

MARCH 2026

Brenton Cove CC

**SECTION 27 MOTIVATION REPORT
IN SUPPORT
OF THE WATER USE LICENSE APPLICATION
(REF: WU44123)
ON
PORTION 152 OF THE FARM UITZIGT 216, KNYSNA**



Prepared By: EnviroSynergy Consulting (Pty) Ltd
Tel: 079 824 7255

Email: ckruger@envirosynergy.co.za
Website: www.envirosynergy.co.za

COPYRIGHT WARNING

Copyright in all text and other matter, including the manner of presentation, is the exclusive property of the author. It is a criminal offence to reproduce and/or use, without written consent, any matter, technical procedure and/or technique contained in this document. Criminal and civil proceedings will be taken as a matter of strict routine against any person and/or institution infringing the copyright of the author and/or proprietors

TABLE OF CONTENTS

SECTION 27(1) (A): EXISTING LAWFUL WATER USES	3
SECTION 27(1)(B): THE NEED TO REDRESS THE RESULTS OF PAST RACIAL AND GENDER DISCRIMINATION	3
SECTION 27(1)(C): EFFICIENT AND BENEFICIAL USE OF WATER IN THE PUBLIC INTEREST.....	4
SECTION 27(1)(D): THE SOCIO-ECONOMIC IMPACT OF THE WATER USE OR USES IF AUTHORISED	6
THE SOCIO-ECONOMIC IMPACT OF THE FAILURE TO AUTHORISE THE WATER USE	6
SECTION 27(1) (E): ANY CATCHMENT MANAGEMENT STRATEGY APPLICABLE TO THE RELEVANT WATER RESOURCE	6
6.2 Water Resource Classification System.....	8
6.3 Aquifer Protection Classification.....	8
SECTION 27(1) (F): THE LIKELY EFFECT OF THE WATER USE TO BE AUTHORISED ON THE WATER RESOURCE AND ON THE WATER USERS	9
SECTION 27(1) (G): THE CLASS AND THE RESOURCE QUALITY OBJECTIVES OF THE WATER USES	10
SECTION 27(1) (H): INVESTMENTS ALREADY MADE AND TO BE MADE BY THE WATER USER IN RESPECT OF THE WATER USE IN QUESTION	11
SECTION 27(1) (I): THE STRATEGIC IMPORTANCE OF THE WATER USE THAT HAS BEEN AUTHORISED	11
SECTION 27(1) (J): THE QUALITY OF WATER IN THE WATER RESOURCE WHICH MAY BE REQUIRED FOR THE RESERVE AND FOR MEETING INTERNATIONAL OBLIGATIONS	11
SECTION 27(1) (K): THE PROBABLE DURATION FOR ANY UNDERTAKING THAT A WATER USE HAS BEEN AUTHORISED	12

TABLES OF FIGURES AND TABLES

Table 1: Lawful and proposed Water Uses	3
Table 2: Efficient and Beneficial Use	4
Table 3: Quaternary Catchment Reserve (July 2024).....	8
Table 4: Ratings – Aquifer System Management and Second Variable Classifications.....	9
Table 5: Wastewater limit values applicable to the irrigation of any land or property up to 50 cubic meters (NWA, 1998).....	10
Table 6: Quaternary Catchment Reserve.....	12

SECTION 27 MOTIVATION

The requirements contained in Section 27 of the National Water Act (Act 36 of 1998) have been considered and are discussed below.

SECTION 27(1) (A): EXISTING LAWFUL WATER USES

Existing approved water uses, and proposed water uses are summarised below.

Table 1: Lawful and proposed Water Uses

Sub-sec	Description as per the Act	Existing License	New Application
a	Taking water from a water resource	-	YES
b	Storing water	-	YES
c	Impeding or diverting the flow of water in a watercourse	-	-
d	Engaging in a stream flow reduction activity	-	-
e	Engaging in a controlled activity	-	YES
f	Discharging waste or water containing waste into a water resource through a pipe, canal, sewer or other conduit	-	-
g	Disposing of waste in a manner which may detrimentally impact on a water resource	-	YES
h	Disposing in any manner of water which contains waste from, or which has been heated in, any industrial or power generation process	-	-
i	Altering the bed, banks, course or characteristics of a watercourse	-	-
j	Removing, discharging or disposing of water found if it is necessary for the efficient continuation of an activity or for the safety of people	-	-
k	Using water for recreational purposes	-	-

SECTION 27(1)(B): THE NEED TO REDRESS THE RESULTS OF PAST RACIAL AND GENDER DISCRIMINATION

Section 27(1b) of the NWA requires information regarding the contribution that will be made to rectify the results of past racial and gender discrimination. The granting of the water use license, will lead to the retaining of existing permanent employees by the applicant (previously disadvantaged individuals).

