.co.za

APPLICATION TO RECTIFY UNLAWFUL COMMENCEMENT OR CONTINUATION OF LISTED ACTIVITIES IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NO 107 OF 1998) ON A PART OF THE FARM CANFORD CLIFFS NO.133, FREE STATE PROVINCE.

(REF.: S24G/4(i),27,12/20/05)

ENVIRONMENTAL MANAGEMENT PROGRAMME

Prepared for: Mr. Foloji Arnold Mathibe
Compliance monitoring and Enforcement
Free State Department of Economic, Small Business Development, Tourism and Environmental Affairs
113 St Andrews Street
Bloemfontein
9300

On behalf of: Soetvelde Feedlot CC
Mr Nicolaas Frans van Tonder
PO Box 265397
Three Rivers
1935

Author: Rowan van Tonder & Pieter van der Merwe

Date: 22 November 2021

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Company Registration: 2016 / 310652 / 07
Tax Registration: 29254157226
VAT Registration: 4870275718
National Treasury CSD: MAAA 0211958

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ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) AND EXPERTISE

EAP: P.N. van der Merwe (Director)	➢ Expertise: Environmental Impact Assessments in Land-use and Infrastructure Development. ➢ Years of experience: 29. Qualifications: B.Sc. Hons. Environmental Management PU for CHE.
EAP: Rowan van Tonder (Senior consultant)	➢ Expertise: Currently involved with various applications for activities under the National Environmental Management Act (NEMA) (Act 107 of 1998), Mineral and Petroleum Recourses Development Act 2002 (Act No. 28 of 2002), and National Environmental Management: Waste Act, 2008 (Act 59 of 2008). ➢ Years of experience: 13. Qualifications: M.Sc. Botany (Conservation Management), B.Sc. Hons. Physical Geography - Environmental Management at TUKS. (For Extended Details, See Appendix 6 – EAP CV). ➢ Registrations: SACNASP (Pri.Sci.Nat): 119204

GENERAL TERMS AND ABBREVIATIONS:

Audit	Regular inspection and verification of implementation of the EMPr
Bund	A sealed enclosure under or around a storage facility to contain any spillage
Batch plant	Concrete or plaster mixing facility and associated equipment and materials
Contractor	Principal persons or company undertaking the construction of the development
Development site	Boundary and extent of development works and infrastructure
Engineer	Person who represents the client and is responsible for enforcing the technical and contractual requirements of the project
ECO	Environmental Control Officer: - Person tasked with monitoring implementation of the EMPr during construction
Emergency situation	An incident, which potentially has the ability to significantly impact on the environment, and which could cause irreparable damage to sensitive environmental features. Typical situations amongst others are: • Large spills of petroleum products and lubricants on site, • Potential damage, erosion and slumping of unstable slopes, • Indiscriminate dumping of construction waste on site, and accessing exclusion zones
RE/PM	Resident Engineer/Project Manager: Person representing the Engineer on site
BAR	Basic Assessment Report

DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner
EMPr	Environmental Management Program
FS DESTEA	Free State Department of Economic, Small Business Development, Tourism and Environmental Affairs
NEMA	National Environmental Management Act, 1998 (Act 107 of 1998)

TABLE OF CONTENTS

1. INTRODUCTION

This Environmental Management Programme (EMPr) describes impact mitigation measures to be implemented during any future construction and operation phases of the current feedlot facilities on a part of the Farm Canford Cliffs No.133, Free State Province (known as the 'Development' from here on).

The careful implementation and management of activities on site, during the entire process of project construction and operation, is vitally important. Focus should be placed on the activities to occur on the site of the development; however, consideration of the adjacent environment (socially and ecologically) is equally important. The mitigation measures represented in this EMPr should not be seen as static measures, but rather as methodologies that can be updated and improved during implementation, as and when site conditions become clearer. However, this EMPr sufficiently serves to provide the most practicable methods to promote sound environmental management during the construction and operational phases of the development.

The measures and principles are provided to assist placing impacts identified in another perspective – more towards the firm potential of mitigating the impacts during the development and implementation of the project. But this, as already mentioned, also implies that during the course of the project certain adaptations can be made or will be eminent during the construction implementation period. These adaptations will be the result of the EMPr monitoring exercise that is planned to take place during the construction period. The EMPr subsequently is an on-site working and dynamic document.

This section of the report provides recommendations on matters relating to the impact of the development on the physical environment, the biological environment and the social environment (of the site and study area) by describing mitigation measures that are to be implemented.

2. PROJECT DESCRIPTION

REC Services (Pty) Ltd. (REC) was appointed by Soetvelde Feedlot CC, for:
Unlawful construction of feedlot facilities on a part of the Farm Canford Cliffs No.133, Free State Province.

The following project description was provided by the applicant of what will be developed on site:
The activity that has commenced involves the construction of feedlot infrastructure. This includes the construction of storage facilities, railing and enclosures for Pens, feeding and water infrastructure.

The farm's total area is 254.32Ha. SOETVELDE FEEDLOT CC constructed the feedlot operations before June 2018 and went into operation 5 months later.

The nearest town to the farm is Parys, Free State Province, about 17 km to the southwest, but the farm itself is located close to the border of the Free State Province.

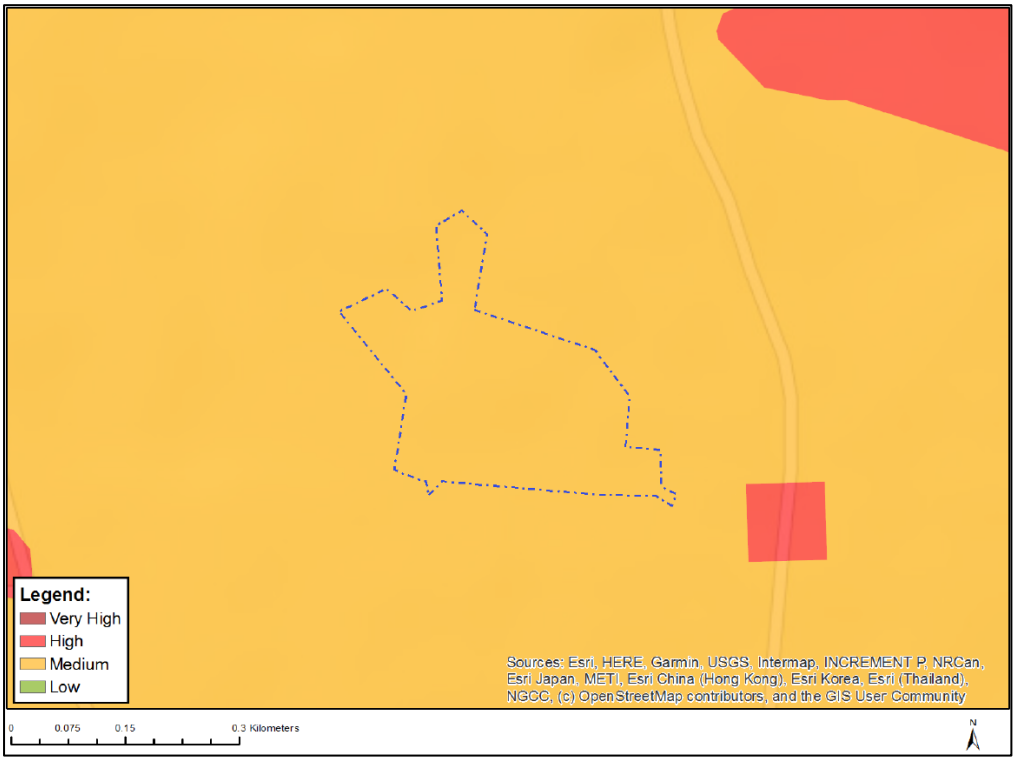
Coordinates:
Longitude: -26.806143°S Latitude: 27.547710°E

All the above buildings and associated infrastructure were constructed after June 2018 and until May 2021.

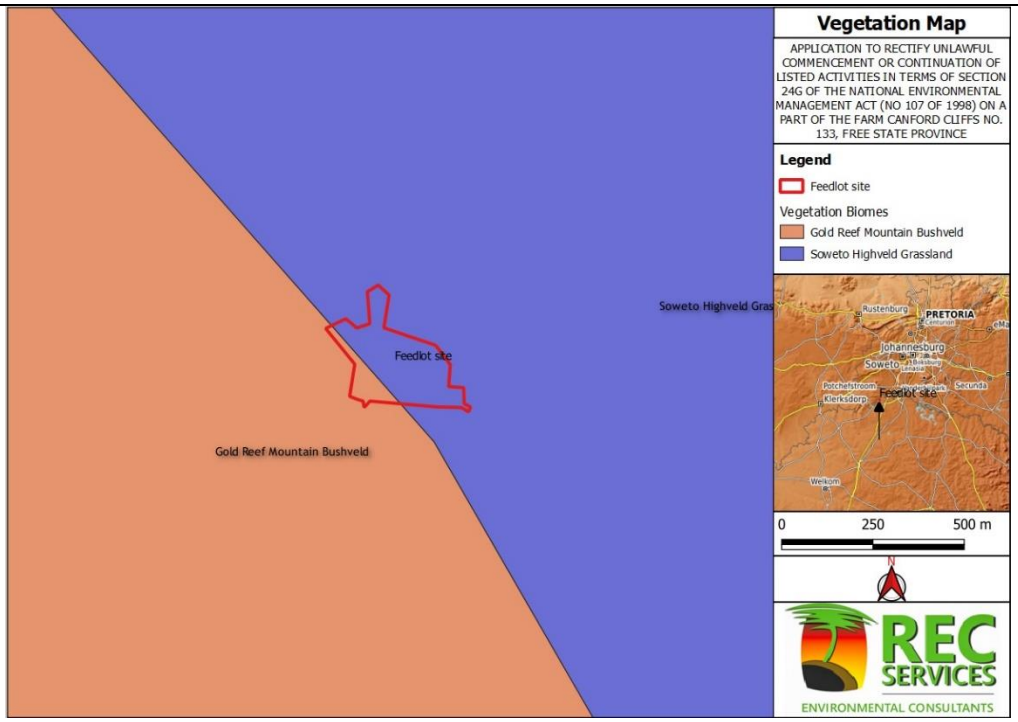
3. DESCRIPTION OF THE ENVIRONMENTAL ASPECTS OF THE ACTIVITY

Environmental Aspects	Development
Geology	Vredefort Dome, approximately 120 km south-west of Johannesburg, is a representative part of a larger meteorite impact structure, or astrobleme. Dating back 2,023 million years, it is the oldest astrobleme yet found on Earth. With a radius of 190 km, it is also the largest and the most deeply eroded. Vredefort Dome bears witness to the world's greatest known single

	energy release event, which had devastating global effects including, according to some scientists, major evolutionary changes. It provides critical evidence of the Earth's geological history and is crucial to understanding of the evolution of the planet. Despite the importance of impact sites to the planet's history, geological activity on the Earth's surface has led to the disappearance of evidence from most of them, and Vredefort is the only example to provide a full geological profile of an astrobleme below the crater floor. <u>Impacts:</u> Possible blasting/drilling of geology to accommodate foundations of the development.
Topography	No Sensitive features near the site.  The 'terrain type' of the area is classified as a plateau with some relief. The wider terrain contains some distinct topographical sections, namely: ▪ The Vaal River is about 3km west of the site. ▪ A small stream/drainage line about 1.5km east of the site. ▪ The topography slopes in a north-western direction and has a fall of 17m over a 500m distance. Ave. Slope is 3.9%. ▪ Cropland/pastures are found west, northwest, north and southeast from the site. ▪ There are farm structures directly North of the site.

	The area has a moderate slope. The site falls within the Vaal Quaternary catchment area (C23B catchment). <u>Impacts:</u> Possible blasting/drilling of geology to accommodate foundations may alter the topography slightly.
Soil, Land Capability and Land Use	The land potential, and specifically the agricultural potential of a site, is determined by the combination of climate, soil conditions and slope prevailing in that region or site, resulting in the classification of areas with similar agricultural land potential. These land potential classes range from "High Potential" to "Low Potential". The Agricultural Geo-Referenced Information System (AGIS) has mapped the agricultural potential of SA. Using this mapping shapefiles, it can be seen that the site as well as areas towards the north, east, and south; the agricultural potential is classified as Moderate/Medium potential.  The site is currently zoned as "Agricultural". This allows the property to be used for agricultural buildings and agricultural land.

	The land uses are: • Agricultural <u>Impacts:</u> • Soil compaction. • Possible soil erosion due to removed vegetation. • Surface disturbance and topsoil removal.
Flora	The study area's vegetation type lies predominantly in the Soweto Highveld Grassland, which is found in the Mpumalanga, Gauteng, and to a very small extent also in neighbouring Free State and North-West Provinces: In a broad band roughly delimited by the N17 road between Ermelo and Johannesburg in the north, Perdekop in the southeast and the Vaal River (border with the Free State) in the south. It extends further westwards along the southern edge of the Johannesburg Dome (including part of Soweto) as far as the vicinity of Randfontein. In southern Gauteng it includes the surrounds of Vanderbijlpark and Vereeniging as well as Sasolburg in the northern Free State. Altitude 1 420–1 760 m. The landscape consists of gently to moderately undulating landscape on the Highveld plateau supporting short to medium-high, dense, tufted grassland dominated almost entirely by *Themeda triandra* and accompanied by a variety of other grasses such as *Elionurus muticus, Eragrostis racemosa, Heteropogon contortus and Tristachya leucothrix*. In places not disturbed, only scattered small wetlands, narrow stream alluvia, pans and occasional ridges or rocky outcrops interrupt the continuous grassland cover (Mucina and Rutherford, 2006). Grass species found in the study area include *Andropogon appendiculatus (d), Brachiaria serrata (d), Cymbopogon pospischilii (d), Cynodon dactylon (d), Elionurus muticus (d), Eragrostis capensis (d), E. chloromelas (d), E. curvula (d), E. plana (d), E. planiculmis (d), E. racemosa (d), Heteropogon contortus (d), Hyparrhenia hirta (d), Setaria nigrirostris (d), S. sphacelata (d), and Themeda triandra (d)* (Mucina and Rutherford, 2006).



A Threatened species and Species of Conservation Concern list for the Grids 2627DC (Weiveld) was obtained from the Plants of South Africa (POSA) database on the South African National Biodiversity Institute (SANBI) website. Threatened species are those that are facing high risk of extinction, indicated by the categories Critically Endangered, Endangered and Vulnerable. Species of Conservation Concern include the Threatened Species, but additionally contain the categories Near Threatened, Data Deficient, Critically Rare, Rare and Declining. This is in accordance with the new Red List for South African Plants (Raimondo et al. 2009). However, the POSA list is based on herbarium specimens housed in the National Herbarium of SANBI; therefore, many plant species that do occur in the area are not listed.

The following possible red data plant species (by the categories Critically Endangered, Endangered and Vulnerable) could occur in the areas surrounding the study area:

- *Miraglossum laeve Kupicha (CE).*
- *Prunus africana (Hook.f.) Kalkman (VU).*

Impacts:

<table>
<tr><td></td><td>Stripping of surface vegetation during construction.</td></tr>
<tr><td>Fauna</td><td>The study area is stretched over a relatively small area. No Red Data Book Species were encountered.

Possible red data mammals (by the categories Critically Endangered, Endangered and Vulnerable) that would commonly occur in the wider surrounding area are:
• (Southern African) Tsessebe - Damaliscus lunatus lunatus
• Hartmann's Mountain Zebra - Equus zebra hartmannae

According to available literature, approximately 303 bird species occur in the Wieveld (2627DC) quarter degree grid cell. No Red Data species were recorded. No Red Data species were recorded on-site. The following Red Data species were recorded on site or flying over the site:
• None.

According to Taylor et al. (2014) and South African Bird Atlas Project 2, the following red data bird species (by the categories Critically Endangered, Endangered and Vulnerable) could occur in the wider area:
List of possible red date avifauna found in a wider region of the site:
<table>
<tr><th>SCIENTIFIC NAME</th><th>COMMON NAME</th></tr>
<tr><td>Balearica regulorum</td><td>Grey Crowned Crane</td></tr>
<tr><td>Circus ranivorus</td><td>African Marsh-Harrier</td></tr>
<tr><td>Falco biarmicus</td><td>Lanner Falcon</td></tr>
<tr><td>Sagittarius serpentarius</td><td>Secretarybird</td></tr>
<tr><td>Mycteria ibis</td><td>Yellow-billed Stork</td></tr>
<tr><td>Pelecanus rufescens</td><td>Pink-backed Pelican</td></tr>
<tr><td>Polemaetus bellicosus</td><td>Martial Eagle</td></tr>
<tr><td>Hydropogne caspia</td><td>Caspian Tern</td></tr>
<tr><td>Tyto capensis</td><td>African Grass Owl</td></tr>
</table>

No Red Data species was recorded. And no amphibians or reptiles were encountered on site. This might be due to the lack of suitable or specialised</td></tr>
</table>

<table>
<tr><td></td><td>searching techniques that is required, as well as the history of anthropogenic activities on site.

List of herpetofauna possibly on site or rather in the wider area:
<table><tr><th>SCIENTIFIC NAME</th><th>COMMON NAME</th></tr><tr><td>Sclerophrys gutturalis</td><td>Guttural Toad</td></tr><tr><td>Kassina senegalensis</td><td>Bubbling Kassina</td></tr><tr><td>Amietia delalandii</td><td>Delalande's River Frog</td></tr><tr><td>Agama atra</td><td>Southern Rock Agama</td></tr><tr><td>Dasypeltis scabra</td><td>Rhombic Egg-eater</td></tr><tr><td>Aparallactus capensis</td><td>Black-headed Centipede-eater</td></tr></table>
<u>Impacts:</u>
Removal of surface vegetation thereby depleting food sources.
Human presence resulting in emigration of animals.
The disturbances of the nearby vegetation cover and natural habitat will have a limited impact on the wildlife. However, it should be viewed against the background of the disturbances by human movement and activities through the area.</td></tr>
<tr><td>Surface Water</td><td>See ‘Topography’ above,

<u>Impacts:</u>
Poorly implemented storm water system will result in increased surface run-off volume and speed, which could lead to the creation of erosion gullies. Storm water must be allowed to spread out gradually over a large surface area to protect the soil surface against erosion. Inadequate designed storm water outlets can lead to flooding of the road surface, adding unnecessary volume to any retention ponds (if any) which is dangerous.</td></tr>
<tr><td>Ground Water</td><td>There is a borehole on the farm of which is sufficient to run the entire operation.

<u>Impacts:</u>
Low potential environmental impact predicted.</td></tr>
</table>

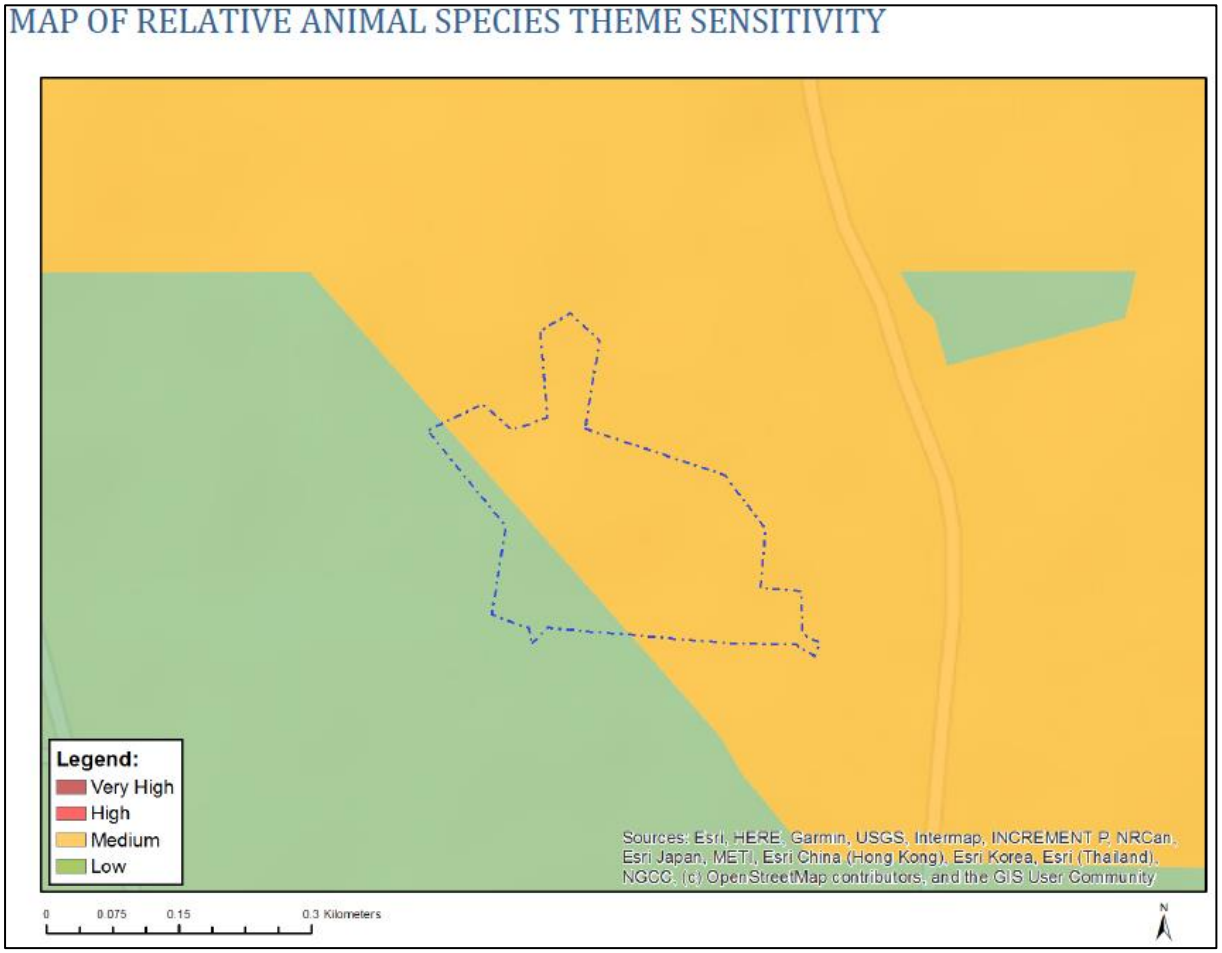
	Temporary toilets (chemical) left unmanaged can leak raw sewage and effluent into the soil, surface and even ground water sources, during the construction phase.
Air Quality	Dust will be generated by vehicular movements on site, the construction & operational phase. Impacts: Low potential environmental impact. During the construction phase; dust could cause problems for nearby human settlements. During the construction phase the air quality will be the same as it currently is.
Noise	Noise generation by operating air compressors, excavators and other heavy machinery. Noise is also generated by the construction workers, farm worker and cattle. Impacts: Low potential environmental impact. Noise from the farm traffic and cattle will be an inconvenience to a certain extent for some existing properties nearby.
Visual	Visual and aesthetic elements are important. This development will alter the visual landscape from agriculture fields/natural veld to a little bit more built-up. Impacts: No significant impact. This is all agricultural land and the development is also agricultural. Waste, such as building rubble and empty cement bags can be a negative visual impact if not collected and disposed of correctly.
Sensitive Landscapes	No 'Sensitive' landscapes identified on-site: • See 'Topography' above. Impacts: Low negative significant impact. Human presence resulting in possible emigration of animals.

