

CHAPTER ONE: INTRODUCTION

1.1 BACKGROUND AND PROJECT OVERVIEW

Die Boeram Venter Trust (project applicant) intends to establish and operate a composting and fertiliser processing plant on Farm 715 Division Uitenhage, MR 00470 (Sunlands Road), Nelson Mandela Bay Municipality. The farm is currently zoned for agriculture use and falls outside of the urban edge of the Nelson Mandela Bay Municipality (NMBM). The property is approximately 377 hectares in extent, and straddles the boundary between the Nelson Mandela Bay Municipality and the Sundays River Valley Local Municipality. The applicant intends to compost poultry litter (manure) to produce fertiliser. The project is proposed to take place in a phased manner. Phase one will entail the establishment of a composting facility for the poultry litter (approximately 10 ha), where after an approximate 8 week cycle, the fertiliser will be bagged and stored on site prior to delivery to market. Phase two (five year plan) will entail the construction and operation of a fertiliser processing plant (approximately 0.5 ha). The total development footprint is thus approximately 10.5 ha (including services and internal roads).

The proposed project requires a Basic Assessment in terms of activities listed in the NEMA EIA Regulations, 2010 published in Government Notice R 543, 544 and 546 on the 18 June 2010, in Government Gazette 33306 (as amended). The project also requires a waste licence in terms of activities listed in Category A of the NEM Waste Act (Act No. 59 of 2008). A precautionary approach is being adopted towards this assessment process, and instead of a Basic Assessment, full Scoping and Environmental Impact Assessment is being undertaken as provided for in Regulation 20 (3) in GN R543 of the NEMA EIA Regulations 2010. Confirmation of this approach has been received from the Provincial Department of Economic Development, Environmental Affairs and Tourism (DEDEAT) and reference number ECm1/LN2/M/12-02 has been assigned to the environmental authorisation and reference number CA/A/17,18/001-12 has been assigned to the waste licence application. See correspondence attached as Appendix B.

An application for Environmental Authorisation and a Waste Licence Application have been submitted to the Provincial DEDEAT. The applicant has appointed Public Process Consultants as the independent Environmental Assessment Practitioner to manage the Scoping and EIA process for this project. The environmental assessment needs to show the responsible authorities, and the applicant, Die Boeram Venter Trust, what the consequences of their choices would be in biophysical, social and economic terms.

1.2 NEED AND JUSTIFICATION FOR THE PROJECT

Need

The national gross income from poultry meat for the period 2009 (as recorded by the Department of Agriculture, Fisheries and Forestry [DAFF]) was R23,165 billion and from poultry eggs it was R6,986 billion. Combined, the national gross poultry farm income for 2009 was R30,151 billion. Poultry producers are the largest part of South African agricultural GDP at 24% of all agricultural production in comparison with 20% in 2008. This equates to 48% of all animal products produced in South Africa (in Rand terms) in comparison with 44% in 2008. Production of poultry meat and egg industries together increased by 0,7% in 2009 in comparison with 2008, while the combined

beef, pork, lamb and goat meat production decreased with 2,3% over the same time period (http://www.sapoultry.co.za/industry_profile.php).

Based on the above the poultry industry is an important and growing sector of the national agricultural industry, a situation which is also reflected in the agricultural industry of Nelson Mandela Bay. The Nelson Mandela Bay Municipality includes numerous commercial poultry facilities engaged in either broiler or egg production on a range of scales; as well as a variety of poultry rearing and keeping facilities which support these operations (e.g. layer facilities, breeder facilities). These facilities represent intensive feed farming operations in which the animals are kept in purpose-built enclosures at high densities and fed optimal diets. During the course of rearing / production substantial amounts of poultry litter¹ accumulates in these enclosures. While the resident time of the poultry litter in the respective facilities varies, the poultry litter ultimately needs to be removed from the enclosures when a new flock of chicks is introduced to the facility. It is estimated that in excess of 30 000 tons of poultry litter is produced by poultry concerns in the greater Nelson Mandela Bay area annually. Based on the above economic indicators, and the expansion trends in the poultry industry, the volume of poultry manure currently being produced can be expected to increase in future.