Brenton Cove cc understands and is dedicated to redress the results of past gender and racial discrimination. The approval of this license will ensure that the current employment is maintained and that future employment opportunities are created. These jobs will be open to persons of any gender and race and should attract mostly black employees from previously disadvantaged communities within the community. The company is committed to provide opportunities for skills development and to provide for and regulate employment services.

The company wants to encourage employees to use the workplace as an active learning environment and provide employees with the opportunities to acquire new skills. Skills will be transferred to unskilled workers from the rural areas surrounding the project site.

SECTION 27(1)(C): EFFICIENT AND BENEFICIAL USE OF WATER IN THE PUBLIC INTEREST

In terms of the Department of Water and Sanitation Water Allocation and Reform Strategy as of September 2008, the following principles need to be adhered to when the allocation of water resources takes place. Therefore, it is important that these principles be adhered to:

Table 2: Efficient and Beneficial Use

Economic Growth and Social Development	• 5 permanent jobs to be created (Black 5) • Numerous temporary jobs to be created during the construction and operational phase								
Job Creation	• The project will aid in economic growth within the local area, especially within the tourism sector • The approval of the water use license will result in permanent and temporary job creation within the local community. • The proposal aligns with the Knysna SDF, IDP, and Western Cape PSDF, and supports local tourism and job creation. The proposal will provide much needed tourism camping facilities in the area, where most of the historic camping facilities have been lost through rezoning to alternative uses.								
Equitable Access to Water for Productive Purposes	The Breede-Gouritz Catchment Management Agency (BGCMA) (replaced by the Breede Olifants Catchment Management Agency – BOCMA) strategy focuses on sustainable water resource management in a water-stressed region, with a vision of <i>"Healthy water resources, for all, forever"</i>. Key strategies include implementing water conservation, clearing invasive plants, verifying lawful water use, and improving compliance to ensure equitable, efficient, and sustainable water allocation: Key Strategic Areas: • Water Resource Protection: Maintaining the health of rivers, groundwater, wetlands, and estuaries. • Water Allocation Reform: Ensuring fair access to water resources for both existing users and to support new economic development. • Management & Compliance: Enhancing monitoring, controlling water quality, and enforcing water use licenses. • Stakeholder Engagement: Actively collaborating with users and communities to manage water demand, particularly during droughts								
Social Stability	The main positive impacts are: • Temporary and permanent employment • The project is expected to stimulate local economic activity, especially through tourism-related opportunities • Knysna Municipal Spatial Development Framework (SDF) – the proposal is consistent with the SDF. • Knysna Municipal Integrated Development Plan (IDP) – the proposal is consistent with the IDP;								
Investor Confidence	<table> <tr> <th>Item</th><th>Cost/Value</th></tr> <tr> <td>Property Value (Land Cost)</td><td>R8 500 000.00</td></tr> <tr> <td>Infrastructure Cost (Including Fees)</td><td>R1 500 000.00</td></tr> <tr> <td>Boreholes (Including filtration)</td><td>R155 000.00</td></tr> </table>	Item	Cost/Value	Property Value (Land Cost)	R8 500 000.00	Infrastructure Cost (Including Fees)	R1 500 000.00	Boreholes (Including filtration)	R155 000.00
Item	Cost/Value								
Property Value (Land Cost)	R8 500 000.00								
Infrastructure Cost (Including Fees)	R1 500 000.00								
Boreholes (Including filtration)	R155 000.00								

