



# DRAFT SCOPING REPORT

for  
**MOSSEL BAY CREMATORIUM**

on  
Erf 50, MossDustria, Mossel Bay

In terms of the  
National Environmental Management Act (Act No. 107 of 1998, as amended) & 2014 Environmental Impact Assessment, as amended, as well as the National Environmental Management: Air Quality Act

**Prepared for Applicant:**  
Pretorius Trust

**Date: 19 April 2023**

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**Report Reference:** MOS770/03  
**Department Reference:** 16/3/3/6/7/1/D6/28/0298/22  
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**PURPOSE OF THIS REPORT:**

Stakeholder Review and Comment

**APPLICANT:**

Pretorius Trust

**CAPE EAPRAC REFERENCE NO:**

MOS770/03

**DEPARTMENT REFERENCE:**

16/3/3/6/7/1/D6/28/0298/22

**SUBMISSION DATE**

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Management: Air Quality Act (NEMAQA)

## MOSSEL BAY CREMATORIUM

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**Erf 50, MossDustria, Mossel Bay**

Submitted for:  
Stakeholder Review & Comment

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## CONTENTS OF A SCOPING REPORT

Section 2 in Appendix 2 of R982 of the 2014 EIA Regulations, details the information that is necessary for a proper understanding of the process, informing all preferred alternatives, including location alternatives, the scope of the assessment, and the consultation process to be undertaken through the environmental impact assessment process. The table below lists the minimal contents of a **scoping report** in terms of these Regulations and provides a reference on where to find said information in this report.

Requirement	Details
(a) details of - <ul style="list-style-type: none"> <li>(i) The EAP who prepared the report; and</li> <li>(ii) The expertise of the EAP, including a curriculum vitae.</li> </ul>	<p>The draft scoping report was compiled by Louise-Mari van Zyl from Cape EAPrac.</p> <p>Louise-Mari van Zyl is a registered EAP (Reg No 2019/1444) with 19 years experience in the field of environmental impact assessments. She holds a Masters Degree in Geography &amp; Environmental Studies from Stellenbosch University.</p>
(b) the location of the activity, including – <ul style="list-style-type: none"> <li>(i) The 21 digit Surveyor General code of each cadastral land parcel;</li> <li>(ii) Where available, the physical address and farm name;</li> <li>(iii) Where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties.</li> </ul>	<p>C05100140000005000000</p> <p>Erf 50, MossDustria, Mossel Bay</p> <p>34° 07' 42.99" S 22° 05' 14.99" E</p>
(c) a plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is <ul style="list-style-type: none"> <li>(i) A linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or</li> <li>(ii) On land where the property has not been defined, the coordinates within which the activity is to be undertaken.</li> </ul>	<p>Site Development Plan is attached.</p>
(d) a description of the scope of the proposed activity, including - <ul style="list-style-type: none"> <li>(i) All listed and specified activities triggered;</li> </ul>	<p>Refer to main report with table on listed activities as agreed to with the Department in response to the Notification of Intent.</p>

Requirement	Details
(ii) A description of the activities to be undertaken, including associated structures and infrastructure.	
(e) A description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process.	Main Report on legislative requirements.
(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 location	Main Report on need & desirability.
<p>(h) A full description of the process followed to reach the proposed preferred activity, site and location within the site, including -</p> <ul style="list-style-type: none"> <li>(i) Details of all the alternatives considered;</li> <li>(ii) Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</li> <li>(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;</li> <li>(iv) The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</li> <li>(v) The impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts - <ul style="list-style-type: none"> <li>(aa) can be reversed;</li> <li>(bb) may cause irreplaceable loss of resources; and</li> </ul> </li> </ul>	Main Report.



Requirement	Details
<p>(cc) can be avoided, managed or mitigated;</p> <p>(vi) The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;(</p> <p>(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;</p> <p>(viii) The possible mitigation measures that could be applied and level of residual risk;</p> <p>(ix) The outcome of the site selection matrix;</p> <p>(x) If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such and</p> <p>(xi) A concluding statement indicating the preferred alternatives, including preferred location of the activity;</p>	
<p>(i) A plan of study for undertaking the environmental impact assessment process to be undertaken, including -</p> <p>(i) A description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity;</p> <p>(ii) A description of the aspects to be assessed as part of the environmental impact assessment process;</p> <p>(iii) Aspects to be assessed by specialists;</p> <p>(iv) A description of the proposed method of assessing the environmental aspects, including a description of the proposed method of assessing the environmental aspects including aspects to be assessed by specialists;</p>	<p>Main Report.</p>

Requirement	Details
<p>(v) A description of the proposed method of assessing duration and significance;</p> <p>(vi) An indication of the stages at which the competent authority will be consulted;</p> <p>(vii) Particulars of the public participation process that will be conducted during the environmental impact assessment process; and</p> <p>(viii) A description of the tasks that will be undertaken as part of the environmental impact assessment process;</p> <p>(ix) Identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.</p>	
<p>(j) An undertaking under oath or affirmation by the EAP in relation to -</p> <p>(i) The correctness of the information provided in the report;</p> <p>(ii) The inclusion of comments and inputs from stakeholders and interested and affected parties; and</p> <p>(iii) 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>	Appendix M
<p>(k) An undertaking under oath or affirmation by the EAP in relation to the level of agreement between the EAP and interested and affected parties on the plan of study for undertaking the environmental impact assessment.</p>	
<p>(l) Where applicable, any specific information required by the competent authority.</p>	
<p>(m) Any other matter required in terms of section 24(4)(a) and (b) of the Act.</p>	

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## ABBREVIATIONS

AEL	Air Emission License
AIA	Archaeological Impact Assessment
BGIS	Biodiversity Geographic Information System
BID	Background Information Document
BGCMA	Breede-Gourits Catchment Management Agency
CBD	Central Business District
ACMP	Archaeological Conservation Management Plan
CEMP	Construction Environmental Management Plan
DEFF	Department of Environmental Affairs (National)
DEA&DP	Department of Environmental Affairs and Development Planning
DEIR	Draft Environmental Impact Report
DSR	Draft Scoping Report
FEIR	Final Environmental Impact Report
GRDM	Garden Route District Municipality
EAP	Environmental Impact Practitioner
EIA	Environmental Impact Assessment
EIR	Environmental Impact Report
EMP	Environmental Management Programme
GA	General Authorisation
GPS	Global Positioning System
HIA	Heritage Impact Assessment
HWC	Heritage Western Cape
I&APs	Interested and Affected Parties
IDP	Integrated Development Plan
LUPA	Land Use Planning Act
NEMA	National Environmental Management Act
NEMAA	National Environmental Management Amendment Act
NEMAQA	National Environmental Management Air Quality Act
NEMBA	National Environmental Management: Biodiversity Act
NERSA	National Energy Regulator of South Africa
NHRA	National Heritage Resources Act
NID	Notice of Intent to Develop
NSBA	National Spatial Biodiversity Assessment
NWA	National Water Act
SANBI	South Africa National Biodiversity Institute
SANS	South Africa National Standards
SPLUMA	Spatial Land Use Management Act
SDF	Spatial Development Framework
TIA	Traffic Impact Assessment
WULA	Water Use License

# SUMMARY

## 1 INTRODUCTION

**Cape EAPrac** has been appointed by Pretorius Trust, hereafter referred to as the Applicant, as the independent environmental practitioner to facilitate the **Scoping & Environmental Impact Assessment (EIA)** and **Air Emission License (AEL)** processes required in terms of the National Environmental Management Act (NEMA, Act 107 of 1998 as amended), as well as the National Environmental Management: Air Quality Act (NEMAQA) for the proposed **Mossel Bay Crematorium** development on Erf 50 situated in the Mossel Bay industrial area (MossDustria).

According to the Mossel Bay Municipal Spatial Development Framework (SDF) the proposed project falls within and existing industrial park (MossDustria, Industrial Zone II), **the Applicant's** objective is to modify an existing building to accommodate a crematorium for the cremation of human and animal (pet/veterinary) remains.

The proposed development requires the necessary **Environmental Authorisation (EA)** and **AEL**, prior to commencement. The **Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)** is the competent decision-making authority in terms of the NEMA for which a **Full Scoping & Impact Assessment** process must be followed, whilst the **Garden Route District Municipality (GRDM)** is the Competent Authority for the AEL.

To capture stakeholder engagement and provide a transparent public participation process, a **Draft Scoping Report** is made available to potential Interested and Affected Parties (I&APs) for a **30-day review and comment** period extending from Wednesday, 19 April 2023 – 22 May 2023.

Following the outcome of the scoping process, the **Final Scoping Report** will be submitted to the DEADP. At the same time the AEL application will be submitted to ensure that the Impact Assessment phase of the processes provide detailed impact assessment information to registered stakeholders.

The steps to be followed from now onwards include:

- Consider comments received in response to the draft Scoping Report;
- Consider comments received in response to the Draft Scoping Report;
- Submit the Final Scoping Report with all submissions/comments/responses to the Department for consideration;
- Submit the AEL application to the GRDM;
- Once the Final Scoping Report is accepted, compile the draft Environmental Impact Report (EIR) with AEL and make such available for registered I&APS review and comment for a further 30-day comment period;
- Consider, respond to and including all comments received during abovementioned DEIR / AEL and include them in the Final EIR;
- Submit the Final EIR / AEL to DEA&DP and the GRDM for decision-making (grant or refuse authorisation).
- Notify all registered I&APs of the outcome of the application processes.
- Appeal procedures applicable to the decisions.



