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AMENDMENT OF ENVIRONMENTAL AUTHORISATION (EA): FINAL ENVIRONMENTAL IMPACT REPORT (EIR)

In terms of

The National Environmental Management Act, 1998 (Act No. 107 of 1998, as amended)
and the Environmental Impact Assessment Regulations (2014, as amended)

For Remainder of Farm 432, Plettenberg Bay - Cairnbrogie



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**PROPOSED AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (EA) FOR REMAINDER OF
FARM 432, PLETTENBERG BAY**

Submitted for:

DEADP decision making purposes

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Applicant details	Holder – Cairnbrogie Farms (Pty) Ltd represented by Andrew Hill	
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In accordance with Appendix 3 of the NEMA EIA Regulations (2014, as amended), the following content must be included in an Environmental Impact Assessment:

Content	Section applicable
(1) An environmental impact assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include- (a) details of- (i) the EAP who prepared the report; and (ii) the expertise of the EAP, including a curriculum vitae;	Page 3 and Appendix G
(b) the location of the development footprint of the activity on the approved site as contemplated in the accepted scoping report, including: (i) the 21 digit Surveyor General code of each cadastral land parcel; (ii) where available, the physical address and farm name; and (iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the	Section 1
(c) a plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is- (i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; (ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken;	Section 1 and appendix A and B
(d) a description of the scope of the proposed activity, including- (i) all listed and specified activities triggered and being applied for; and (ii) a description of the associated structures and infrastructure related to the development;	Section 1 and 2
(e) a description of the policy and legislative context within which the development is located and an explanation of how the proposed development complies with and responds to the legislation and policy context;	Section 3
(f) a motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred development footprint within the approved site as contemplated in the accepted scoping report;	Section 5
(g) a motivation for the preferred development footprint within the approved site as contemplated in the accepted scoping report;	Section 4
(h) a full description of the process followed to reach the proposed development footprint within the approved site as contemplated in the accepted scoping report, including: (i) details of the development footprint alternatives considered; (ii) details of the public participation process undertaken in terms of regulation 41 of the regulations, including copies of the supporting documents and inputs;	Section 4 Appendix G and Section 11

<p>(iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;</p> <p>(iv) the environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> <p>(v) the impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts- (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated; (vi) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks; (vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; (viii) the possible mitigation measures that could be applied and level of residual risk; (ix) if no alternative development footprints for the activity were investigated, the motivation for not considering such; and (x) a concluding statement indicating the location of the preferred alternative development footprint within the approved site as contemplated in the accepted scoping report;</p>	<p>This report is still subject to PPP, therefore, the final report will contain this in Appendix G</p> <p>Section 6</p> <p>Section 7</p>
<p>(i) a full description of the process undertaken to identify, assess and rank the impacts the activity and associated structures and infrastructure will impose on the preferred development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity, including- (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process; and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures;</p>	<p>Section 7</p>
<p>(j) an assessment of each identified potentially significant impact and risk, including- (i) cumulative impacts; (ii) the nature, significance and consequences of the impact and risk; (iii) the extent and duration of the impact and risk; (iv) the probability of the impact and risk occurring; (v) the degree to which the impact and risk can be reversed; (vi) the degree to which the impact and risk may cause irreplaceable loss of resources; and (vii) the degree to which the impact and risk can be mitigated;</p>	<p>Section 7</p>

<p>(k) where applicable, a summary of the findings and recommendations of any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final assessment report;</p>	<p>N/A – original findings remain the same. The final BAR (original assessment) is attached as Appendix D which outlines the specialists' original findings</p>
<p>(l) an environmental impact statement which contains- (i) a summary of the key findings of the environmental impact assessment; (ii) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred development footprint on the approved site as contemplated in the accepted scoping report indicating any areas that should be avoided, including buffers; and (iii) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;</p>	<p>Section 7 Section 9</p>
<p>(m) based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management outcomes for the development for inclusion in the EMPr as well as for inclusion as conditions of authorisation;</p>	<p>Original recommendations and EMPr remain unchanged</p>
<p>(n) the final proposed alternatives which respond to the impact management measures, avoidance, and mitigation measures identified through the assessment;</p>	<p>Section 4</p>
<p>(o) any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation;</p>	<p>Section 14</p>
<p>(p) a description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed;</p>	<p>Section 13</p>
<p>(q) a reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation;</p>	<p>Section 14</p>
<p>(r) where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required and the date on which the activity will be concluded and the post construction monitoring requirements finalised;</p>	<p>Section 11</p>
<p>(s) an undertaking under oath or affirmation by the EAP in relation to- (i) the correctness of the information provided in the reports; (ii) the inclusion of comments and inputs from stakeholders and I&APs; (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and (iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties;</p>	<p>Section 15</p>

1 INTRODUCTION, LOCATION AND HISTORY

Hilland Environmental, independent Environmental Assessment Practitioners (EAPs), have been appointed by the Applicant/Holder, **Cairnbrogie Farms (Pty) Ltd represented by A Hill**, to ensure compliance with the National Environmental Management Act (NEMA, No 107 of 1998, as amended) and the Environmental Impact Assessment Regulations, 2014 (as amended) for the proposed amendment of the Environmental Authorisation (EA) that is in place for remainder of the Farm Kranshoek No. 432, Plettenberg Bay.

The remainder of Farm 432 (hereafter referred to as 'the property') is located within the Kranshoek rural area of Plettenberg Bay and access to the property is gained via the Plettenberg Bay Airport Road (DR 1770) to the north. The Indian Ocean is located to the south of the property and the most southern part of the property is a proclaimed protected environment.

Table 1: Property details

Province	Western Cape
District Municipality	Garden Route District Municipality
Local Municipality	Bitou Municipality
21 Digit Surveyor General's Number	C03900000000043200000
Property size (m²)	4471374 m ²
Coordinates of the property	34°05'01.5"S 23° 16'43.2"E
Environmental authorisations (EA) in place (to be amended)	EIA REFERENCE NUMBER: 16/3/3/1/D1/8/0007/19 NEAS REFERENCE: WCP/EIA/0000610/2019 ENQUIRIES: Mr Steve Kleinhans DATE OF ISSUE: 03 MAR 2020

Surrounding land uses are mostly agricultural, low density residential and for tourism. Some schools, churches and light commercial activity can be found in the neighbouring Kranshoek community.

- *Potable Water Supply: Water for the operation of the units and associated infrastructure will be sourced from the existing boreholes on the property.*
- *Energy, power and electricity supply: The existing Eskom power supply infrastructure on the property will supply energy needs for the Dam Camp (Area 1); whereas gas and solar panels will be installed at the Coastal Campe (Area 2) as this camp will not connect to Eskom electricity for power.*

Dam Camp (Area 1):

The proposed Dam Camp (Area 1) is to be located on the northern part of the property and south of the existing farm dam. The Development Zone for this camp will be approximately 2 800 square metres. Within this Development Zone, the units will be set out consisting of six fully furnished north-facing containers, sleeping approximately 24 guests in total. The units will be installed on concrete plinths above the full supply level of the dam and behind the planted Yellowwood trees. The approximately footprint for transformation within the Development Zone is 270 square metres.