The poultry litter which accumulates in the enclosures requires regular removal as a fundamental component of the poultry production process. Due to the high residual nutrient content of the poultry litter, it is considered to be a valuable source of fertilizer for the agricultural industry. It is for this reason that some poultry concerns have registered their poultry litter as a fertilizer with the Department of Agriculture; and many sell their poultry litter to selected farmers for controlled and managed direct application to land. Composted manure is known to be a more effective fertiliser when compared with untreated manure (Brown *et al.* 2008).

However, poorly managed storage and disposal of poultry litter has the potential to result in a variety of environmental impacts, most notably; nuisance odours, fly breeding, nutrient enrichment of surface water runoff, eutrophication of water sources, and the alteration of soil characteristics. These practices may be particularly prevalent in situations where poultry farmers cannot access suitable markets for the poultry litter due to logistical or other constraints (no distribution capacity, unregistered litter).

Further to the above, the use of untreated poultry litter also presents certain challenges to the end-user.

- Loss of nutrients during storage / stockpiling which reduces the value of the manure / litter.
- No control over the Nitrogen / Phosphorous / Carbon ratio of the fertilizer.
- The elevated ammonia content in untreated poultry manure may be harmful to (burn) the crop.
- Unpleasant odours associated with untreated manure limits its use in urban agriculture projects and domestic settings.
- The un-processed manure / litter is not suitable for application to land by most mechanical fertilizer spreaders.

¹ Poultry Litter – a mixture of poultry manure and sawdust bedding material which accumulates on the floors of poultry enclosures.

The above physical and environmental challenges associated with the management of poultry litter can be overcome by composting and processing the manure in a controlled manner. There is currently no such facility in the Nelson Mandela Bay or surrounding area. The applicant intends to provide such a facility for the composting of poultry litter.

The proposed facility will be able to address the practical challenges associated with the handling and use of poultry litter as a fertilizer source, while also providing a solution to the potential environmental risks associated with uncontrolled storage and application of untreated poultry manure. While the applicant has already secured a source of poultry litter from a major poultry producer in the NMBM, the facility is also intended to accept litter from other smaller poultry concerns in the area.

Site Suitability

The proposed site (Farm 715) was selected based on the following criteria:

- Distance to source and markets – the travelling distance to existing poultry concerns in the Nelson Mandela Bay Municipality (NMBM) and Sundays River Valley Municipality (SRVM), as well as potential markets was considered, as it impacts on transport costs which would impact on product costs and the financial feasibility of the project. Ready access to a site was also a requirement. The site is set back from the R335 and R75, it is easily accessible from both these main transport routes.
- Proximity to residential areas - Separation distance from existing or future residential areas was considered in order to proactively limit and avoid potential nuisance impacts associated with odour and flies.
- Topography – the slope / topography of the site was important in order to allow for the effective management of potential surface (stormwater) water runoff from the composting area. In addition, areas with steep slopes would not be suitable due to the potential site preparation costs (site levelling).
- Size – a site big enough to allow for internal buffers between the composting component of the facility and the boundary of the property.
- Availability – the availability of affordable land, from a willing seller, meeting the above criteria was a critical consideration.