Figure 1: Erf 50 (red outlined area) situated in MossDustria (Source: Google Earth, imagery date 20/11/2022)

## 2 SITE DESCRIPTION & GENERAL ATTRIBUTES

**De Denne Wiele Mark CC** as the land owner of the greater Erf 50, has entered into a valid Lease Agreement with the Applicant for the rental of the specified building on Erf 50 to operate a Crematorium, subject to approvals.

Erf 50 is located in the MossDustria industrial area (Mossel Bay) and is an already transformed, developed site with four existing buildings individually being leased for various purposes (Figure 1). At the time of this investigation, there were woodwork, sandblasting, storage and a small tannery operating from the four (4) existing buildings on the property.

The identified building for the Crematorium housed a sandblasting operation. The existing structure will be modified through the erection of a stack (for emission and control monitoring purposes), the construction of three (3) cremators within the building itself, along with internal modifications to accommodate an office and dedicated, controlled off-loading space for remains. It is not the intention of the Applicant to accommodate funeral functions at the facility.

The property is located approximately 10 kilometers east of Mossel Bay and accessed is via the N2, R327 and existing Voortrekker Street within MossDustria (Figure 1).



### 3 PROPOSED *MOSSSEL BAY CREMATORIUM*

The Pretorius Trust is proposing to convert an existing structure, that housed a sandblasting operation to date, to a Crematorium for human and animal (pet/veterinary) remains.

The identified brick, steel and corrugated iron building (152.44m<sup>2</sup>) located on Erf 50 MossDustria, will be modified to accommodate a stack, three (3) cremators and internal changes for an office and off-loading area.

The stack pipes from the three cremators will go through the southern wall and be combined into one central stack (14 meters tall) that will be located against the wall, rising above the roof.

The closest residential areas are approximately 4.5 km east of the south-eastern boundary of the site. The proposal is to operate 24 hours per day, seven (7) days per week, 52 weeks per year, with two (2) one-day shutdowns planned for Good Friday and Christmas.

The crematorium will operate with two (2) cremators, with an average of 32 cremations that could be exercised per day i.e. 16 per cremator. A third cremator will be installed, but will solely serve as a backup unit while one of the other units is offline or due to maintenance, breakdown, etc.

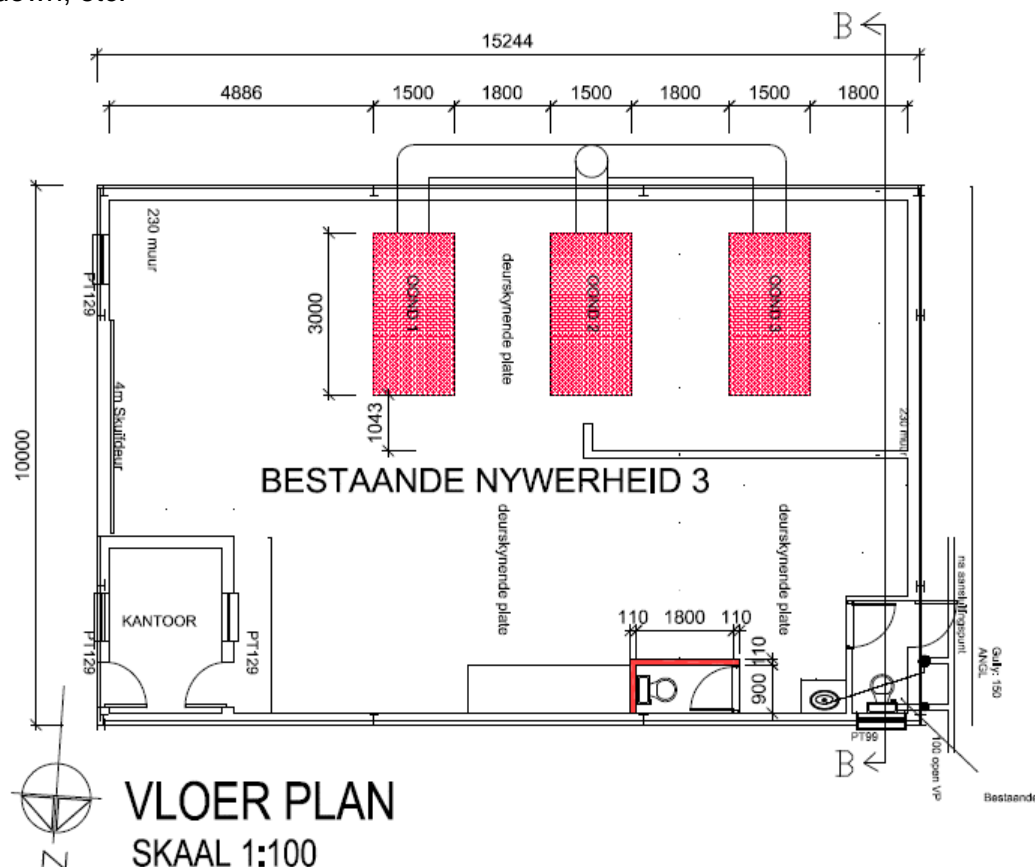
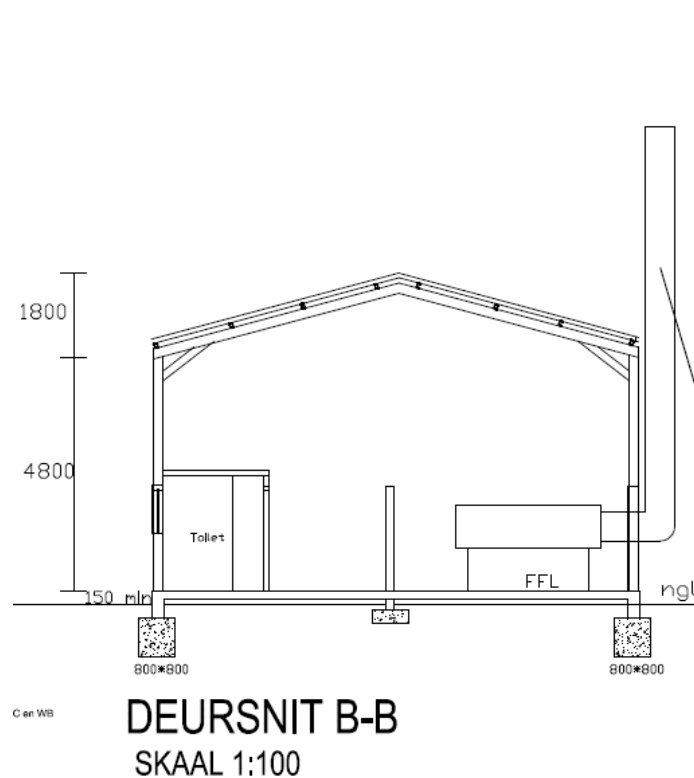


Figure 2: Schematic design of the internal layout for the proposed Crematorium on Erf 50 (Source: HD Studios).



**Figure 3: Schematic design showing the proposed stack that must be constructed for emissions (Source: HD Studios).**

Human remains will be received at the crematorium facility in caskets and will be delivered by undertakers who will bring the remains to the facility in suitable vehicles. The vehicles will have a dedicated entrance into the building from where the remains will be off-loaded in a controlled environment i.e. there will be no deliveries done outside the building itself.

Animal remains will be received at the crematorium facility via the service providers used by the veterinary/animal welfare fraternity. Vehicles will offload the remains through the dedicated entrance into the building as a controlled environment.

Human and/or animal remains will be placed into cremators at temperatures ranging between 800 - 900 °C. Typical cremation times will vary, depending on body sizes. An afterburner will increase the flue gas temperature to approximately 1200 °C once the remains have been deposited in the cremator(s).

The cremator(s) will be fired with liquid petroleum gas (LPG). During the cremation process, a large mass of the organic matter is vaporised and oxidised due to the very high temperatures. Gases are discharged through the stack at air quality standards to be prescribed by the competent authority.

What remains after cremation is ash, dry bone fragments (consisting mainly of calcium phosphates), minor minerals and in some instances metal prosthetic components, e.g. hip joints. After the cremation, the bone fragments are swept out of the cremator and crushed in-house into smaller grains and chips by use of a cremulator. The crushed remains are handed back to the undertaker who returns them to the family.

Metal prosthetic components, e.g. hip joints will also be handed over to the undertaker that will in turn hand them over to the family. Cremated animal remains will also be crushed in-house and handed back to the owner.

Should the owner/family not claim the remains, they will be temporarily accommodated on-site. The Applicant will purchase a grave(s) at the municipal graveyard and will deposit the on-site stored remains in the grave once it reaches the volume required to fill and close the purchased grave(s).

**Importantly, specific information will be required from the Applicant/Operator of the facility on how the crematorium separates human and pet remains, how the cleaning of the cremator(s) between cremations work, how remains will be stored prior to cremation, as well as details on the system for digital monitoring and managing of the operation of the cremator(s), as well as mitigating pollution. The detailed Air Quality Impact Assessment study will include an air dispersion model to indicate the area of influence that may be impacted its air quality. As a specific measure to address/mitigate potential impacts, the GRDM will only issue a Provisional Air Emission License for a set period of time i.e. one year, to test the emissions and ensure that the correct procedures / quality controls / emission levels are adhered to. Only in the event that these measures are met, will the GRDM consider issuing a permanent AEL. The latter will require regular monitoring to ensure compliance.**

The following images show *examples* of cremators, caskets and the texture of cremation ashes to give a sense of what it typically looks like within.



Figure 4: Example of cremators with caskets to indicate scale (Source: <https://www.us-funerals.com/the-ultimate-guide-to-cremation-2023>).