The Development Zone will allow for the installation of either two (2) communal ablution containers set back behind the individual units (for sleeping) or the installation of en-suite bathrooms within each unit.

Wooden boardwalks/walkways/steps will be used to access the accommodation units (refurbished containers) and two(2) demarcated parking bays will be provided behind each accommodation units which will be surfaced with a permeable materials (i.e. loose pavers / wood chips).

Access from the parking bays to the containers will be gained via a pathway linking to the boardwalk.

Coastal Camp (Area 2)

The proposed Coastal Camp (Area 2) is to be located on the southwestern part of the property overlooking the ocean and bordering the Robber Coastal Corridor Protected Environment (RCCPE).

The Development Zone for this camp is located within the pasture area adjacent to the coastal fynbos and a fence keeping livestock out of the area is already in place. The entire development zone will be set back from the boundary of RCCPE, and no part thereof will encroach on the protected area.

The Development Zone of camp area 2 will be approximately 2 000 square metres, which entails the installation of container units equipped with en-suite bathrooms or the provisioning of a communal ablution facility, a communal central area, decking areas (boardwalk etc.). A communal parking area is located behind the existing container with the radar equipment. Guest movement will be restricted to boardwalks which will connect the units and the communal central area.

The development footprint within the DZ will allow for the installation of either six (6) smaller containers (sleeping two (2) guests each) or three (3) larger contained (each sleeping four (4) guests".

The following site development plans (SDPs) for the two (2) camps are approved:

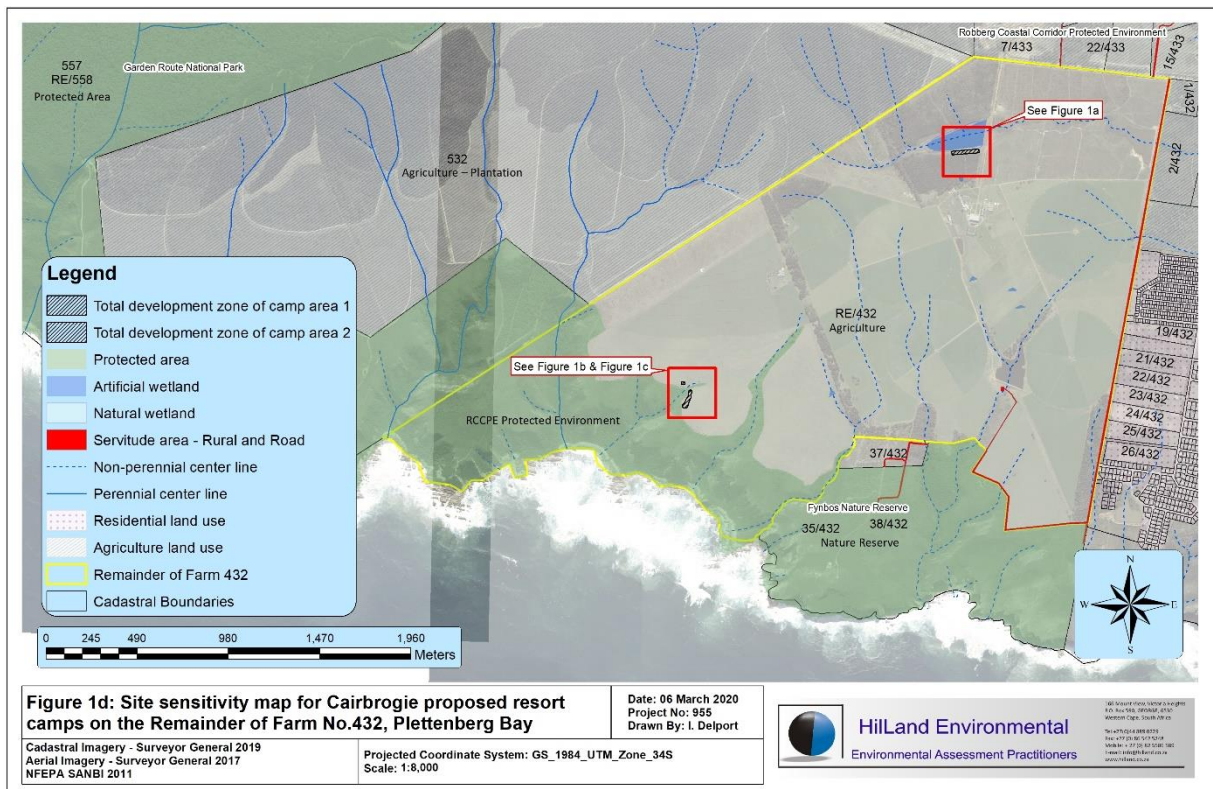


Figure 2: Site plan showing the two areas in relation to the cadastral boundaries