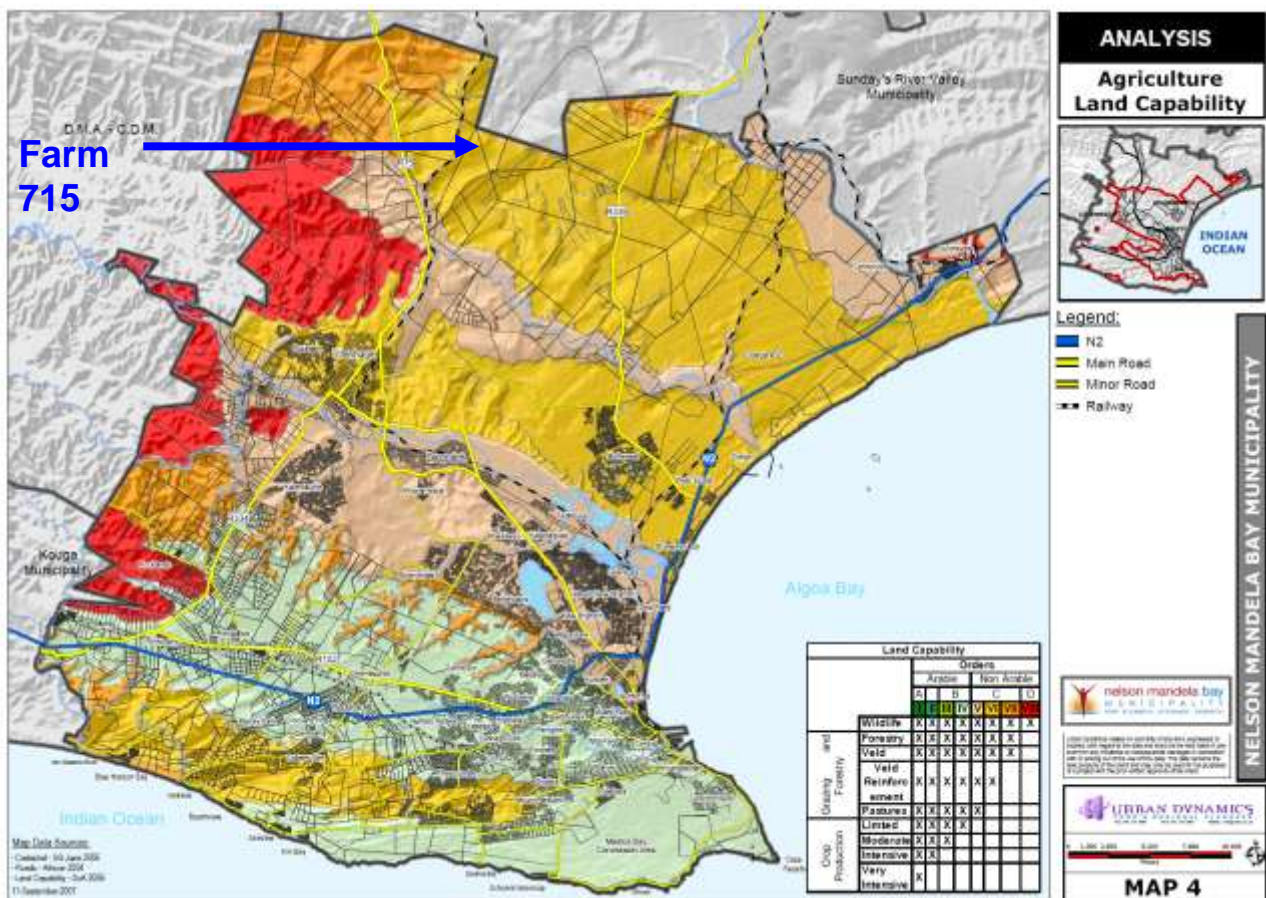
The site is located outside the urban edge for the NMBM (approximately 12 km), however it is still within travelling distance of the main poultry producing areas in the NMBM and SRVM. It is also in close proximity to potential markets in need of fertiliser in the Sundays River Valley Municipal area (citrus and crop producers). The site is rural in nature and is currently zoned for agricultural use. It is not located near any existing residential areas or land proposed for future zoning to residential use. Land-uses in the area include game and stock farming, calcrete mining, private nature reserves (not declared), and the proposed Regional Hazardous Waste Site. The site represents a gently sloping area where surface (storm) water runoff from the composting operation can be effectively managed. Based on the above the proposed site (Farm 715) satisfied the site suitability criteria. Chapter Five of this report deals with alternative sites considered as part of this assessment process.

IDP & SDF

The IDP (2006 – 2011) of the NMBM² relates the following with regards to extensive agriculture outside the urban edge of the NMBM:

“Areas outside of the urban edge represent a peripheral use zone, identified by the Department of Agriculture as prime agricultural land on which extensive agriculture should be protected and promoted “.

According to the NMBM SDF (March 2009), the area under assessment falls within the Agriculture Development Zone. The NMBM Rural Land Use Management Policy, indicates that permitted uses in this zone include, inter alia, Agriculture³ as defined in the section 8 zoning scheme. In addition the proposed site has been given an Agricultural Land Capability classification of VI. Land in Class VI has severe limitations that make it generally unsuited for cultivation and limits its use largely to pasture and range, woodland or wildlife food and cover.



Map 1.1: The proposed site (Farm 715) falls within the Agriculture Development Zone and has a Land Capability classification of VI (according to the NMBM SDF, 2009).