	The movement of water to drainage lines further afield could be altered by future construction activities.
Sites of Archaeological and Cultural Interest	During the site investigations, focus was also placed on the presence of any stone built structure, ruins, grave sites, complete built structures and the presence of artefacts. Based on preliminary observations no such features occur within the area of development. It is therefore not identified as an issue at this stage. The site does not contain any surface archaeological deposits; a possible reason is previous infra-structure development and farming activities in the greater study area. The possibility of sub-surface findings always exists and should be taken into consideration. If sub-surface archaeological material is discovered work must stop and a heritage practitioner preferably an archaeologist contacted to assess the find and make recommendations. The site does not contain any marked graves or burial grounds. The possibility of graves not visible to the human eye always exists and this should be taken into consideration. It is important to note that all graves and cemeteries are of high significance and are protected by various laws. Legislation with regard to graves includes the National Heritage Resources Act (Act 25 of 1999) whenever graves are 60 years and older. Other legislation with regard to graves includes those when graves are exhumed and relocated, namely the Ordinance on Exhumations (no 12 of 1980) and the Human Tissues Act (Act 65 of 1983 as amended). If sub-surface graves are discovered work should stop and a professional preferably an archaeologist contacted to assess the age of the grave/graves and to advice on the way forward.

	Impacts: No significant impact.
Socio-economic	This development will have a positive impact on the regional socio-economic structure through its support of the development industry, better local services support, job creation and the skills development of its employees and local community. This fully integrated development offers the shareholders the opportunity to assist in local upliftment through the following: • Involvement of local contractors, • Job opportunities, • Skills training and development, • Social upliftment Impacts: Positive impact on the regional socio-economic structure through its support to the community, like: Job opportunities during the construction phase. Local economic boost.
Interested and Affected Parties	Comments received. Issues stemming from this development: Please see Comment and Response Report;
Cumulative	The cumulative impact of the development on the social environment is positive. More job possibilities and economic boost for the local area. Seen at a wider scale the additional developments are not physically connected, but the removal of vegetation cover, such that the soil surface is exposed, may lead to increased soil erosion in the area and loss of habitat.

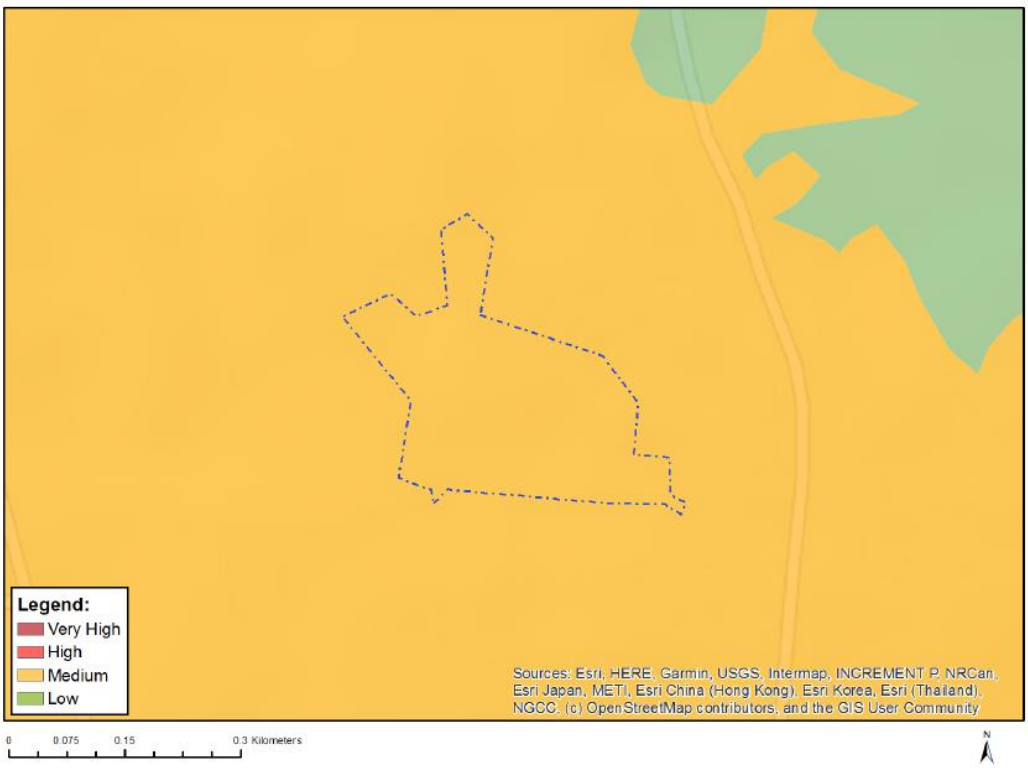
4. SENSITIVITY MAP

The following sensitivity maps are available:



MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY

MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY



5. DESCRIPTION OF THE IMPACT MANAGEMENT OBJECTIVES FOR ALL PHASES OF THE DEVELOPMENT

5.1 Recommendations applicable to any future planning and design stage:

Time frame: 1 Month

There are a number of potential impacts that can be mitigated through careful design of technical/physical project components. The following design components are relevant in this regard:

- Address the potential contamination of surface run-off and soil through storm water drainage;
- Ensuring effective effluent management – to prevent potential contamination of soil and groundwater resources, as a result of insufficient or incorrect waste management systems by point source pollution;
- Visual and aesthetic impacts of the development on the surrounding environment – landscaping will be an important component in this regard, as will the type and intensity of lighting used; and
- Waste management on site, including handling, storage and collection of solid waste and disposal of liquid waste.

5.1.1 Contamination of surface water/soil through storm water run-off from hard or paved surfaces

It is recommended that the storm water management system, leading from the hard surfaces or from outside the footprint be designed in such a manner that no direct link or piping be established into a natural drainage course.

Other precautions to be implemented in order to prevent storm water pollution are:

- Cover any wastes that are likely to wash away or contaminate storm water;
- Build a bund/berm around waste storage area/pens to stop overflow into storm water;
- Storm water outflows will not enter directly into a drainage line;
- Energy dissipaters (gabions/grass bales etc.) should be installed at all potential large flow volume areas, especially during the construction phase where large areas will be open soil;

- Natural storm water must not be piped other than in areas where it runs perpendicularly cross a roadway;

5.1.2 Visual and aesthetic impacts of the building structure

The development is built far from any recreational and business entities, which should not be unattractive and undesirable in to such an environment. The development, however, is situated in an agricultural setting. However, the character of the site and its location (rural/agricultural area) makes the development acceptable and compatible with the aesthetics of the study area. Nevertheless, careful attention will be placed on various design elements associated with the development, including attention to aspects that will enhance the aesthetic quality of a feedlot, such as landscaping.

Poor maintenance of the facility will affect the visual and aesthetic quality of the area. Therefore, general building maintenance on a regular basis will form a crucial component of the operational phase of the development. Generally, feedlots have similar layouts, formats, and appearances. Therefore, to pay special attention to "blending" the development to the environment is not a practical exercise. In terms of the level and nature of night illumination, carefully placed and downward shining lights are recommended to reduce this impact sufficiently. No high floodlights should be installed on the site.

5.1.3 Waste management on site

Poorly designed waste collection/storage facilities have a significantly negative impact in terms of surface pollution, possible water pollution and negative impacts on the visual quality of an area. Therefore, practical design and efficiency is essential in this regard. The location of the refuse areas/waste collection area must be carefully planned and located so as not to cause a visual nuisance, as wind-blown refuse is often a problem. It is suggested that large black bins, which are secured in place, are distributed frequently at strategic locations across the site to discourage littering. The dustbins should be secured to prevent them from being knocked over or carried away. The lids should also be suspended permanently above the dustbins, to ensure that the waste disposed of is efficiently contained. The waste from these bins should be collected on a weekly basis and stored in a refuse collection yard (which should be contained within a walled fence), until such a time that a certified/registered contractor collects the waste - on a weekly basis – to be disposed of at a registered waste disposal site or when the farmer see fit to do it himself.

Implementation responsibility: The site engineer / applicant will be responsible for the implementation of the above measures as an on-going process during construction phase.

5.2 Impact mitigation during the construction phase:
Timeframe: 5 Months

The following recommendations are proposed to assist as basic environmental management steps and to be implemented during the construction phase of the project:

The construction stage of the development will cause minor impacts on the biophysical and social environment. Although these impacts are short-term and low significance in nature, it still is essential to address them as sufficiently as possible.

The following elements must be considered and addressed when the construction stage of the development commences:

- The locality of the construction camp and site offices (if used). Limited accommodation will be provided for construction workers. Staff will be limited to security personnel after normal working hours.
- The locality of stockpile areas must be confirmed and discussed with the appointed contractor before construction activities commence.
- Specified areas of access and movement by construction vehicles during the construction period are essential.

5.2.1 Management of impacts on vegetation cover and faunal habitats
Clearing/removal of the existing vegetation for the construction of the buildings will be necessary, however, due to the non-indigenous vegetation and size of the site, the significance of this impact is rated as low.

The propagation of exotic species and weeds will need to be controlled during the construction phase, as there are many activities on site that could lead to the establishment of weeds - including compaction of the soil by heavy machinery, construction waste, stockpile areas etc. Weed species should be removed on a four-week basis.

Weed species should be removed on a four-week basis. The site will not be paved, and a large portion will be landscaped / maintained. It is recommended that only indigenous species be used in the landscaping process (if implemented), and that trees are incorporated into the landscaping design on the boundary of the feedlot.

No specific mitigation measures are deemed necessary with regards to mitigating the impact of the development on the faunal component, because the area is small and disturbed. No mammal species were detected on the site. Avifaunal species were plenty in the indigenous vegetation areas around the site.

Implementation responsibility: The main contractor will be responsible for the implementation of the above measures as an on-going process during construction phase.

5.2.2 Soil stability and storm water management

If construction is to take place during the summer months, the terrain could be susceptible to sheet and gully erosion because of the angle of the terrain. However, if additional access routes are required (at this stage such a requirement is highly unlikely), the physical layout of the access routes should follow the contours of the site wherever possible.

Aspects that typically impact on soil conditions are blasting activities, excavations for the founding of foundations, establishment of stockpile areas, removal and/or clearance of vegetation, movement of construction vehicles, and maintenance of construction vehicles, construction camp establishment and sanitation provision to workers during the construction period. Therefore, the following recommendations pertaining to soil conservation practices are made:

- Topsoil should be stockpiled separately from subsoil. The height of the stockpiles may not exceed 2.5 m and the stockpiles should not be stored for more than a one-year period.
- Topsoil must be stripped from all areas, where construction activities are going to take place, to be re-used in landscaping the site.
- If any blasting activities occur on site, the blasted rocks and heavy rock material must be transported to an external venue. These rocks are not

allowed to rest on site. If the rocks are left on site, the soil will be greatly compacted, which will promote the growth of weeds.

- Any excess overburden material that is generated may not be dumped in a random manner. Dumping sites should be predefined, agreed upon and adhered to.
- Any embankments created adjacent to the roads, or any drainage lines must be stabilised during construction and re-habilitated afterwards.
- Generally, surface water must be prevented from damming or creating gully erosion. This can be achieved by placing sandbags along the boundaries of steep working areas where higher intensity surface run-off may occur.
- All rills and erosion channels developing during the construction period or during the operational and maintenance period should be backfilled and consolidated immediately.
- The movement and maintenance of construction vehicles may only take place in pre-determined and delineated areas. Only planned and formal routes for hauling of material should be used.
- Soil contamination during construction vehicle maintenance or because of fuel storage on site is easily prevented, but in the event of such an accident, the spill should immediately be cleaned up by absorbing the worst of the fluid with saw dust and then disposing of the saw dust and the first bit of the soil layer.
- Fuel storage areas should be bounded effectively, and all applicable safety standards must be adhered to.

In terms of the stability of excavations, it is strongly recommended that all excavations exceeding 1.5 m should have proper sidewall protection to ensure the safety of workers. Seepage may result in the destabilising of the soils above the seepage and special precautions may be required. The contractor is responsible for the implementation of suitably designed support systems. Constructed embankments exceeding 1.5 m, or as deemed necessary by the design engineer, can be stabilised/protected by means of retaining walls. Embankments should be adequately compacted and protected from erosion.

The development site is sloped; however, abnormal transportation of sediment during construction activities is possible. The following management measures must be

implemented during construction. Abnormal soil erosion plays an important role in the siltation of watercourses and the loss of valuable topsoil.

The following suitable storm water management and mitigation measures may therefore be necessary:

A key aspect in the design of any cattle feedlot is effective stormwater runoff management. Inadequate provision for the management of stormwater and feedlot pen run off can pose environmental and health risks to onsite employees, surrounding communities and the animals themselves. Stormwater and feedlot pen run off can be adequately managed with a well-designed drainage system. The key components in the design of an adequate drainage system include:

- Clean stormwater runoff
- Feedlot pen configuration and drainage
- Sedimentation system
- Evaporation pond
- Manure stockpiling and composting

5.2.2.1 Clean stormwater runoff

Clean stormwater runoff is described as upslope stormwater that results for rainfall events but has not come into contact with the feedlot footprint. In order to address clean stormwater runoff, a stormwater berm should be constructed along the southern and eastern boundary of the feedlot footprint and will divert stormwater towards to northern and western side of the development. This stormwater runoff will not be contaminated by any animal waste that is generated by the feedlot and will therefore not require any further treatment.

5.2.2.2 Feedlot pen configuration and drainage

The current design has been chosen due to the natural slope of the feedlot site. In order to ensure optimal feedlot pen runoff, the ideal slope should be 3%, and it is 3.9%. A slope between 2.5% and 4% will ensure that runoff is not so rapid that it removed excessive amounts of manure from the feedlot pens.

Using the results from the slope analysis on Google Earth, the cattle feedlot pens can utilise the 3.9% slope to allow feedlot runoff to be directed into a catch drain that should run along

the western and northern boundary of the site. The runoff from the catch drain can then be directed to a possible sedimentation pond in the northwest corner of the site.

In order to minimise the risk of groundwater contamination, the feedlot drainage canal will be lined with a synthetic liner and poured with concrete.

The surface of the feedlot pens should be constructed out of compacted clay and other suitable compactible soils to prevent the contamination of any possible groundwater sources.

In order to ensure that the feedlot drainage operates sufficiently, the following need to be considered in the design:

- Drainage canals that have sufficient capacity to avoid overflow in "normal" rainfall and maintenance conditions.
- Drainage canals must not be impeded by excessive sedimentation of vegetation growth.
- Significant scouring of drainage canals must not occur.

The following monitoring recommendations must take place to ensure that the feedlot drainage system continues to work effectively:

- Visual monitoring of sediment depth and vegetation growth in the drainage canal.
- Visual monitoring of scouring and damage to the drainage canals during maintenance operations.
- Records must be kept of the date of cleaning operations and of any repairs or maintenance.

5.2.2.3 Sedimentation system

The sedimentation pond will remove at least 50% of the settable fraction of the solids that are part of the feedlot pen runoff. The solids consist primarily of manure derived from the surface of the feedlot pens.

The purpose of the sedimentation pond is to prevent build-up of organic matter and sludge build up in the evaporation pond. This will help to reduce odour emission. The sedimentation pond will need to be cleaned out every 3-5 years. Due to the infrequent cleaning required,

the sedimentation pond will be deep, approximately 2 meters. The sedimentation pond will have to be lined with a synthetic liner as well as compacted clay in order to minimise the risk of groundwater contaminations.

In order to ensure that the sedimentation system operates sufficiently, the following need to be considered in the design:

- The sedimentation pond will be desludged every 3-5 years, assuming that desludging will occur when the sludge occupies a maximum of 10% of the design capacity of the pond.
- Sedimentation pond must be cleaned of solids before the sludge occupies 60% of the design capacity of the pond.

The following monitoring recommendations must take place to ensure that the sedimentation system continues to work effectively:

- Visual monitoring of sediment depth in the sedimentation pond following rainfall events to determine depth of deposited material.
- Regular visual inspection of damage to and condition of the sedimentation pond lining.
- Quarterly inspections of the sedimentation pond wall structures, paying close attention to structural problems such as cracking and slumping. The date of inspections and significant outcomes of the inspections must be recorded.
- Records must be kept of dates of cleaning activities and any repairs or maintenance.

5.2.2.4 Evaporation pond

The holding pond should be located immediately below the sedimentation pond and aims to capture and store the runoff from the feedlot pens prior to the runoff going through an evaporation and composting process. To minimise the risk of contamination of groundwater, the evaporation pond will have to be lined with a synthetic liner and compacted clay. The clay liner will be approximately 300mm thick.

In order to ensure that the evaporation pond operates sufficiently, the following need to be considered in the design:

- Spill frequency must not exceed an average of one in 20 years.

- Biological activity in the evaporation pond must provide for the rapid stabilisation of the pond contents following significant inflow and odour emissions must remain within acceptable limits so as not to affect surrounding communities.
- Any potential groundwater must not be contaminated by seepage from the evaporation pond.
- No catastrophic failure of pond walls must take place.

The following monitoring recommendations must take place to ensure that the evaporation pond continues to work effectively:

- Ant spills must be recorded and reported.
- Downstream surface water sources must be tested and analysed when spill constituents enter a water source.
- Any desludging, cleaning and maintenance activities must be recorded.
- Water quality in any surrounding boreholes must be tested and monitored.
- Quarterly inspections of the evaporation pond walls must be carried out an any structural problems, such as cracking and slumping, must be noted. The date of inspections and any significant outcomes must be recorded.

5.2.2.5 Manure stockpiling and composing

The solids removed from the regular feedlot pen manure removal, sedimentation pond and evaporation pond should be stockpiled on a bunded slab. The solids should be composted and sold to surrounding communities.

In addition to the above, the following restrictions will be enforced:

- No borrow pit or quarry will be opened on site, larger than 2500m^2. All imported material will be obtained from commercial borrow pits or quarries.
- The footprint of the various structures will be staked out prior to commencement of construction activities.
- No moving or removal of stones, plants or any other natural specimens will be allowed outside the staked construction area.

The construction of engineering services including any water, sewerage and underground electricity lines will require trenching and backfilling as per the engineering design. Where

possible, all excavations of trenches shall be done by hand to limit the impact of excavators on site.

The following will be applicable where excavation done by hand is conducted:

- Excavated material from the trenches along the roads and construction area will be placed on the road surface or as close as possible to the construction area and will not be allowed to be stockpiled in a nearby veld or adjacent vegetation.
- Trenches will only be as deep as required and be backfilled as soon as possible.
- The contractor will check all open trenches every morning for trapped animals.
- All open trenches will be demarcated clearly with danger tape, or as otherwise instructed by the Engineer.

The top 150 mm of backfilling will not be compacted and will comprise topsoil stripped from the area prior to opening of the trench.

Implementation responsibility: The main contractor and project engineer will be responsible for the implementation of the above measures as an on-going process during construction phase.

5.2.3 Visual and aesthetic quality

Currently the study area comprises mostly disturbed/degraded vegetation and cropland. The visual quality of the area may be negatively affected, considering that the development is an above-ground level development. However, to reduce the visibility of the structures, the following techniques should be implemented:

- Directional lighting is advised. Security lights should face away from neighbouring properties.
- Replacement of topsoil where necessary.
- Construction vehicles are not permitted to turn/drive into areas that are not designated for this purpose.
- No additional access routes may be established in the vicinity of any area where construction action is taking place.

Implementation responsibility: The site engineer will be responsible for the implementation of the above measures as an on-going process during construction phase. Hydro-seeding can be done by a contractor in this field.

5.2.4 Stockpiles and general storage of building material and equipment

Special care must be exercised when selecting the location of temporary material storage areas.

- Any excess soil or overburden material must be stockpiled to reduce visibility.
- Excess material that is not used during construction activities should be removed from the site to be used by other users in the construction industry.
- It is essential to place enough sandbags along the toe line of any loose material stockpiled and for the storage of building material.
- In the event of soil and overburden being removed from its locality, it should be stockpiled in a suitable place where, if possible, surfaces are already disturbed and where the natural vegetation will not be covered by this material to a significant extent.
- Overburden or stock-piled material must only be stockpiled temporarily. No soil may be left exposed after construction activities have ceased.
- In the event of soil and overburden being removed from its locality, it must be suitably stockpiled away from any drainage ways.
- Overburden soil can alternatively be re-used in landscaping depending on the need.
- No material must in any event be dumped in any place in the surrounding region. Written proof of disposal at a waste disposal site must be given to the applicant and site manager on every load of construction waste removed from the site.
- No vehicle and equipment parking areas may be established within 20m of any natural drainage ways.

All stockpile areas should be ripped and ploughed at the end of the construction period to loosen soil surfaces for the natural propagation of vegetation and/or to allow for landscaping of the area. The same applies to other temporarily disturbed areas on site, which are vulnerable to the propagation of unwanted species (weeds). It is important that the contractor implements weed control through physical and/or approved chemical eradication methods. Only registered herbicides should be used to curb this problem.

The temporary storage of construction material and especially fuel must be carefully monitored by the site engineer to prevent the risk of accidental spillage or disposal of any such material that will contaminate soil surfaces, surface, and subsurface water. All liquid material must, where applicable, be stored on solid concrete surfaces and must be surrounded by bunds. Bunding is also applicable to fuel and mechanical oil storage areas. Bunding walls should not be less than 30 cm high. Bunding walls must be able to contain 110% of the *"unit's"* capacity stored within it. Storage containers must be inspected regularly to prevent leaks that could contaminate the site.