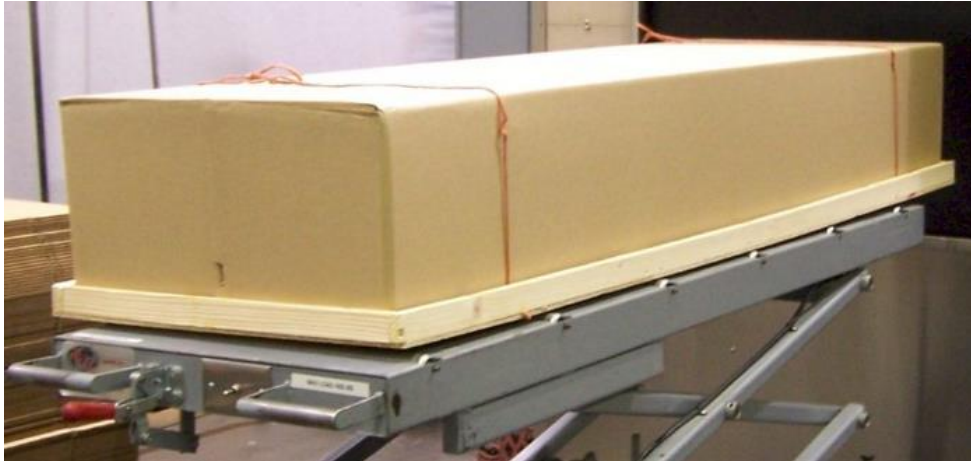


Figure 5: Example of casket entering a cremator (Source: <https://cremationinstitute.com/cremation-process>).



Figure 6: Typical cremated material left over after grinding of remains post-cremation (<https://cremationinstitute.com/cremation-process>).

## 4 ACCESS & SERVICES

Access will be via Voortrekker Street (Figure 1). The proposed crematorium is located in a well established industrial area (MossDustria) and will be located within an existing building located on erf 50 that is already connected to existing municipal services.

## 5 ALTERNATIVES

Erf 50 is zoned as Industrial Zone II which permits a crematorium according to the Mossel Bay Zoning Scheme regulations.

An existing building on the erf will be modified to accommodate a stack, three (3) cremators and internal changes for an office and off-loading area. The only addition will be the stack pipes from the three cremators that will go through the southern wall which will be combined into one central stack that will be located against the wall rising above the roof.

For the purpose of the scoping investigation, the following alternatives have been considered:

- Status Quo (so-called No-Go): Alternative 1 is a continuation of the existing building for industrial purposes (type of activity unknown), with no Crematorium on the property.
- Alternative 2 – The modification of the existing building on Erf 50 to accommodate the proposed crematorium.

## 6 ENVIRONMENTAL REQUIREMENTS

The current assessment is being undertaken in terms of the **National Environmental Management Act** (NEMA, Act 107 of 1998 as amended) as well as the NEMAQA. These Acts makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the competent authorities (in this case, the Provincial Department of Environmental Affairs and Development Planning) based on the findings of an Environmental Assessment, as well as the GRDM based on the AEL application).

The proposed development entails a number of listed activities, which require a **Scoping & Environmental Impact Reporting (S&EIR) process**, which must be conducted by an independent environmental assessment practitioner (EAP). *Cape EAPrac* has been appointed to undertake this process

The listed activities associated with the proposed development are shown in the table below.

Activity No(s):	Provide the relevant <b>Scoping and EIR Activity(ies)</b> as set out in <b>Listing Notice 2</b>	Describe the portion of the proposed development to which the applicable listed activity relates.
6	The development of facilities or infrastructure for any process or activity which requires a permit or licence in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent.	The proposed activity will trigger Subcategory 8.2 of GNR 893 promulgated under NEM:AQA " <i>Crematoria and Veterinary waste incineration: Cremation of human, companion animals (pets) and veterinary waste</i> ".
<p><b>Note:</b> Only those activities listed above shall be considered for authorisation. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. Environmental Authorisation must be obtained prior to commencement with each applicable listed activity. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted.</p>		

## 7 PLANNING CONTEXT

Erf 50 is located in an existing industrial park (MossDustria) and is zoned as Industrial Zone II which permits a crematorium according to the Mossel Bay Zoning Scheme regulations.

The development proposal is therefore seen as being in line with the local planning context of the area.

## 8 SPECIALIST/TECHNICAL INPUT

The following **specialist** and **technical input** was obtained to inform site constraints and the development proposal/alternatives and is discussed in detail in the main report. Professional input comprises of various specialist and technical reports and is listed below.

Note that in terms of the May and October 2020 Protocols Gazetted by the Minister of Environmental Affairs, all specialists must be SACNASP registered where the protocol so prescribes and all reports must adhere to the protocols where necessary.

Technical investigations are not subject to the protocols, however, the professionals must still be registered in terms of their professional affiliations.

No vegetation is present on the property or within the existing building (concrete floor surface) that will accommodate the crematorium. The property surrounding the existing building is covered with gravel and deemed to be transformed.

The modification of the existing building on the site to accommodate the crematorium will not result in the removal of any fauna, or flora and will not impact any other terrestrial biodiversity. No watercourses are present on the property or within the existing building that will house the crematorium. The closest NFEPA watercourse is indicated approximately 130m southeast of Erf 50.

The property contains and the existing building that will house the crematorium contains no agricultural resources.

No heritage or no paleontological resources will be impacted upon.

Due to the process of cremation both heat and emissions are deemed by-products. The resulting impact on air quality is noted for which a detailed Air Quality Impact Assessment will be required.

Based on site sensitivity verifications, no specialist investigations are deemed necessary with the exception of the air emissions assessment.

<b>SPECIALIST INVESTIGATIONS to inform the IMPACT ASSESSMENT PHASE</b>	
<b>(Please note specialist assessments are on-going and detailed impact assessments will be included in the environmental impact assessment phase of the Environmental Process. Baseline specialist report are however included in this Scoping Report to support the findings and recommendations of this document.)</b>	
Air emissions assessment	Chris Albertyn

In the event that the process dictates the need for additional specialist studies, such will be commissioned during the impact assessment phase of this application process.

## **9 NEED AND DESIRABILITY**

Need and desirability must be considered during the environmental process and is described in detail in Section 13 of the main report.

In keeping with the requirements of an integrated Environmental Impact process, the DEA&DP **Guidelines on Need and Desirability (2010 & 2011 & 2017)** were referenced to provide an estimation of the activity in relation to the broader societal needs. The concept of need and desirability can be explained in terms of its two components, where *need* refers to *time* and *desirability* refers to *place*.

The following considerations have been taken into account in considering need & desirability of the project:

- The project will be located within a well established industrial park.
- The property is zoned Industrial Zone II that permits crematoriums and the Mossel Bay municipality advised the Applicant to select a property in the industrial park.
- Bulk services are already available.
- Accessibility of the site via existing road infrastructure in place.
- No natural environmental features likely to be impacted due to the transformed nature of the site.
- The site is located far from the closest residential area (this is a requirement for Crematoriums to not have permanent occupancy within 500m from the facility).
- There is a growing demand for additional cremation services with George having the closest operating crematorium.

## 10 POTENTIAL RISKS / CONSTRAINTS / ISSUES

The project team and specialist input have identified the following as potential key issues/concerns/impacts.

The public participation process will help identify any additional potential concerns, risks and impacts (both positive and negative) that may arise from this development proposal.

- Air pollution risk associated with emissions i.e. health risk
- Odours associated with emissions and operations
  - Time frames for holding remains prior to cremation
  - Conditions where remains will be kept prior to cremation
- Providing a service that does not exist in the immediate Mossel Bay area (closest crematorium is located in George)
- Ensuring compliance with conditions of approval
- Measures available to enforce conditions or approval and/or how to deal with non-compliance if nuisance or prescribed emission/odour levels are exceeded

**Table 1: Potential impacts/risks associated with the proposed development as broken up into specific disciplines.**

Possible Constraints	Specialist Input
Air quality	<p>The results of provisional dispersion modelling show that the estimated maximum ground-level concentrations of all controlled pollutants as a result of maximum allowed emissions from the Mossel Bay Crematorium is likely to be below ambient air quality standards, where these exist (Source: Chris Albertyn, Letabo Air Quality specialists – appointed specialist).</p> <p>The maximum ground-level concentrations of Hg and PCDD/F are likely to be very low and are not expected to pose a health risk (Source: Chris Albertyn, Letabo Air Quality specialists – appointed specialist)..</p> <p>The detailed air quality specialist study must confirm the impact of the proposed crematorium's emissions on air quality in the Mossdustrua area.</p> <p>Crematorium emissions must be verified by a reputable and independent contractor on an annual basis, as required by</p>



	GN893. All results obtained over time must be used to calculate more representative average pollutant emission values.
Operational conditions	Operational protocols to be specified.

## 11 CONCLUSION

The scoping exercise is a very important part of the environmental investigation process. It aims to present concept proposals to the public and potential Interested & Affected Parties and for stakeholders to help identify environmental issues and concerns raised as a result of the proposed development alternatives to date. This allows Interested & Affected Parties (I&APs), authorities, the project team, as well as specialists to provide input and raise issues and concerns, based on the information presented in this report.

The proposed *Mossel Bay Crematorium* development site has been considered from Botanical, Faunal, Freshwater, Agricultural, Heritage, Palaeontological and Terrestrial biodiversity perspectives, and the constraints and anticipated risks, impacts and consequences identified.