² Integrated Development Plan (2006 – 2011) of the Nelson Mandela Bay Metropolitan Municipality 2010/11 Review 9th Edition

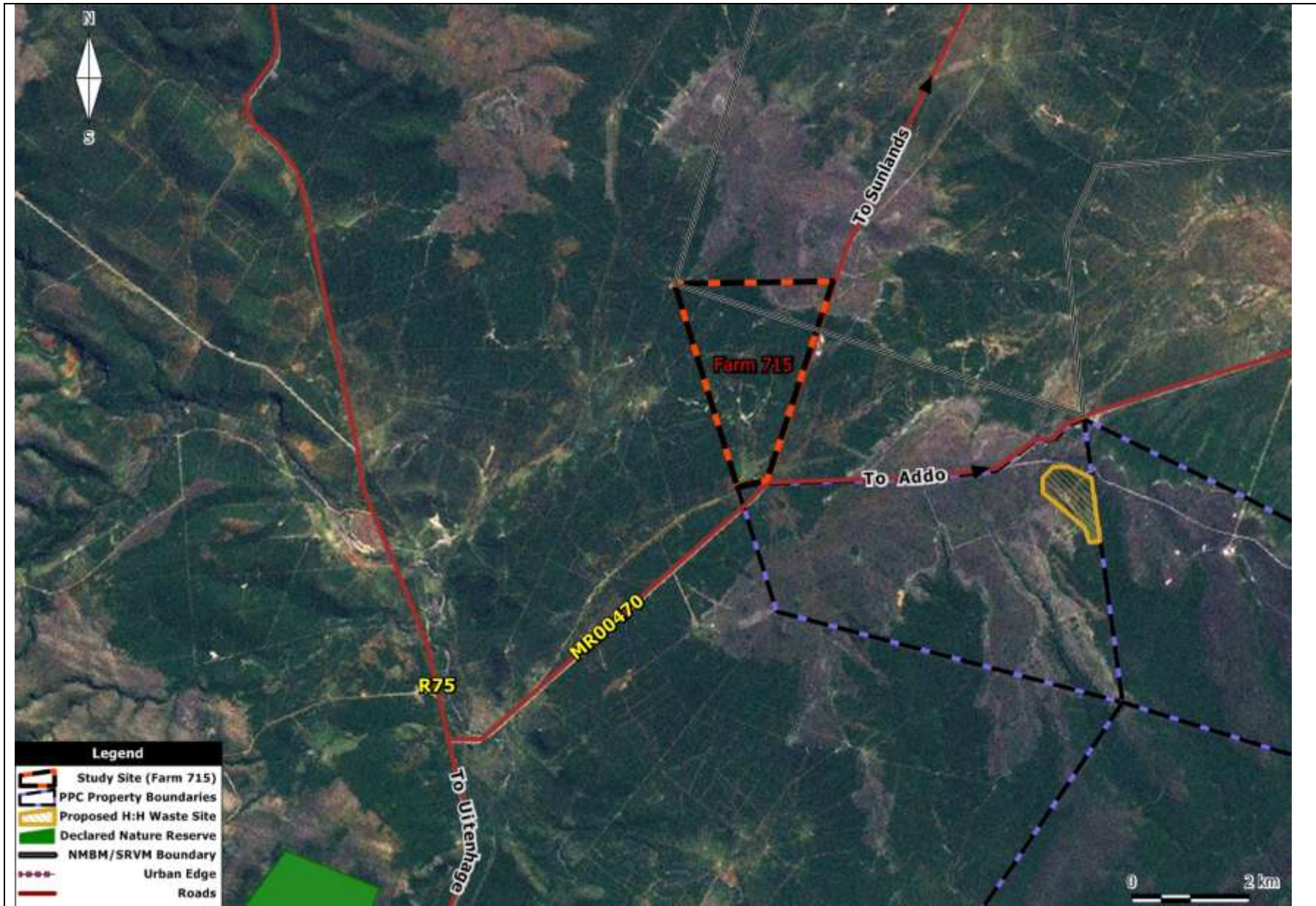
³ Agriculture – means the cultivation of land for crops and plants or the breeding of animals, or the operation of a game farm on an extensive basis on the natural veld or land, and includes only such activities and buildings as are reasonably connected with the main farming activities of the farm, but does not include the consent uses applicable to agricultural zone 1.