Implementation responsibility: The main contractor will be responsible for the implementation of the above measures as an on-going process during construction phase.

5.2.5 Community or public safety

The study area is situated in a rural area. Large construction vehicles, including trucks and other heavy machinery, will impact on road safety circumstances on the roads they use, and it is the duty of the contractor to ensure that safety measures are implemented and adhered to.

The safety of the community throughout the construction period is of utmost importance. As road safety awareness is imperative, the following important actions must be noted that will assist in the management of safety during the construction phase where necessary:

- Adequate and correct caution signage and road marking during construction in accordance with the requirements of the South African Road Traffic Signs Manual and the CSRA / CUTA Road Signs Note 13. (Workers with red flags, visible workers and vehicles etc.)
- No soiling of road surfaces, causing accidents.
- A maximum of fifteen workers (if any) may be housed on-site, mainly to guard material and machinery. This will assist in managing and maintaining safety and security at appropriate levels.
- Names and identification numbers of each worker housed on-site must be provided by the contractor.

Implementation responsibility: The main contractor will be responsible for the implementation of the above measures as an on-going process during construction phase.

5.2.6 Waste disposal and management

It is crucial to implement strict and effective waste control and waste management procedures during the construction phase. No littering by any personnel is permissible. The site manager/contractor should conduct regular site clean-ups to keep the site litter free – as litter is not only aesthetically displeasing, but it is also harmful to the environment. All domestic solid waste produced must be disposed of in waste bins situated on site. The bins should be emptied into a covered skip (for storage) on a regular basis, until its collection and removal to a municipal waste disposal site (preferably on a weekly or bi-weekly basis).

No liquid waste material should be disposed of on or near the site during construction, or in any non-designated areas. A firm arrangement must be made to place chemical toilets on the construction site (within the construction camp to be erected). A sufficient number of chemical toilets need to be provided; in the range of 1 per every 8 workers. These toilets must be well maintained and inspected on a daily basis to ensure that they are clean and functioning properly. The toilets must be within walking distance from the work areas. No person is allowed to use any area, other than the chemical toilets provided, as a toilet. No washing of people and/or goods should take place on cleared surfaces, as this water should not be allowed to drain into any of the adjacent storm water canals.

In the event of accidental spillage of liquid substances, like paints and resins, it is important to implement the correct emergency procedures and cleaning-up operations. Pollution of surfaces should be limited at all costs.

The generation of construction waste occurs at every site under development and construction. Due to the costs involved in the disposal of this material at municipal or other licensed waste sites, the contractor or sub-contractor may be tempted to illegally dump waste at concealed locations to save on costs. Therefore, strict control is required from the main contractor on site to control this issue. Proof of disposal of waste material at a registered waste disposal site must be shown after off-loading of each waste load, which should then be logged or registered for control purposes. Control measures in terms of the National Building Regulations and standard requirements laid down by the local authority, with regards to spillage and waste disposal, must strictly be adhered to.

General waste disposal management involves the collection of construction waste at a central collection facility, which should be pre-arranged and implemented. This should include making points available for solid as well as liquid waste – including mechanical fluids disposed of during vehicle maintenance.

The site should be designed in such a manner that hazardous wastes are not located near the permitted fire making area. These areas shall be predetermined and located in areas that are already disturbed. This area should be on a concrete base to avoid any possible seepage into the soil. All hazardous waste must be stored in sealed and suitably marked containers for removal to a hazardous waste landfill site by the contractor on a b-weekly basis. Hazardous waste could include used oils and fluorescent light tubes, as examples. The contractor should refer to the relevant SANS 10228 guidelines (Identification and Classification of Dangerous Goods for Transport – Table 6: Minimum Requirements for Waste Classification) for the classification of hazardous waste.

Implementation responsibility: The resident engineer and contractor will be responsible for the implementation of the above measures as an on-going process during construction phase. Removal of waste from the terrain will be the responsibility of a certified waste contractor.

5.2.7 Dust suppression

During the initial construction phase, it is anticipated that the generation of dust may occur. The management of dust generation during construction is of particular importance. Therefore, dust suppression, as a normal daily practice, is essential. This can be achieved by:

- Watering and compacting of exposed surfaces where dust is generated. This must be conducted and strictly monitored. Such surfaces also include construction areas and unpaved access roads as part of the construction site.
- On rainy days this should obviously not be implemented to avoid access mud generation and water accumulation.
- In dry hot weather conditions water spraying must be applied twice a day on surfaces.

Implementation responsibility: The main contractor will be responsible for the implementation of the above measures as an on-going process during construction phase.

5.2.8 Noise

Another important aspect is the control of noise pollution. This is achieved by implementing the following measures:

- Ensuring that machinery and trucks are well-oiled and maintained; this will make less noise than poorly serviced construction equipment.
- Silencers can be fitted to exhausts of heavy vehicles to limit the noise they produce.
- Lastly, construction hours should be confined to daylight hours of a normal working day, specifically from 7 am to 5 pm in the summer and 7.30 am to 5 pm in the winter.
- No activities should take place on Saturdays after 14:00 and no actions must take place on Sundays.

Implementation responsibility: The main contractor will be responsible for the implementation of the above measures as an on-going process during construction phase.

5.2.9 Vehicle Maintenance and Fuel Storage

- Lubricants and mechanical oils or mechanical fluids must be collected in separate containers or drums to be collected by waste contractors for disposal at hazardous waste sites.
- Used oils that can be refined must be made available to companies for collection.
- These containers must not be placed near any drainage ways.
- In the event of construction vehicle breakdowns or during routine maintenance checks, care must be taken to avoid oil, grease, or any mechanical fluid spills within the study area. Vehicles may not be serviced in or adjacent to the road reserve of the study area, thus servicing must be limited to the designated areas or workshops.
- No temporary fuel storage tanks or containers may be erected near drainage courses and refueling must be done by means of a fuel bowser.
- Fuel storage areas must be bunded effectively and all applicable safety standards must be adhered to. The bunded area around the fuel storage areas should be able to contain 110% of the volume of the fuel container inside it.
- All fuel storage areas must be fenced and secured.

Implementation responsibility: The main contractor will be responsible for the implementation of the above measures as an on-going process during construction phase.

5.2.10 Archaeology and Cultural Sites

- Should archaeological objects of any nature (including fossils, graves or remains of structures) be found, the developer will stop all construction activity, and notify REC. immediately. The Provincial Heritage Resources Agency (PHRA) will be consulted for further investigation and clarification.
- All finds of human remains must be reported to the nearest police station.
- Human remains or any burial ground or part thereof that are deemed to be of cultural significance may not be destroyed, damaged, altered, exhumed, or removed from their original positions without a permit from the PHRA.
- Work in areas where artefacts are found must cease immediately.
- Under no circumstances must the Contractor, his/her employees, his/her sub-contractors, or his/her sub-contractors' employees remove, destroy or interfere with archaeological artefacts. Any person who causes intentional damage to archaeological or historical sites and/or artefacts could be penalised or legally prosecuted in terms of the National Heritage Resources Act, 25 of 1999.
- A fence at least 2 m outside the extremities of the site must be erected to protect archaeological sites.
- All known and identified archaeological and historical sites must be left untouched.
- Work in the area can only be resumed once the site has been completely investigated. The Project Manager will inform the Contractor when work can resume.

Implementation responsibility: The main contractor will be responsible for the implementation of the above measures as an on-going process during construction phase.

5.2.11 Construction camp establishment (if used)

- Workers that are allowed to live on-site should be kept to minimal numbers. Those workers present at night should be on site only to look after construction equipment and to take register of the workers present on site to eliminate crime in the area.
- Any temporary structures will be soundly built and will not pose a danger to personnel.
- The contractor must supply cooking facilities (preferably gas) if labourers are to be housed at the site.

- No fires will be permitted outside the construction camp and adequate firefighting equipment, which complies with fore and safety regulations, must be available at the construction camp site at all times (at least one all-purpose 12,5 kg extinguisher)
- Chemical toilets to be supplied at the construction camp for labourers accommodated on site. They may also use existing facilities on site.
- Welding, gas cutting or cutting of metal will only be permitted inside the construction camp.
- The contractor will supply 210 litre drums at the construction camp, as well as at the construction site, for the storage of domestic waste.
- Recyclable waste including glass, paper and plastic shall be separated at the construction camp, stored, and recycled (where economically feasible).
- Waste must be removed on a weekly basis to a registered waste disposal facility, or through the utilisation of existing municipal waste removal systems.
- As far as possible, local labour should be employed during the construction period.

Implementation responsibility: The main contractor will be responsible for the implementation of the above measures as an on-going process during construction phase.

5.2.12 General rehabilitation of the construction site

It is important that rehabilitation will commence as soon as feasible on each of the construction areas to run concurrent with the construction phase and not to be left until completion of the works. This will increase the chances of successful rehabilitation.

All areas disturbed by development activities will be rehabilitated on completion of the construction phase. The following general procedure will be followed:

- Removal of all construction facilities and materials from site, cleaning up of any remaining oil or other spills and removal of all construction waste from site.
- Shaping of the disturbed areas to blend with the surrounding landscape.
- Placing of topsoil on all disturbed areas (minimum depth 150 mm).
- Organic fertilizers must be added to the topsoil prior to seeding (if required).
- Re-vegetation of all areas where topsoil is placed using a mixture of indigenous grasses and bushes.
- Maintenance of these areas until an acceptable cover has been established. Acceptable cover shall mean 75% ground cover with no gaps exceeding 500 mm.

Maintenance may include watering, mowing, and weeding as well as preventing the development of erosion channels or, backfilling where they have occurred.

5.2.13 Stockpile Areas

Once stockpiles have been removed the ground surface is to be inspected for compaction. Should it be required, the surface is then to be ripped and the prescribed re-vegetation process followed.

5.2.14 Rehabilitation of Construction Camps

Rehabilitation will be necessary in the following areas:

- Concrete and compacted earth platforms.
- Removal of fuel storage tanks.
- Removal of chemical toilets.
- Access roads running into and through the camps.

Concrete platforms will need to be broken up and rubble removed. The prescribed re-vegetation process must then be followed.

5.2.15 Re-vegetation Process

The basic re-vegetation steps which will be implemented where and if required are detailed below:

Step 1: Prepare the area to be re-vegetated for top-soiling - this may require soil ripping, scarifying and/or digging of steps or terraces. The scarification should take place to a minimum depth of 150 mm. If ridges are formed, they should be approximately 100 mm high and 400 mm wide.

Step 2: Stockpiled topsoil must be placed on areas to be re-vegetated to a minimum depth of 100 mm, spread when dry by means of hand raking or mechanical means to a uniform thickness.

Step 3: If required when sodding or hydro seeding, appropriate organic fertilisers must be applied and worked into the soil to a minimum depth of 150 mm.

Step 4: Fresh, good quality seed - which is certified by the supplier and free from contamination by seeds of other species - can be used for the re-vegetation process, although seed harvested from site is preferable. The rehabilitation grass seed mix will be seeded at a minimum density of 30 kg/ha, utilising a mixture of suitable species. The mixture must also always include at least one legume species.

Step 5: Mulch should be applied to protect the seeded area from erosion. The mulch should be composed of straw or other cellulose-rich material and free of undesirable seeds. The mulch must not be excessively fresh and green or in an advanced state of decomposition as it could smother growth. It must be applied to a depth and density that will prevent erosion by wind and water, but not completely block out the access of sunlight to the soil or prevent penetration by young plants.

Step 6: Re-vegetated areas are to be enclosed within an erected safety barrier to prevent excessive trampling and any other factors that might cause erosion or compaction. No road building equipment, trucks or other heavy equipment will be permitted onto re-vegetated areas.

Step 7: Re-vegetated areas must be irrigated on a regular basis, or as required.

Step 8: An appropriate maintenance and monitoring program must be implemented. This program will include monitoring of the success of seed germination, growth of the plants, removal of invasive weeds, replanting of areas where re-vegetation has not been successful once the cause of the inhibiting factor has been identified and remedied, and repair of any funnels or erosion channels.

5.3 Operational phase:
Timeframe: 30 years plus

Responsibility: The applicant will be responsible for the implementation of the measures as an on-going process during operational phase.

Mitigation of impacts during the operational phase is of great importance, as there are long-term issues that are of relevance.

5.3.1 Waste Management of domestic solid waste

- General waste generated during the operation of the feedlot must be collected in waste bins that are emptied on a regular basis into a central waste collection facility.
- General waste is to be collected on a regular basis to be emptied at the nearest municipal solid waste disposal site. The products that will typically be generated are general refuse such as empty food cans, leftover foods, paper, plastic and bottles.
- Recycling is always desirable and if the separation of waste can be encouraged and implemented, this would be highly beneficial.

5.3.2 Waste management of cattle manure from feedlot

The main waste product of a beef cattle feedlot is manure. To maintain good conditions for workers and cattle and to ensure sound environmental performance, manure must be removed from feedlot pens regularly. Some feedlots use bedding and this, along with small amounts of spoilt feed thrown into the pen during bunk cleaning, is removed with manure during pen cleaning. Thus, manure handling becomes a major ongoing part of feedlot management.

5.3.2.1 Pen cleaning

Pens must be cleaned regularly to:

- optimise cattle performance and welfare.
- present animals for pre-slaughter inspection in a clean condition.
- provide a safe work environment for staff (particularly pen riders).
- mimimise odour levels.
- minimise dust during hot, dry conditions.
- promote good pen drainage.
- promote good integrity of the pen surface.
- minimise costs of pen maintenance.

Frequent, regular pen cleaning reduces the average depth of manure over the pens, promoting more rapid pen drying. Odour emissions from wet feedlot manure can be 50–100 times higher than from dry manure and the odour is more offensive. Even a small area of

wet manure, such as a pothole, can be a significant source of odour. Regular pen inspection allows low spots to be identified early and repaired.

Muddy, odorous conditions do not provide a pleasant, safe working environment for pen riders and others working within the feedlot.

Weight gains can be reduced by 30–40% and feed conversion rates increased by 20–35% when cattle are kept on deep manure. Wet, muddy conditions also adversely affect animal health, with increased incidence of foot problems such as foot abscesses.

5.3.2.1.1 The manure pad

As manure deposited on the floor of feedlot pens dries and is compacted by the action of cattle hooves, it typically forms layers. The lowest layer may be an 'interface' layer – a compacted, moist plastic mixture of manure and soil – which has low permeability and can reduce nutrient leaching through the feedlot pen. If there is no interface layer, the manure layer overlies the feedlot base directly as a moist and plastic layer, sometimes with a crust on the surface.

The thickness of the manure layer depends upon the manure deposition rate, the pen cleaning frequency, weather conditions and other factors. Under dry conditions, about 20 mm of manure accumulates across the pens after 25 days, gradually increasing to about 30 mm after 75 days and to around 35 mm after 100 days. When the dry compact manure pack is moistened by rainfall, it may double in depth.

5.3.2.1.2 Principles of pen cleaning

Feedlot pens should be cleaned at least every 13 weeks. Ideally, pen cleaning should occur when the manure is moist (but not wet). Moist manure is more easily removed in a good even cut for a smooth pen surface. However, pens should be cleaned regularly even when conditions are not ideal.

If a manure–soil interface layer will be retained, it is necessary to determine the depth of manure covering it. In moist manure, a screwdriver pushed into the pad will encounter increased resistance at the interface layer. The difference is less distinct if the manure is hard and dry, and it may be necessary to dig into the pad to confirm the depth to interface.

The depth of manure and its moisture content will vary over the pen; for example, manure will accumulate and may be wetter under shade. During cleaning, care needs to be taken to prevent machinery from cutting too deep in different parts of the pen. If the manure is too hard, pen cleaning can be deferred until the manure moisture content increases.

Because of climatic conditions some feedlots do clean all manure from the feedlot floor. But this may include large amounts of soil or rock resulting in more material for processing, including manure screening. It may also increase pen maintenance needs and result in more wear and tear on manure handling equipment.

Attention to detail during pen cleaning is important to control odour since even small areas of wet manure can emit significant odour. Every time pens are cleaned, manure that has accumulated under fencelines, along the sides of feedbunks and water troughs and along aprons should also be removed. Cleaning under the bottom fenceline more frequently will also promote good pen drainage and fly control.

Manure can be temporarily mounded in the pens before stockpiling and composting, but never in drains or cattle alleys.

Temporary mounding of manure in the pen may increase management flexibility because:

- decomposition reduces the mass of manure to be removed from the pen.
- pens can be cleaned as required and more regularly.
- the manure mound can be removed from the pen at a convenient time.

Mounds should be removed when conditions allow but also when:

- they become too high for machinery to practically and safely drive over them.
- they become a hazard to the welfare of cattle.
- they begin to disintegrate under dry conditions.
- manure haulage equipment becomes available.

To form stable mounds, the manure needs to be moist enough to be well compacted so that it can support the weight of cattle and also to exclude air. Mounds should be shaped so they

shed runoff and located so as not to interfere with pen drainage. In unshaded pens, they should be situated in the centre of the pen with their long axis running down the slope. In pens with shade over the centre or top third of the pen, they should be located downslope of the shade structure.

5.3.2.1.3 Pen cleaning equipment

Equipment that can be used for pen cleaning includes:

- Tractor-drawn box scrapers – box scrapers are widely used in medium to large feedlots in conjunction with wheel loaders. These scrapers provide good depth control, a smooth pen finish, a single manure removal and mounding operation and a fast rate of manure removal. However, they are less effective in wet conditions when an excavator may need to be used instead.
- Wheel loaders – wheel loaders are widely used in medium and large feedlots for removing mounded manure from the pen. While they can also be used to quickly clean the pens, they often produce a rough surface finish and may damage the interface layer. Buckets should be fitted with small teeth to minimise damage to the pen surface.
- Excavators – excavators can efficiently remove manure, particularly under wet conditions, but need to be used carefully as it can be difficult to achieve good depth control and a smooth finish. They are efficient at transferring mounded manure into trucks.
- Skid-steer bobcats – bobcats can be used to tidy up small areas.
- Under-fence pushers – mounted on tractors, front-end loaders or bobcats, under-fence pushers are commonly used for removing manure from under fencelines, around shade posts and water troughs; and manure and spilt feed from feed bunk aprons.
- Slider blade – mounted on a skid steer bobcat, the slider blade can be used in place of an under-fence pusher but can also clean drains and lanes.
- Graders – graders are suitable only for cleaning large pens; they provide good depth control and a smooth finish.

5.3.3 Waste management of mortalities

Increased public concern for the environment and resulting stricter regulations governing the disposal of mortalities present new challenges. The usual way of dealing with carcasses in the past was by burial or incineration. Buried animals can contaminate ground water and smoke from incineration contaminates the air. In most cases currently carcasses are disposed of on the farm itself, thereby promoting bio-security and the prevention of collection trucks entering the farm grounds.

Composting (as an alternative) is an inexpensive and environmentally friendly way to dispose of carcasses.

A different technique regularly used in the US is (that is also be implemented in RSA):

Mortality composting is begun by placing a 30 cm layer of cover material (wood shavings) in the bottom of the bin (a bin is built from treated wood, concrete or bales of hay, over a concrete floor with a tin roof) (please refer to the attached articles for drawings and images). Decaying carcasses release excess moisture, so a thick absorptive base layer (wood shavings) plays an important role in preventing release of excess liquid. Carcasses placed in the composting bins should not touch each other and should be at least 22.5 to 30 cm from bin walls. Too many carcasses in one spot leads to localized wet spots and poor decay. Carcasses that are too close to the cool exterior side walls of the bin will decay slowly and are less likely to be exposed to the high temperatures necessary to kill disease-causing microorganisms.

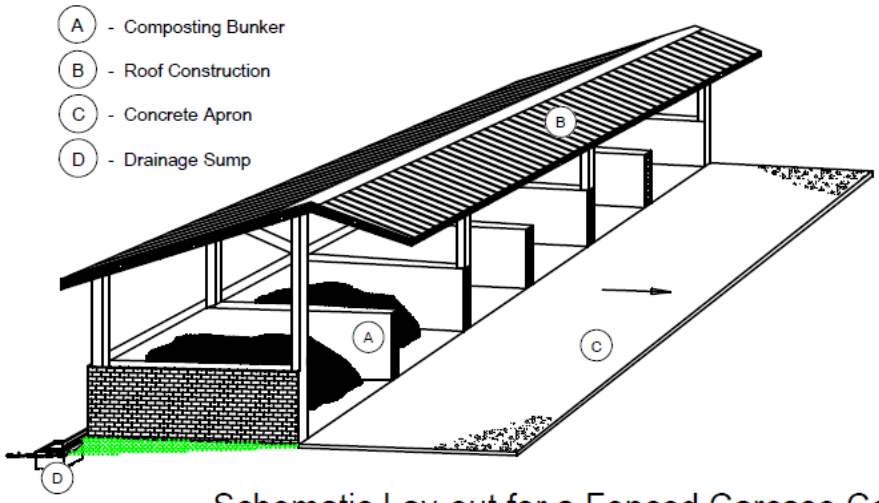
After a layer of carcasses has been placed in the bin, according to the article, 15 to 22.5 cm of cover material must be added. Complete coverage is essential to avoid problems with insects, rodents, and scavengers. Daily layering of new carcasses and cover material continues until the bin is filled to a depth of about 1.6 m. In some instances, it may help to segregate large and small carcasses in separate bins. This allows smaller carcasses to move through the treatment process quickly, minimizing the amount of bin space tied up in lengthy treatment cycles. To ensure continuous coverage throughout the composting cycle the article refers to the fact that it may be necessary to add cover material from time to time as material within the bins settles. This is particularly true when large carcasses are composted. In a properly operating facility, new material added to bins reaches temperatures of 50 to 65°C within 24 to 48 hours. Internal temperatures can be monitored with a long stemmed (90- to 120-cm) composting thermometer.

For an accurate picture of internal conditions, probe the bin at several locations. It is normal to find hot and cool spots within the same bin, so a single temperature measurement can be misleading. If a bin fails to heat up, too much or too little moisture is the most common cause. It may be necessary to unload the bin and mix-in compost from an active (hot) bin to remedy the problem. After a bin is completely filled, it must undergo a primary heating cycle of 60 to 90 days. The length of the primary heating cycle will vary with the size of carcasses placed in the bin. For farrowing house and nursery losses, an initial heating cycle of as little as 30 days may be adequate. If the bin is filled with larger market-weight animals or breeding stock, primary heating cycles as long as 6 months may be necessary.