Based on site sensitivity verification on all of the above disciplines, as well as consultation with the DEADP and GRDM, the recommendation is for an Air Quality Impact Assessment to be undertaken to inform the impact assessment phase, as well as the Air Emissions License application *prior* to decision-making.

Comments on this draft scoping report must be submitted, in writing, by no later than 22 May 2023 to the following person:

Louise-Mari van Zyl @ *Cape EAPRac*

[louise@cape-eaprac.co.za](mailto:louise@cape-eaprac.co.za) / PO Box 2070, George, 6530

Our offices can also be contacted at 044-8740365.

NOTE: I&APs who wish to register for this process as a stakeholder must provide detailed reasons for their interest/reason for participating. Furthermore, stakeholders must take note that their submissions and contact details may be published as part of the documents that go out for general public review and to the competent authority.

**MAIN REPORT**

## 1 INTRODUCTION

**Cape EAPrac** has been appointed by Pretorius Trust, hereafter referred to as the Applicant, as the independent environmental practitioner to facilitate the **Scoping & Environmental Impact Assessment (EIA)** process required in terms of the National Environmental Management Act (NEMA, Act 107 of 1998 as amended), as well as the national Environmental Management: Air Quality Act (NEMAQA), for the proposed **Mossel Bay Crematorium** development that will be located within an existing building on Erf 50 situated in the Mossdustria industrial park, Mossel Bay.

According to the Mossel Bay Municipal Spatial Development Framework (SDF) the proposed project falls within an existing industrial park (MossDustria, Industrial Zone II). The **Applicant's** objective is to develop a crematorium for the cremation of human and animal (specifically pet and veterinary) remains.

The proposed development requires the necessary **Environmental Authorisation (EA)**, as well as an **Air Emission License (AEL)** prior to commencement/operation. The **Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)** is the competent decision-making authority in terms of NEMA, whilst the **Garden Route District Municipality (GRDM)** issues the AEL. To inform these decisions, a **Full Scoping & Impact Assessment process** must be followed.

To capture stakeholder engagement and provide a transparent public participation process, a **Draft Scoping Report** is made available to registered Interested and Affected Parties (I&APs) for a **30-day review and comment** period commencing on **19 April 2023 and ending on 22 May 2023**.

The DEADP **accepted the formal Application Form** on 12 April 2023, instructing that the Final Scoping Report must be submitted, inclusive of stakeholder input, no later than 24 May 2023 (44-days from submission of the Application Form).

The steps to be followed from now onwards include:

- Consider comments received in response to the Draft Scoping Report;
- Submit the Final Scoping Report with all submissions/comments/responses to the Department for consideration within the stipulated timeframe;
- If the Final Scoping Report is accepted, then compile the draft Environmental Impact Report (EIR) and AEL Application and circulate it to registered I&APS review and comment for a further 30-day comment period;
- Consider, respond to and include all comments received during abovementioned DEIR / AEL and include them in the Final EIR / AEL;
- Submit the Final EIR / AEL to DEA&DP and the GRDM for decision-making (grant or refuse authorisation);
- DEADP to issue Environmental Authorisation (decision to refuse or approve the application)
- GRDM to issue Provisional Air Emission License
- Following monitoring of air quality for a minimum period of one year, if deemed within standards, the GRDM may issue a Permanent AEL.

## 1.1 **PUBLIC PARTICIPATION Process**

The scoping phase includes the distribution of the **Draft Scoping Report** to potential Interested and Affected Parties (I&APs) for review and comment.

The following also forms part of the stakeholder engagement process:

- Placing and advert in the *Mossel Bay Advertiser* and *South Cape Burger* calling for I&AP registrations and informing the public of the availability of the draft Scoping Report and where it can be viewed (advert appears in newspapers of 14 April 2023);
- Making the draft Scoping Report available on the *Cape EAPrac* website / Garden Route District Municipality and Mossel Bay Municipality's websites;
- Putting up site notices at the entrance to the site informing the public of the process and proposed development (done on 14 April 2023);
- Send out written notifications to potential stakeholders as determined in the NEMA Regulations, including mandated Authorities, local Councillor, the District and Local Municipality's, immediate neighbouring property owners;
- A stakeholder register has been opened and will be maintained throughout the application.

Comments and submissions received during the draft scoping phase will be captured and reflected in the Final Scoping Report.

All reports will be available for a minimum commenting period of 30-days throughout the process, as prescribed in the Environmental Regulations.

The Final Scoping Report will be submitted to the DEADP for decision-making and registered I&APs will be notified that it is available for information and viewing once submitted.

## **2 GENERAL DESCRIPTION OF THE SITE AND CONTEXT**

Erf 50 (Industrial Zone II zoning) is located in the MossDustria industrial complex (Mossel Bay) and is a developed site with numerous buildings individually being leased for various purposes (Figure 1). At the time of conducting scoping, there were woodwork, sandblasting, storage and a small tannery operating from the four (4) existing buildings on the property. The property is surrounded by existing industrial buildings and roads.

The property is covered in gravel and no vegetation or water courses are present in the location of the Crematorium. The property is located approximately 10 kilometers east of Mossel Bay and access is via the N2, R327 and Voortrekker Street (Figure 1).



Figure 7: Existing building on Erf 50 where the Applicant wishes to establish and operate a Crematorium.



Figure 8: Existing building where the Applicant wishes to establish and operate a Crematorium (indicated with yellow arrow).

### 3 PROPOSED DEVELOPMENT

The Pretorius Trust is proposing to convert an existing structure, that housed a sandblasting operation till very recently, to a Crematorium for human and animal remains.

The existing brick, steel and corrugated iron building (152.44m<sup>2</sup>) located on Erf 50 MossDustria will be modified to accommodate a stack, three (3) cremators and internal changes for an office and off-loading area.

The only addition to the building will be the stack pipes from the three cremators that will go through the southern wall and be combined into one central stack (14 meters) that will be located against the southern wall rising above the roof.

The closest residential areas are approximately 4.5 km east of the south-eastern boundary of the site. This is deemed important since it is advised to not have such a facility in proximity to areas with permanent occupancy i.e. residential homes (500m distance recommended as a minimum).

The proposal is to operate 24 hours per day, seven (7) days per week, 52 weeks per year, with two (2) one-day shutdowns planned for Good Friday and Christmas.

The crematorium will operate with two (2) cremators, with an average of 32 cremations that could be exercised per day i.e. 16 per cremator. A third cremator will be installed, but will solely serve as a backup unit while one of the other units is offline or due to maintenance, breakdown, etc. This ensures that human/animal remains are not stored for unnecessary long periods in the event of a breakdown/maintenance.

Human remains will be received at the crematorium facility in caskets and will be delivered by undertakers who will bring the remains to the facility in suitable vehicles. The vehicles will have a dedicated entrance into the building from where the remains will be off-loaded in a controlled environment i.e. there will be no deliveries done outside the building itself.

Animal remains will be received at the crematorium facility via the service providers used by the veterinary/animal welfare fraternity. Vehicles will offload the remains through a dedicated entrance into the building as a controlled environment. There will be no deliveries done outside the building itself.

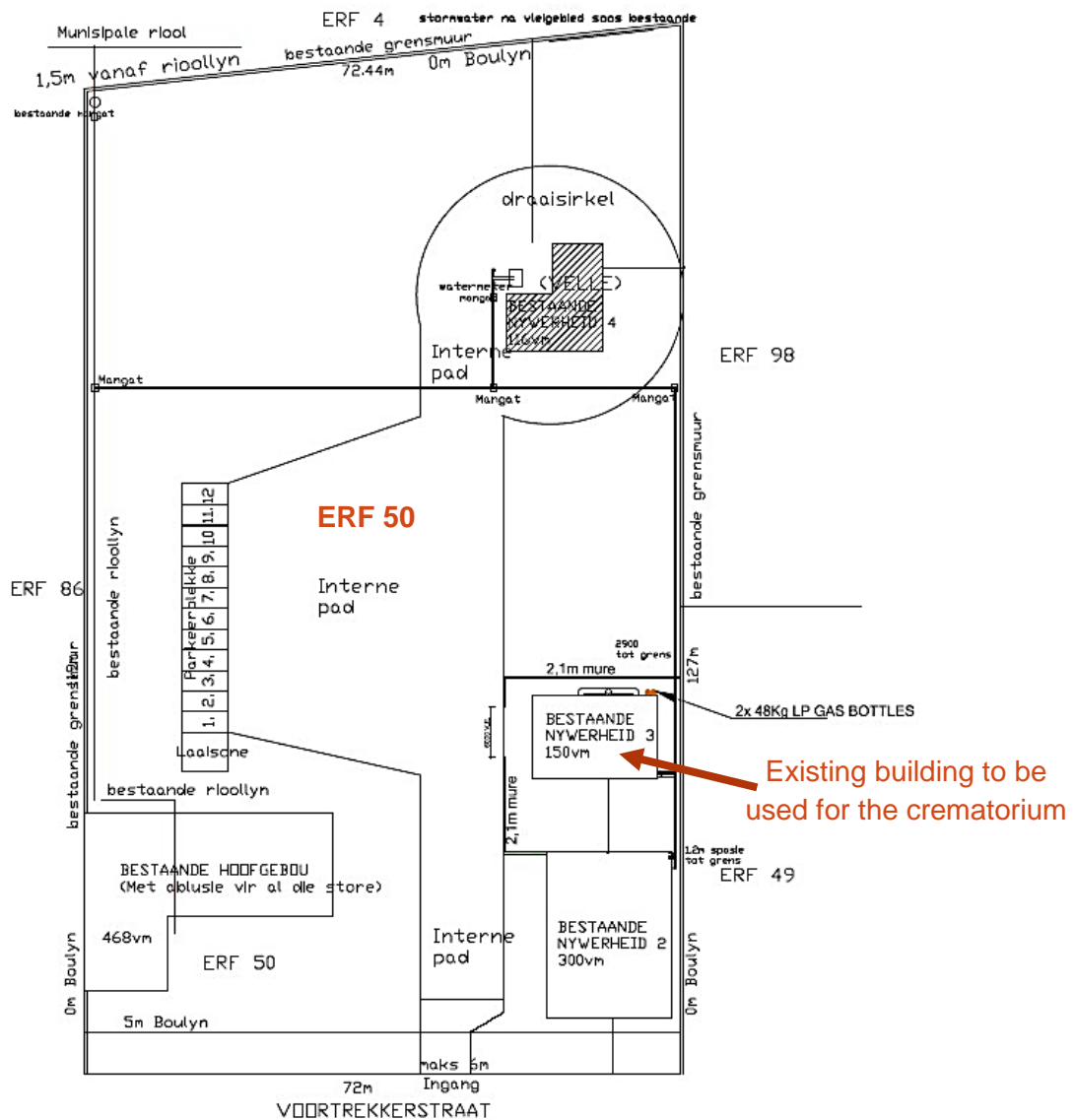
Human and/or animal remains will be placed into cremators/cremators at temperatures ranging between 800 - 900 °C. Typical cremation times will vary, depending on the body size. An afterburner will increase the flue gas temperature to approximately 1200 °C once the remains have been deposited in the cremator/cremator.