The facility will provide for the beneficiation of poultry litter, a by-product of the poultry industry in the NMBM region. The portion of the site proposed to be used for the activity would have to be suitably re-zoned to provide for the facility. Current agricultural practices (small scale crop farming as well as rangeland for livestock and game) may continue to take place on the remaining (untransformed) portions of the farm (± 366.5 ha). Due to the close linkages between the proposed facility and the agricultural industry (market), the selection of the site within a designated agricultural area on land that is non-arable and is away from existing or proposed future residential areas, is considered appropriate.

Local Setting

The site is located in the sparsely populated rural area between the R75 and the R335 regional roads, approximately 35 kilometres north of the city of Port Elizabeth. The surrounding landscape includes various agricultural pursuits, namely, game farming, stock farming, and cultivation, as well as proposed bird / poultry farming. The fertile Sundays River floodplain is located approximately 12 kilometres north east of the site, and comprises extensive areas of irrigated agriculture, such as citrus fruit, vegetable and grain production. While the area is predominantly agricultural in nature, the land on the southern boundary of the proposed site includes land which is being mined by PPC for the extraction of calcrete. The PPC mining area also includes the site earmarked for the establishment of the proposed Regional Hazardous Waste Site. The Coega Industrial Development Zone represents the nearest industrial area, and is located 18 km southeast of the site. The nearest residential areas are Uitenhage (12 km), Motherwell (17km) and Addo (17 km). The boundary of the Addo Elephant National Park is 19 km east of the site, while the nearest formal conservation area, the Springs Municipal Nature Reserve, is located approximately 7km southwest of Farm 715.

Map 1.2 below indicates the location of the property forming part of the assessment.



Map 1.2 Locality of Erf 715, Division Uitenhage

1.3 REQUIREMENTS FOR SCOPING AND ENVIRONMENTAL ASSESSMENT

In terms of the National Environmental Management Act (Act no 107 of 1998), as amended (NEMAA), and the NEMA EIA Regulations 2010 published in Government Notice R 543, 544, 545 and 546 on the 18 June 2010 in Government Gazette 33306 (as amended), the project requires a Basic Assessment in order to obtain Environmental Authorisation and a Waste Licence, prior to commencement of activities on site.

- The project requires Environmental Authorization from the Provincial Department of Economic Development Environmental Affairs and Tourism (DEDEAT) in terms of the National Environmental Management Act (Act No. 107 of 1998) as amended (“NEMAA”) and the NEMA EIA regulations 2010 (as amended) for activities listed in GN R 544 and 546.
- The project also requires a Waste License in terms of the National Environmental Management Waste Act (NEM:WA), Act 59 of 2008, for Category A listed Activities in GN R718⁴ which is also issued by the Provincial DEDEAT.

The project does not require an Atmospheric Emissions Licence (AEL) and confirmation of this has been obtained from the National Department of Environmental Affairs, see correspondence attached as Appendix C. The project is however subject to the National Environmental Management Air Quality Act (NEM:AQA), section 35. (1) and (2) regarding the control of offensive odours.

The application to commence the Scoping and EIA process in terms of the NEMA EIA Regulations 2010 was prepared and submitted to the DEDEAT, dated the **27 May 2011**. The acknowledgement of receipt of the application was not issued within the prescribed period, due to the need to obtain confirmation regarding the application and interpretation of Category 10: Animal Matter Processing, listed in terms of NEM:AQA. Should an Atmospheric Emissions Licence (AEL) not be required for the project, the application would require Basic Assessment and not full Scoping and EIA. In accordance with Regulation 20 (3)⁵ in GN R543 of the NEMA EIA Regulations, 2010 a recommendation was submitted to DEDEAT on the **13 December 2011**, to adopt a precautionary approach towards the assessment process and, regardless of whether an AEL would be required by the project, to apply Scoping and EIA, instead of a Basic Assessment. Acknowledgement of the application submitted and confirmation of the approach to the assessment process, was received from DEDEAT in correspondence dated the **10 February 2012** and reference number **ECm1/LN2/M/12-02** has been assigned to the application for environmental authorisation. See correspondence attached in Appendix B.

The decision-making authority for the waste license is also the Provincial Department of Economic Development, Environmental Affairs and Tourism (DEDEAT), Cacadu Region. An application for a

⁴ Confirmation has been provided by the National Department of Environmental Affairs (DEA) that poultry litter is considered to be animal manure, and not general or hazardous waste, and therefore the licensing authority is the Provincial Department of Environmental Affairs (in this instance DEDEAT). See correspondence attached as Appendix C.