Following the primary heating cycle, the partially composted carcasses are removed from the primary bin and placed in a secondary bin. The mechanical action of moving the compost breaks up the pile, redistributes excess moisture, and introduces a new oxygen supply. Once this takes place, a secondary heating cycle occurs, accompanied by further decomposition.

By the end of a 60- to 90-day secondary heating cycle, even large carcasses of breeding stock are normally reduced to a few large bones that are free of soft tissues which cause odours or attract insects and predators.

An example of the composting facility below:



Schematic Lay-out for a Fenced Carcase Composting Facility

5.3.4 Water usage

• The water used that is supplied from the onsite bore hole should be carefully managed to ensure that water extraction does not exceed the maximum amount allowable as indicated on the water licence application. • The water to the houses should be under constant pressure to ensure sufficient water supply to the feedlot.	

5.3.5 Management of odour, dust and flies

Odour, dust and flies can cause conflict with neighbours, create an unpleasant workplace and affect cattle performance and staff welfare.

Odour at cattle feedlots is mainly the result of anaerobic breakdown of organic matter, primarily in manure but also in waste feed. While good siting and feedlot design (particularly drainage) are vital in minimising odour, good hygiene and waste management are also imperative.

Odour release sites at a feedlot can include:

- pens and cattle handling facilities.
- drainage systems including sedimentation tank or basin and effluent holding pond.
- feed storage and preparation areas and silage pits.
- manure and effluent utilisation areas.

Two days after wetting, odour emissions from wet feedlot manure can be 50–100 times higher than those from dry pads and the odour is more offensive. Even a relatively small area of wet manure could be a significant odour source.

Pad temperature and moisture content are the most important factors influencing odour emissions from the pen (Nicholas et al. 2004). However, the depth of manure influences the rate of pad drying and hence the length of time over which higher odour levels persist.

Odour emission rates for sedimentation basins are generally greater than those from holding ponds. Pond rates under stable conditions are generally very low, but they can suddenly increase greatly after a significant inflow.

Odour from manure stockpiles, compost piles and silage pits are similar to those of feedlot pads. The character of odour from these sources seems to be less offensive than those from pads and ponds.

To minimise odours, limit the depth of manure over the pad, maintain an even feedlot surface and use practices that facilitate rapid drying of manure. Odour is reduced by cleaning pens frequently, and regularly removing:

- manure or waste feed that has accumulated under fencelines and may impede drainage.
- manure that accumulates along feedbunks, water troughs and aprons.
- manure that settles in the drains, settling pit or sedimentation basin after rainfall.

As manure stockpiling areas can be a source of odour under wet conditions, good drainage from the windrows themselves and the pad is important.

5.3.5.1 Odour control

Areas or activities where there are opportunities to control odours include:

- pen cleaning
- cleaning of drains and sedimentation tanks and basins
- pond desludging
- manure screening
- manure spreading
- effluent irrigation
- disposal of mortalities.

As there is some flexibility in the timing of these activities, it is useful to have a basic understanding of atmospheric conditions that can disperse odours. Atmospheric conditions and their effects on odour dispersal are:

- Unstable atmosphere – typically the atmosphere is unstable on a warm sunny day when hot eddies of air rise from the land surface and cause significant mixing of the atmosphere. Odours are rapidly dispersed and carried upwards, quickly reducing odour intensity away from the feedlot. Because these conditions promote rapid dispersion, they are ideal for carrying out most odour-generating activities.

- Stable atmosphere – occurs on cold, still clear nights when the air at the land surface stays cool and remains trapped below an inversion layer. Little atmospheric mixing occurs below this layer and there is little dispersal of odours. Odours remain at relatively high intensity at some distance from the feedlot. These conditions are unsuitable for undertaking activities that will generate significant odour.
- Neutral atmosphere – occurs on heavy overcast days and odour dispersion is only moderate.

Effluent and manure utilisation should occur only when the prevailing weather conditions are unlikely to result in odour and dust nuisance for nearby residents. Consider the wind direction and strength, the time of day and the atmospheric stability. A plan showing the location of all nearby neighbours and a simple wind vane will help to show which neighbours are at risk of odour nuisance from effluent or manure utilisation on particular fields. It is also useful to understand the relative sensitivities of different neighbours to odour.

It can be worthwhile to develop an annual utilisation plan that takes into account seasonal wind directions, rainfall patterns and crops grown. Different paddocks might be selected for utilisation at different times of the year depending on risk.

To reduce odour nuisance to neighbours, spread manure or irrigate effluent:

- frequently to minimise events with large odour generation
- evenly
- in the morning when the air is warming rather than late in the afternoon
- as close to the ground as possible, particularly for spray irrigated effluent
- then as soon as possible harrow, disc or chisel plough to incorporate manure into the soil
- spray effluent as close to the ground as possible and avoid high-pressure guns.

But do not spread (or irrigate):

- if the wind is blowing towards a neighbour
- if rain or heavy cloud are expected – use weather forecasts
- just before weekends or public holidays, particularly if close to a public area
- very dry manure that will result in dust being blown towards neighbours.

Also:

- Eliminate all wet patches in drains and yards
- Avoid stockpiling wet manure as this produces very strong odours, even after spreading
- Train all staff in the mechanics and importance of odour dispersion
- Undertake public relations exercises – advise neighbours before spreading manure or irrigating effluent, even if winds will not blow towards them.

5.3.5.2 Dust control

Dust in feedlot pens should be controlled for the comfort and safety of cattle and workers, and to avoid impacting amenity. The health effects of dust depend on their concentration, size distribution, composition and persistence. Large dust particles (>10 µm) are typically responsible for adverse aesthetic impacts (e.g., soiling and discolouration) rather than health concerns. Finer dust particles are strongly linked to respiratory symptoms; these fine particles can remain suspended in the atmosphere for days and travel long distances.

Dust concentrations can be high downwind of feedlots, with a peak concentration typically seen around sunset with increased cattle movement and stable atmospheric conditions at that time. However, nuisance dust from the feedlot is unlikely to travel far enough to cause nuisance above that from other agricultural activities.

Control dust by minimising the depth of manure over the pad, by managing the moisture content of pad manure and by watering roads and lanes. For most feedlots, dust will need to be controlled only periodically.

Temporarily increasing the stocking density is one way to add moisture to the feedlot pad as it increases the rate of urine and faeces added to a given area. However, the capacity to vary stocking density may be limited by the conditions of the feedlot's licence or permit.

Mobile water tankers are useful for controlling dust on roads and lanes. Controlling dust loss reduces the exposure of sharp gravel so watering roads may provide an additional benefit through reduced wear and tear on tyres. Typically, tanker sizes range from 20,000–25,000 L up to 40,000 L capacity. These tankers should be fitted with 30–90 kW pumps to supply a

discharge rate of 2,000–10,000 L/min. Depending on the design of the tanker nozzles, water can be spread in a band 2–24 m wide (Sweeten and Lott 1994). The main determinant of tanker efficiency is turnaround time for loading and travel between the load and spreading points. In large feedlots, this can be minimised by providing multiple fill-up points. Roads can also be sealed to eliminate dust from this source.

Amending feedlot pad surfaces with wood chips might cushion hoof impact that causes dust and reduce dust directly by decreasing evaporation from the pad.

Since pen cleaning disturbs pad manure and creates dust, it should be avoided when the manure is very dry. However, the pens still need to be cleaned at an acceptable frequency.

Spreading dry manure can generate significant dust and should be avoided, especially under windy conditions.

5.3.5.3 Fly control

Feedlot operators consider flies to be a nuisance. The most important impacts (Vrech et al. 2004) are:

- poorer working conditions
- risk to human health
- spoilage of feed
- poorer animal welfare
- potential for chemical residues
- production losses.

Of the major fly species found at feedlots, only house flies and stable flies breed at the feedlot; other species predominantly breed elsewhere. Flies breed in a number of relatively small areas, the most common being manure, vegetation and moist areas e.g., in hospital and induction areas, under fence-line manure, drains, silage pits and heavily grassed areas adjacent to the feedlot.

Pen cleaning has a short-lived effect on fly breeding since manure quickly builds up under fences after cleaning. Because this manure is not trampled by the cattle it provides a good larvae habitat. Most feedlots use fly control including baits, insecticide sprays and traps. Fly

baits have limited effectiveness as they attract and kill only adult house flies. There are also resistance issues with these. On the whole, insecticidal treatments have limited effectiveness.

Integrated pest management (IPM) systems that incorporate mechanical, physical, biological and chemical controls are likely to be most effective.

The RULES developed for control of nuisance flies at a feedlot site (based on Urech et al. 2004) are:

- Reduce fly breeding sites through
  - good manure management: clean under fencelines, sedimentation basins, drains, hospital pens and manure stockpiles.
  - clean up feed spilled near the bunks, hospital pens, stables and feed mill.
  - good feedstuff storage – some ingredients, such as molasses and silage, attract more flies. Clean up spills and keep silage well covered.
  - appropriate mortalities management – compost and cover completely.
  - maintaining the feedlot troughs, drains, sedimentation basins and vegetation management by mowing or slashing around the feedlot complex, particularly areas adjacent to drains and pens.
- Using insecticides selectively
  - rotate chemical groups
  - target insecticide use towards hot spots
  - use residual adulticides, particularly on resting sites rather than manure
  - use larvicides that will not affect beneficial insects
  - use baits for house flies with rotation between chemical groups.
- Lot feeding design principles, including
  - suitable pen foundation and slope
  - good feed bunk and water trough design
  - fence design that allows for easy cleaning
  - good construction of drains, sedimentation systems and effluent holding ponds
  - well-designed manure stockpile and composting area.
- Enhancing populations of biological control agents through

- biological control agents, such as parasitic wasps, predatory mites and entomopathenogenic fungi, that can play an important role in killing larvae and flies; further development is needed
- sustaining target parasite and predator populations through appropriate management
- boosting parasite populations through strategic releases.

- Systematically monitor fly populations by
  - scouting adults and larvae to determine population thresholds
  - using traps for adults; larval density ratings for immatures
  - observing animals.

5.3.6 Noise impact management

The location of the development is adjacent to other farming practises. The significance of the noise impact associated with the development during the operational phase of the feedlot is low negative. Noise will be generated by the movement of vehicles such as delivery and pick-up trucks within the feedlot and the opening and closing of the security gate entrance. The following noise impact mitigation measures can be implemented:

⇒ The security gate entrance should be well-oiled at all times to prevent excessive noise. ⇒ Speed limits should be enforced within the complex (speed bumps are one way of ensuring this), not only in terms of reducing noise levels, but also to ensure the safety of workers on the Feedlot. ⇒ Deliveries and pick-ups with large trucks should be limited to twice a week on predetermined days of the week. ⇒ Intentional disturbances to the cattle should be avoided to keep them calm, therefore making less noise.	

5.3.7 Compliance to standards

Compliance to all relevant regulatory standards and codes of practice is essential. An assurance that the development will comply with the relevant regulatory standards and codes of practice will be enforced by the Environmental Authorization to be issued by the FS DESTEA, providing that authorisation for the development is granted and also in terms of NHBRC guidelines, to which all building and services will comply.

Standards for Feedlots should be adhered and complied to.

Implementation responsibility: The applicant will be responsible for the implementation of the above measures as an on-going process during operational phase.

5.3.8 General provisions

Disposal of hazardous waste should be separately handled from domestic waste. This will help to prevent water and soil pollution. Hazardous waste includes substances such as paint, chemicals, razorblades, needles etc.

Implementation responsibility: The applicant will be responsible for the implementation of the above measures as an on-going process during operational phase. The applicant expressed his willingness to participate in this regard.

5.3.9 Utilisation of manure, compost, and effluent

Feedlot manure, compost and effluent can be valuable sources of nutrients and organic matter for improving soil fertility, structure, waterholding capacity and crop or pasture production. Careful management is needed to gain the most benefit from their utilisation while protecting environment and preventing impacts to neighbours.

While manure and compost may be spread off-site, effluent is less readily transportable, and its utilisation generally occurs on-site.

5.3.9.1 Environmental protection for utilisation areas

Application of effluent and manure to land may pose a risk to the environment through:

- excessive nutrients or nutrient imbalances in soils
- loss of nutrients to surface waters through runoff
- nutrient leaching through soils into groundwater.

The risk of nutrient loss from utilisation areas can be prevented or mitigated by selecting areas that provide suitable land and buffers to sensitive sites, by using appropriate spreading or irrigation practices, and by regularly monitoring soil nutrient levels and responding appropriately.

Amenity can be protected from odour and dust by careful application practices and timing of utilisation, and by maintaining adequate separation distances to nearby sensitive land uses.

5.3.9.1.1 Selecting a utilisation area

When selecting a new utilisation area or assessing the viability of an existing utilisation area, the following should be considered:

- Nutrients are most efficiently removed by growing a high yielding crop that is harvested and transported from the site. Thus, the area should either be able to produce dryland crops reliably or should be irrigated.
- Select areas with good agricultural soils (e.g., adequate nutrients, plant available water capacity) with no serious limitations to plant growth (e.g., no subsoil constraints, not prone to salinity, waterlogging or flooding). The land should have a suitable topography for cropping (not steeply sloping).
- The utilisation area needs to be large enough to spread the nutrients in the wastes at sustainable levels. While it may be possible to use land with some significant limitations, this will require increased land area and/or management.
- Grazing removes nutrients at a slow rate and is not a preferred land use for utilisation areas. In addition, the recommended withholding period between effluent irrigation or manure spreading and grazing by stock is 21 days.
- Provide buffers between utilisation areas and watercourses, and unprotected aquifers (e.g., shallow water table covered by permeable soil).
- Provide adequate separation distances to nearby sensitive uses. Distance between utilisation areas and sensitive land uses such as residences and public amenity areas allows odour to disperse and reduces the likelihood of odour nuisance.

5.3.9.1.2 Management practices that protect the environment

Good management of manure spreading, or irrigation is necessary to protect the environment. The following principles should be adopted:

- Apply the wastes at rates that are sustainable considering the nutrients, salts and organic matter of the waste stream, soil nutrient status, land use and expected yields and climatic conditions of the site. Supplementary irrigation helps ensure the crops grow and fully utilise the applied effluent.

- Do not spread or irrigate wastes if the soil is very wet or if heavy rainfall is imminent. This may promote increased drainage or runoff which can pose a pollution risk to groundwater and surface water.
- Control the effluent irrigation rate to prevent runoff.
- Spread manure and effluent evenly.
- Incorporate spread manure into the soil to a shallow depth.
- Monitor soil conditions on an ongoing basis.
- Record nutrient application rates and nutrient removal rates. This helps in understanding the ongoing suitability of utilisation areas and the likelihood of nutrient losses.
- Protect amenity by careful application and timing of utilisation.

5.3.9.2 Manure and compost spreading

5.3.9.2.1 Manure and compost utilisation practices

Most of the larger feedlots send at least part of their manure off-site. The spreading rates used on-farm by these feedlots are highly variable, ranging from less than 5 t/ha to more than 30 t/ha. Manure is mainly spread on land used to grow hay, silage or grain crops (O'Keefe et al. 2011).

Most of the smaller feedlots spread manure on their own or nearby land, typically at rates of up to 5 t/ha.

5.3.9.2.2 Timing of manure and compost spreading

The ideal timing of manure applications depends on factors including:

- crop or pasture needs
- manure or compost maturity
- timing of other management events (cultivation to incorporate manure)
- field conditions (soil moisture)
- wind conditions.

On soils with low background nutrient levels, spreading manure just before sowing may result in crops that are less vigorous and lower yielding than those grown using inorganic fertilisers. This can occur because the nutrients in the manure are less available for immediate uptake by the plant roots. Nitrogen and phosphorus are present in manure and compost in both

inorganic and organic forms; the latter have to be mineralised into inorganic forms to be available to the plants. Most potassium in manure is in the inorganic form and ready for uptake.

Applying manure 4–6 months before the crop is established allows nutrients to mineralise from their organic matter and reduces the risk of nitrogen draw-down, which may occur after aged manure is spread. However, nitrogen losses can increase if manure is applied too far ahead of crop planting, particularly if there is minimal incorporation of the manure. Nutrient availability is likely to be less of a concern if the manure is well-aged or composted before spreading, particularly if the soil has reasonable background nutrient levels.

Accessibility of manure nutrients to plant roots can also be an issue. In modern broadacre cropping systems, manure is generally broadcast before the crop is sown using low disturbance, no till (e.g., knife points and press wheels) or zero till (e.g., disc seed systems) seeding equipment. This results in little incorporation of manure at planting and minimal manure in the seed row close to the tiny roots of germinating crop seedlings. Minimal manure incorporation can also result in increased nitrogen losses. Thus, spreading manure as close as possible to planting is sometimes recommended to allow the crop to take up rapidly mineralised nitrogen as it becomes available. In many cases poor crop vigour is phosphorus-related.

The problems described above can be overcome by spreading manure annually or using a 'starter' application of inorganic phosphorus fertiliser with the manure just before planting. Depending on the background phosphorus levels in the soil, the fertiliser rates may be significantly lower than conventional application rates. The levels of available nutrients in paddocks planned for manure or compost spreading should be tested. Recent improvements in soil testing technologies such as DGT (Diffuse Gradients in Thin Films) tests have increased confidence in making decisions on whether inorganic fertiliser should be applied in conjunction with manure applications.

If the paddocks are to be ploughed for sowing, spreading manure beforehand will allow it to be incorporated into the soil. If possible, manure should be spread when the soil is not too wet to limit compaction.

Manure spreading should be avoided under windy conditions especially if the wind is blowing towards nearby houses or public use areas.

To protect grazing livestock from risk of pathogens a withholding period of 21 days applies to paddocks that have been spread with manure or compost.

5.3.9.2.3 Manure and compost spreaders

There is a wide range of manure spreaders. The amount of manure for spreading the quality of the manure and the proposed spreading rate all determine which spreader will be most suitable. The cost and efficiency of manure spreading influences the value of manure as a fertiliser.

Purpose-built manure spreaders are typically categorised as rear or side discharge systems with capacities of 1–20 t. Rear discharge spreaders are usually equipped with a moving conveyor belt, moving floor chain or hydraulic push door that transfers manure to horizontal or vertical beaters, or spinning discs. Side discharge systems use a horizontal auger to transfer manure to the spinning discs or beaters. Both discharge systems can be self-propelled (i.e., mounted on a truck or tractor chassis) or towed behind a tractor as an independent unit.

Conventional fertiliser spreaders typically use a rear door to control the rate of fertiliser falling onto the spinning discs (to ensure accurate, uniform application rates). Chunks of manure can become trapped in the rear door and prevent manure from being uniformly spread over land. Hence, conventional fertiliser spreaders are not suited to applying unscreened manure.

The best coverage is often achieved by belt or moving floor-fed horizontal disc spinners with screened or composted manure. Beltfed spreaders are less effective with inconsistent manure. While side-delivery spreaders use more power, they are suitable for all manure. Horizontal beater spreaders also suit all manure but spread at higher rates.

The uniformity and time efficiency of manure application is highly dependent on manure physical properties. Manure with a low moisture content (<35% moisture) that has been either composted and/or screened can be effectively applied using a spreader with either

beaters or spinning discs but inconsistent, lumpy manure can be effectively applied only using a spreader with beaters.

Operator efficiency influences where manure is spread on the paddock and at what rate. This is especially relevant for spreaders where operation speed influences the rate applied. Consistent spacings between spreader passes are important for covering the whole paddock evenly. GPS guidance aids the accuracy and efficiency of the spreading operation, reducing overlap and missed areas, compared to estimation by the operator.

5.3.9.2.4 Off-site use of manure and compost

Many feedlots provide at least part of their manure or compost to off-site buyers. Duty of care: manure utilisation can be provided to people buying manure to ensure they are aware of their duty of care.

5.3.9.2.5 Manure transport

To avoid manure spillage and associated odour or dust concerns, loads of manure being transported along public roads should always be covered.

5.3.9.2.6 Utilisation of carcase compost

The principles for utilising carcase compost are generally the same as those for manure or compost. Since carcase compost contains material of animal origin, it should not be spread on land that is being grazed.

5.3.9.3 Effluent irrigation

5.3.9.3.1 Effluent utilisation practices

Most larger feedlots irrigate some effluent, generally using spray irrigation systems; some use surface irrigation. Effluent is mostly used to grow hay or silage crops although it is also used to produce grain.

5.3.9.3.2 Timing of effluent irrigation

The timing of effluent irrigation will often be driven by the need to empty effluent ponds so that they are ready to receive future runoff. To reduce pathogen levels, effluent should be stored in the holding pond for at least a month before irrigating and then used to meet crop water demands like other irrigation. If a terminal pond is used to capture runoff from an

effluent irrigation area this water should be irrigated back onto the land as soon as practical after any significant inflow.

Effluent applications should never raise the soil moisture content above field capacity and the application rate must be controlled to ensure runoff does not occur. Effluent should not be irrigated under heavy cloud, if rain is forecast or on windy days.

Effluent should not be irrigated in the four weeks before harvest on human food crops that will be eaten raw or with minimal processing. To protect grazing livestock from pathogen risks, a withholding period of 21 days after effluent irrigation is recommended.

5.3.9.3.3 Practical effluent irrigation

A range of different effluent irrigation methods is available. The most suitable methods will depend on the following factors:

- effluent composition
- topography – slope and uniformity
- crop type – cultivation requirements, value, required accuracy and uniformity of application
- soils – permeability, sealing characteristics, water holding capacity, variability
- costs – capital, labour and energy
- physical shape of the utilisation area – fences, drainage lines, other infrastructure
- prevailing seasonal conditions.

The salt content of effluent may be a constraint and cause leaf burn, yield reduction and degradation of some soils and crop types. Sustainable effluent irrigation rates may need to be very low to manage the salt load. Management options could include using a low pressure spray or drip system, effluent dilution with clean water, or following effluent with irrigation with clean water.

Some form of sprinkler irrigation is generally preferred to flood irrigation because:

- there is reduced potential for runoff and subsequent collection problems
- it can provide greater uniformity of application
- it can be used on soils with high infiltration rates (e.g. >10 mm/hr)

- it can accurately apply smaller quantities more regularly to more closely balance crop or pasture water requirements and utilise more effluent.

Travelling drip irrigation may also be an option. Small travelling irrigators generally operate at higher pressures to pivot and lateral move irrigators which means a higher operating cost per unit of water applied.