The cremator/cremator will be fired with liquid petroleum gas (LPG). During the cremation process, a large mass of the organic matter is vaporised and oxidised due to the very high temperatures. Gases are discharged through the stack and emissions levels will be monitored.

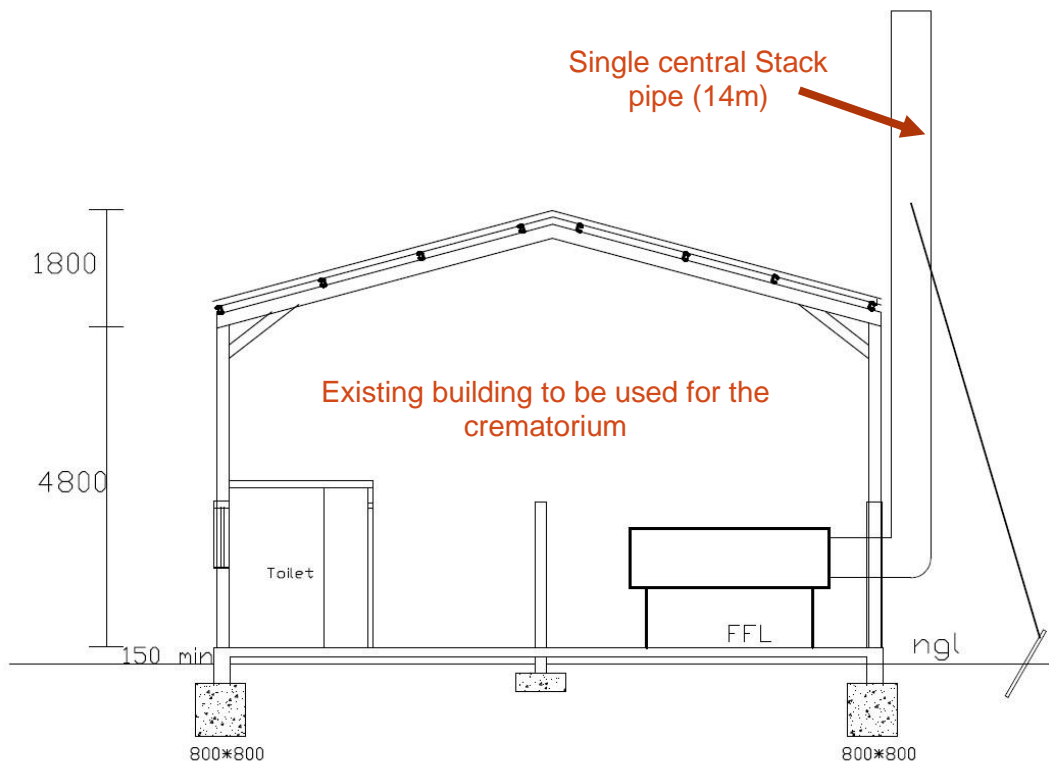
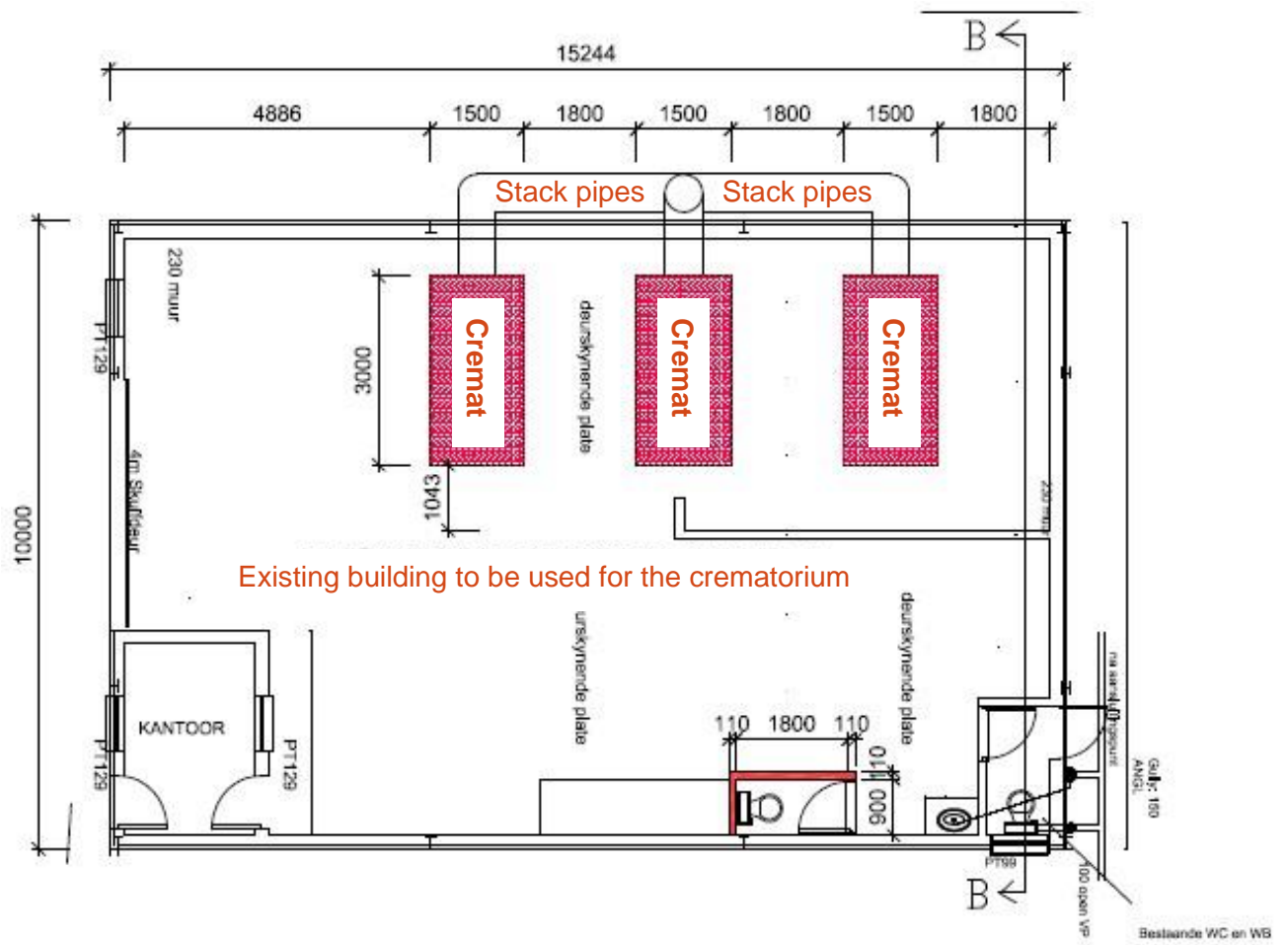
What remains after cremation is ash, dry bone fragments (consisting mainly of calcium phosphates), minor minerals and metal prosthetic components, e.g. hip joints. After the cremation, the bone fragments are swept out of the cremator/cremator and crushed in-house into smaller grains and chips by use of a cremulator. The crushed remains are handed back to the undertaker that will in turn hand them over to the family.

Metal prosthetic components, e.g. hip joints will also be handed over to the undertaker that will in turn hand them over to the family. Cremated animal remains will also be crushed in-house and handed back to the owner. Should the owner not claim the remains they will be temporarily stored on-site in air tight containers. The crematorium owner will purchase a grave(s) at the municipal graveyard and will deposit uncollected, stored remains in said grave(s) once it reaches the volume required to fill and close the purchased grave.

The site development plan is depicted in the next figures and a larger version is also attached to this report as Appendix E.







### **3.1 SERVICES AND ACCESS**

Erf 50 (Industrial Zone II zoning) is located in the well established MossDustria industrial complex (Mossel Bay). Erf 50 is a developed site with numerous buildings individually being leased for various purposes. The complex, erf 50 and the existing building that will be used for the crematorium is fully serviced (municipal) in terms of water, electricity, sewage, solid waste and stormwater. The MossDustria complex has a fully developed municipal road network that provides access to the various businesses located within the complex, including erf 50.