⁵ GN R 543: 20 (3) If an applicant intends undertaking an activity to which basic assessment must be applied in terms of subregulation (1) and the applicant, on the advice of the EAP managing the application, is for any reason of the view that it is unlikely that the competent authority will be able to reach a decision on the basis of information provided in a basic assessment report, the applicant may apply, in writing, to the competent authority for permission to apply S&EIR instead of basic assessment to the application

waste licence was submitted to DEDEAT, **dated 3 June 2011**, acknowledgement of receipt was received on the **10 February 2012** and reference number **CA/A/17,18/001-12** has been assigned to the waste licence application See copy attached as Appendix B.

Chapter Four of this report provides an overview of the listed activities that are triggered by the project proposal. Public Process Consultants has been appointed as the independent Environmental Assessment Practitioner (EAP) to conduct the Scoping and EIA, including public participation for this application.

1.4 EIA TEAM

This section of the report provides an overview of the proposed EIA project team under the leadership of Public Process Consultants, who has been appointed as the independent Environmental Assessment Practitioner for the Scoping, EIA and public participation process.

Table 1.1 EIA Team and Specialists

EIA PROJECT TEAM		
Ms Sandy Wren	Public Process Consultants	EIA Team Leader
Dr Paul-Pierre Steyn	Public Process Consultants	Environmental Scientist
Ms Marisa Jacoby	Public Process Consultants	Biophysical Assessment - Ecology, fauna & flora
Mr Wandile Junundu	Public Process Consultants	Community Consultation
Ms Ronel Claasen	Poltech	Materials Handling and Waste Management
Riona Kruger/ Gert Nel	SRK Consulting	Geohydrological
Mr Benton Pillay	uMoya NILU	Air Quality
Mr Brian Colloty	Scherman Colloty and Associates	Wetland Specialist
Mr Cary Hastie	Engineering Advice and Services	Traffic
Dr Johan Binneman	Albany Museum	Archaeology
Dr John Almond	Natura Viva cc	Palaeontology
Henry Holland	Mapthis	Visual Impact Assessment
TECHNICAL TEAM		
Mr Johan Van Der Westhuizen	Urban Dynamics	Town Planner
Mr Jaco Spies	JJ Spies Civil Engineers	Bulk Services (water, roads, sanitation, electricity and stormwater management)
Mr Adriaan Le Roux	Le Roux Incorporated	Legal Review

Further technical input on the project will be provided by the applicant, Mr J.N. Venter.

1.5 DETAILS AND EXPERTISE OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) AND EXPERTISE TO CARRY OUT SCOPING AND EIA

Public Process Consultants was established in 1997 by Sandy Wren. Initially the company was established to focus on the overarching management and integration of the public participation component for Scoping Reports, EIAs and SEAs. Under this role Sandy was actively involved in projects such as the Strategic Environmental Assessment ("SEA") for the expansion of Addo Elephant National Park, SEA for the Coega Industrial Development Zone and Port of Ngqura, the EIA for the Boardwalk Casino and development of a Sustainable Coastal Development Policy for

SA. This management and integration role expanded through years of experience to include the management of Basic Assessments, Scoping and EIA Reports. Sandy has over 15 years of experience in the management of Scoping and EIA's as well as Basic Assessment reports for numerous projects within the Nelson Mandela Bay Metropolitan Area and beyond, for both public and private clients.

The application for the Venter Fert Composting and Processing Plant project EIA team is being led by Sandy Wren (EIA Team Leader) who will be supported by Dr Paul-Pierre Steyn (Environmental Scientist). Appendix A includes the CV for Sandy Wren and Dr Paul-Pierre Steyn.