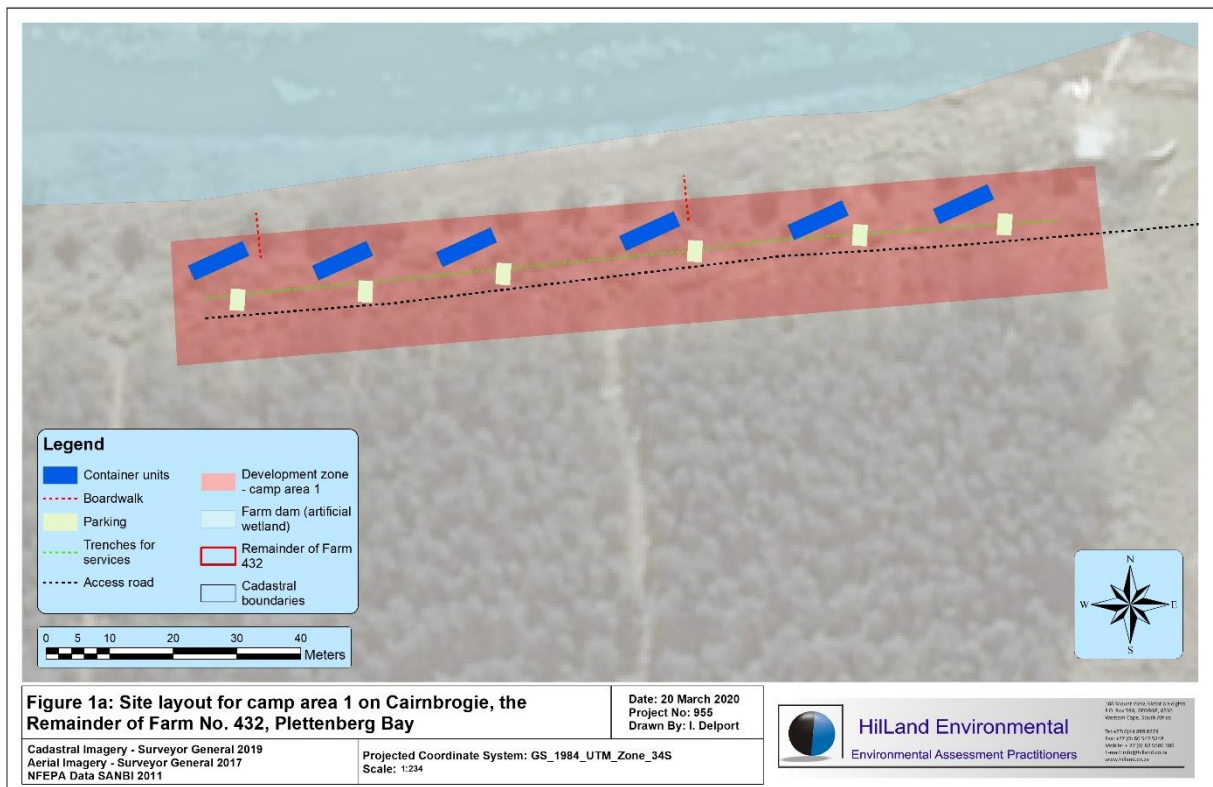


Figure 3: Site plan for Area 1 (Dam Camp)

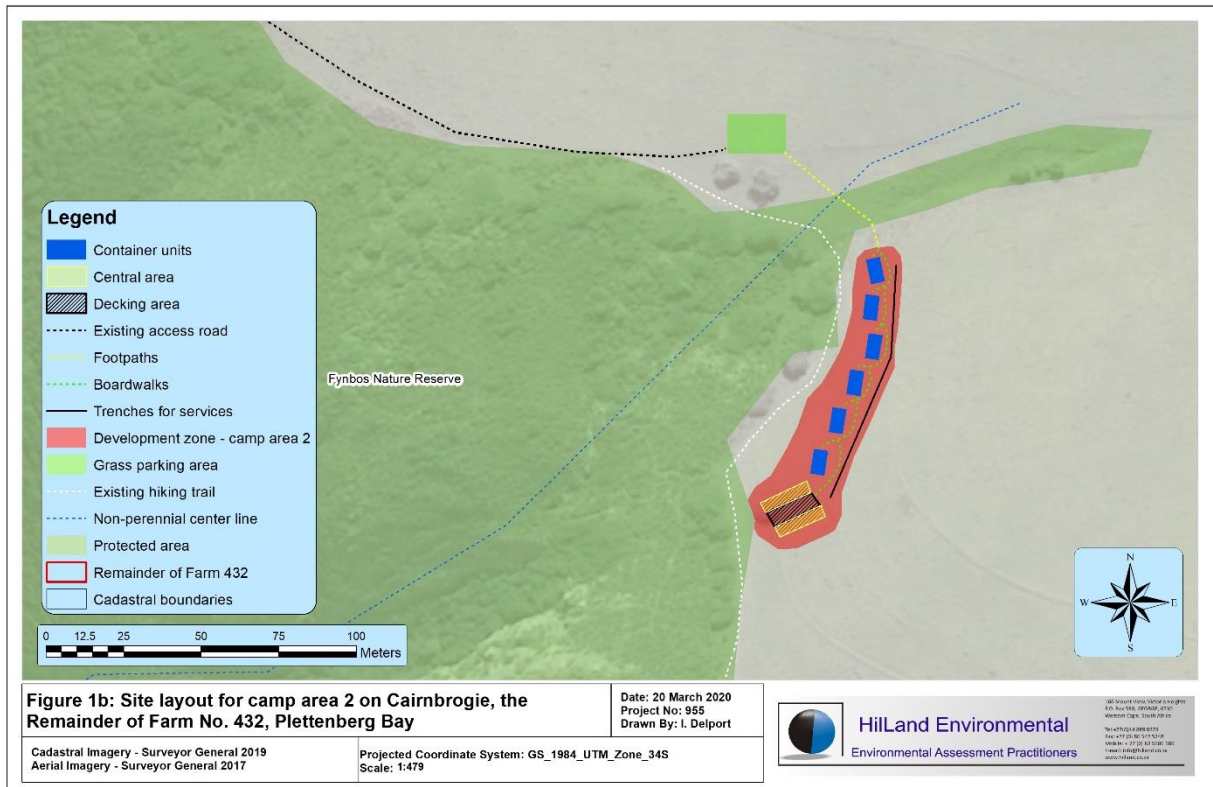


Figure 4: Site plan for Area 2 (Coastal Camp)

1.1 ACTIVITIES UNDERTAKEN TO DATE AND COMPLIANCE

Activities commenced at Area 1 (Dam Camp) in 2020 with the installation of associated conservancy tank and water services and clearance of one unit footprint.





HillLand Environmental
Cairnbrogie
30.01.2025 15:12
-34.07708, 23.27969 (+4m)
Altitude: 224m

Sanitation infrastructure constructed for the camp



HillLand Environmental
Cairnbrogie
30.01.2025 15:13
-34.07706, 23.27962 (+3m)
Altitude: 223m

Existing structure

Photographs of the current state of Area 2 (Cliff site), no activities undertaken and the site remains in the same transformed state as assessed originally