## **4 LEGISLATIVE AND POLICY FRAMEWORK**

The legislation that is relevant to this study is briefly outlined below. These environmental requirements are not intended to be definitive or exhaustive but serve to highlight key environmental legislation and responsibilities only.

### **4.1 THE CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA**

The Constitution of the Republic of South Africa (Act 108 of 1996) states that everyone has a right to a non-threatening environment and that reasonable measure are applied to protect the environment.

This includes **preventing pollution** and promoting conservation and environmentally **sustainable development**, while promoting **justifiable social and economic development**.

### **4.2 ENVIRONMENT CONSERVATION ACT, 1989 (ECA)**

The **EIA** regulations contained in the Environmental Conservation Act (ECA) have been replaced by the NEMA, however the provisions included in this legislation are still applicable. In particular, compliance with the draft regulations pertaining to noise as published in the province of Western Cape Provincial Extraordinary Gazette as provision made in section 25 of the ECA), as well as **Section 24** of the ECA regarding waste management and Section 20 of the ECA dealing with waste management under Part IV, **Control of Environmental Pollution**.

### **4.3 NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NEMA, ACT 107 OF 1998)**

The National Environmental Management Act (**NEMA**, Act 107 of 1998, as amended), makes provision for the identification and assessment of **activities** that are potentially detrimental to the environment and which require authorisation from the competent authority (**in this case, the provincial Department of Environmental Affairs and Development Planning**) based on the findings of an Environmental Assessment.

It embraces the notion of **sustainable development** as contained in the Constitution of South Africa (Act 106 of 1996) in that everyone has the right:

- to an environment that is not harmful to their **health or wellbeing**; and
- to have the **environment protected** for the benefit of present and future generations through reasonable legislative and other measures.

**NEMA** aims to provide for cooperative environmental governance by establishing principles for decision-making on all matters relating to the environment and by means of Environmental Management Plans / Programmes (**EMP**).

Principles contained in Section 2 of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended (NEMA), which, amongst other things, indicates that environmental management should:

- In order of priority aim to: **avoid, minimise or remedy disturbance of ecosystems and loss of biodiversity;**
- **Avoid degradation of the environment and avoid jeopardising ecosystem integrity;**
- Pursue the **best practicable environmental** option by means of **integrated environmental management;**
- **Protect the environment as the people's common heritage;**
- **Control and minimise environmental damage;** and
- Pay specific attention to **management and planning procedures** pertaining to sensitive, vulnerable, highly dynamic or stressed ecosystems.

It is incumbent upon the proponent to show how the proposed activities would comply with these principles and thereby contribute towards the achievement of sustainable development as defined by the NEMA.

The proposed development entails a number of listed activities to the NEMA and NEMAQA, which require a **Scoping & Environmental Impact Reporting (S&EIR) process**, that must be conducted by an independent, registered environmental assessment practitioner (EAP). *Cape EAPrac* has been appointed to undertake this process. The Principle EAP is registered with the Environmental Assessment Practitioners of South Africa (EAPASA), Registration Number 2019/1444.

#### **4.4 NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY (ACT 10 OF 2004)**

This Act controls the management and conservation of South African biodiversity within the framework of NEMA. Amongst others, it deals with the protection of species and ecosystems that warrant national protection, as well as the sustainable use of indigenous biological resources. Sections 52 & 53 of this Act specifically make provision for the protection of critically endangered, endangered, vulnerable and protected ecosystems that have undergone, or have a risk of undergoing significant degradation of ecological structure, function or composition as a result of human intervention through threatening processes.

The site is transformed and where the Crematorium is proposed there are no remanent natural habitat.

##### **4.4.1 The National Spatial Biodiversity Assessment (NBA)(2011)**

The NBA 2011 assesses the state of South Africa's biodiversity, across terrestrial, freshwater, estuarine and marine environments, emphasising spatial (mapped) information for both ecosystems and species. The NBA is central to fulfilling the South African National Biodiversity Institute's (SANBI) mandate in terms of the National Environmental Management: Biodiversity Act (Act 10 of 2004) to monitor and report regularly on the state of biodiversity, and includes two headline indicators that are assessed across all environments: **ecosystem threat status**

and **ecosystem protection level**. Information from the NBA can thus be used to streamline environmental decision-making, strengthen land-use planning, strengthen strategic planning about optimal development futures for South Africa, and identify priorities for management and restoration of ecosystems with related opportunities for ecosystem-based job creation.

The site is transformed and where the Crematorium is proposed there are no remanent natural habitat.

**CapeNature will be approached for comment.**

#### **4.4.2 Garden Route Biodiversity Sector Plan (GRBSP)**

A Biodiversity Sector Plan (BSP) provides a way forward in reconciling the conflict between development and the maintenance of natural systems. It provides biodiversity information needed for land-use planning and decision-making and other multi-sectoral planning processes (between Cape Nature / SANParks, DEA&DP and Department of Water Affairs, district and local municipalities etc.). Central to the Garden Route BSP is the **Critical Biodiversity Area (CBA) Map**, which together with its associated guidelines and GIS maps, have been consulted in the assessment of this development proposal.

The site is transformed and where the Crematorium is proposed there are no remanent natural habitat.

**CapeNature will be approached for comment.**

#### **4.5 NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The protection and management of South Africa's heritage resources are controlled by the National Heritage Resources Act (Act No. 25 of 1999). Heritage Western Cape (HWC) is the enforcing authority in the Western Cape, and is registered as a Stakeholder for this environmental process.

A Notice of Intent to Develop (NID) has been submitted to HWC who commented on the NID by requesting that a **Heritage Impact Assessment (HIA)** be conducted to assess the following heritage resources: built environment, historic townscape and archaeological.

The HIA must thus consist of an archaeological study, a built environment study as well as an assessment of the impact on the cultural landscape of the settlement. An integrated set of recommendations have been requested by HWC.

The following triggers in terms of the NHRA are applicable to the proposed development:

**Section 34 (1)** No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority. **Buildings older than 60 years or with heritage significance will be altered as part of the proposed development – approval for such activities are being applied for from HWC.**

**Section 35 (4)** No person may destroy, damage, excavate, alter or remove from its original position, or collect, any archaeological material or object, without a permit issued by the SAHRA, or the responsible resources authority. **If archaeological materials are exposed during vegetation clearing and/or earth moving activities, then they must be dealt with in accordance with the National Heritage Resources Act (No. 25 of 1999). An**

**archaeological impacts assessment is being conducted as part of the Environmental Process.**

**Section 36 (1)** Where it is not the responsibility of any other authority, SAHRA must conserve and generally care for burial grounds and graves protected in terms of this section, and it may make such arrangements for their conservation as it sees fit.

**Section 36 (3)** Nor may anyone destroy, damage, alter, exhume or remove from its original position, or otherwise disturb, any grave or burial ground older than 60 years, which is situated outside a formal cemetery administered by a local authority, without a permit issued by the SAHRA, or a provincial heritage authority, in terms of Section 36 (3).

**Section 38 (1)** Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as—

- (a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
- (b) the construction of a bridge or similar structure exceeding 50 m in length;
- (c) any development or other activity which will change the character of a site—
  - (i) exceeding 5 000 m<sup>2</sup> in extent; or
  - (ii) involving three or more existing erven or subdivisions thereof; or
  - (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
  - (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
- (d) the re-zoning of a site exceeding 10 000 m<sup>2</sup> in extent; or
- (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority.

The activity is not affected a historical building with limited excavations and on a site that has already been earmarked and developed for industrial purposes, as such cultural landscape and context is not impacts.

**Heritage Western Cape will be approached for comment.**

#### **4.6 NATIONAL WATER ACT, NO 36 OF 1998**

The National Water Act (NWA) gives effect to the **constitutional right of access** to water. The Act's overall purpose is to ensure that South Africa's water resources are protected, used and managed in ways which take into account a number of factors, including inter-generational equity, equitable access, redressing the results of past racial and gender discrimination, promoting sustainable and beneficial use, facilitating social and economic development, and providing for water quality and **environmental protection**.

The NWA makes persons who own, control, occupy or use land responsible for taking measures to prevent pollution of water resources, and empowers Government authorities to take measures to enforce this obligation. A Catchment Agency may enforce these obligations and recover costs from those responsible or from those who benefited from the measures.

**The Breede Gourits Catchment Management Agency (BGCMA) has confirmed that the proposed development will not require a Water Use Application.**

#### **4.7 NATIONAL ENVIRONMENTAL MANAGEMENT AIR QUALITY ACT (Act 39 of 2004)**

The National Environment Management: Air Quality Act 39 of 2004 intends:

- to reform the law regulating air quality in order to protect the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development while promoting justifiable economic and social development;
- to provide for national norms and standards regulating air quality monitoring, management and control by all spheres of government;
- for specific air quality measures; and
- for matters incidental thereto.

An **Air Emission License (AEL)** must be obtained from the GRDM prior to operations commencing. A Provisional AEL will be issued if the activity is deemed acceptable and the Authority monitor compliance with the set conditions and standards for operation. If the Applicant maintains standards, the Authority will consider issuing a permanent AEL which will still require regular monitoring.

If however the Authority is not satisfied with operational conditions during the period the Provisional AEL is valid, the Applicant will be instructed to improve, or cease operations till compliance can be ensured.