The EIA Project Team is being led by **Ms Sandy Wren** of Public Process Consultants, who has over 15 years of experience in Scoping and EIA studies. Sandy is a graduate from the University of Port Elizabeth, majoring in Political Science, Sociology and Industrial and Organisational Psychology. Sandy obtained a BA Honours Degree in Development Studies in 2003 for which she obtained distinctions in courses in Environmental Management. Sandy is a former Regional Director of Idasa (Institute for Democracy in SA). Sandy's EIA project management experience includes, proposed new housing and "estate" type developments, expansion of agricultural related activities (broiler house facilities and citrus production), bulk infrastructure related projects (sewer, stormwater, sewage reticulation works and pump stations) as well as industrial type developments (SA Breweries IBhayi Biogas facility, NiRoVe Paint Stripping and increase in LNG for Umicore). Sandy continues to play a key role in the management of various public participation processes associated with the Coega Project (Proposed Regional Hazardous Waste Site Facility; Proposed Bulk Liquid Storage and Handling Facility in the Coega IDZ: Marine Servitude and Pipelines in the Coega IDZ), as well as various renewable energy projects (wind and solar).

Dr Paul-Pierre Steyn, Environmental Scientist, has a BSc (Botany & Zoology), BSc Hons (Botany), MSc Botany and PhD Botany awarded by the Nelson Mandela Metropolitan University (NMMU). In 2009 Dr Steyn completed his thesis on: The Ecophysiology of the agarophyte *Gelidium pristoides* towards commercial production. From the period 2000 to 2006, Paul was a contract Lecturer in the Botany Department of the NMMU as well as an independent specialist consultant for the SAB Institute for Environmental and Coastal Management. During this period Paul provided specialist consulting services on coastal projects (Mossel Bay Coastal Walk Way), bio-monitoring (Ngqura Port bio-monitoring) and ecological specialist services for various housing, resort and mining related developments. Paul joined Public Process Consultants in 2007 as an Environmental Assessment Practitioner and has subsequently managed various Basic Assessments, Scoping and EIAs, EMPPr's and provided Environmental Control Officer services for numerous projects in and beyond the NMBM boundary (Sundays River Valley Municipality and Kouga Municipality). Paul has successfully acted as an independent EAP as well as provided specialist biophysical input (flora, fauna and wetlands) for various agricultural developments (broiler houses, citrus and crop production), estate and residential housing, mixed use type developments (Amanzi Country Estate), bulk infrastructure projects (water, sewer, roads and sanitation), renewable energy projects (solar), industrial developments (Umicore, NiRoVe and SA Breweries) and mining applications.

1.6 OBJECTIVES OF THE SCOPING PROCESS

The Scoping Phase of the EIA refers to the process of determining the spatial and temporal (extent) boundaries for the EIA, as well as the key issues to be addressed in the environmental

assessment. This is done through a parallel process of public consultation and specialist consultation involving the selected specialists, as well as a review of relevant background literature on the development (Local and Regional Planning Frameworks, EC Biodiversity Conservation Plan (ECBCP), and Subtropical Thicket Ecosystem Plan (STEP)). This is done in order to focus the environmental assessment on key issues requiring assessment and to identify reasonable and feasible alternatives.

The primary objective of the Scoping Process is to present (to key stakeholders and affected organs of state) an overview of the project, including key issues that require assessment in the EIA Phase and to allow the opportunity for the identification of additional issues that may require assessment in the EIA phase of the assessment. Issues raised in response to requests to register interest in the project were included in the Draft Scoping Report which was made available for a 44 day review period. The Final Scoping Report includes the issues of concern raised by I&APs during the review of the Draft Scoping Report.

In terms of legal requirements, a crucial objective of the Scoping Process is to satisfy the requirements of Regulations 28 and 29 of the NEMA EIA Regulations 2010. These sections regulate and prescribe the content of Scoping Reports and specify the type of supporting information that must accompany the submission of the Scoping Report to the authorities. In this Scoping Report, such supporting information is included in the Appendices. Table 1.2 below indicates how the requirements of these regulations are met by the different sections of this Scoping Report.

Furthermore, the scoping process is designed to satisfy the requirements of Regulations 55, 56 and 57 of the NEMA EIA Regulations 2010, which relate to the public participation process and, specifically, the registration of interested and affected parties and the acknowledgment of their comments and views on the proposed project.

Table 1.2 Summary of where requirements for a Scoping Report (in terms of Section 28 and 29 of the NEMA EIA Regulations 2010) are provided for in this report.