For irrigation of resuspended sludge or other effluent with a high solids concentration system, the irrigation system requires high pressure main lines to prevent settling in the pipeline, capacity for clean water flushing along the pipeline and large aperture spray nozzles.

In some cases, terminal ponds may be positioned below utilisation areas to capture the initial and possibly heavily polluted runoff from storm events and runoff from flood irrigation. Captured runoff should be re-irrigated onto the utilisation area when the soil has a suitable moisture content.

5.3.10 Disease/Biosecurity management in general

The goal of biosecurity is to stop transmission of disease-causing agents by preventing, minimizing or controlling cross-contamination of body fluids (faeces, urine, saliva, etc.) between animals, animals to feed and animals to equipment that may directly or indirectly contact animals. Biosecurity management practices are designed to prevent the spread of disease by minimizing the movement of biologic organisms and their vectors (viruses, bacteria, rodents, flies, etc.) onto and within your operation. Biosecurity can be very difficult to maintain because the interrelationships between management, biologic organisms and biosecurity are very complex. While developing and maintaining biosecurity is difficult, it is the cheapest, most effective means of disease control available, and no disease prevention program will work without it.

Infectious diseases can be spread between operations by:

- the introduction of diseased cattle or healthy cattle incubating disease;
- introduction of healthy cattle who have recovered from disease but are now carriers;
- vehicles, equipment, clothing and shoes of visitors or employees who move between herds;

- contact with inanimate objects that are contaminated with disease organisms;
- carcasses of dead cattle that have not been disposed of properly;
- feedstuffs, especially high-risk feedstuff which could be contaminated with faeces,
- impure water (surface drainage water, etc.);
- manure handling and aerosolized manure and dust; and
- non-livestock (horses, dogs, cats, wildlife, rodents, birds and insects).

5.3.10.1 Develop a biosecurity resource group

The first step is to develop a Biosecurity Resource Group/Team. The group should include people important to the success of your operation such as your operation supervisors, veterinarian, nutritionist, extension specialist, suppliers and others who may have special knowledge in control of biologic organisms. Generally, beef operations have been open to vehicle traffic and visitors. Of all the possible breakdowns in biosecurity, the introduction of new cattle and traffic pose the greatest risks to cattle health. Properly managing these two factors should be a top priority in your operation. Biosecurity plans should be developed to meet the specific needs of each operation.

Biosecurity has three major components:

- isolation,
- traffic control, and
- sanitation.

When effectively managed these components meet the principle biosecurity objective of preventing or minimizing cross-contamination of body fluids (faeces, urine, saliva, respiratory secretions, etc.) between animals, animals to feed and animals to equipment.

5.3.10.1.1 Isolation

Isolation prevents contact between animals within a controlled environment. The most important step in disease control is to minimize commingling and movement of cattle. This includes all new purchases as well as commingling between established groups of cattle. Even in operations that have high cattle turnover, such as feedlots, keeping feeding groups from mixing is an important biosecurity measure. Isolate feedlot hospital cattle and return them to their home pen as soon as possible. Long-acting therapies have improved our ability to minimize movement of infectious organisms between groups. An important biosecurity

action on ranches is to separate cattle by age and/or production groups. Facilities should be cleaned and disinfected appropriately between groups. Visit with your veterinarian about specific isolation management procedures and how they can be applied to control targeted diseases.

5.3.10.1.2 Traffic control

Traffic control includes traffic onto your operation and traffic patterns within your operation. It is important to understand traffic includes more than vehicles. All animals and people must be considered. Animals other than cattle include dogs, cats, horses, wildlife, rodents and birds. The degree of control will be dictated by the biology and ecology of the infectious organism being addressed, and the control must be equally applied.

Stopping a truck hauling cattle from driving onto your operation as a biosecurity measure for controlling Bovine Viral Diarrhea (BVD) may not be beneficial since the virus is spread from animal to animal. Buying cattle from herds that have a verifiable quality vaccination program would be more important in maximizing biosecurity. However, it would be important for the truck to have been adequately cleaned before hauling the cattle. Traffic control can be built into the facilities design. An example would be placing cattle loading facilities on the perimeter of the operation.

Traffic control within the operation should be designed to stop or minimize contamination of cattle, feed, feed handling equipment and equipment used on cattle. Pit silos should not be accessible from nonfeed handling equipment such as loaders used outside the feeding area or vehicles that travel outside the feed mixing and handling facility. No one (manager, nutritionist, veterinarian, banker — no one) should be allowed to drive onto the surface of a trench silo. The only equipment allowed should be the loader used for handling the feedstuff. In large pits, it may be acceptable to allow feed trucks to enter, provided they are loaded at least 100 feet away from the working face of the stored feed. If possible, separate equipment should be used for handling feedstuffs and manure.

Vehicles and employees should not travel from the dead cattle area without cleaning and disinfecting. The dead animal removal area should be placed in a location that allows rendering trucks access without cross-contaminating healthy cattle. Vehicle cleaning areas are becoming more common in commercial feedlots. Unfortunately, they are frequently used

only for trucks and heavy equipment. Management should consider extending a decontamination policy to other vehicles (especially tires) that are used across biosecurity control areas on the operation. Ask your biosecurity resource team to help you evaluate traffic control on your operation.

5.3.10.1.3 Sanitation

Sanitation addresses the disinfection of materials, people and equipment entering the operation and the cleanliness of the people and equipment on the operation.

The main objective of sanitation is to prevent faecal contaminates from entering the oral cavity of cattle (faecal - oral cross contamination). Equipment used which may contact cattle's oral cavity or cattle feed should be a special target. The first step in sanitation is to remove organic matter, especially faeces. Blood, saliva, and urine from sick or dead cattle should also be targeted. All equipment that handles feed or is introduced into the mouth of cattle should be cleaned, including disinfection as appropriate, before use. Loaders used for manure or dead cattle handling must be cleaned thoroughly before using for feedstuff. It would be best to use different equipment. Minimize the use of oral equipment and instruments such as balling guns, drench equipment and tubes. If used at processing and treatment, thoroughly clean and disinfect between animals. Store cleaned equipment in clean, dry areas. Avoid storage in tanks or containers containing disinfectants because most disinfectants are neutralized by organic material. Disease transmission is commonly traced to the use of those storage tanks.

5.3.10.2 Good Management Practices (GMP) for Controlling Infectious Diseases

Develop a biosecurity plan and commit to its implementation. Committing to a biosecurity plan is a vital step toward controlling of infectious disease. Keeping pathogens out of a herd improves production efficiency, lowers costs and reduces risks to employees and family.

5.3.10.3 Biosecurity GMP Checklists

Review the checklists below and discuss each item with your veterinarian to decide what is applicable. Ask your veterinarian to rank the biosecurity importance of each item (0 = not important, 5 = very important). Check Y (yes) or N (no) if the biosecurity item is being addressed.

General Good Management Practice (GMP) Checklist

Notes *Rank importance of each GMPs in biosecurity and note if being addressed:*

_____ Meet all of the Beef Quality Assurance Good Management Practices and Guidelines.

_____ Understand it is more profitable to prevent problems than to correct problems.

_____ Agree that doing things right the first time is a critical part of biosecurity.

_____ Biosecurity requires some method of cattle identification. An identification system in place.

_____ Can readily track and validate management practices used on my cattle.

GMP Checklist for Sanitation

Notes *Rank importance of each sanitation measure in biosecurity and note if being addressed:*

_____ Attempt to prevent manure contamination of feed and equipment used orally.

_____ Clean equipment used orally between animals.

_____ Attempt to prevent cross contamination between healthy and sick/dead cattle.

_____ Regularly evaluate the activities on my operation to assess the potential for contaminating cattle.

_____ If manure accidentally contaminates feed or water, an immediate remedy is provided.

GMP Checklist for Equipment

Notes *Rank importance of each equipment item in biosecurity and note if being addressed:*

_____ Use different equipment to feed and to clean pens or completely clean between use.

_____ Never step in the feed bunk.

_____ Never leave manure-hauling equipment in pens with different groups of animals.

_____ Clean contaminated vehicles and equipment before use around healthy cattle.

_____ Routinely clean and disinfect feeding equipment and cattle handling equipment.

_____ Routinely clean and disinfect equipment used to medicate cattle.

GMP Checklist for Disease Containment

Notes *Rank importance of each disease containment item in biosecurity and note if being addressed:*

_____ Facilities provide a clean area for restraint, treatment and isolation of sick cattle.

_____ Facilities prevent cross contamination of water, manure, feed, or equipment between groups.

_____ Have a plan to manage group size, age distribution, and animal flow to reduce risk of disease.

_____ Handle highest health status animals first (young calves, healthy older cattle and sick animals last).

_____ Everyone uses strict sanitation practices

_____ All animals that die are examined by a veterinarian (necropsy).

_____ Veterinarian collects blood samples from all cows that abort.

_____ Have visitors observe our strict sanitation practices.

_____ Clean contaminated vehicles and equipment before use around healthy cattle.

GMP Checklist for Preventing Infectious Disease from Entering All Operations

Notes *Rank importance of each disease entry item in biosecurity and note if being addressed:*

_____ Know the health history of the herds from which cattle are purchased.

_____ Know the health status of animals brought into my operation.

_____ My veterinarian talks to the seller's veterinarian prior to buying animals.

_____ Never bring in animals without knowing their vaccination history.

_____ Never buy animals from a herd that has mixed origin cattle.

_____ Transport animals in clean vehicles.

_____ Have a control program for outside animals which could spread disease (rodents, etc.).

_____ Loading area is located at the perimeter of the operation.

_____ Dead animal pickup area located so rendering trucks do not contaminate my operation.

_____ Limit people's access to my cattle pens, feed mixing and storage area, and treatment area.

_____ Keep a record of visitors to my operation.

GMP Checklist for Preventing Infectious Disease from Entering Cow/Calf Operations

Notes *Rank importance of each disease entry item in biosecurity and note if being addressed:*

_____ Cattle don't use community pastures, or are not placed in performance evaluation centers.

_____ Cattle do not share fence lines with neighbor's cattle.

_____ Do not purchase, borrow, or use loaner bulls from other farms.

_____ Buy cattle from a Johne's certified free farm.

_____ Limit purchases to open heifers and virgin bulls.

_____ Know the biosecurity, vaccination, and testing program of herd(s) for my replacement cattle.

_____ Quarantine new arrivals for 21-30 days before allowing them contact with my cattle.

_____ Quarantined area is designed to prevent cross contamination between cattle.

GMP Checklist for Calf Management

Notes *Rank importance of each calf management item in biosecurity and note if being addressed:*

_____ Have a strategic vaccination and parasite control plan in place for all cows.

_____ Replacement cattle are kept off pastures where manure has been spread for six months.

_____ Replacement cattle are kept separate from other cattle for at least six months.

_____ Replacement cattle have a separate source of water.

_____ Consult with veterinarian annually about calf care.

_____ Calving area is clean and disinfected.

_____ All calves are born from cows that have been tested clean of infectious diseases.

_____ All colostrum fed to calves comes from cows that have been tested clean of infectious diseases.

_____ Calves are permanently identified prior to any grouping.

GMP Checklist for Strategic Vaccine Use

Notes *Rank importance of each strategic vaccine item in biosecurity and note if being addressed:*

_____ Have a written strategic vaccination plan for my operation.

_____ Know when and how to use the vaccines listed in the vaccination plan for my herd.

_____ Discuss the vaccination history of all cattle purchased before the cattle enter my operation.

GMP Checklist for controlling Johne's *(M. paratuberculosis)* Disease

Notes *Rank importance of each Johne's control item in biosecurity and note if being addressed:*

_____ Understand how Johne's disease can impact my herd and how it is spread.

_____ Whole herd is screened using an antibody ELISA test (measures antibody in blood).

_____ Whole herd is tested using a fecal culture.

_____ Animals testing positive are culled. (Johne's is reportable disease in some states.)

_____ Replacement heifers are tested prior to introduction to the herd.

_____ Calves from cows testing positive are removed to a feedlot.

_____ Have implemented a follow-up Johne's testing program and reviewed the results with my vet.

GMP Checklist for controlling Bovine Leukosis

Notes *Rank importance of each Leukosis control item in biosecurity and note if being addressed:*

_____ Are needles and sleeves used on more than one animal?

_____ Are cows which provide colostrum for your calves tested for bovine leukosis?

_____ Purchased cattle are tested during quarantine.

GMP Checklist for controlling Bovine Viral Diarrhea (BVD)

Notes *Rank importance of each BVD control item in biosecurity and note if being addressed:*

_____ Understand "persistently infected" (PI) animals as they relate to BVD.

_____ Am not willing to live with one or more PI calves in my herd.

_____ Am not willing to keep a PI calf as a replacement heifer.

_____ Am committed to finding BVD PI cattle and removing them from herd.

_____ Have discussed killed versus modified live virus (MLV) vaccines for BVD with my veterinarian.

GMP Checklist for controlling Salmonella

Notes *Rank importance of each Salmonella control item in biosecurity and note if being addressed:*

_____ Realize that my family and employees can be infected with salmonella from cattle.

_____ Isolate sick cattle in hospital area and prevent cross contamination.

_____ Discuss proper antibiotic use with my veterinarian.

_____ Clean all instruments and equipment used on sick cattle between cattle.

_____ Provide dry, clean, disinfected calf and maternity pens.

_____ Test purchased feed for salmonella once per year.

_____ Restrict birds, cats, rodents and stray animals from access to my operation's animal feed and water.

_____ Do not allow rendering trucks to access feed or animal areas.

The client must contact a veterinary practice to help manage and implement a biosecurity plan for the feedlot and also do monthly inspections as part of the biosecurity plan.

5.4 Closure phase

Timeframe: 5 months

Responsibility: The applicant will be responsible for the implementation of the measures as an on-going process during closure phase.

- The physical and chemical stability of the remaining structures on site should be appropriately secured.
- The site should be securely fenced off and all remaining structures securely locked up.
- The physical integrity of the remaining structures on site should under no circumstances be allowed to deteriorate to an extent that makes the site visually unpleasant.

6. PROPOSED MECHANISMS FOR MONITORING

It is recommended by the Environmental Practitioner that an Environmental Control Officer (ECO) be appointed by the applicant. The ECO will be the person involved with the development of the project and also be responsible for the monitoring of the implementation of the EMPr. It may be different parties during the different phases of the project.

- This person may be appointed by the appointed engineer or indirectly by the applicant/client. It must, however, be a person with adequate technical and environmental knowledge to understand and implement this management programme.
- The ECO may not be someone appointed by the contractor.
- The ECO must report to the applicant on a regular basis or frequency.
- The ECO has the authority to stop works during construction if in his opinion there is a serious threat to, or impact on the environment caused directly from the construction operations. This authority is to be limited to emergency situations (see definitions) where consultation with the engineer or developer is not immediately possible. In all such work stoppage situations the ECO is to inform the engineer and developer of the reasons for the stoppage as soon as possible.
- Upon failure by the contractor or his employees to show adequate consideration to the environmental aspects of this contract, the ECO may recommend to the engineer to have the contractor's representative, or any employee(s) removed from the site or work suspended until the matter is remedied. No extension of time will be considered in the case of such suspensions and all costs will be borne by the contractor.

Monitoring will be done on monthly, weekly or quarterly basis and a report will be submitted to the relevant authority for checking compliance with the EMPr. This report will give a point scale of implementation measures. This may be the construction site manager, contractor, safety officer, and engineer.

CONSTRUCTION PHASE

MONITORING TYPE	FREQUENCY			
	DAILY	WEEKLY	MONTHLY	QUARTERLY
WEED ERADICATION			X	
EROSION CONTROL			X	
WASTE MANAGEMENT		X		
DUST CONTROL	X			
NOISE MONITORING	X			
SAFETY	X			
BOREHOLE				X
HAZARDOUS SUBSTANCE			X	

Compliance with the EMPr was rated according to the system detailed below:

SCORE	COMPLIANCE RATING	DEFINITION
5	Full Compliance	All requirements and conditions have been addressed or met.
4	Substantial Compliance	Between 75 and 100% met
3	Broad Compliance	Between 50 and 75% met
2	Partial Non-Compliance	Between 25 and 50% met
1	Non-Compliance	Less than 25% met
0	Major Non-Compliance	None of the requirements and conditions has been addressed or met.

Outlined below are a number of steps, relating to increasing severity of environmental problems, which will be implemented. The principle is to keep as many issues within the first few steps as possible.

Step 1: The ECO discusses the problem with the contractor or guilty party, and they work out a solution together. The ECO records the discussion and the solution implemented. This detection together with the solution will be included in the monthly monitoring report.

Step 2: The ECO observes a more serious infringement, and notifies the guilty party in writing, with a deadline by which the problem must be rectified. All costs will be borne by the contractor. This incident will be included in the monthly monitoring report.

Step 3: The ECO shall order the contractor to suspend part, or all, the works. The suspension will be enforced until such time as the offending party(ies), procedure or equipment is corrected and/or remedial measures put in place if required. No extension of time will be granted for such delays and all cost will be borne by the contractor. The Department of Environmental Affairs shall be involved, and penalties will be allocated. In this time the department can decide to submit a pre compliance notice and has authority to withdraw the Record of Decision.

7. ENVIRONMENTAL AWARENESS PLAN

7.1 Training programmes:

1. Occupational Health and Safety (OHS) – Done internally by Health of Officer.
2. Personal Protection Equipment (PPE) – Done internally by Safety Officer.
3. Environmental training
    a. program 1 – Introduction to Environment, Ecosystems and Habitats. Including symbiotic interactions.
    b. program 2 – Environmental Degradation, Soil, Air, Noise, Water and Ground water Pollution. Erosion.

Programmes 1 and 2, the OHS and PPE training is something that is done either annually or bi-annually depending on the need identified by management of the development. The

environmental training and awareness will be implemented a.s.a.p. before the construction phase begins. Management will also arrange for training bi-annually for 2 to 4 hour sessions at a time. Training will either be done internally or externally. Internal training will be done by the Environmental Management Department and externally training providers will be sourced as approved by the owner of the site.

7.2 Monitoring of awareness

Bi-monthly Health and Safety meetings are held where relevant issues regarding health, safety and environment are discussed, and feedback is given. Environmental awareness should be incorporated into the compulsory 'Toolbox talks' that include health and safety issues. These should be done on a monthly basis.

8. A TABULAR VERSION OF ENVIRONMENTAL ASPECTS, IMPACTS, MITIGATION AND PERSONS RESPONSIBLE

ENVIRONMENTAL ASPECT AND PROJECT STAGE	ENVIRONMENTAL COMPONENT THAT MAY BE AFFECTED	LOCALITY / APPLICABLE ZONE OF THE IMPACT	NATURE AND DESCRIPTION OF THE IMPACT/ISSUE BEFORE MITIGATION	NATURE OF THE IMPACT/ISSUE AFTER MITIGATION
Vegetation clearance for the footprint of the development. Clearance of vegetation in the establishment of infrastructure	Soil layers, soil surface, indigenous vegetation cover.	On-site.	The removal of vegetation cover, such that the soil surface is exposed, may lead to increased soil erosion in certain areas. The existing vegetation will be permanently removed to accommodate the footprint of the development. Where the removal of surface vegetation is of a temporary nature only, the establishment of weeds is a threat. The topsoil layer is required to rehabilitate the area (i.e., for landscaping the area). Probability = 4 (highly probable) Intensity = 4 (moderate intensity) Duration = 4 (long term) Severity = 4x4=16 (rating 4) Significance= 4x4=16 This impact is of negative high significance.	It is advisable that only vegetation be removed where and when it is necessary. After removal of vegetation, landscaping needs to be incorporated by re-establishing natural grassland/vegetation where appropriate. No red data plant species were recorded during the site visits conducted. Probability = 3 (improbable) Intensity = 2 (low intensity) Duration = 2 (short term) Severity = 2x2=4 (rating 2) Significance= 3x2=6 This impact is of negative low significance.

ENVIRONMENTAL ASPECT AND PROJECT STAGE	ENVIRONMENTAL COMPONENT THAT MAY BE AFFECTED	LOCALITY / APPLICABLE ZONE OF THE IMPACT	NATURE AND DESCRIPTION OF THE IMPACT/ISSUE BEFORE MITIGATION	NATURE OF THE IMPACT/ISSUE AFTER MITIGATION
Stockpiling building materials (C)	Soil and vegetation cover.	The impact is of a localized nature.	Stockpiles will need to be established for the storage of aggregate, bricks and cement. As mentioned, stockpiles cause compaction of the soil surface, which leads to the growth of unwanted weed species. Probability = 3 (probable) Intensity = 2 (low intensity) Duration = 4 (long term) Severity = 2x4=8 (rating 3) Significance= 3x3=9 This impact is of negative moderate significance.	Building material stockpiles must not be stockpiles within any of the riparian areas. Any alien vegetation that established itself because of disturbance need to be eradicated. Probability = 3 (improbable) Intensity = 2 (low intensity) Duration = 2 (short term) Severity = 2x2=4 (rating 2) Significance= 3x2=6 This impact is of negative low significance.
Water use for operational purposes of the development.	Groundwater is used.	On-site.	A Water Use License Application is in process and will be addressing this impact.	Mitigation measure would still be to use water only when needed to stay within the estimated quota.