**GRDM has been approached for comment and guidance on the AEL and ToR for the Air Quality Impact Assessment.**

#### **4.8 GUIDELINE ON NEED & DESIRABILITY (DEADP 2017)**

Although there are a number of applicable guidelines the Guideline on Need & Desirability is considered important because it relates directly to the questions of rural development and how/if it should be done. Other relevant guidelines are also considered applicable and listed in 4.14.

The Guideline on Need and Desirability (2017) compiled by the Department of Environmental Affairs contains information on best practice and how to meet the peremptory requirements prescribed by the legislation and sets out both the strategic and statutory context for the consideration of the need and desirability of a development involving any one of the NEMA listed activities.

Need and desirability is based on the principle of sustainability, set out in the Constitution and in NEMA, and provided for in various policies and plans, including the NDP. Addressing the need and desirability of a development is a way of ensuring sustainable development – in other words, that a development is ecologically sustainable and socially and economically justifiable – and ensuring the simultaneous achievement of the triple bottom-line.

#### **4.9 APPLICABLE GUIDELINES FOR ENVIRONMENTAL APPLICATION PROCESSES**

The following guidelines have been used to inform the process to date as well as relevant specialist studies, although this is not an exhaustive list it does highlight those developed by the Department of Environmental Affairs *inter alia*, the following:

- Guideline for determining the Scoping of Specialist involvement in the EIA process (2005)
- Guidelines on Alternatives (2013)
- Guideline on Public Participation (2013)
- Guidelines for involving Heritage Specialists in the EIA process (2005)
- Guideline for reviewing Specialist Reports in the EIA process (2005)
- Guidelines for environmental management plans (2005)
- Circular EADP 0028/2014: One Environmental Management System
- Specialist Protocols (May 2020 & October 2020)

#### **4.10 PROVINCIAL SPATIAL DEVELOPMENT FRAMEWORK FOR THE WESTERN CAPE**

The PSDF coordinates, integrates and aligns Provincial plans and development strategies with policies of National Government; the plans, policies and development strategies of Provincial Departments; and the plans, policies and development strategies of municipalities. It is the common spatial reference framework for delivering on the Province's strategic Development priorities individually and collectively and therefore serves to guide the location and form of public investment in the natural and built environment, so that the returns on these investments are consistent with the PSGs.

#### **4.11 NATIONAL WASTE MANAGEMENT STRATEGY**

The National Waste Management Strategy presents the South African government's strategy for **integrated waste management** for South Africa. It deals among others with: Integrated Waste Management Planning, Waste Information Systems, Waste Minimisation, Recycling, Waste Collection and Transportation, Waste Treatment, Waste Disposal and Implementing Instruments.

#### **4.12 DEA&DP WASTE MINIMISATION GUIDELINE DOCUMENT FOR ENVIRONMENTAL IMPACT ASSESSMENT REVIEWS (MAY 2003)**

This Guideline raises awareness to waste minimisation issues and highlights waste and wastage minimization practices. Part B of this document is of particular importance, as it addresses issues of general waste and wastage minimization during construction activities. LAND USE PLANNING ACT, 2014 (ACT 3 OF 2014) (LUPA)

LUPA gives effect to SPLUMA in the Western Cape Province. Section 49 of the LUPA gives the basis of assessment of land use applications. It states that when a Municipality considers and decides on a land use application, the municipality must have regard to at least:

- the applicable spatial development frameworks;
- the applicable structure plans;
- the principles referred to in Chapter VI (Section 59 - land use planning principles);
- the desirability of the proposed land use; and
- guidelines that may be issued by the Provincial Minister regarding the desirability of proposed land use (none issued to date).

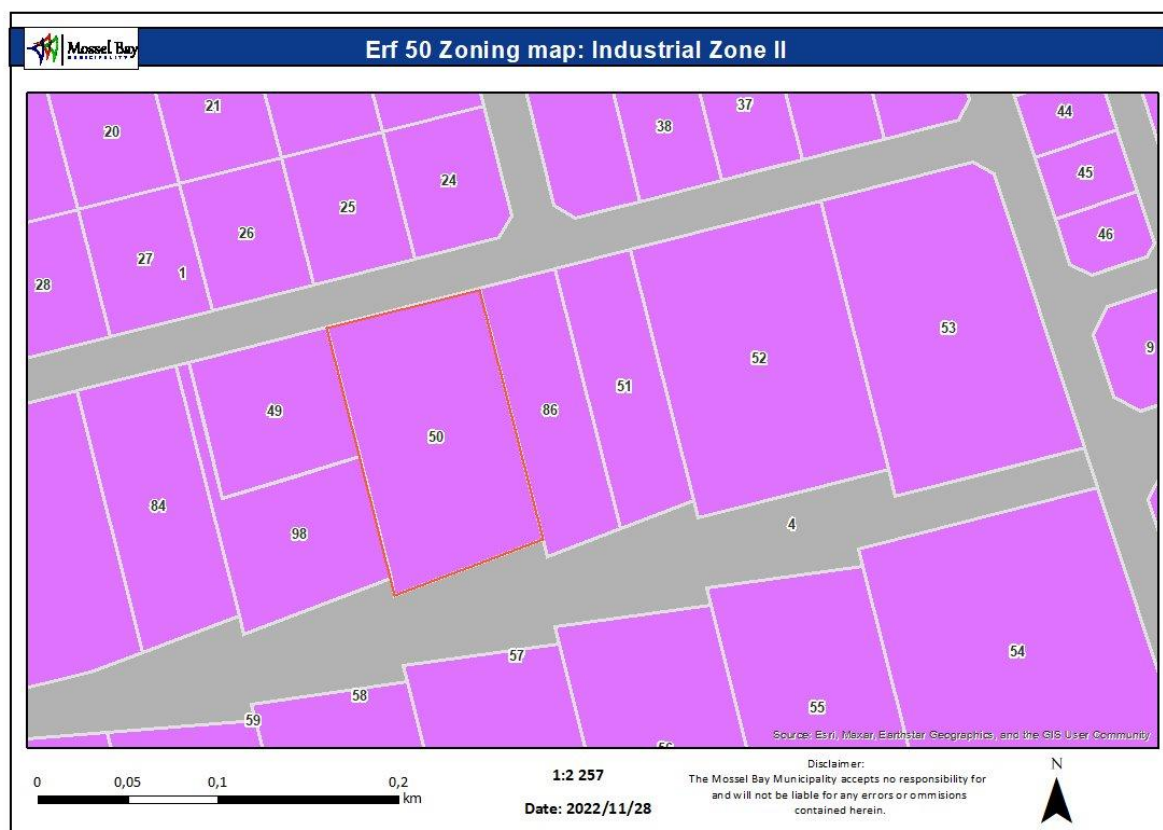
#### **4.13 LAND USE PLANNING BY-LAW FOR MOSSEL BAY MUNICIPALITY**

The Mossel Bay Municipality: Land Use Planning By-Law, 2015 lists in Section 65 the general criteria for the consideration of applications in terms of the by-law which includes amongst other:



- the desirability of the proposed utilisation of land;
- the impact of the proposed land development on municipal engineering services;
- the integrated development plan, including the municipal spatial development framework, the applicable local spatial development framework and/or local structure plans;
- relevant municipal policies;
- the provincial spatial development framework;
- Section 42 of SPLUMA;
- the land use planning principles of LUPA; and
- the provisions of the zoning scheme.

The Applicant has reached out to the Mossel Bay Municipality as part of his due diligence and the Planning Directorate has confirmed that the proposed land use is compatible with the applicable zoning and spatial planning. **MossDustria is the only area within the greater Mossel Bay area the Municipality will consider a Crematorium.**



#### 4.14 RELEVANT GOVERNMENT AIR QUALITY REGULATIONS

- "List of Activities That Result in Atmospheric Emissions" as published in Government Notice 893 of 22 November 2018 (GN893), as amended
- "National Ambient Air Quality Standards" as published in Government Notice 1210 of 24 December 2009 (GN1210)
- "Regulations Regarding Air Dispersion Modelling" as published in Government Notice GN R.533 of 11 July 2014 (GN R.533)

#### **4.15 GARDEN ROUTE DISTRICT MUNICIPALITY AIR QUALITY MANAGEMENT PLAN (AQMP)**

The Garden Route District Municipality pursues the vision and mission of its AQMP through a series of nine objectives. These objectives are aimed at enhancing the District's role as manager of air quality in the region.

Objective 1: Set Air Quality Goals

Objective 2: Set Up Air Quality Management System

Objective 3: Carry Out Risk Assessments

Objective 4: Assess and Select Control Measures

Objective 5: Implement Intervention and Monitoring Effectiveness

Objective 6: Revise Air Quality Goals

Objective 7: Integrate the AQMP into the IDP

Objective 8: Compliance Monitoring, Enforcement and Control

Objective 9: Review the Air Quality Management Plan

## **5 ENVIRONMENTAL ATTRIBUTES OF THE SITE**

According to the National Screening Tool used to help identify potential environmental themes that may require investigation/assessment in terms of an environmental application process, the following disciplines have been identified:

<b>Theme</b>	<b>Very High sensitivity</b>	<b>High sensitivity</b>	<b>Medium sensitivity</b>	<b>Low sensitivity</b>
Agriculture Theme			X	
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme		X		
Defence Theme				X
Paleontology Theme		X		
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

It is noted that the site sensitivity for each of these themes, must be verified by the Environmental Assessment Practitioner (EAP) or a specialist through a Site Sensitivity Verification exercise.

Based on the outcome of this exercise, as well as consultation with the DEADP, it was confirmed that these themes are not applicable for the most part, most notably because of the existing transformed nature and site location within an existing industrial park.