Section	Requirement for Scoping Report	Where this is provided in this Draft Scoping Report
28. (1) (a) (i)	details of the EAP who prepared the report	Appendix A
28. (1) (a) (ii)	the expertise of the EAP to carry out scoping procedures;	Appendix A
28. (1) (b)	a description of the proposed activity	Chapter 2
28. (1) (c)	a description of any feasible and reasonable alternatives that have been identified	Chapter 5
28. (1) (d)	a description of the property on which the activity is to be undertaken and the location of the activity on the property, or if it is —	Chapter 3
28. (1) (d) (i)	a linear activity, a description of the route of the activity; or	This is not a linear activity
28. (1) (d) (ii)	an ocean-based activity, the coordinates where the activity is to be undertaken	This is not an ocean based activity
28. (1) (e)	a description of the environment that may be affected by the activity and the manner in which the activity may be affected by the environment	Chapter 2 and 3

28. (1) (f)	an identification of all legislation and guidelines that have been considered in the preparation of the scoping report	Chapter 4
28. (1) (g)	(g) a description of environmental issues and potential impacts, including cumulative impacts, that have been identified;	Chapter 2, 3 and 6 and to be assessed in full in the Draft and Final EIA
28. (1) (h)	details of the public participation process conducted in terms of regulation 27(a) , including —	Chapter 4
28. (1) (h) (i)	the steps that were taken to notify potentially interested and affected parties of the application;	Chapter 4
28. (1) (h) (ii)	proof that notice boards, advertisements and notices notifying potentially interested and affected parties of the application have been displayed, placed or given;	Appendix D
28. (1) (h) (iii)	a list of all persons or organisations that were identified and registered in terms of regulation 55 as interested and affected parties in relation to the application; and	Appendix E
28. (1) (h) (iv)	a summary of the issues raised by interested and affected parties, the date of receipt of and the response of the EAP to those issues;	Chapter 4
28. (1) (i)	a description of the need and desirability of the proposed activity;	Chapter 1
28. (1) (j)	a description of identified potential alternatives to the proposed activity, including advantages and disadvantages that the proposed activity or alternatives may have on the environment and the community that may be affected by the activity;	Chapter 5
28. (1) (k)	copies of any representations, and comments received in connection with the application or the scoping report from interested and affected parties;	Appendix G
28. (1) (l)	copies of the minutes of any meetings held by the EAP with interested and affected parties and other role players which record the views of the participants; and	Appendix G for notes from meetings held.
28. (1) (m)	any responses by the EAP to those representations and comments and views;	Chapter 4: Issues and Responses Trail
28. (1) (n)	a plan of study for environmental impact assessment which sets out the proposed approach to the environmental impact assessment of the application, which must include —	Chapter 6
28. (1) (n) (i)	a description of the tasks that will be undertaken as part of the environmental impact assessment process, including any specialist reports or specialised processes, and the manner in which such tasks will be undertaken;	Chapter 6
28. (1) (n) (ii)	an indication of the stages at which the competent authority will be consulted;	Chapter 4 and 6
28. (1) (n) (iii)	a description of the proposed method of assessing the environmental issues and alternatives, including the option of not proceeding with the activity; and	Chapter 6 for methods of assessing environmental issues and Chapter 5 for

		Alternatives
28. (1) (n) (iv)	particulars of the public participation process that will be conducted during the environmental impact assessment process;	Chapter 6
28. (1) (o)	any specific information required by the competent authority; and	None requested to date
28. (1) (p)	any other matters required in terms of sections 24(4)(a) and (b) of the Act.	The Scoping and EIA process takes into consideration IEM principles as contained in NEMA
28. (2)	In addition, a scoping report must take into account any guidelines applicable to the kind of activity which is the subject of the application	Chapter 4
28. (3)	The EAP managing the application must provide the competent authority with detailed, written proof of an investigation as required by section 24(4)(b)(i) of the Act and motivation if no reasonable or feasible alternatives, as contemplated in sub regulation (1)(c), exist.	The Scoping and EIA Report as proof of the assessment process and Chapter 5 for alternatives
29.	The EAP managing an application must submit 5 copies of the scoping report compiled in terms of regulation 28 to the competent authority, together with —	5 copies submitted to the competent authorities
29. (a)	copies of any representations, and comments received in connection with the application or the scoping report from interested and affected parties;	Appendix G
29. (b)	copies of the minutes of any meetings held by the EAP with interested and affected parties and other role players which record the views of the participants; and	Appendix G for notes from meetings held
29. (c)	any responses by the EAP to those representations and comments and views.	Chapter 4, Issues and Responses Trail