ENVIRONMENTAL ASPECT AND PROJECT STAGE	ENVIRONMENTAL COMPONENT THAT MAY BE AFFECTED	LOCALITY / APPLICABLE ZONE OF THE IMPACT	NATURE AND DESCRIPTION OF THE IMPACT/ISSUE BEFORE MITIGATION	NATURE OF THE IMPACT/ISSUE AFTER MITIGATION
Provisions for storm water i.e., storm water drainage (C) (O)	Soil surfaces, vegetation cover and drainage patterns. Also groundwater and overall health of people and animals.	Areas where surface water run-off is collected i.e., like from compacted surfaces, gutters and structures, as well as open surfaces in and around the feedlot.	Poorly implemented storm water outlets will result in increased surface run-off volume and speed, which could lead to the creation of erosion gullies. Storm water must be allowed to spread out gradually over a large surface area to protect the soil surface against erosion. Inadequate provision for the management of stormwater and feedlot pen run off can also pose environmental and health risks to onsite employees, surrounding communities and the animals themselves. Probability = 3 (probable) Intensity = 2 (low intensity) Duration = 4 (long term) Severity = 2x4=8 (rating 3) Significance = 3x3=9	Storm water outlet designs have to be done and construction undertaken within the correct design documents from the civil engineer. Vegetation cover needs to be established on bare soil areas to prevent erosion due to storm water. Stormwater and feedlot pen run off can be adequately managed with a well-designed drainage system. The key components in the design of an adequate drainage system include: • Clean stormwater runoff • Feedlot pen configuration and drainage • Sedimentation system • Evaporation pond • Manure stockpiling and composting Probability = 3 (improbable) Intensity = 2 (low intensity) Duration = 2 (short term) Severity = 2x2=4 (rating 2)

ENVIRONMENTAL ASPECT AND PROJECT STAGE	ENVIRONMENTAL COMPONENT THAT MAY BE AFFECTED	LOCALITY / APPLICABLE ZONE OF THE IMPACT	NATURE AND DESCRIPTION OF THE IMPACT/ISSUE BEFORE MITIGATION	NATURE OF THE IMPACT/ISSUE AFTER MITIGATION
			This impact is of negative moderate significance.	Significance = 3x2=6 This impact is of negative low significance.
Maintenance of storm water management systems. (O)	Soil surfaces, drainage patterns and surface water.	In all areas where storm water management systems have to be created.	Storm water management will particularly be important with careful design eminent at the crossing of any natural drainage ways. Storm water outlets can get blocked due to debris and other substances that are washed from the hard surfaces. This includes siltation due to soil erosion. Probability = 3 (probable) Intensity = 2 (low intensity) Duration = 4 (long term) Severity = 2x4=8 (rating 3) Significance= 3x3=9 This impact is of negative moderate significance.	Maintenance of storm water structures and outlets is required to ensure that they don't get blocked (i.e., no longer fulfil their function) or result in erosion. The custodian of the development has to perform regular checks and maintenance. Probability = 3 (improbable) Intensity = 2 (low intensity) Duration = 2 (short term) Severity = 2x2=4 (rating 2) Significance= 3x2=6 This impact is of negative low significance.

ENVIRONMENTAL ASPECT AND PROJECT STAGE	ENVIRONMENTAL COMPONENT THAT MAY BE AFFECTED	LOCALITY / APPLICABLE ZONE OF THE IMPACT	NATURE AND DESCRIPTION OF THE IMPACT/ISSUE BEFORE MITIGATION	NATURE OF THE IMPACT/ISSUE AFTER MITIGATION
Site maintenance. (O)	Vegetation and soil surface conditions, as well as social well-being of the residents of the area.	The site needs to be maintained.	Poorly maintained storm water drainage structure will cause abnormal soil erosion at outlets. Therefore, site maintenance is essential. Probability = 3 (probable) Intensity = 2 (low intensity) Duration = 4 (long term) Severity = 2x4=8 (rating 3) Significance = 3x3=9 This impact is of negative moderate significance.	Site maintenance is essential and is the responsibility of the property owner and feedlot managers. Probability = 3 (improbable) Intensity = 2 (low intensity) Duration = 2 (short term) Severity = 2x2=4 (rating 2) Significance = 3x2=6 This impact is of negative low significance.
Noise generation by the feedlot. (C) (O)	Impacts on faunal and surrounding landowners.	Areas on and surrounding the site at which activities take place.	Excessive noise levels on site may negatively impact upon the behaviour and movements of site fauna. Surrounding landowners may also potentially be negatively impacted upon by noise levels from cattle and machinery. Probability = 3 (probable)	This feedlot is situated in a rural/farming area and not close to any densely populated areas. Noise Impact can be mitigated by planting trees along the border of the feedlot. Probability = 3 (improbable) Intensity = 2 (low intensity)

ENVIRONMENTAL ASPECT AND PROJECT STAGE	ENVIRONMENTAL COMPONENT THAT MAY BE AFFECTED	LOCALITY / APPLICABLE ZONE OF THE IMPACT	NATURE AND DESCRIPTION OF THE IMPACT/ISSUE BEFORE MITIGATION	NATURE OF THE IMPACT/ISSUE AFTER MITIGATION
			Intensity = 2 (low intensity) Duration = 4 (long term) Severity = 2x4=8 (rating 3) Significance = 3x3=9 This impact is of negative moderate significance.	Duration = 2 (short term) Severity = 2x2=4 (rating 2) Significance = 3x2=6 This impact is of negative low significance.
The development on endangered/threatened animals and plants. (C)	Animals & plants	On-site and surrounding area.	The development will influence animal life and habitat. Snaring and hunting of fauna and avifauna species during the construction phase and the destruction of habitats can have a detrimental effect on some species. No red data species were recorded during the site visits. Probability = 3 (probable) Intensity = 2 (low intensity) Duration = 4 (long term) Severity = 2x4=8 (rating 3) Significance = 3x3=9	Although habitat was lost, proper rehabilitation of the site, not used, could lessen the severity of the impact. Strict measures to prevent the hunting/snaring/scaring of fauna species should be implemented. The gathering of wood should not be allowed on site or on any adjacent properties. Any person that is caught hunting, snaring or damaging existing vegetation (earmarked to be retained) should be fined. The responsible contractor will also be fined and will have to replace the fauna or flora species as specified by the ECO at the time. The involved authorities should be informed of the

ENVIRONMENTAL ASPECT AND PROJECT STAGE	ENVIRONMENTAL COMPONENT THAT MAY BE AFFECTED	LOCALITY / APPLICABLE ZONE OF THE IMPACT	NATURE AND DESCRIPTION OF THE IMPACT/ISSUE BEFORE MITIGATION	NATURE OF THE IMPACT/ISSUE AFTER MITIGATION
			This impact is of negative moderate significance.	activity, the fine and the replacement specifications. Caught animals should be relocated to conservation areas in the vicinity. Probability = 3 (improbable) Intensity = 2 (low intensity) Duration = 2 (short term) Severity = 2x2=4 (rating 2) Significance = 3x2=6 This impact is of negative low significance.
Loss of ecological and soil feature. (C)	Soil	Bare soil on site.	Unmanaged op soil will lead to largescale erosion. Probability = 3 (probable) Intensity = 2 (low intensity) Duration = 4 (long term) Severity = 2x4=8 (rating 3) Significance = 3x3=9	The infrastructure of the feedlot will aid in the prevention of soil loss from the area due to the fact that energy is dissipated. Probability = 3 (improbable) Intensity = 2 (low intensity) Duration = 2 (short term) Severity = 2x2=4 (rating 2) Significance = 3x2=6

ENVIRONMENTAL ASPECT AND PROJECT STAGE	ENVIRONMENTAL COMPONENT THAT MAY BE AFFECTED	LOCALITY / APPLICABLE ZONE OF THE IMPACT	NATURE AND DESCRIPTION OF THE IMPACT/ISSUE BEFORE MITIGATION	NATURE OF THE IMPACT/ISSUE AFTER MITIGATION
			This impact is of negative moderate significance.	This impact is of negative low significance.
Odour from the Feedlot. (O)	Air quality.	Onsite and neighbouring properties.	Unwanted smells blowing to neighbours on neighbouring properties. Probability = 3 (probable) Intensity = 2 (low intensity) Duration = 4 (long term) Severity = 2x4=8 (rating 3) Significance = 3x3=9 This impact is of negative moderate significance.	It is recommended that lime powder be used at pre-set intervals to neutralize smells. It is also recommended that cattle pens be cleaned after each cycle (approx. 2 months). Probability = 3 (improbable) Intensity = 2 (low intensity) Duration = 2 (short term) Severity = 2x2=4 (rating 2) Significance = 3x2=6 This impact is of negative low significance.
Eradication of invasive species. (C)	Natural veld.	Onsite.	Invasive species being removed. Probability = 4 (highly probable) Intensity = 4 (moderate intensity) Duration = 4 (long term)	Eradication of invasive species during the construction phase benefitted the biophysical environment. Not necessary to mitigate. No risk due to positive impact.

ENVIRONMENTAL ASPECT AND PROJECT STAGE	ENVIRONMENTAL COMPONENT THAT MAY BE AFFECTED	LOCALITY / APPLICABLE ZONE OF THE IMPACT	NATURE AND DESCRIPTION OF THE IMPACT/ISSUE BEFORE MITIGATION	NATURE OF THE IMPACT/ISSUE AFTER MITIGATION
			Severity = 4x4=16 (rating 4) Significance= 4x4=16 This impact is of POSITVE high significance.	
Agricultural potential. (O)	Agricultural land.	Onsite.	Feasible use of agricultural land. Probability = 4 (highly probable) Intensity = 4 (moderate intensity) Duration = 4 (long term) Severity = 4x4=16 (rating 4) Significance= 4x4=16 This impact is of POSITVE high significance.	The Feedlot construction has promoted the principle of higher agricultural yields on smaller portions of land, the construction therefore had a beneficial impact. No risk due to positive impact.
Social & Economic Environment. (C) (O)	Job creation.	Onsite.	Creation of Job opportunities. Probability = 4 (highly probable) Intensity = 4 (moderate intensity) Duration = 4 (long term) Severity = 4x4=16 (rating 4) Significance= 4x4=16 This impact is of POSITVE high significance.	The construction created job opportunities during the construction and operational phases. Only employing people from the local community could mitigate the potential adverse impact. No risk due to positive impact.

9. COMPLYING, REMEDYING, AND CONTROLLING ENVIRONMENTAL POLLUTION INCIDENTS AND CAUSES

If there is an environmental incident, like oil or diesel spills, or any other form of pollution during the construction phase then the applicant/contractor/engineer should consult with the appointed Environmental Control Officer (ECO) for the project. The ECO should then respond immediately on the incident at hand with the appropriate mitigation measure as practically as possible.

An environmental awareness plan should be communicated to the workers and contractors via a training session before the construction phase starts. All risks should be put forward in terms of pollution and environmental degradation. The environmental awareness plan can be compiled by the ECO or environmental practitioner for the training session before the construction phase.

APPENDIX 7

SWORN AFFIDAVIT BY THE EAP

REC SERVICES
ENVIRONMENTAL CONSULTANTS

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566 Rubenstein Drive
Moreleta Park, 0181

PO Box 40541
Moreleta Park, 0044

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REC SERVICES
ENVIRONMENTAL CONSULTANTS

ATTENTION: Mr. Foloji Arnold Mathibe
Compliance monitoring and Enforcement
Free State Department of Economic,
Small Business Development, Tourism and Environmental Affairs
113 St Andrews Street
Bloemfontein
9300

Date: 23 November 2021

Affidavit/Declaration:

Name & Surname: Rowan Conrad van Tonder
Home Address: 510 Alandale St., Unit 44, Die Meent, Elarduspark, 0181
Work Address: 566 Rubenstein Dr., Rubenstein Office Park, 2nd Floor, Moreletapark, 0044
Work Tel: 012 997 4742 Cell: 082 879 4218
ID No.: 8105215099085 Age: 40 Race: W Sex: M

I hereby declare the following under oath:

Rowan Conrad van Tonder an environmental assessment practitioner of REC Services (Pty) Ltd. declare under oath that the information provided to the department (FS DESTEA) was at no stage influenced by the applicant and that the EAP has explained the potential consequences of submitting this application:

Application to rectify unlawful commencement or continuation of listed activities in terms of Section 24G of the National Environmental Management Act (No 107 of 1998) for construction of feedlot facilities on a part of the Farm Canford Cliffs No.133, Free State Province.

Ref. No.: S24G/4(i),27,12/20/05

I KNOW AND UNDERSTAND THE CONTENTS OF THIS STATEMENT. I HAVE NO OBJECTION IN TAKING THE PRESCRIBED OATH. I CONSIDER THE PRESCRIBED OATH TO BE BINDING ON MY CONSCIENCE.

PLACE: Pretoria DATE: 23 November 2021 TIME: 8:15am

SIGNATURE OF DECLARANT: _____

I HEREBY CERTIFY THAT THE ABOVE STATEMENT WAS TAKEN DOWN BY ME, AND THAT THE DECLARANT ADMITTED THAT HE/SHE IS FAMILIAR WITH THE CONTENTS, AND UNDERSTANDS IT. THIS STATEMENT WAS SWORN/ AFFIRMED AND SIGNED BY THE DECLARANT IN MY PRESENCE AT:

PLACE: Pretoria DATE: 23/11/2021 TIME: 8:17

_____
COMMISSIONER OF OATH

I certify that this document is a true copy of the original which was examined by me and that, from my observations, the original has not been altered in any manner.

_____ 23/11/2021
Signature Date

Commissioner Of Oaths (RSA)
Adri Norina Kemp
Professional Accountant (SA). Member of SAIPA / SAIPA NR. 20449
Rubenstein Office Park. 566 Rubenstein Drive. Moreleta Park. Pretoria
Tel: 012 809 4367

APPENDIX 8

SCREENING TOOL REPORT

REC SERVICES
ENVIRONMENTAL CONSULTANTS

SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED SITE ENVIRONMENTAL SENSITIVITY

EIA Reference number: S24G/4(i),27,12/20/05

Project name: Wagyu Feedlot

Project title: APPLICATION TO RECTIFY UNLAWFUL COMMENCEMENT OR CONTINUATION OF LISTED ACTIVITIES IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NO 107 OF 1998) ON A PART OF THE FARM CANFORD CLIFFS NO.133, FREE STATE PROVINCE

Date screening report generated: 29/09/2021 08:56:46

Applicant: Soetvelde Feedlot CC

Compiler: REC Services (Pty) Ltd.

Compiler signature: .....

Application Category: Agriculture_Forestry_Fisheries|Animal Production

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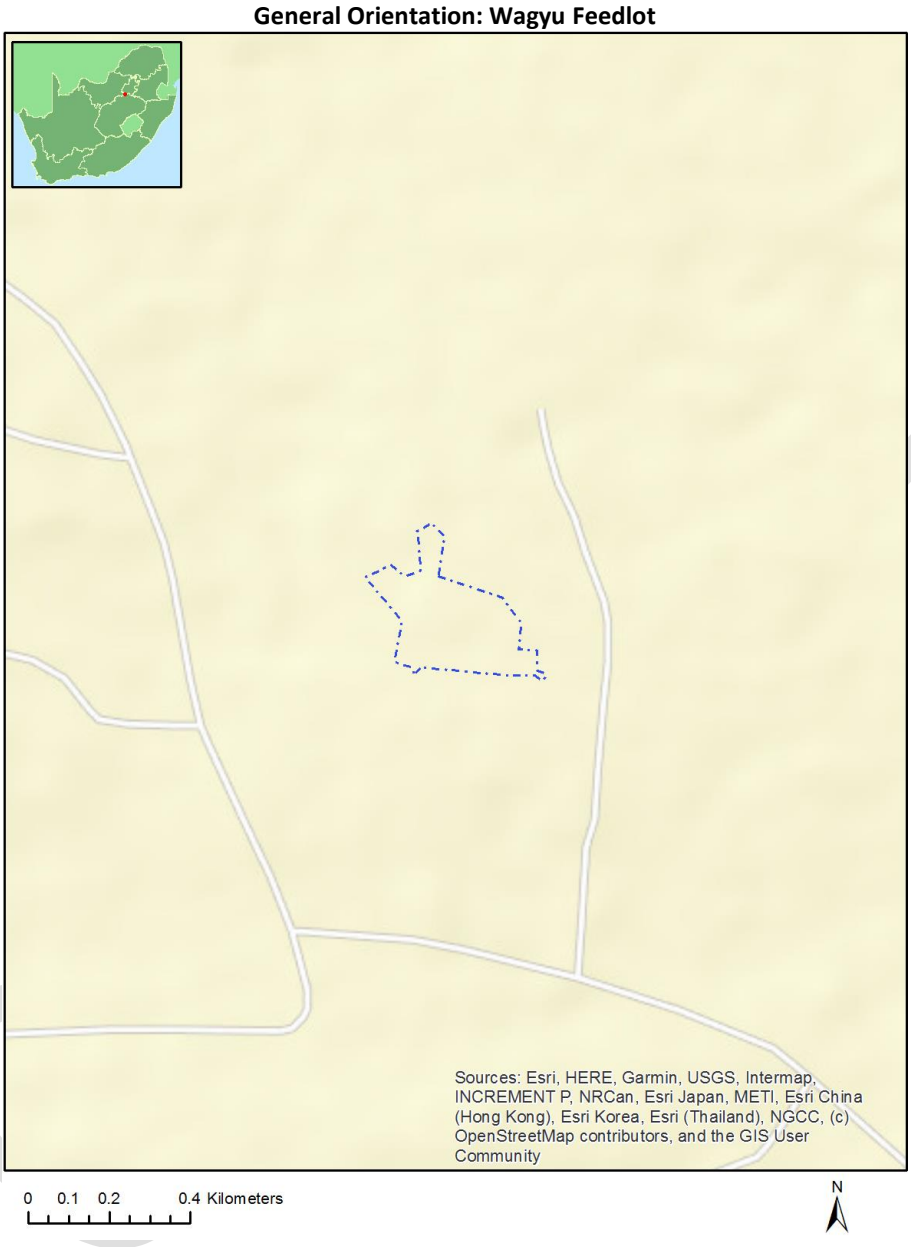
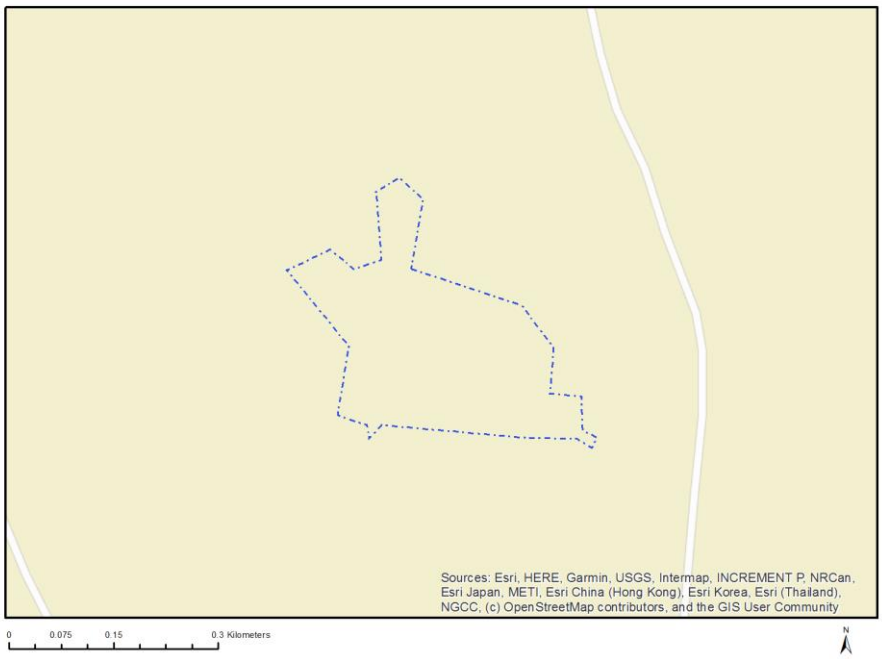
Proposed Project Location

Orientation map 1: General location



Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:

No	Farm Name	Farm/ Erf No	Portion	Latitude	Longitude	Property Type
1	CANFORD CLIFFS	133	0	26°48'3.68S	27°32'45.76E	Farm
2	CANFORD CLIFFS	133	0	26°48'3.68S	27°32'45.76E	Farm Portion

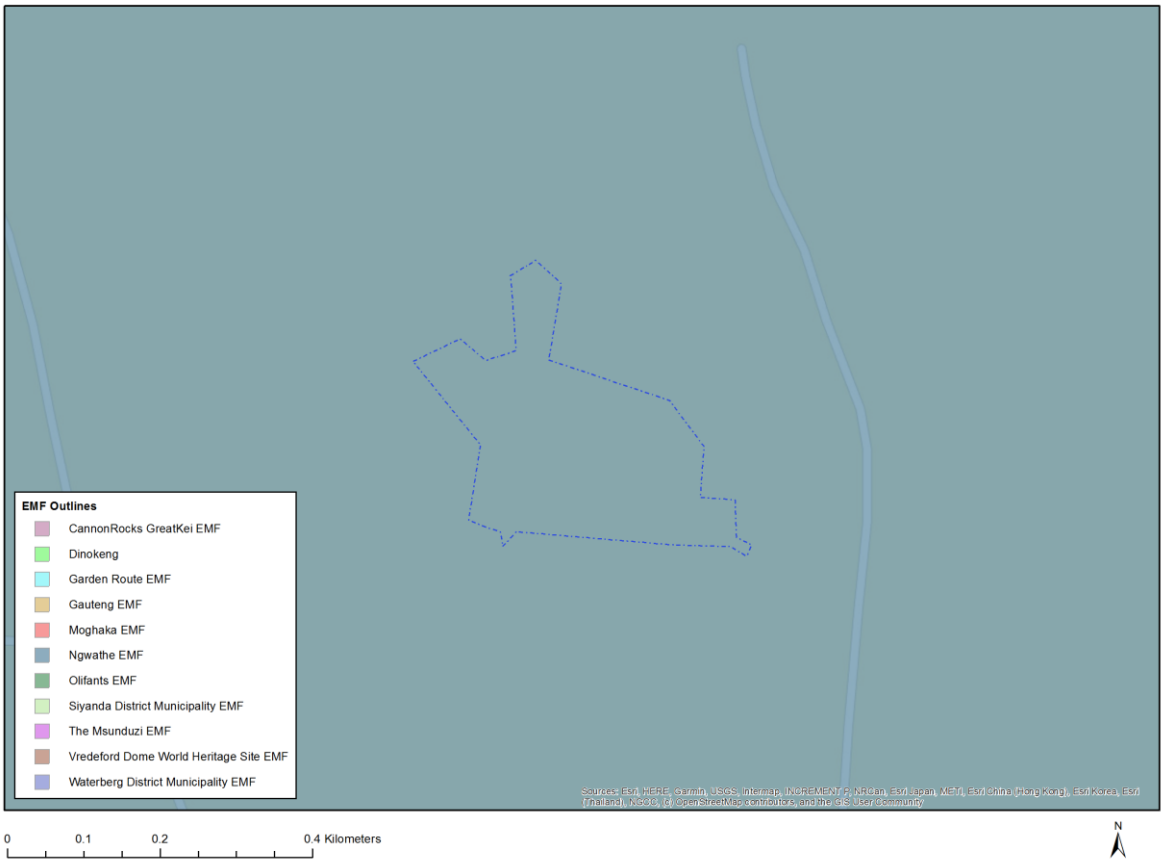
Development footprint[1] vertices:
No development footprint(s) specified.