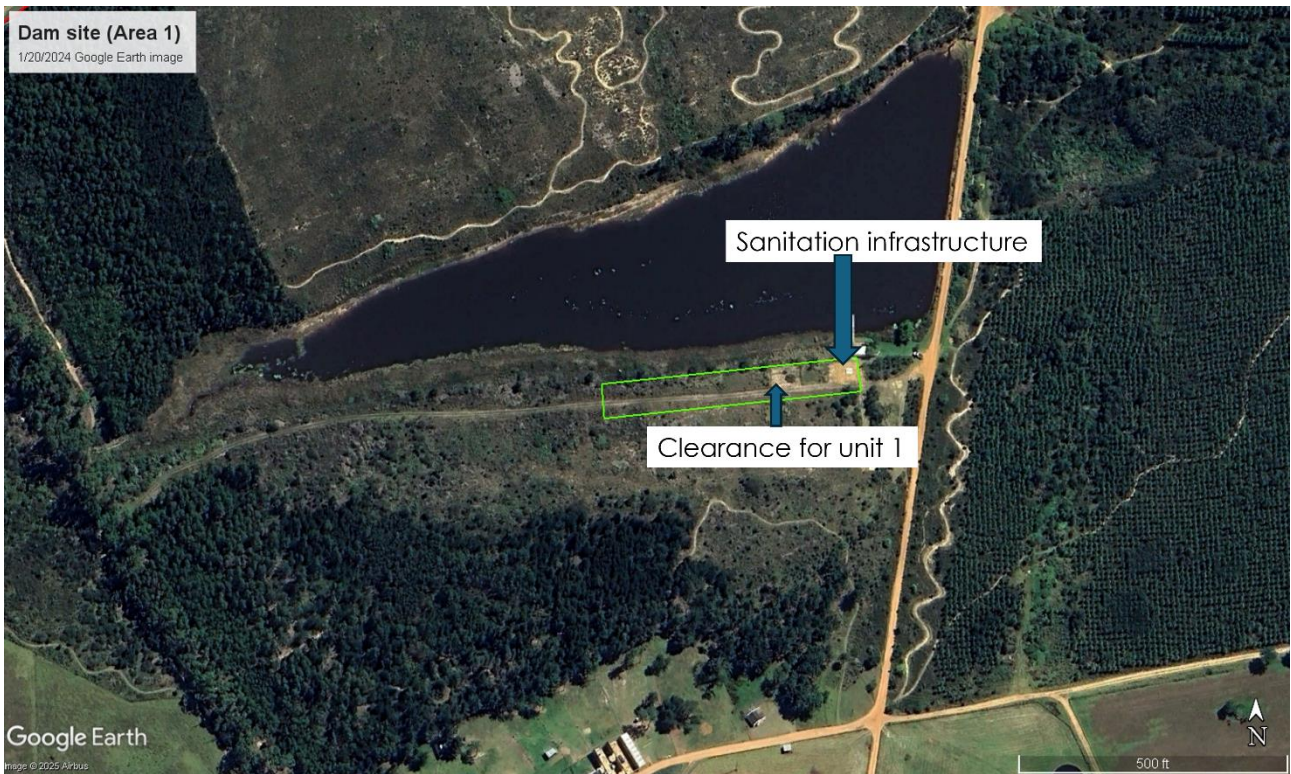


Figure 5: 1/2/2024 Google Earth image showing the approved development zone of area 1 in green. The sanitation infrastructure constructed, and the clearing of unit 1 footprint are highlighted by the arrows



Figure 6: 1/2/2024 Google Earth image showing the approved development zone for area 2 in yellow. No activities undertaken at this area to date.

2 PROPOSED AMENDMENT OF THE COMPLETION DATE

Following the implications of the COVID-19 pandemic, financial constraints and various unforeseen delays resulted in the holder being unable to complete the construction process for the resort and has necessitated the application for an extension of time to complete the development.

Condition 1, Scope and Validity Period of authorization, of the EA reads as follows:

1. This Environmental Authorisation is granted for the period from date of issue until **31 March 2025**, the date on which all the listed activities, including post construction rehabilitation and monitoring requirements, will be deemed to be concluded at the site.

Further to the above, the Environmental Authorisation is subject to the following:

- 1.1. The Holder must start with the physical implementation of all the authorised listed activities on the site by 31 March 2023.
- 1.2. The post construction rehabilitation and monitoring requirements must be finalised at the site within a period of 3-months from the date the construction activities (construction phase) are concluded; but by no later than 15 December 2024.

Note: Failure to complete the post construction rehabilitation and monitoring requirements at least three months prior to expiry of the validity period of an environmental authorisation may result in the Holder not being able to comply with the environmental auditing requirements in time.

Failing which, this Environmental Authorisation shall lapse, unless the environmental authorisation is amended in accordance with the relevant process contemplated in the Environmental Impact Assessment Regulations promulgated under the National Environmental Management Act, 1998 (Act no. 107 of 1998).

Activities commenced on site in compliance with the EA before 31 March 2023, however the Holder is unable to complete the development and the post construction rehabilitation requirements by the 31st March 2025.

To avoid the lapsing of the EA, a Part 2 amendment application has been submitted to the Competent Authority, DEADP, on the 3rd December 2024.

The proposal is to extend the conclusion date and validity period by another five (5) years. The new dates to be specified in the Addendum to the EA, should the application be approved, are as follows:

- The EA is valid until 31 March 2030.
- The post construction rehabilitation and monitoring requirements to be concluded by no later than: 15 December 2029

All the other information contained in the original process and Final Basic Assessment Report (BAR) and subsequent EA remain valid and unchanged.

No new listed activities in terms of the NEMA EIA Regulations (2014, as amended) (not previously assessed and approved in the original EA) will be triggered by the request to extend the conclusion date for the development. All the listed activities applied for and approved in the current EA remain valid and unchanged.

The following listed activities are authorized and will remain authorized in the extension of completion date:

Table 2: Listed activities authorised as per the EA

Listed Activities	Activity/Project Description
Environmental Impact Assessment Regulations Listing Notice 1 of 2014, Government Notice No. 983 of 4 December 2014 (as amended)	
Activity Number: 12 Activity Description: The development of - (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; — excluding— (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such development occurs within an urban area; (ee) where such development occurs within existing roads, road reserves or railway line reserves; or (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.	The proposed dam camp (area 1) is located adjacent to the farm dam built in a perennial drainage line that flows from east to west. The proposed units and associated infrastructure fall approximately 22 metres from the full supply level of the dam. Parts of the development zone of the Coastal camp are located within 32 metres of the non-perennial drainage line. These are not likely to exceed 100 square metres.
Environmental Impact Assessment Regulations Listing Notice 3 of 2014, Government Notice No. 985 of 4 December 2014 (as amended)	
Activity Number: 6 Activity Description: The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more. i. Western Cape I. Inside a protected area identified in terms of NEMPAA; ii. Outside urban areas: (aa) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; or (bb) Within 5km from national parks, world heritage sites, areas identified in terms of NEMPAA or from the care area of a biosphere reserve; - excluding the conversion of existing buildings where the development footprint will not be increased.	The proposed tourist accommodation on Coimbrogie will sleep more than 15 people. The Dam camp will sleep a maximum of 24 guests while the Coastal camp will sleep a maximum of 12 guests.

This report assesses only the impacts associated with the requested extension of the conclusion date. Where necessary, reference will be made to the Final BAR which informed the original approval and the EA which contains all the conditions of the approval as well as the reasons for the approval.

3 APPLICABLE LEGISLATION

Table 3: Table highlighting the applicable legislation and amendment implication

Legislation	Relevant approval/applicability	Amendment implication
Section 38 of the National Heritage Resource Act (Act 25 of 1999)	28 June 2019 Response to NID: No reason to believe that the proposal will impact on heritage resources, no further action was required.	As there is no change in the development, the final comments provided by HWC remain unchanged.
National Water Act (Act 36 of 1998)	02 August 2019 General Authorisation (GA) (Section 21 (i) and (ii)) were issued for the construction of Area 1 within 100m from a water resource (in-stream dam)	As there is no change in the development of Area 1, the GA issued by BOCMA remains valid.
National Forest Act (Act 84 of 1998)	Area 1 (dam camp) specifically avoided the planted yellowwood trees. No NFA licence application was required.	As there is no change in the development zone, the yellowwood trees will still be avoided. Should minor pruning be required at the time, the necessary NFA licence application will be made to the Department of Forestry (Knysna).
OSCAE	OSCAE permit issued for the clearance of vegetation and earthworks associated with the approval	As there is no change in the development the OSCAE permit issued remains valid. Both vegetation clearance and earthworks commenced at Area 1 and as such the OSCAE permit has not lapsed and will continue to be applicable.

