



REFERENCE: 16/3/3/5/D1/8/0020/24
DATE OF ISSUE: 10 March 2025

The Managing Director
CAIRNBROGIE FARMS (PTY) LTD
Airport Road
PLETTENBERG BAY
6600

Attention: Mr. Andrew Hill

E-mail: info@cairnbrogie.co.za

Dear Sir,

COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT REPORT IN TERMS OF REGULATION 32(1)(A) OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 IN RESPECT OF THE APPLICATION FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (REF: 16/3/3/1/D1/8/0007/19) ISSUED ON 3 MARCH 2020 FOR THE DEVELOPMENT OF THE CAIRNBROGIE RESORT ON THE REMAINDER OF THE FARM KRANSHOEK NO. 432, PLETTENBERG BAY

1. The Draft Environmental Impact Report (Ref: PLE24/955/42) dated 6 February 2025 ("DEIR") compiled on your behalf by your appointed Environmental Assessment Practitioner ("EAP"), Ms. Inge Delpont (EAPASA No: 2019/1689) of *HillLand Environmental*, and received by the Department on 6 February 2025, refers.
2. The Directorate: Development Management (Region 3) ("this Directorate") has reviewed the report and provides the following comments:

2.1. Declaration by the applicant

This Directorate notes that the declaration from the applicant and included in the report was signed and dated on 5 June 2025. Although this may be a typographical error, the declaration is not in order. Therefore, you are required to include a recent duly signed and dated upon submission of the EIR to the competent authority for consideration.

2.2. Compliance with the condition of the environmental authorisation

This Directorate has undertaken compliance monitoring audit in respect of the environmental authorisation and the approved Environmental Management Programme ("EMPr"). Although the development has not been concluded, it has been confirmed that the majority of the conditions have been complied with to date. There are conditions which still need to be complied with such as an ECO being appointed until all development activities are concluded and the post construction rehabilitation and monitoring requirements are finalised, and the environmental auditing.

This Directorate encourages you to continue ensuring compliance with the conditions of the environmental authorisation ("EA") (Ref: 16/3/3/1/D1/8/0007/19) issued on 3 March 2020.

2.3. Implementation programme

It is understood that the activities undertaken to date includes the installation of the conservancy tank and water services at Area 1 (Dam Camp) and the clearance of the footprint for one of the units at the Dam Camp. However, due to the implications of the COVID-19 Pandemic, financial constraints and various unforeseen delays, the holder would be unable to complete the construction on the resort development, including the rehabilitation measures within the validity period of the EA, namely by 31 March 2025.

It is noted from the request that the validity period of the EA is extended by five (5) years i.e. the validity period extended until 31 March 2030.

In light of the above and in accordance with Regulation 27(3) of the Environmental Impact Assessment Regulations, 2014 ("EIA Regulations, 2014") please be advised that the validity period of the EA may only be extended further for a maximum period of 5-years. Therefore, should the requested extension be granted and the holder is again unable to conclude the proposed development within the extended validity period, such an EA shall lapse and a new application for environmental authorisation will need to be submitted to the competent authority to continue any of the relevant outstanding listed activities.

3. Submission of Amendment Environmental Impact Report

The amendment report must reflect the information requirements stipulated in Regulation 32(1)(a)(i)-(iv) of the EIA Regulations, 2014 and must also include and address any information requested in any previous correspondence in respect of this matter.

Please be reminded that in accordance with Regulation 32 of the EIA Regulations, 2014, the Department hereby stipulates that the amendment report (which has been subjected to public participation) must be submitted to this Department for decision within 90 days from the date of receipt of the application for amendment by the Department. However, if significant changes have been made or significant new information has been added to the amendment report, the applicant/EAP must notify the Department that an additional 50 days (i.e. 140 days from receipt of the application) would be required for the submission of the amendment report. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information.

If the report is not submitted within 90 days or 140 days, where an extension is applicable, the application will lapse in terms of Regulation 45 of Government Notice Regulation No. 982 of 4 December 2014 and your file will be closed. Should you wish to pursue the amendment application again, a new application process would have to be initiated.

NOTE: Furthermore, in accordance with Environmental Impact Assessment best-practice, you are kindly requested to notify all registered Interested and Affected Parties including the authorities identified in the Public Participation Plan of the submission of the FEIR and to make the document available to them. This will provide such parties an opportunity to review the document and how their issues (if any) were addressed.

4. Please note that the conditions stipulated in the environmental authorisation remain applicable until a decision on this amendment application is taken by this Department. Furthermore, in accordance with Regulation 28(1B) the environmental authorisation (Ref: 16/3/3/1/D1/8/0007/19) issued on 3 March 2020 remains valid pending the finalisation of this application for amendment of the environmental authorisation.

5. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
6. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.

Yours faithfully

HEAD OF COMPONENT
ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 3
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

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