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area

No nearby wind or solar developments found.

[1] "development footprint", means the area within the site on which the development will take place and incudes all ancillary developments for example roads, power lines, boundary walls, paving etc. which require vegetation clearance or which will be disturbed and for which the application has been submitted.

Environmental Management Frameworks relevant to the application



Environmental Management Framework	LINK
Ngwathe EMF	https://screening.environment.gov.za/ScreeningDownloads/EMF/Ngwathe_EMF_SummaryReport.pdf

Environmental screening results and assessment outcomes

The following sections contain a summary of any development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmental sensitive features on the site based on the site sensitivity screening results for the application classification that was selected. The application classification selected for this report is: **Agriculture_Forestry_Fisheries|Animal Production**.

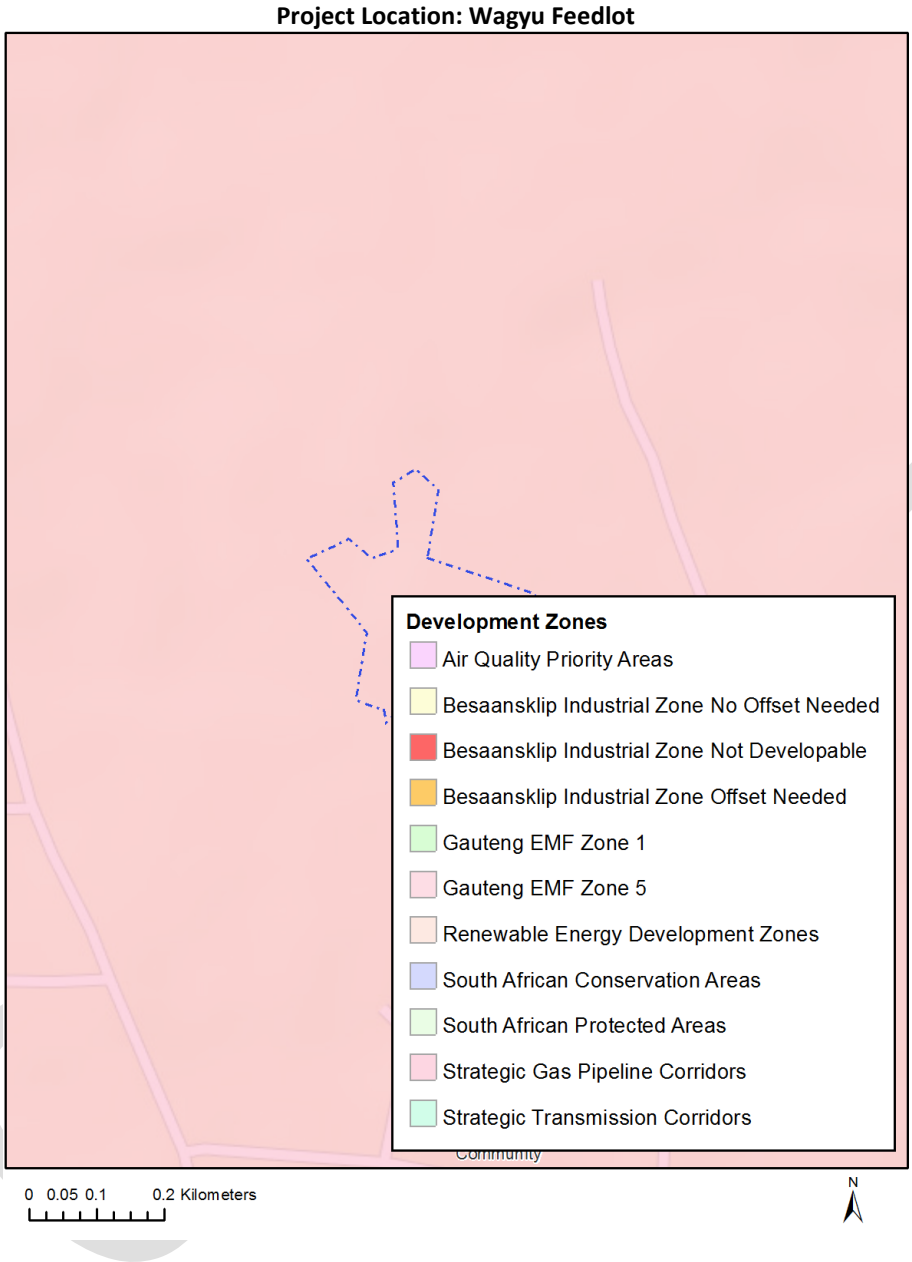
Relevant development incentives, restrictions, exclusions or prohibitions

The following development incentives, restrictions, exclusions or prohibitions and their implications that apply to this site are indicated below.

Incentive	Implication

, restriction or prohibition	
Strategic Transmission Corridor-Central corridor	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/Combined_EGI.pdf
Strategic Gas Pipeline Corridors-Phase 3: Richards Bay to Gauteng	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/Combined_GAS.pdf

Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones



Proposed Development Area Environmental Sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme			X	
Animal Species Theme			X	

Aquatic Biodiversity Theme				X
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme			X	
Defence Theme				X
Paleontology Theme			X	
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

Specialist assessments identified

Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

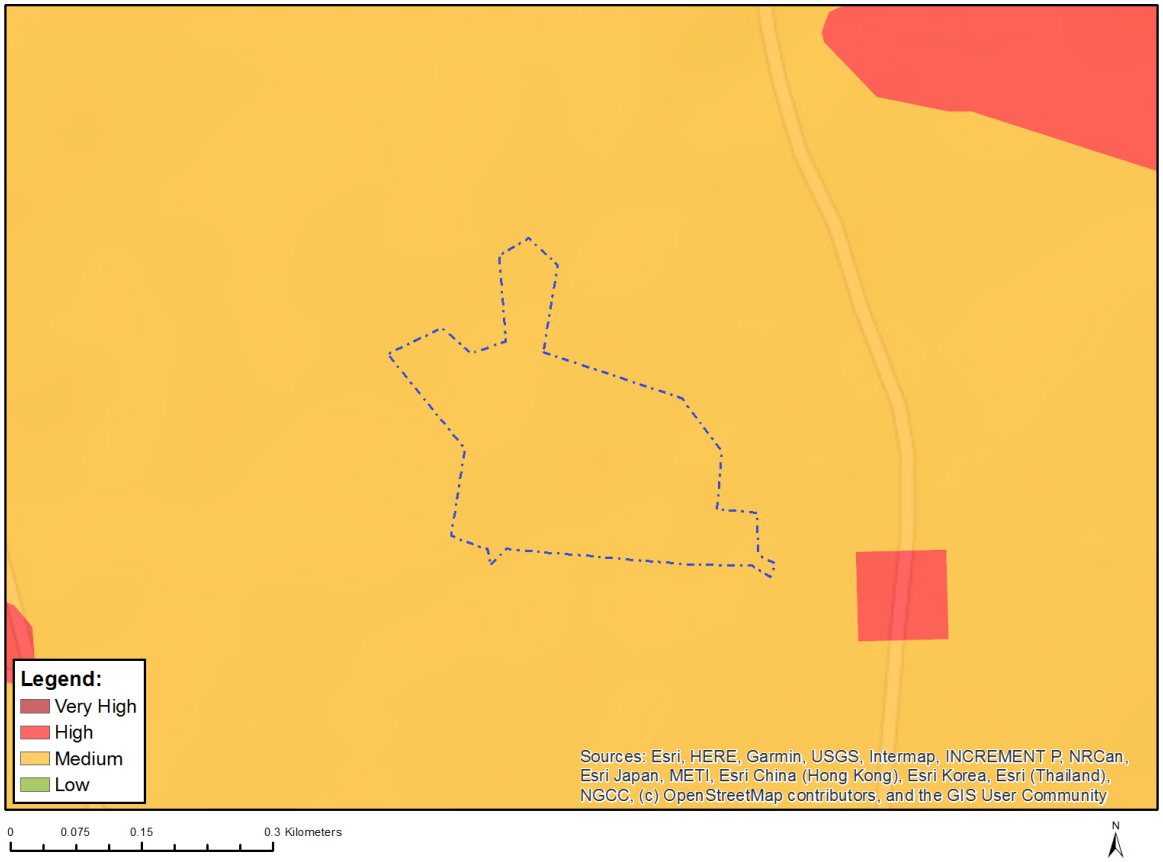
No	Specialist assessment	Assessment Protocol
1	Landscape/Visual Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
2	Archaeological and Cultural Heritage Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
3	Palaeontology Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
4	Terrestrial Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Terrestrial_Biodiversity_Assessment_Protocols.pdf
5	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Aquatic_Biodiversity_Assessment_Protocols.pdf
6	Hydrology Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
7	Traffic Impact Assessm	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf

	ent	
8	Socio-Economic Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
9	Ambient Air Quality Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
10	Plant Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Plant_Species_Assessment_Protocols.pdf
11	Animal Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Animal_Species_Assessment_Protocols.pdf

Results of the environmental sensitivity of the proposed area.

The following section represents the results of the screening for environmental sensitivity of the proposed site for relevant environmental themes associated with the project classification. It is the duty of the EAP to ensure that the environmental themes provided by the screening tool are comprehensive and complete for the project. Refer to the disclaimer.

MAP OF RELATIVE AGRICULTURE THEME SENSITIVITY

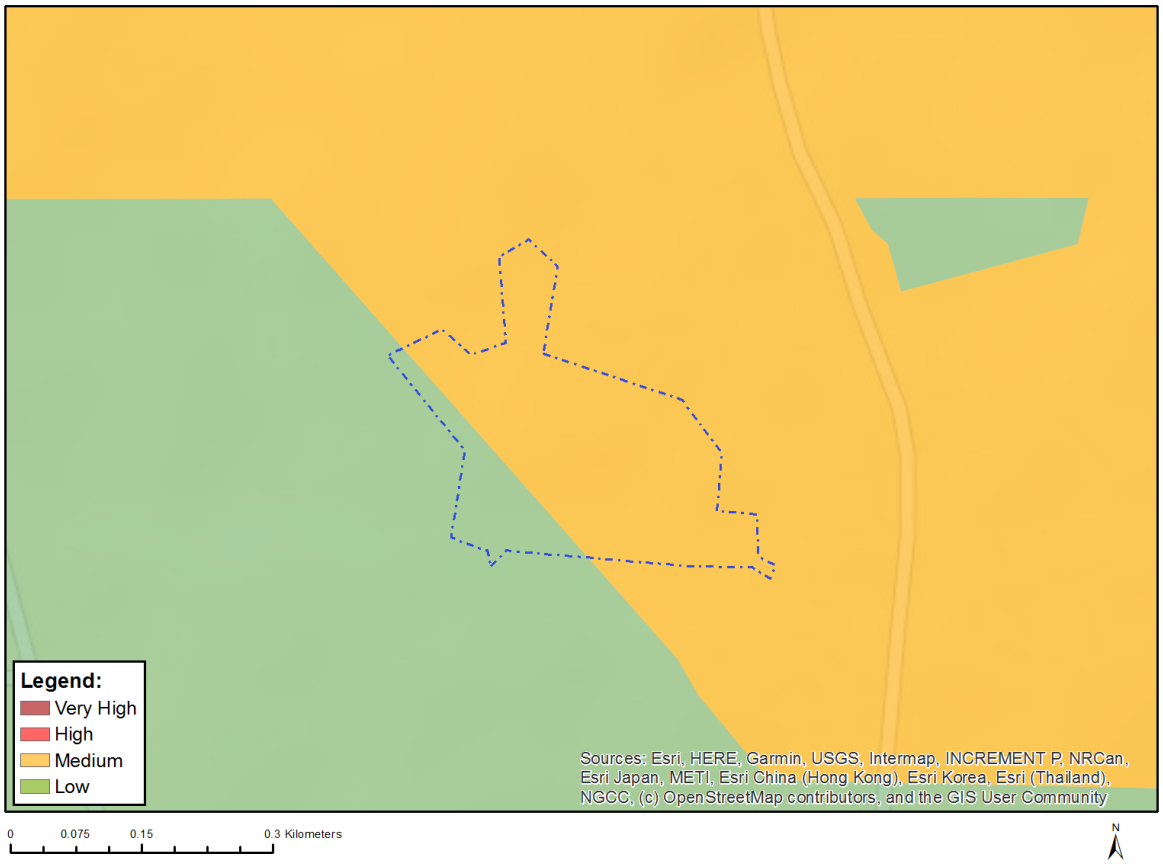


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Land capability;06. Low-Moderate/07. Low-Moderate/08. Moderate

MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY



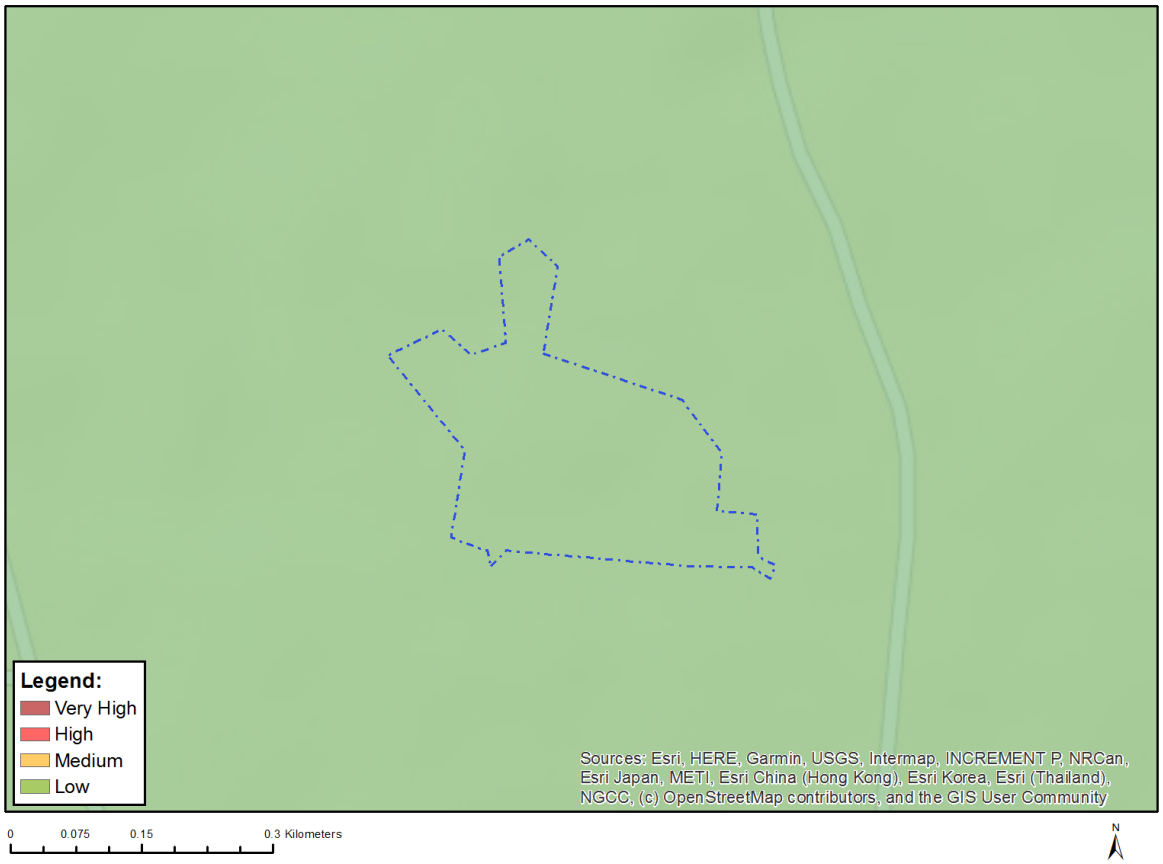
Where only a sensitive plant unique number or sensitive animal unique number is provided in the screening report and an assessment is required, the environmental assessment practitioner (EAP) or specialist is required to email SANBI at eiadatarequests@sanbi.org.za listing all sensitive species with their unique identifiers for which information is required. The name has been withheld as the species may be prone to illegal harvesting and must be protected. SANBI will release the actual species name after the details of the EAP or specialist have been documented.

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity
Medium	Insecta-Lepidochrysops procera