4 ALTERNATIVES CONSIDERED

- **Preferred alternative description and motivation**

The application is to extend the conclusion and validity date to allow the Holder to continue to implement the approved development and conclude construction within the proposed extended timeframe. Conclude by 31st March 2030 instead of by the 31st March 2025.

This application to extend the timeframe does not result in any additional / new / increased environmental impacts – the impacts remain as assessed and approved.

Extension of time allows the applicant to complete the development without having to redo the application in terms of NEMA (should the EA lapse and need to be re-applied for) – which would be an unnecessary expenditure, and which would place a further financial strain on the applicant. Lapsing the EA would mean that the applicant cannot legally complete the project, and this would leave redundant services in the ground and the socio-economic benefits of the project would never be able to be realized.

- **No-Go alternative description and motivation**

The no-go alternative would imply doing nothing – the application would lapse; the applicant would have to go through a repeat NEMA application process which would require repeat administration and unnecessary financial obligations on the applicant.

This will result in the financial loss of the investment already made in terms of services installed for the development, it would have a negative socio-economic impact as the opportunity to provide additional tourist accommodation within the Kranshoek area will be lost, the provision of good visitor experience and the potential to increase income to local businesses will be lost.

Additionally, the opportunity to create short- and long-term employment for skilled and unskilled people will be lost. The opportunity to provide overnight accommodation for the Robberg to Harkerville coastal hiking trail hikers will also be lost.

The owners will, therefore, not be able to use the property effectively and the opportunity to utilise already disturbed sites to generate an income will be lost.

The opportunity costs for sound eco-tourism will be lost.

The selected sites are ideally located for this type of venture, have been identified as opportunities along the Robberg Coastal Corridor Protected Environment.

Should the EA lapse, there will be the need to reapply for environmental authorization which will result in increased financial and administrative burden – a “red tape” application which would be contrary to the Provincial socio-economic development principles.

Based on the above, the approval of the extension of time is recommended for authorization as it ensures compliance with the current conditions of the authorization and it does not result in any additional environmental or negative socio-economic impacts.

5 NEED AND DESIRABILITY

Due to unforeseen financial circumstances, there were delays that resulted in the inability of the holder to meet the conclusion date specified in the EA.

In order to prevent the lapsing of the EA, an amendment of the conclusion date is required. Without such an extension, a whole new NEMA application for environmental authorization would be required with no variation in the outcome. This would place an unnecessary negative financial burden on the applicant, where those resources could be spent on achieving the current approval and the associated rehabilitation. Failure to continue and failure to reapply due to the financial burden of following a new NEMA application, would result in lost opportunity costs and lost rehabilitation opportunities and lost tourism opportunities.

The amendment will only extend the conclusion date of the EA. There are no changes to the description and associated SDPs as outlined in the authorization.

No new environmental impacts and / or activities are introduced that were not assessed in the original application process. The impacts, including cumulative impacts have already been identified and mitigated through the EMPr. These mitigation measures remain applicable and enforceable.

The continuation of the development will still result in the expected socio-economic benefits such as economic investment, additional desired tourist accommodation, job creation etc. The development remains aligned with Municipal planning (SDF and IDP) for the area and zoning and land-use rights of the property.

All concerns raised by stakeholders were addressed in the original process, and all I&AP's will have an opportunity to comment on this application for extension of time.

6 ENVIRONMENTAL ATTRIBUTES

The environmental attributes (geographical, physical, biological, social, economic, heritage and cultural aspects) were assessed in the original assessment. The proposed amendment does not introduce any new environmental impacts that were not assessed.

- There is no change to the SDPs for the two development areas, as such there is no additional disturbance to fauna and flora. The location, design and construction methods remain the same.
- The impact on water resources has been considered and assessed in the original process. There is no change in the impact.
- The development description remains the same and will result in the same positive socio-economic impacts.
- All mitigation measures previously described and included in the EMPr remain in place
- The only negative impact of extension of time for construction to be concluded is the escalation cost for the construction itself – building materials etc. all cost more now, that they did at the time of the original application and the holder will need to evaluate this in his feasibility and viability decisions going forwards.
- Based on the above, no further specialist input was required and are applicable to the proposed amendment. The findings and mitigation measures provided by specialist in the original process remain valid and as implemented in the EMPr.

As the resort has not been marketed in any way, the delay in implementation has no impact on the community / tourists' expectations. The continuation of the development will result in continued sustainable development and positive socio-economic impacts.

7 IMPACT ASSESSMENT AND STATEMENT

The following table highlights the methodology used for determining nature, significance consequences, extent, duration and probability of potential environmental impacts and risks associated with the preferred and no-go alternative:

Seven rating scales will be considered when assessing potential impacts. These include:

- **extent;**
- **duration;**
- **intensity;**
- **status of impact;**
- **probability;**
- **degree of confidence; and**
- **significance.**

In assigning significance ratings to potential impacts before and after mitigation the following approach presented below is to be adhered to:

1. **The core criteria for determining significance ratings are “extent”, “duration” and “intensity”. The preliminary significance ratings for combinations of these three criteria are given.**
2. **The status of an impact is used to describe whether the impact will have a negative, positive or neutral effect on the surrounding environment. An impact may therefore be negative, positive (or referred to as a benefit) or neutral.**

3. Describe the impact in terms of the probability of the impact occurring and the degree of confidence in the impact predictions, based on the availability of information and knowledge.
4. Additional criteria to be considered, which could “increase” the significance rating if deemed justified, with motivation, are the following:
 - Permanent / irreversible impacts (as distinct from long-term, reversible impacts);
 - Potentially substantial cumulative effects; and
 - High level of risk or uncertainty, with potentially substantial negative consequences.
5. Additional criteria to be considered, which could “decrease” the significance rating if justified, with motivation, is the following:
 - Improbable impact, where confidence level in prediction is high.
6. When assigning significance ratings to impacts after mitigation:
 - First, consider probable changes in intensity, extent and duration of the impact after mitigation, assuming effective implementation of mitigation measures, leading to a revised significance rating; and
 - Then moderate the significance rating after taking into account the likelihood of proposed mitigation measures being effectively implemented. Consider:
 - Any potentially significant risks or uncertainties associated with the effectiveness of mitigation measures;
 - The technical and financial ability of the proponent to implement the measure; and
 - The commitment of the proponent to implementing the measure, or guarantee over time that the measures would be implemented.
7. The cumulative impacts of a project should also be considered. “Cumulative impacts” refer to the impact of an activity that may become significant when added to the existing activities currently taking place within the surrounding environment.
8. Where applicable, assess the degree to which an impact may cause irreplaceable loss of a resource. A resource assists in the functioning of human or natural systems, i.e. specific vegetation, minerals, water, agricultural land, etc.