	Running Costs p/months /Maintenance costs per month	R30 000.00
	Salary and Wages	R36 000.00
	Consultant Fees	R550 000.00
Protection of Aquatic Ecosystems	Based on the Hydrogeological assessment (2025) the following potential risks were identified: • Over utilisation of the borehole, which could lead to the dewatering of the fracture network and ultimately the borehole failure (drying up through fracture dewatering). • Over abstraction of borehole which could influence receptors (other borehole users and/or baseflow contribution to streams) • Over abstraction may cause saltwater intrusion The following actions are recommended to ensure sustainable water management practices: • The recommended sustainable abstraction should be strictly adhered to, to ensure that the aquifer is not depleted and that saltwater intrusion does not occur; • Adhere to the recommended maximum abstraction depths; • Adhere to the specified maximum abstraction drawdown and let borehole recover to 90% of its original static water levels; • Daily autonomous volume gauging (flow meter); • Monthly reconnaissance of the volumes and water levels should be done; • Bi-annual groundwater quality analyses to be conducted	
Efficient and Non-Wasteful Water Use	• The development optimises water use and discourages wasteful water use. The water is used for the low impact luxury tented camps. • Water is stored in closed tanks and a damask (from rooftops) which minimises evaporation loss. Daily routine water infrastructure inspections and leak assessments will be implemented to ensure that no unnecessary leaks occur. • The treatment plant will be a Fluidco¹ installed and managed and maintained system. Grey and black water will be treated on-site and re-used as per the Wastewater limit values specified in Government Notice 665 in Government Gazette 36820, dated 6 September 2013 of the NWA. • As a precaution, any tank will have a sump to ensure that should there be any overflow, this cannot pollute any surrounding water body or ground water. • Any surplus water from the water treatment plant that is <u>not recycled</u> for toilet flushing <u>must be</u> removed by municipal honey sucker tanker / private honey sucker tanker to the municipal sewage treatment works. • A separate reticulation will be laid for gardening and toilet flushing using treated effluent from the sewage treatment works. • Potable water for the project will make use of ONLY the captured rainwater harvesting and existing potable municipal supply until such time as the use of supplementary borehole water has been granted a Water Use Licence.	

¹ <https://fluidco.africa/sewage/>

A Balance Between the Water Using Sectors

- The water will be sourced from the on-site borehole, and no pressure will be placed on the already overutilized municipal infrastructure.

SECTION 27(1)(D): THE SOCIO-ECONOMIC IMPACT OF THE WATER USE OR USES IF AUTHORISED

- Job creation and retainment of existing jobs (5 permanent jobs and more);
- Job creation of numerous temporary jobs (direct and indirect);
- Rural economic growth, stimulation of local tourism sector;
- Compliance with applicable regulations thereby unlocking further economic opportunities for the applicant.
- Increase in land value
- The proposal aligns with the Knysna SDF, IDP, and Western Cape PSDF, and supports local tourism and job creation. The proposal will provide much needed tourism camping facilities in the area, where most of the historic camping facilities have been lost through rezoning to alternative uses.

THE SOCIO-ECONOMIC IMPACT OF THE FAILURE TO AUTHORISE THE WATER USE

- Prevention of infrastructure related socio-economic benefits.
- Loss of 5 permanent - and temporary jobs.
- Loss of more than investment value if not authorised
- Non – compliance, prevention of future investment opportunities.

SECTION 27(1) (E): ANY CATCHMENT MANAGEMENT STRATEGY APPLICABLE TO THE RELEVANT WATER RESOURCE

In terms of Section 27(1) of the National Water Act 36 of 1998 (NWA), consideration must be given to, inter alia, the efficient and beneficial use of water in the public interest, the socio-economic impact of the water use, the need to redress past discrimination, and the protection of water resources. The proposed water use has therefore been assessed against the objectives and priorities of the Breede-Gouritz Catchment Management Strategy (CMS) (replaced the Breede Olifants Catchment Management Agency (BOCMA)).

- **Strategic Context of the Breede Olifants Water Management Area (WMA):** The Breede Olifants WMA covers the Breede Olifants river systems, including the southern coastal catchments such as the Knysna area. The CMS for the WMA is founded on principles of:
 - Sustainable water resource protection;
 - Equitable and efficient water allocation;
 - Protection of ecological infrastructure (rivers, estuaries, wetlands and aquifers);
 - Adaptive management in response to climate variability and water scarcity; and
 - Participatory water governance.

Lake Brenton is hydrologically linked to the Knysna Estuary system and associated coastal aquifers. The protection of groundwater quality, estuarine ecological integrity and coastal wetlands is a strategic priority within the southern coastal catchments of the WMA.