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY

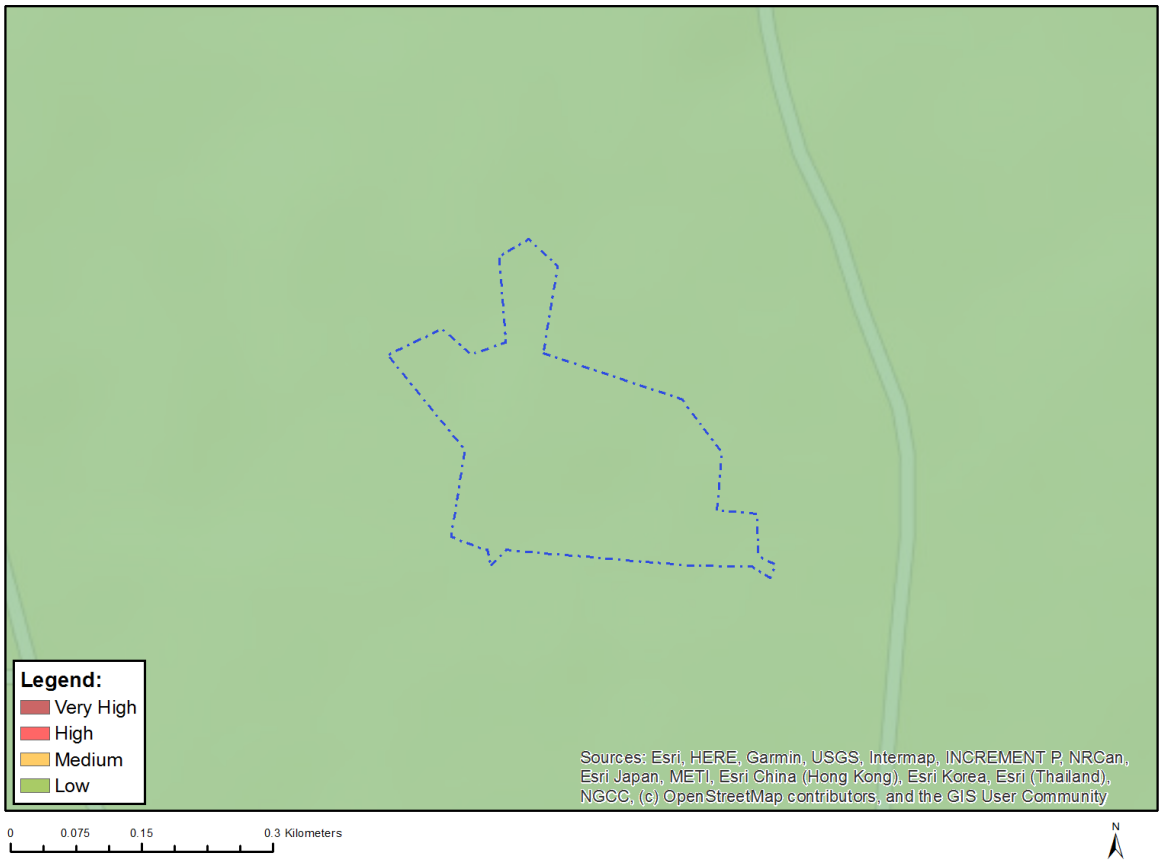


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY

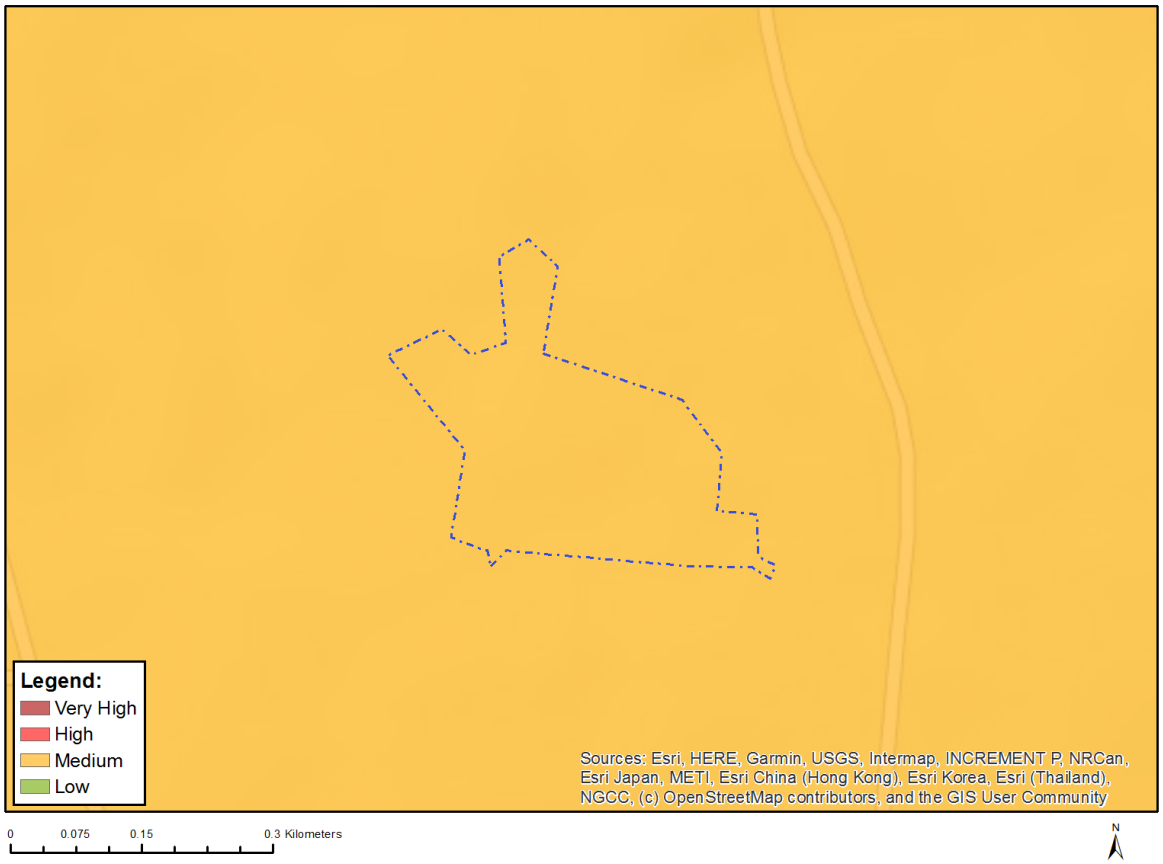


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY

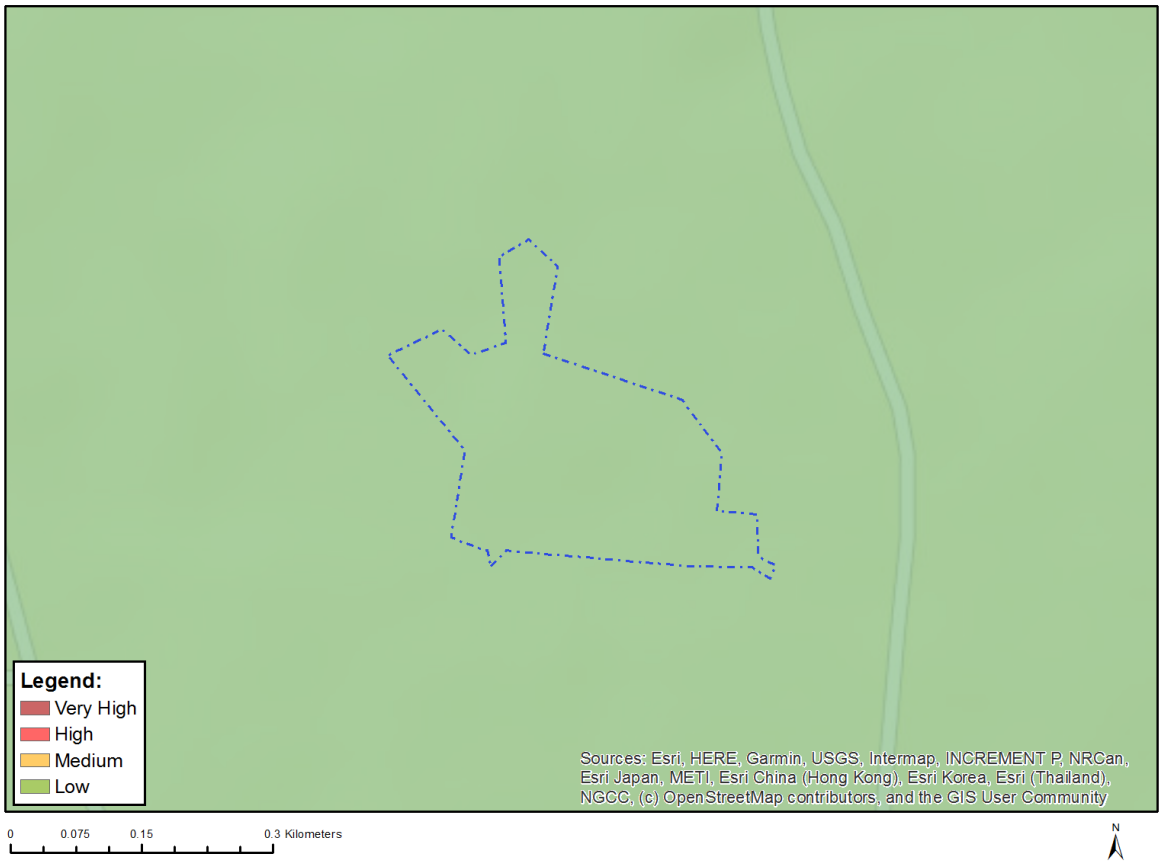


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Between 8 and 15 km of other civil aviation aerodrome

MAP OF RELATIVE DEFENCE THEME SENSITIVITY

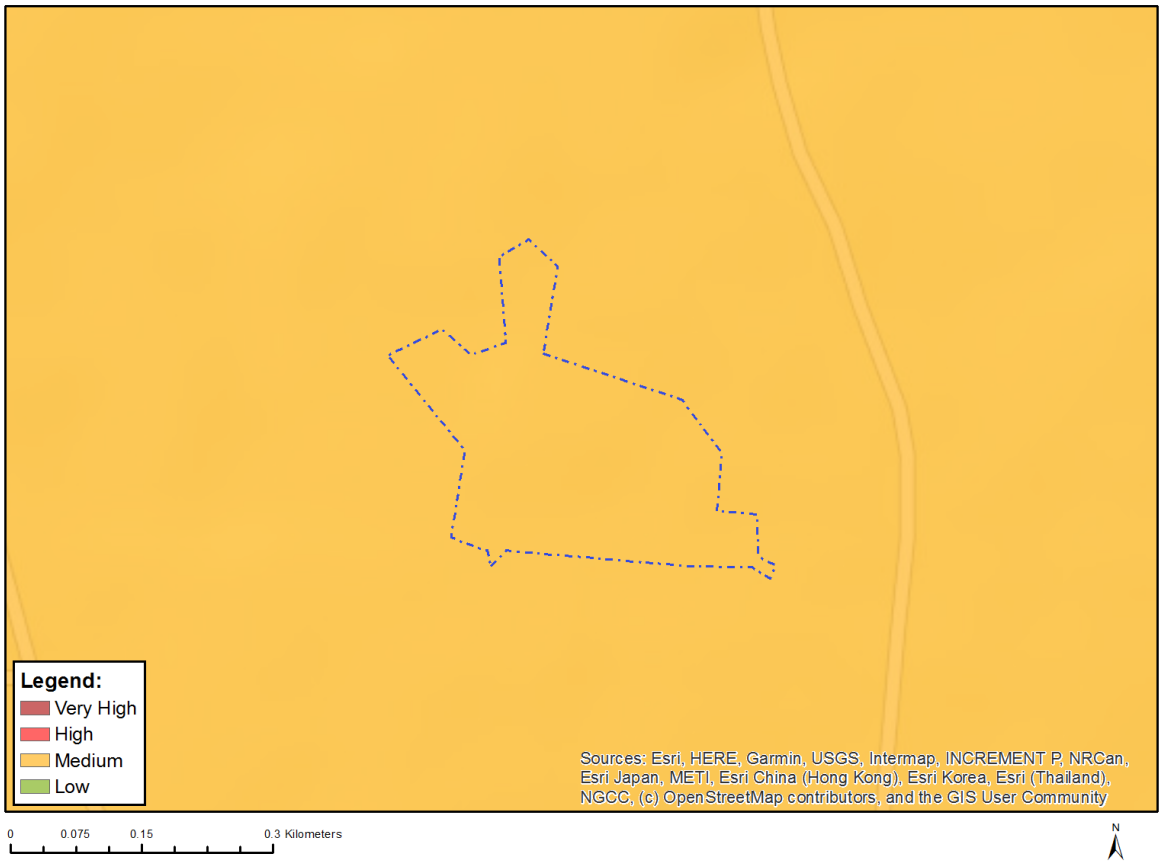


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY

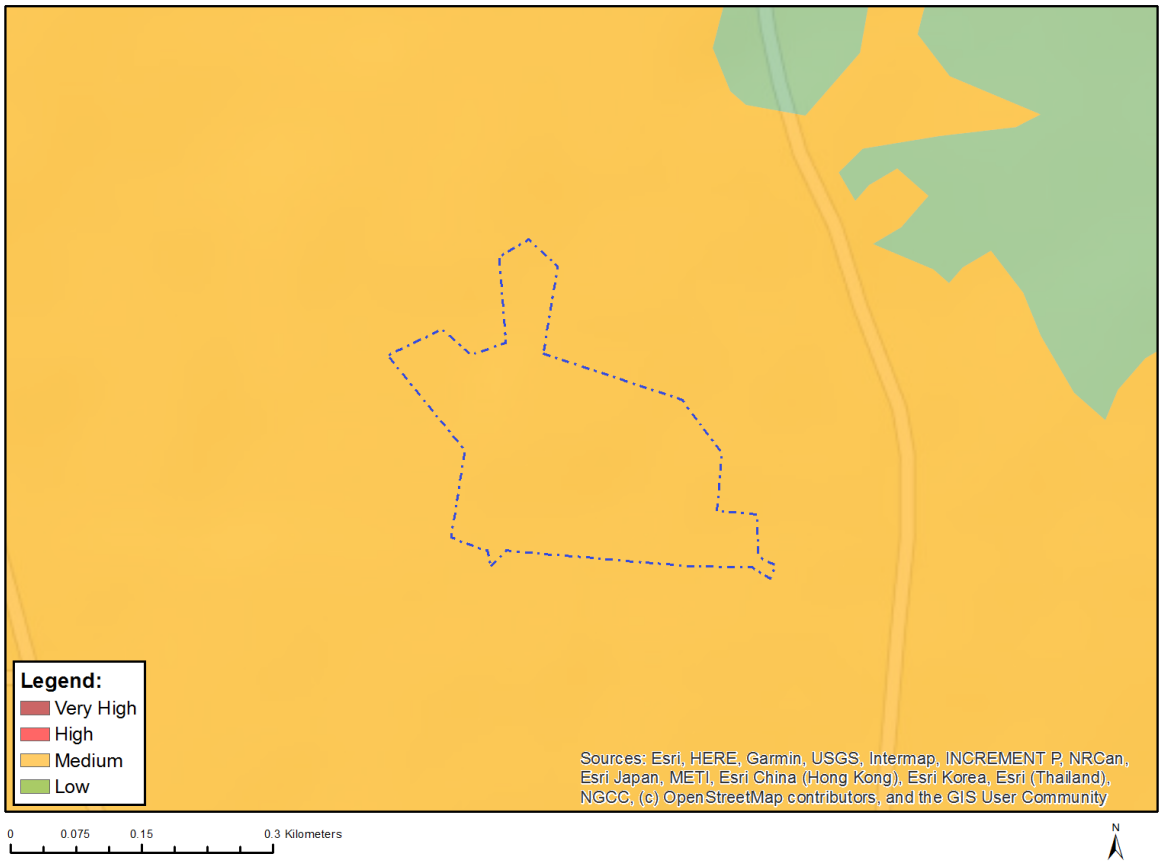


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Low	Features with a Low paleontological sensitivity
Medium	Features with a Medium paleontological sensitivity

MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY



Where only a sensitive plant unique number or sensitive animal unique number is provided in the screening report and an assessment is required, the environmental assessment practitioner (EAP) or specialist is required to email SANBI at eiadatarequests@sanbi.org.za listing all sensitive species with their unique identifiers for which information is required. The name has been withheld as the species may be prone to illegal harvesting and must be protected. SANBI will release the actual species name after the details of the EAP or specialist have been documented.

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Sensitive species 1252
Medium	Miraglossum laeve
Medium	Sensitive species 691
Medium	Sensitive species 1248
Medium	Prunus africana

MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	Critical biodiveristy area 2
Very High	Vulnerable ecosystem
Very High	Protected Areas Expansion Strategy

APPENDIX 9

AN AFFIDAVIT DEPOSED TO BY THE APPLICANT

To be included in the
final EIR to the Dept.

REC SERVICES
ENVIRONMENTAL CONSULTANTS

APPENDIX 10

FINANCIAL CONSIDERATIONS

Documentation

To be included in the
final EIR to the Dept.

REC SERVICES

ENVIRONMENTAL CONSULTANTS

ANNEXURE A TO THE SECTION 24G APPLICATION FORM

SECTION A: DIRECTIVE

Section 24G(1) of the National Environmental Management Act, 1998 (Act 107 of 1998) ("NEMA") provides that on application by a person who has commenced with a listed or specified activity without an environmental authorisation in contravention of section 24F(1); or a person who has commenced, undertaken or conducted a waste management activity without a waste management licence in terms of section 20(b) of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) ("NEM:WA ") the Minister, the Minister responsible for mineral resources or the MEC concerned (or the official to which this power has been delegated), as the case may be, may direct the applicant to -

i	immediately cease the activity pending a decision on the application submitted in terms of this subsection	
ii	investigate, evaluate and assess the impact of the activity on the environment	
Iii	remedy any adverse effects of the activity on the environment	
iv	cease, modify or control any act, activity, process or omission causing pollution or environmental degradation	
v	contain or prevent the movement of pollution or degradation of the environment	
vi	eliminate any source of pollution or degradation	
vii	compile a report containing -	
	aa	A description of the need and desirability of the activity
	bb	assessment of the nature, extent, duration and significance of the consequences for or impacts on the environment of the activity, including the cumulative effects and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity
	cc	description of mitigation measures undertaken or to be undertaken in respect of the consequences for or impacts on the environment of the activity
	dd	description of the public participation process followed during the course of compiling the how the issues raised have been addressed
	ee	an environmental management programme
	Provide such other information or undertake such further studies as the Minister, Minister responsible for mineral resources or MEC, as the case may be, may deem necessary.	

You are hereby provided with an opportunity to make representations on any or all of the abovementioned instruction, including where you are of the opinion that any of these instructions are not relevant for the purposes of your application, setting out the reasons for your assertion. Kindly note further that, after taking your representations into account, a final directive may be issued.

Representations on selected instructions as per the abovementioned paragraph:

i	immediately cease the activity pending a decision on the application submitted in terms of this subsection	
If operations are seized, current employees depending on their wages for survival will lose their income and livelihood.		
ii	investigate, evaluate and assess the impact of the activity on the environment	
Noted and a EIR was done.		
Iii	remedy any adverse effects of the activity on the environment	
No adverse effect (transformation) can be remedied because the whole site is also being earmarked for development by the applicant.		
iv	cease, modify or control any act, activity, process or omission causing pollution or environmental degradation	
Once a year this festival is held currently. Very little and low impacts of pollution or environmental degradation is taking place.		
v	contain or prevent the movement of pollution or degradation of the environment	
See above.		
vi	eliminate any source of pollution or degradation	
Once a year this festival is held. All solid waste is collected in bins/skips and taken to the nearest landfill site. Portable/mobile toilets are provided at this festival.		
vii	compile a report containing - DONE	
	aa	A description of the need and desirability of the activity
	bb	assessment of the nature, extent, duration and significance of the consequences for or impacts on the environment of the activity, including the cumulative effects and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity
	cc	description of mitigation measures undertaken or to be undertaken in respect of the consequences for or impacts on the environment of the activity
	dd	description of the public participation process followed during the course of compiling the how the issues raised have been addressed
	ee	an environmental management programme
	Provide such other information or undertake such further studies as the Minister, Minister responsible for mineral resources or MEC, as the case may be, may deem necessary.	

SECTION B: DEFERRAL

Section 24G(7) of the NEMA provides that if at any stage after the submission of an application it comes to the attention of the Minister, the Minister responsible for mineral resources or the MEC, that the applicant is under criminal investigation for the contravention of, or failure to comply with, section 24F(1) of the NEMA or section 20(b) of the NEM:WA, the Minister, Minister responsible for mineral resources or MEC may defer a

decision to issue an environmental authorisation until such time as the investigation is concluded and-

(a) The National Prosecuting Authority has decided not to institute prosecution in respect of such contravention or failure;
(b) The applicant concerned is acquitted or found not guilty after prosecution in respect of which such contravention or failure has been instituted; or
(c) The applicant concerned has been convicted by a court of law of an offence in respect of such contravention or failure and the applicant has in respect of the conviction exhausted all the recognised legal proceedings pertaining to appeal or review.

Kindly answer the following questions:

Are you, the applicant, being investigated for a contravention of section 24F(1) of the NEMA in respect of a matter that is not subject to this application and in any province in the Republic?	YES	NO	UNCERTAIN
If yes provide details of the offence being investigated and authority conducting the investigation, If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.			
Are you, the applicant, being investigated for the contravention of section 20(b) of the NEMWA in respect of a matter that is not subject to this application and in any province in the Republic?	YES	NO	UNCERTAIN
If yes provide details of the offence being investigated and authority conducting the investigation. If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.			
Are you, the applicant, being investigated for an offence in terms of section 24F(1) of the NEMA or section 20(b) of the NEMWA in terms of which this application directly relates?	YES	NO	UNCERTAIN
If yes provide details of the offence being investigated and authority conducting the investigation. If uncertain provide details of the activity or activities in relation to which you suspect you may be under investigation.			

If you have answered yes or uncertain to any of the above questions, you are hereby provided with an opportunity to make representations as to why the Minister, Minister responsible for mineral resources or MEC, as the case may be, should not defer the application as he or she is entitled to do under section 24G (7).

SECTION C: QUANTUM OF THE SECTION 24G FINE

In terms of section 24G(4) of the NEMA, it is mandatory for an applicant to pay an administrative fine as determined by the competent authority before the Minister, Minister responsible for mineral resource or
MEC may take a decision on whether or not to grant an ex post facto environmental

authorisation or a waste management license as the case may be. The quantum of this fine may not exceed R5 million.

Having regard to the factors listed below, you are hereby afforded with an opportunity to make representations in respect of the quantum of the fine and as to why the competent authority should not issue a maximum fine of R5 million.

Please note that Part 1 of this section must be completed by an independent environmental assessment practitioner after conducting the necessary specialist studies, copies of which must be submitted with this completed application form.

Please also include in your representations whether or not the activities applied for in this application (if more than 1) are in your view interrelated and provide reasons therefore.

PART 1: THE IMPACTS OR POTENTIAL IMPACTS OF THE ACTIVITY/ACTIVIITIES

Index: Socio Economic Impact Description of variable	Place an "X" in the appropriate box
The activity is not giving, has not given and will not give rise to any negative socio-economic impacts	X
The activity is giving, has given, or could give rise to negative socio- economic impacts, but highly localised	
The activity is giving, has given, or could give rise to significant negative socio-economic and regionalized impacts	
The activity is resulting, has resulted or could result in wide-scale negative socio-economic impacts.	
Motivation:	
Food and Agricultural Organisation (FAO) report (2004) emphasised that agriculture is a key to food security in many parts of the world. The report indicates further that agriculture contributes to poverty alleviation by reducing food prices, creating employment, improving farm income and increasing wages. Making agriculture work must be central component of policy approaches to food insecurity reduction and increasing economic growth. Increased investment in agriculture will help address the current inequalities. Empowering people to grow their own food for subsistence or income generation will provide nourishment and potential income to many people in the country.	

Index: Biodiversity Impact Description of variable	Place an "X" in the appropriate box
The activity is not giving, has not given and will not give rise to any impacts on biodiversity	

The activity is giving, has given or could give rise to localised biodiversity impacts	X
The activity is giving, has given or could give rise to significant biodiversity impacts	
The activity is, has or is likely to permanently / irreversibly transform/ destroy a recognised biodiversity 'hot -spot' or threaten the existence of a species or sub-species.	
Motivation:	
As described by the ecological studies, a small section of Soweto Highveld grassland was cleared for the current feedlot site. The impact on biodiversity is of a localized nature due to this being the only feedlot in the immediate area.	

Index Sense of Place Impact and /or Heritage Impact	Place an "X" in the appropriate box
Description of variable	
The activity is in keeping with the surrounding environment and I or does not negatively impact on the affected area's sense of place and /or heritage	
The activity is not in keeping with the surrounding environment and will have a localised impact on the affected area's sense of place and/or heritage	X
The activity is not in keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage	
The activity is completely out of keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage.	
Motivation:	
This is an agricultural entity or practice on agricultural land and therefore will not impeded on the agricultural sense of place.	

Index Pollution Impact	Place an "X" in the appropriate box
Description of variable	
The activity is not giving, has not given and will not give rise to any pollution	
The activity is giving, has given or could give rise to pollution with low impacts,	X
The activity is giving, has given or could give rise to pollution with moderate impacts.	X
The activity is giving, has given or could give rise to pollution with high impacts.	
The activity is giving, has given or could give rise to pollution with major impacts.	

Motivation: The activity that has commenced involves the construction of feedlot infrastructure. This includes the construction of: • Handling and storage facilities • Railing and enclosures for Pens • Feeding and water infrastructure. • On and off-loading ramps. • Dipping tanks. A pollution factor will be involved, but if the EMPr is abide by the in terms of waste management then the impact will be low.	

PART 2: COMPLIANCE HISTORY AND KNOWLEDGE OF THE APPLICANT	
Index: Previous administrative action (i.e. administrative enforcement notices) issued to the applicant in respect of a contravention of section 24F(1) of the National Environmental Management Act and/ or section 20(b) of the National Environmental Management Waste Act	Place an "X" in the appropriate box
Description of variable	
Administrative action was previously taken against the applicant respect the abovementioned provisions.	
No previous administrative action was taken against the applicant, but previous administrative action was taken against a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time when the administrative action was taken.	
Administrative action was not previously taken against the applicant in respect of the abovementioned provisions.	X
Explanation of all previous administrative action taken in respect of the above: N/A	
Index: Previous Convictions in terms of section 24F (1) of the National Environmental Management Act and/or section 20(b) of the National Environmental Management Waste Act	Place an "X" in the appropriate box
Description of variable	
The applicant was previously convicted in terms of either or both of the abovementioned provisions.	
No previous administrative action was taken against the applicant but previous administrative action was taken against a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time when the administrative action was taken.	
The applicant has not previously been convicted in terms of either or both of the abovementioned provisions.	X
Explanation of all previous convictions in respect of the above: N/A	
Index: Number of section 24G applications previously submitted by the applicant	Place an "X" in the appropriate

Description of variable	box
Number of section 24G applications previously submitted by the applicant	None.
No previous applications have been submitted by the applicant but a previous application(s) have been submitted by a firm(s) on whose board one or more of the applicant's directors sit or sat at the relevant time.	
No previous applications have been submitted by the applicant but the applicant sat on the board of a firm that previously submitted an application.	
Explanation in respect of all previous applications submitted in terms of section 24G: N/A	

PART 3: APPLICANT'S PERSONAL CIRCUMSTANCES

Index: Applicant's legal persona	Place an "X" in the appropriate box
Description of variable	
The applicant is a natural person.	
The applicant is a firm/company/farming enterprise.	X

Describe the firm/company/farming enterprise:

- Raising of beef inside a pen as a farming activity for the purpose of slaughtering at an approved abattoir off site.

The follow process description is provided:

1. Cattle are brought to the farm at various ages.
2. Weaners calves are brought in from other farms for a backgrounding process at age 205 days.
3. Animals that pass the backgrounding phase are placed in the feedlot for the grower phase. 200kg to 360kg.
4. Animals that have finished the grower phase are placed in the finisher phase. 630kg to 850kg.
5. After the slaughter weight has been achieved, animals are transported away from the farm for slaughter at Cavalier near Cullinan.

Index: Any other relevant information that the applicant would like to be considered.
Motivate and explain fully: None.