A. Significance

The significance ratings are based on largely objective criteria and inform decision-making at a project level as opposed to a local community level. In some instances, therefore, whilst the significance rating of potential impacts might be “low” or “very low”, the importance of these impacts to local communities or individuals might be extremely high. The importance which I&APs attach to impacts must be taken into consideration, and recommendations should be made as to ways of avoiding or minimising these negative impacts through project design, selection of appropriate alternatives and / or management.

The relationship between the significance ratings after mitigation and decision-making can be broadly defined as follows (see overleaf): substance

Significance rating	Effect on decision-making
VERY LOW; LOW	Will not have an influence on the decision to proceed with the proposed project, provided that recommended measures to mitigate negative impacts are implemented.
MEDIUM	Should influence the decision to proceed with the proposed project, provided that recommended measures to mitigate negative impacts are implemented.
HIGH; VERY HIGH	Would strongly influence the decision to proceed with the proposed project.

B. Extent

“Extent” defines the physical extent or spatial scale of the impact.

Rating	Description
LOCAL	Extending only as far as the activity, limited to the site and its immediate surroundings. Specialist studies to specify extent.
REGIONAL	Southern Cape. Specialist studies to specify extent.
NATIONAL	South Africa
INTERNATIONAL	

C. Duration

“Duration” gives an indication of how long the impact would occur.

Rating	Description
SHORT TERM	0 - 5 years
MEDIUM TERM	5 - 15 years
LONG TERM	Where the impact will cease after the operational life of the activity, either because of natural processes or by human intervention.
PERMANENT	Where mitigation either by natural processes or by human intervention will not occur in such a way or in such time span that the impact can be considered transient.

D. Intensity

“Intensity” establishes whether the impact would be destructive or benign.

Rating	Description
ZERO TO VERY LOW	Where the impact affects the environment in such a way that natural, cultural and social functions and processes are not affected.
LOW	Where the impact affects the environment in such a way that natural, cultural and social functions and processes continue, albeit in a slightly modified way.
MEDIUM	Where the affected environment is altered, but natural, cultural and social functions and processes continue, albeit in a modified way.
HIGH	Where natural, cultural and social functions or processes are altered to the extent that it will temporarily or permanently cease.

E. Loss of resources

“Loss of resource” refers to the degree to which a resource is permanently affected by the activity, i.e. the degree to which a resource is irreplaceable.

Rating	Description
LOW	Where the activity results in a loss of a particular resource but where the natural, cultural and social functions and processes are not affected.
MEDIUM	Where the loss of a resource occurs, but natural, cultural and social functions and processes continue, albeit in a modified way.
HIGH	Where the activity results in an irreplaceable loss of a resource.

F. Status of impact

The status of an impact is used to describe whether the impact would have a negative, positive or zero effect on the affected environment. An impact may therefore be negative, positive (or referred to as a benefit) or neutral.

G. Probability

“Probability” describes the likelihood of the impact occurring.

Rating	Description
IMPROBABLE	Where the possibility of the impact to materialise is very low either because of design or historic experience.
PROBABLE	Where there is a distinct possibility that the impact will occur.
HIGHLY PROBABLE	Where it is most likely that the impact will occur.
DEFINITE	Where the impact will occur regardless of any prevention measures.

H. Degree of confidence

This indicates the degree of confidence in the impact predictions, based on the availability of information and knowledge.

Rating	Description
HIGH	Greater than 70% sure of impact prediction.
MEDIUM	Between 35% and 70% sure of impact prediction.
LOW	Less than 35% sure of impact prediction.

I. Significance

“Significance” attempts to evaluate the importance of a particular impact, and in doing so incorporates the above three scales (i.e. extent, duration and intensity).

Rating	Description
VERY HIGH	Impacts could be EITHER: of high intensity at a regional level and endure in the long term; OR of high intensity at a national level in the medium term; OR of medium intensity at a national level in the long term.
HIGH	Impacts could be EITHER: of high intensity at a regional level and endure in the medium term; OR of high intensity at a national level in the short term; OR of medium intensity at a national level in the medium term; OR of low intensity at a national level in the long term; OR of high intensity at a local level in the long term; OR of medium intensity at a regional level in the long term.
MEDIUM	Impacts could be EITHER: of high intensity at a local level and endure in the medium term; OR of medium intensity at a regional level in the medium term; OR of high intensity at a regional level in the short term; OR of medium intensity at a national level in the short term; OR of medium intensity at a local level in the long term; OR of low intensity at a national level in the medium term; OR of low intensity at a regional level in the long term.
LOW	Impacts could be EITHER of low intensity at a regional level and endure in the medium term; OR of low intensity at a national level in the short term; OR of high intensity at a local level and endure in the short term; OR of medium intensity at a regional level in the short term; OR of low intensity at a local level in the long term; OR of medium intensity at a local level and endure in the medium term.
VERY LOW	Impacts could be EITHER of low intensity at a local level and endure in the medium term; OR of low intensity at a regional level and endure in the short term; OR of low to medium intensity at a local level and endure in the short term.
INSIGNIFICANT	Impacts with: Zero to very low intensity with any combination of extent and duration.

UNKNOWN	In certain cases, it may not be possible to determine the significance of an impact.
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J. Degree to which impact can be mitigated

This indicates the degree to which an impact can be reduced / enhanced.

Rating	Description
NONE	No change in impact after mitigation.
VERY LOW	Where the significance rating stays the same, but where mitigation will reduce the intensity of the impact.
LOW	Where the significance rating drops by one level, after mitigation.
MEDIUM	Where the significance rating drops by two to three levels, after mitigation.
HIGH	Where the significance rating drops by more than three levels, after mitigation.

K. Reversibility of an impact

This refers to the degree to which an impact can be reversed.

Rating	Description
IRREVERSIBLE	Where the impact is permanent.
PARTIALLY REVERSIBLE	Where the impact can be partially reversed.
FULLY REVERSIBLE	Where the impact can be completely reversed.