- **Resource Protection and Ecological Sustainability:** A key objective of the Breede Olifants CMS is the protection of water resources in line with the Ecological Reserve and Resource Quality Objectives (RQOs). The proposed water use has been designed to:
 - Avoid contamination of surface water and groundwater resources;
 - Prevent deterioration of water quality entering the Knysna estuarine system
 - Limit abstraction to sustainable yields where groundwater is involved; and

- Ensure that stormwater management measures prevent erosion and sediment transport.
- Where applicable, abstraction volumes are modest and aligned with local aquifer characteristics, and no significant alteration of natural flow regimes is anticipated. As such, the proposed use is consistent with CMS objectives aimed at maintaining ecological integrity within the southern coastal sub-catchments.
- **Efficient and Beneficial Use of Water:** The Breede Olifants CMS promotes water conservation and demand management (WC/WDM) to address regional water constraints and climate variability in the Western Cape. The proposed development incorporates:
 - Water-efficient fixtures and infrastructure;
 - Monitoring of abstraction volumes (if applicable);
 - Implementation of leak detection and maintenance protocols; and
 - Responsible water management practices to avoid waste.

These measures support Section 27(1)(c) of the NWA regarding efficient and beneficial use of water in the public interest and align with CMS goals promoting sustainable resource utilisation.

Socio-Economic Considerations: The CMS recognises the importance of balancing ecological protection with socio-economic development. The proposed water use:

- Supports lawful land use and local economic activity in the Lake Brenton area;
- Contributes to local property development and municipal rates base;
- Does not compromise downstream users or existing lawful water uses; and
- Is limited in scale relative to regional water availability.

The application therefore aligns with Section 27(1)(b) and (d) of the NWA, as the socio-economic benefits are positive and no material adverse impacts on other users are anticipated.

Equity and Lawful Water Use: The Breede Olifants CMS promotes transparent regulation of water use through registration, licensing and compliance monitoring. This application:

- Seeks lawful authorisation under the National Water Act;
- Enables regulatory oversight by the Breede Olifants Catchment Management Agency (BOCMA); and
- Ensures compliance with licence conditions and monitoring requirements.
- By applying for authorisation, the applicant contributes to improved water governance and equitable water management within the WMA.

The proposed water use at Brenton Cove is consistent with the objectives and strategic priorities of the Breede-Gouritz Catchment Management Strategy. The development:

- Protects water resources and ecological integrity;
- Promotes efficient and beneficial use of water;
- Supports local socio-economic activity without compromising other users; and
- Aligns with integrated water resource management principles within the Breede Olifants WMA.

It is therefore respectfully submitted that the application satisfies the relevant Section 27 considerations of the National Water Act and is compatible with the strategic direction of the BOCMA. Based on the National Integrated Water Information System (NIWIS) (2025), the reserve within quaternary catchment K50B is not stressed (GRA2), and a surplus is available for groundwater (GWR) abstraction (refer to Table 3).

Table 3: Quaternary Catchment Reserve (July 2024)

Quaternary Catchment	Available (GRA2)	Recharge (GWR)	Reserve (GWR)	Abstracted (WARMS)	Surplus (GRA2)	Surplus (GWR)
	[m³/a]	[m³/a]	[m³/a]	[m³/a]	[m³/a]	[m³/a]
K50B	4 652 940	14 400 000	1 055 000	2 430 310	2 222 630	10 914 690

[m³/a] cubic meters per annum

6.2 Water Resource Classification System

Water resource

Chapter 3 of the National Water Act (NWA, Act 106 of 1998) provides for the protection of water resources through the implementation of Resource Directed Measures (RDM) which includes the Classification of water resources, setting the Reserve and Resource Quality Objectives (RQOs). Classification of water resources aims to ensure that a balance is reached between the need to protect and sustain water resources on one hand and the need to develop and use them on the other. Resource Quality Objectives (RQOs) are defined for each prioritised RU for every IUA in terms of water quantity, habitat and biota, and water quality. The determination of a management class for a water resource represents the first stage in the water resource protection process. The MC essentially describes the desired condition of the resource, along with the degree to which it can be utilised. In terms of the WRCS, the MCs will range from minimally used to heavily used. Regulation 810 (Government Gazette No. 33541, September 2010) that establishes the WRCS defines three water resource MCs:

- Class I - minimally used and configuration of ecological categories of that water resource minimally altered from its pre-development condition;
- Class II - moderately used and configuration of ecological categories of that water resource moderately altered from its pre-development condition; and
- Class III - heavily used and configuration of ecological categories of that water resource significantly altered from its pre-development condition.

