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**ENQUIRIES:** Ms Jessica Christie  
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The Managing Director  
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Attention: Mr. H. Gale

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Dear Sir

**COMMENT ON THE BASIC ASSESSMENT REPORT FOR THE PROPOSED GRAIN SILO BAG AREA ON A PORTION OF PORTION 8 OF THE FARM PATRYSFONTEIN 228, MOSSEL BAY**

1. The abovementioned document dated 14 December 2017 and received by this Department on 19 December 2017 refers.
2. This letter serves as an acknowledgment of receipt of the abovementioned document.
3. This Directorate has reviewed the information contained within the Pre-App BAR and provides the following comment.

**3.1. Basic Assessment Report ("BAR") format**

Please note that any report, plan or document submitted as part of an application must *inter alia* be prepared in a format that may be determined by the competent authority.

Kindly take note that the Basic Assessment Report ("BAR") form utilised for the Pre-Application BAR is based on an outdated BAR form. This Department has determined the format of the new form in October 2017. It is advised that your Environmental Assessment Practitioner (EAP) utilise the new BAR form for the application process. This form can be obtained on the Departmental website at URL.:

[https://www.westerncape.gov.za/eadp/sites/eadp.westerncape.gov.za/files/basic-page/downloads/DEA&DP\\_Basic\\_Assessment\\_Report\\_15Sept2017.docx](https://www.westerncape.gov.za/eadp/sites/eadp.westerncape.gov.za/files/basic-page/downloads/DEA&DP_Basic_Assessment_Report_15Sept2017.docx)

### 3.2. *Alternatives*

It is understood that the project includes the grain silo bags area with the associated routes for the trucks and the weigh bridge for both alternatives. Furthermore, the preferred alternative includes a storm water retention pond for the possible storm water surface flow that will be generated.

The alternative which is not preferred, has no facility for the storm water surface flow. This Directorate is of the opinion that this is not an appropriate alternative as storm water must be catered for with any alternative layout or design of a facility. It is suggested that more realistic alternatives be assessed.

In addition to the above, an alternative to grain silo bags should be assessed (i.e. grain silo structures).

### 3.3. *Retention Dam*

It is noted that the retention dam proposed for the storm water is located in the south west corner of the property and that it has a controlled outflow. It is not clear where the outflow will be and to where the water will drain to. The retention dam must be free draining, furthermore, this Directorate does not support an option where water will drain into an unlicensed or unregistered water storage facility. It is unclear whether the facility on the neighbouring landowner's property is indeed registered/licenced and if it has the capacity receive and store the stormwater generated from the proposed development. This matter must be clarified and the issued resolved with the Breede Gouritz Catchment Management Agency.

Please be reminded of the requirements of One Environmental Management System in this regard.

### 3.4. *Traffic impact*

It is noted that the proposal and Pre-Application BAR has been submitted to the relevant to roads authority for MR342, DR1553 and OP5005 respectively, however, it is advised that the matter be followed up with the said authorities to obtain their comment and design requirements.

### 3.5. *Impact Assessment*

It is noted that no impact assessment has been conducted for the decommissioning phase of the development. Kindly take note of the following contained within Appendix 1 Content of the Basic Assessment Report:

*"(i) a full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the **life of the activity**, including—*

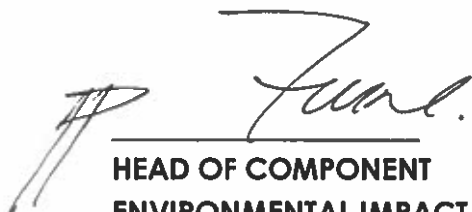
- (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process; and*
- (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures; "*

4. The Department awaits the submission of the Application Form or a Revised Pre-application BAR as prescribed by the EIA Regulations, 2014. Please note that one printed copy and one electronic copy (saved on CD/DVD) of the Application Form must be submitted.

Upon the submission of a revised BAR, this Directorate may provide further comment.

5. Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Department. It is an offence in terms of Section 49A of the NEMA for a person to commence with a listed activity unless the Department has granted an Environmental Authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F and 49A of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department for prosecution. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
6. The Department reserves the right to revise initial comments and request further information based on the information received.

Yours faithfully



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

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{EAP}

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