Determination and ranking of potential impacts is based on years of experience working on similar developments across the same area as well as applying sound environmental knowledge informed by available information on site, vegetation, development type, current condition and other relevant factors that could/ will influence such a development

Impact assessment and risks identified (as assessed in the Final BAR 22 October 2019)

Planning, design, development and operational phases	
Impact	Description
Agriculture impacts	<p>There is no change to the approved development description and SDP which already avoids active grazing areas. No change to the impacts originally assessed and the risks identified.</p> <p>Nature of the impact = Neutral – impact on active grazing areas already avoided Extent = local and long term – Consequence = continued use of disturbed agriculture land that no longer forms part from the active grazing areas Probability = definite Degree to which impact can be reversed = not necessary to reverse Degree to which the impact will cause irreversible loss of resources = low, no resources to be lost Indirect impacts = improvement of disturbed areas through rehabilitation Cumulative impacts = use of disturbed areas Significance prior to mitigation = low Significance after mitigation = low Degree to which impact can be avoided = not necessary to avoid Degree to which impact can be managed = not necessary to manage Degree to which impact can be mitigated = no mitigation required Proposed mitigation = implement approved SDP and associated disturbance zones Mitigation measures as identified in the original process remain in place Residual impacts = none anticipated</p> <p>Significance rating = Very low</p>

	<p>The amendment will not result in any new impacts on agricultural areas There are no risks associated with the proposal</p>
<p>Clearance of vegetation and impact on sensitive areas – Area 1 – in proximity to the dam and Area 2 – in proximity to the protected area</p>	<p>The development zones remain the same as approved, there will be no encroachment beyond the original assessed areas – sensitive areas already avoided.</p> <p>There is no change to the area of vegetation clearing as approved.</p> <p>Nature of the impact = Neutral Extent = local and long term Consequence = limited pioneer indigenous vegetation remain in the development zone, no impact on identified sensitive areas, mitigation measures have been provided by the specialists and included in the EMPr Probability = definite. Degree to which impact can be reversed = not necessary to reverse Degree to which the impact will cause irreversible loss of resources = low, no resources to be lost Indirect impacts = impact on sensitive areas already avoided Cumulative impacts = low no loss of sensitive habitat Significance prior to mitigation = low Significance after mitigation = low Degree to which impact can be avoided = not necessary to avoid Degree to which impact can be managed = not necessary to manage Degree to which impact can be mitigated = no new impacts to mitigate Proposed mitigation = continued implementation of the approval and EMPr. Mitigation measures as identified in the original process remain in place</p> <p>Residual impacts = none anticipated</p> <p>Significance rating = Low</p> <p>There are no new impacts on vegetation clearing and/or sensitive areas that was not originally assessed, avoided and mitigated. The proposal will not result in any new risks as the approved SDP's and description will remain the same and will be implemented.</p>
<p>Potential erosion and sedimentation</p>	<p>The construction method assessed originally remains the same. Therefore, there are no new activities that could result in increased erosion / sedimentation. The potential impacts have already been mitigated through the EMPr.</p> <p>Nature of the impact = Negative Extent = local and short term – Consequence = limited erosion and sedimentation. Probability = unlikely. Degree to which impact can be reversed = easily reversible. Degree to which the impact will cause irreversible loss of resources = low, minimal loss of resources. Indirect impacts = impact on areas outside of the development zone. Cumulative impacts = requirement for ongoing maintenance and mitigation implementation. Significance prior to mitigation = low Significance after mitigation = low Degree to which impact can be avoided = medium. Degree to which impact can be managed = high – EMPr requires management. Degree to which impact can be mitigated = high – mitigation measures proposed. Proposed mitigation = continued implementation of the EMPr which contains the necessary mitigation measures. Mitigation measures as identified in the original process remain in place</p> <p>Residual impacts = none anticipated.</p> <p>Significance rating = very low</p>

<p>Potential pollution as a result of construction activities or operational activities</p>	<p>The amendment will no result in any new physical impacts.</p> <p>Potential pollutants such as construction waste, cement, sewage and hydrocarbons could have an impact on the surrounding environment and must be prevented.</p> <p>No change in anticipated impact between the proposed amendment and the current approval. Construction EMPr covers the anticipated impacts.</p> <p>Nature of the impact = Negative Extent = local and long term – Consequence = Pollution into identified sensitive areas Probability = unlikely but control is essential. Degree to which impact can be reversed = reversible. Degree to which the impact will cause irreversible loss of resources = low, minimal loss of resources. Indirect impacts = unknown – rather avoid. Cumulative impacts = requirement for ongoing maintenance of systems to prevent pollution. Significance prior to mitigation = low Significance after mitigation = low (controlling and preventing pollution at source.) Degree to which impact can be avoided = high – prevention essential. Degree to which impact can be managed = high – EMPr requires management. Degree to which impact can be mitigated = high – mitigation measures proposed Proposed mitigation = litter traps, bunding and use of drip trays, oil traps. The EMPr includes various mitigation measures. Mitigation measures as identified in the original process remain in place</p> <p>Residual impacts = potential contamination of soil and the required cleanup and safe disposal</p> <p>Significance rating = very low</p> <p>The amendment will not result in any new pollution associated with the construction phase.</p>
<p>Construction-related nuisances, such as noise and traffic</p>	<p>The construction phase and related activities will increase site-specific noise levels, dust and typical disturbance to the peace and quiet of the environment. These nuisances will be temporary and are typically anticipated with any construction activities.</p> <p><u>No</u> difference in impact.</p> <p>Nature of the impact = Negative – construction noise is inevitable and cannot be avoided. Extent = local and short term – construction noise is limited to the construction site and immediate surrounds. Consequence = normal construction related noise during normal work hours. Probability = definite. Degree to which impact can be reversed = not necessary to be reversed. Degree to which the impact will cause irreversible loss of resources = low, no irreversible loss of resources. Indirect impacts = none anticipated. Cumulative impacts = none expected. Significance prior to mitigation = low. Significance after mitigation = low. Degree to which impact can be avoided = low. Degree to which impact can be managed = high – EMPr and OHS requirements. Degree to which impact can be mitigated = high – mitigation measures as per the EMPr to be adhered to. Proposed mitigation = adhering to municipal approved working times, use of flag/warning signals when obstructions are anticipated. Mitigation measures as identified in the original process remain in place</p> <p>Residual impacts = none anticipated.</p> <p>Significance rating = very low</p> <p>No new nuisance impacts</p>

Potential uncovering of heritage resources	HWC ROD remains valid, mitigation included in EMPr. No new assessment is required.
The visual impact	The SDP and design of the accommodation units and associated infrastructure remains the same – visual impact already assessed, and mitigation measures already implemented. No new assessment required
Socio-economic impacts	<p>The extension of the validity period will allow the development to continue, and the originally assessed positive socio-economic impacts associated with the construction and operational phases will be occur.</p> <p>No difference in impact (other than the increase in escalation cost of building materials and labour).</p> <p>Nature of the impact = positive – construction noise is inevitable and cannot be avoided. Extent = local and short and long term Consequence = positive socio-economic impacts – short-and long-term job opportunities, tourist accommodation within a desired area Probability = definite. Degree to which impact can be reversed = not necessary to be reversed. Degree to which the impact will cause irreversible loss of resources = no loss of resources Indirect impacts = meeting community and tourist expectations Cumulative impacts = none expected. Significance prior to mitigation = low. Significance after mitigation = low. Degree to which impact can be avoided = low. Degree to which impact can be managed = high Degree to which impact can be mitigated = none required Proposed mitigation = none required Residual impacts = none anticipated.</p> <p>Significance rating = medium</p> <p>Positive socio-economic impacts as a result of the continuation of the project.</p>

The proposed amendment of the conclusion date and validity period will **not result in any new environmental impacts other than what was originally assessed with the necessary mitigation implemented.**

The findings and mitigation measures recommended by specialists in the original assessment remain the same.