A **Class II resource** is managed to:

- Balance ecological protection with sustainable water use;
- Maintain the resource in a condition that is largely natural to moderately modified;
- Prevent unacceptable ecological degradation; and
- Ensure long-term sustainability of abstraction and water quality.

Ecological category:

Within K50B, water resources contributing to the Knysna Estuary are typically regarded as having high ecological importance and sensitivity and are commonly managed at an ecological category approximating Category B (largely natural).

This means:

- Ecological functioning must be largely maintained.
- Only limited modification from natural conditions is acceptable.
- Water quality deterioration and excessive abstraction are not permissible.

6.3 Aquifer Protection Classification

A Groundwater Quality Management Index of 4 was estimated for the study area from the ratings for the Aquifer System Management Classification. According to this estimate a medium level groundwater protection which is non-degradational is required for the aquifer. DWS's water quality management objectives are to protect human health and the environment. Therefore, the significance of this aquifer classification is that measures must be taken to limit the risk to the following environments.

- The protection of the underlying aquifer.
- Groundwater users downstream of the site

Table 4: Ratings – Aquifer System Management and Second Variable Classifications

Present Status Category	Description	Stress Index
A	Unstressed or low level of stress	<0.05
B		0.05-0.2
C	Moderate levels of stress	0.2 – 0.5
D		0.5 – 0.75
E	Stressed	0.75 – 0.95
F	Critically stressed	>0.95

Due to the current and proposed abstraction, the groundwater resource unit is classified as stressed, monitoring is therefore necessary to ensure that no detrimental impact on the underlying resource occurs.

SECTION 27(1) (F): THE LIKELY EFFECT OF THE WATER USE TO BE AUTHORISED ON THE WATER RESOURCE AND ON THE WATER USERS

The following impacts are relevant to the water use:

- The Table Mountain Group aquifer is very vulnerable to contamination because no buffer exists due to its highly permeable recharge zones. Its slow recharge, fractured structure and interconnection amplify the risks;
- Following the hydrocensus (2026), it was determined that groundwater users were located surrounding the study area;
- Susceptibility to saltwater intrusion. Coastal drawdown may trigger seawater intrusion—salinizing aquifer and reducing abstraction quality and availability;
- Ecological stress may exist due to over abstraction. Lowering of the regional water table may impact wetland fauna and flora dependant on subsurface flow;
- Total Coliforms were detected and in exceedance with the SANS 241 drinking water standard in borehole BC-BH1 (microparticles). However, no Faecal Coliforms or Escherichia coli (E. coli) were detected;
- Based on the groundwater reserve calculations it was determined that the proposed groundwater abstraction is medium, and the aquifer is moderately stressed.

The primary concern would be the potential of over abstraction and its impacts on the aquifer.

The following receptors are relevant:

- Groundwater users abstracting groundwater through a borehole for domestic use.

The following possible impact from activities are relevant if not managed:

- Over abstraction of the aquifer.

Wastewater intended for irrigation should be analysed regularly according to the wastewater limits for irrigation² of any land or property up to 50 cubic meters (m³). These limits are listed in Table 5 below:

Table 5: Wastewater limit values applicable to the irrigation of any land or property up to 50 cubic meters (NWA, 1998)

Variable	Limit
pH	Not less than 6 or more than 9 pH units
Electrical Conductivity	Must not exceed 200 milliSiemens per metre (mS/m)
Chemical Oxygen Demand (COD)	Must not exceed 5000 mg/L after removal of algae
Faecal Coliforms	Must not exceed 100 000 per 100 ml
Sodium Adsorption Ratio (SAR)	Must not exceed 5 for biodegradable industrial wastewater

The following must be adhered to:

- Wastewater limit values applicable to the irrigation of any land or property up to 50 cubic meters;
- Irrigate provided that the irrigated wastewater is not detrimental to the health and safety of the public in the vicinity of the activity.
- Quality of water in the estuary must be protected by not allowing sewerage or irrigation run-off into the estuary. Fertilisers must not be used on the property (David Hoare Consulting (Pty) Ltd, 2024- Terrestrial and Aquatic Biodiversity, and Plant Species and Animal Species Assessment Report)