The lapsing of the EA is not desired as it will have negative socio-economic impacts and financial implications where the risk of not being able to continue and complete the development is greater.

Mitigation hierarchy applied to the proposal:

- Avoidance
 - o The proposal will not result in any additional environmental impact. All impacts have been assessed in the original process and mitigation measures have been included in the EMPr.
 - o The approved site plans associated with the two areas will remain the same, therefore no additional expansion will be required.
- Minimisation

- o Continued implementation of the EMPr will ensure mitigation of any avoidable impacts
- Rehabilitation
 - o Rehabilitation to be done in accordance with the EMPr
- Offset
 - o None required

8 MANAGEMENT OBJECTIVES AND OUTCOMES

The objective of the proposed amendment will ensure that sustainable development continues, that will adhere to the existing approvals and will not result in any new environmental impacts that were not originally assessed and mitigated.

The outcome by extending the date will ensure that positive impacts identified in the original assessment are realized and eliminate the need to re-apply which will have additional financial and time implications.

DEADP, in their comment on the extension of time application, emphasized the need to continue to comply with the conditions of the EA issued for the duration of the extended time period and stressed that the activities must be concluded prior to the extended conclusion date or the EA will lapse and a new application will be required in terms of NEMA.

9 ADVANTAGES AND DISADVANTAGES OF THE AMENDMENT

Advantages

- The proposed amendment process ensures compliance with the EA and NEMA
- The proposed amendment does not propose any changes to the approved description and SDP's associated with the two areas, therefore, no additional environmental impacts will occur
- Proceeding with the approved development will ensure positive socio-economic impacts and sustainable and feasible development

Disadvantages

- The delay to the project will have a cost implication due to the escalation cost of materials and labour – this will have to be factored into the feasibility and viability decisions made by the holder.

10 CHANGES TO THE ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPR)

The proposed amendment does not relate to any development changes, the EMPr that is in place remains valid and no changes are required.

11 PERIOD FOR WHICH ENVIRONMENTAL AUTHORISATION (EA) IS REQUIRED

New dates to be reflected in the authorization

- The EA is valid until 31 March 2030.
- The post construction rehabilitation and monitoring requirements to be concluded by no later than: 15 December 2029

12 PUBLIC PARTICIPATION PROCESS (PPP)

This report was subject to a minimum 30-day commenting period from **7 February 2025 – 10 March 2025**.

- A site notice was placed at the entrance to Cairnbrogie on 30 January 2025
- A legal advert has been placed in the Knysna-Plett Herald on 6 February 2025
- All previously registered I&AP's and authorities on the original NEMA EIA process were notified of the need to comment on the proposed amendment (6 February 2025).

All comments received during the 30-day commenting period are included in the comment and response table in the PPP report.

13 ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE

Conclusion and recommendations have been made based on the following assumptions:

- That the information provided and gathered to compile this report is correct.
- That the recommended mitigation methods that have been specified in this report and the approved EMPr will continue complied with; &
- That stakeholders and interested and affected parties (I&APs) will submit relevant comments during the public participation process.
- It is assumed that all the impacts have been identified and that the proposed preferred alternative will be accepted and approved.
- Escalation in the cost of materials and labour is assumed based on the standard inflation figures.

Uncertainties and gaps in knowledge:

Given that the proposed amendment is for the extension of the conclusion and validity date, it is not foreseen that there are any uncertainties for the activity procedures in question other than that the holder will need to resolve their current financial constraints which have delayed the project prior to continuation.

Once the project construction continues, the holder will be obliged to continue to implement the requirements of the EA conditions of approval and comply with the EMPr.

14 CONCLUSION

Based on the assessment, it is recommended that the amendment of the conclusion and validity dates are authorized.

The proposal does not introduce any new environmental risks or impacts.

The extension is the most viable option as it ensures sustainable development, compliance with the current approvals and socio-economic benefits.

The continuation of the development must be done in compliance with the EA and the EMPr that is in place.

DEADP is now in the position to process the final EIR and amend the EA to include the extension of time.

15 DECLARATIONS

15.1 APPLICANT

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

I, ANDREW ALEXANDER HILL ID Number:

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in my personal capacity or duly authorised thereto hereby declare/affirm that:

- the information provided or to be provided as part of this Application form, is true and correct;
- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, as defined in Chapter 5 of NEMA (as amended) and any relevant Specific Environmental Management Acts and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware that is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation ("EA");
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I appointed the Environmental Assessment Practitioner ("EAP") which:
 - meets the requirements of the Section 24H Registration Authority Regulations, 2016, promulgated in terms of NEMA;
 - meets all the requirements in terms of Regulation 13 of the EIA Regulations, 2014;
 - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the EIA Regulations, 2014;
- I will provide the EAP and specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the EIA Regulations, 2014 and other environmental legislation including but not limited to –
 - costs incurred for the appointment of the EAP or any person contracted by the EAP;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the EIA Regulations, 2014;
 - costs in respect of specialist reviews; and
 - the provision of security to ensure compliance with applicable management and mitigation measures; and
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority; hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which the Applicant or EAP is responsible in terms of the EIA Regulations, 2014 and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.



Signature of the Applicant:

11 March 2025

Date:

CAIRNBROGIE FARMS (PTY) LTD

Name of company (if applicable):

15.2 EAP

I, INGE DELPORT

EAP Registration Number:

2 | 0 | 1 | 9 | / | 1 | 6 | 8 | 9

as the appointed EAP hereby declare/affirm that:

- my EAP Registration is current and up to date, and will inform the Applicant and Department if the registration should lapse during this pre-application process;
- the information provided or to be provided as part of this Application form, is true and correct;
- in terms of the general requirement to be independent:
 - other than fair remuneration for work performed/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of EIA Regulations, 2014 have been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- in terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed/will disclose, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this Application form;
- I have ensured/will ensure that information containing all relevant facts in respect of the Application form was/will be distributed or was/will be made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were/will be provided with a reasonable opportunity to participate and to provide comments;
- I have ensured/will ensure that the comments of all interested and affected parties were/will be considered, recorded and submitted to the Competent Authority in respect of this Application form;
- I have ensured/will ensure the inclusion of inputs and recommendations from any specialists in respect of the Application form, where relevant;
- I have kept/will keep a register of all interested and affected parties that participated in the public participation process;
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014; and
- All specialist investigations must comment on how the potential impacts relate to climate change concerns.



11 March 2025

Signature of the EAP:

Date:

HillLand Environmental (Pty) Ltd

Name of company (if applicable):