SECTION 27(1) (G): THE CLASS AND THE RESOURCE QUALITY OBJECTIVES OF THE WATER USES

Chapter 3 of the National Water Act (NWA, Act 106 of 1998) provides for the protection of water resources through the implementation of Resource Directed Measures (RDM) which includes the Classification of water resources, setting the Reserve and Resource Quality Objectives (RQOs). Classification of water resources aims to ensure that a balance is reached between the need to protect and sustain water resources on one hand and the need to develop and use them on the other. Resource Quality Objectives (RQOs) are defined for each prioritised RU for every IUA in terms of water quantity, habitat and biota, and water quality. The determination of a management class for a water resource represents the first stage in the water resource protection process. The MC essentially describes the desired condition of the resource, along with the degree to which it can be utilised. In terms of the WRCS, the MCs will range from minimally used to heavily used. Regulation 810 (Government Gazette No. 33541, September 2010) that establishes the WRCS defines three water resource MCs:

- Class I - minimally used and configuration of ecological categories of that water resource minimally altered from its pre-development condition;
- **Class II - moderately used and configuration of ecological categories of that water resource moderately altered from its pre-development condition; and**
- Class III - heavily used and configuration of ecological categories of that water resource significantly altered from its pre-development condition.

² Government Notice 665 in Government Gazette 36820, dated 6 September 2013

- A Class II resource is managed to:
 - Balance ecological protection with sustainable water use;
 - Maintain the resource in a condition that is largely natural to moderately modified;
 - Prevent unacceptable ecological degradation; and
 - Ensure long-term sustainability of abstraction and water quality.

Ecological category:

Within K50B, water resources contributing to the Knysna Estuary are typically regarded as having high ecological importance and sensitivity and are commonly managed at an ecological category approximating Category B (largely natural).

This means:

- Ecological functioning must be largely maintained.
- Only limited modification from natural conditions is acceptable.
- Water quality deterioration and excessive abstraction are not permissible.

SECTION 27(1) (H): INVESTMENTS ALREADY MADE AND TO BE MADE BY THE WATER USER IN RESPECT OF THE WATER USE IN QUESTION

To following figures are relevant:

Item	Cost/Value
Property Value (Land Cost)	R8 500 000.00
Infrastructure Cost (Including Fees)	R1 500 000.00
Boreholes (Including filtration)	R155 000.00
Running Costs p/months /Maintenance costs per month	R30 000.00
Salary and Wages	R36 000.00
Consultant Fees	R550 000.00

SECTION 27(1) (I): THE STRATEGIC IMPORTANCE OF THE WATER USE THAT HAS BEEN AUTHORISED

The proposal aligns with the Knysna SDF, IDP, and Western Cape PSDF, and supports local tourism and job creation. The proposal will provide much needed tourism camping facilities in the area, where most of the historic camping facilities have been lost through rezoning to alternative uses.

SECTION 27(1) (J): THE QUALITY OF WATER IN THE WATER RESOURCE WHICH MAY BE REQUIRED FOR THE RESERVE AND FOR MEETING INTERNATIONAL OBLIGATIONS

Based on the National Integrated Water Information System (NIWIS) (2024), the reserve within quaternary catchment K50B is stressed (GRA2). However, a surplus is available for groundwater (GWR) (refer to **Table 6**).

Table 6: Quaternary Catchment Reserve

Quaternary Catchment	Available (GRA2)	Recharge (GWR)	Reserve (GWR)	Abstracted (WARMS)	Surplus (GRA2)	Surplus (GWR)
	[m³/a]	[m³/a]	[m³/a]	[m³/a]	[m³/a]	[m³/a]
K50B	4 652 940	14 400 000	1 055 000	2 430 310	2 222 630	10 914 690

Several general and specific mitigation measures are proposed in order to reduce negative impacts and incorporate some potentially positive impacts from the proposed development. Some of the most pertinent recommendations include:

- Groundwater level monitoring (daily):
- Groundwater level reconnaissance (monthly)
- Hydrochemical monitoring (Quarterly, by Hydrogeologist); and
- Volume Abstraction monitoring.

SECTION 27(1) (K): THE PROBABLE DURATION FOR ANY UNDERTAKING THAT A WATER USE HAS BEEN AUTHORISED

- The water use license is being sought for a period of at least 20 years