Botanical, Faunal and Aquatic are presented in more detail below, however the following comments are submitted on the remaining themes:

- **Agriculture:** The site is not zoned, nor utilised for agricultural purposes. There is no reason for an agricultural study to be undertaken despite the sensitivity rating indicated as Medium. This rating has been refuted and the theme deemed to be not applicable;
- **Civil Aviation:** Although the site is located within 15km from the Mossel Bay Airport, the provision of a stack at 14m height does not trigger the Civil Aviation Regulations. The South African Civil Aviation Association (SACAA) will be consulted for comment to verify.
- **Defence:** The site is not in proximity to any military base and poses no threat to military operation in the area.
- **Biodiversity:** The site is not deemed sensitive from a botanical, faunal or aquatic perspective. The sensitivity rating of Very High is refuted. CapeNature will be consulted for verification.

Notably **air quality** as a specialist theme is absent from this populated list of studies. However consider the type of activity and the potential impacts that are mostly associated with air quality, it was determined that an Air Quality Impact Assessment will be required as a specified specialist study, to inform decision-making.

### 5.1 VEGETATION

The proposed development falls within an existing industrial complex (MossDustria) and will be contained within an existing building on Erf 50. The property has a gravel surface and contains existing infrastructure with associated industrial activities that take place on-site.

The proposed activity will not result in the removal of any vegetation or natural habitat since modifications required to accommodate the crematorium within an existing building (concrete floor) are limited to the existing building only and immediate surrounding transformed area only.



Figure 9: Critical Biodiversity Area indicated for the MossDustria Industrial Park (Crematorium site not affected).





Figure 10: Ecosystem Threat Status indicated as Least Threatened (2011).

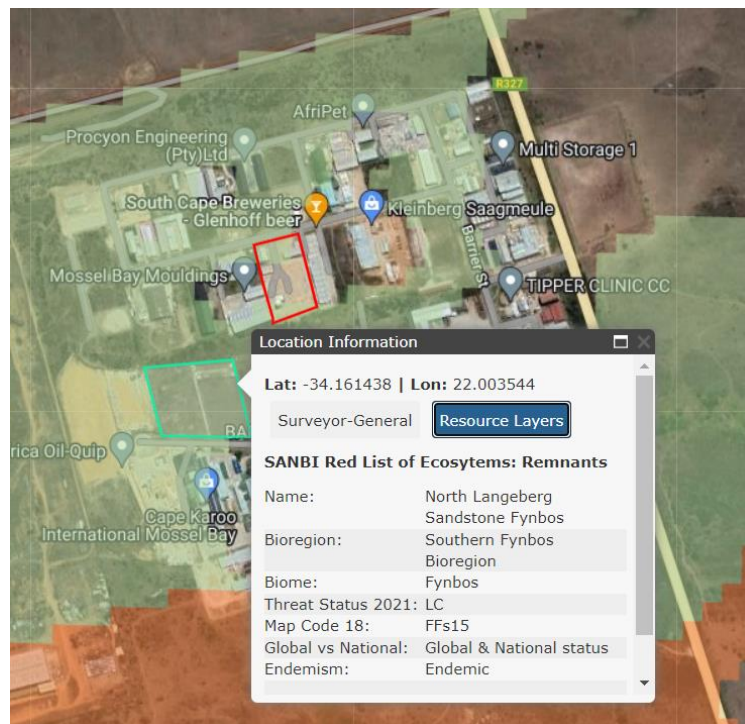


Figure 11: Remnant natural ecosystem with threat status indicated as Least Threatened North Langeberg Sandstone Fynbos (2021).



Figure 12: Erf 50 (red outlined area) situated in MossDustria (Source: Google Earth, imagery date 20/11/2022)

The site is not affected by the classification of endangered or critically endangered vegetation and/or ecosystem threat statuses either according to the previous 2011 or newly (2021) Gazetted Ecosystem Threat Status. Regardless, the site is transformed and the activity will not result in the loss of habitat or further transformation of natural habitat.

The area falls outside of the Critical Biodiversity Area and Ecological Support Areas (ESAs).

## 6 FAUNAL CONSIDERATIONS

The proposed development falls within an existing industrial complex (MossDustria) and will be contained within an existing building on Erf 50. The property has a gravel surface and contains existing infrastructure with associated industrial activities that take place on-site. The proposed activity will not result in the removal of any vegetation or natural habitat since modifications required to accommodate the crematorium within an existing building (concrete floor) are limited to the existing building and immediate transformed surrounding areas only.





Figure 13: Site photos (Date: 16/09/2022)

## 7 FRESHWATER CONSIDERATIONS

The proposed development falls within an existing industrial complex (Mossdustrai) and will be contained within an existing building on site. The site contains existing infrastructure and industrial activities take place on-site. No watercourses are present on the property or within



the existing building / transformed area that will house the crematorium. The closest NFEPA watercourse is indicated approximately 130m southeast of the structure on Erf 50.

Consultation with the BGCMA has confirmed that no water use applications will be necessary to inform decision-making.

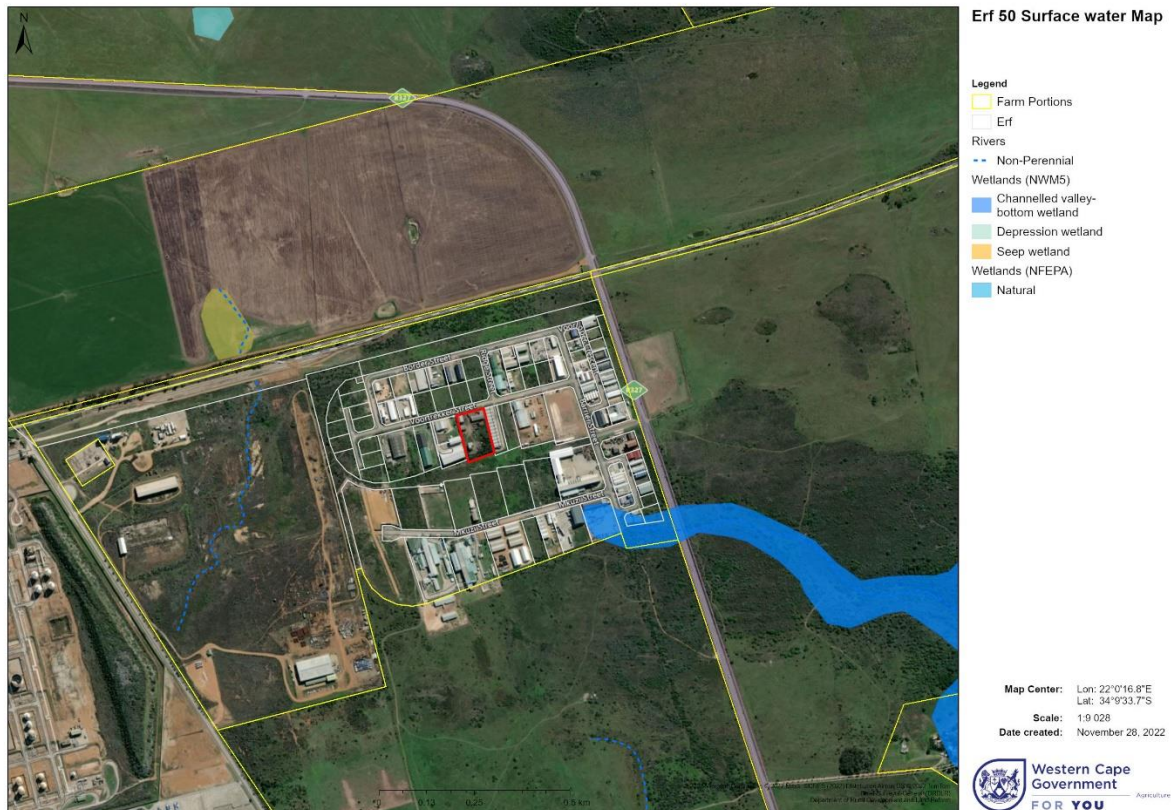


Figure 14: River & Wetland Map of the proposed development (Site indicated with a red line) (CapeFarmMapper,2022).

## 8 HERITAGE CONSIDERATIONS

The proposed development is located in an existing industrial complex and will be contained within an existing building on the project site. No earthworks will take place in any untransformed area. The site contains existing industrial infrastructure that is not older than 60 years, and existing industrial activities take place on-site as such there will be impact on cultural landscape either.

Heritage Western Cape will be consulted and requested to verify that no specific heritage related studies are required.

## 9 AIR POLLUTION CONSIDERATIONS

Air pollutant emissions generated during the cremation process are emitted into the atmosphere through a single 14-meter high stack that will be fitted to the side of the building.

The cremation activity proposed is included in Government Notice 893 of 22 November 2018 (GN893), as amended. The activity falls under the following category: Subcategory 8.2: Crematoria and Veterinary Waste Incineration for the cremation of human and animal (particularly pets/veterinary waste) remains.

The results of the provisional dispersion modelling study show that the estimated maximum ground-level concentrations of all controlled pollutants as a result of maximum allowed emissions from the Mossel Bay Crematorium will most likely be below ambient air quality standards, where these exist.

Likewise the maximum ground-level concentrations of Hg and PCDD/F are also shown to be very low and are not expected to pose a health risk.

The detailed Air Quality Impact Assessment will provide more information about the likely extend of emissions from the facility which will consider aspects such as odour, as well as health risk aspects.

## 10 SUMMARY OF POTENTIAL RISKS AND IMPACTS

The project team and specialist input have identified the following as potential issues/concerns/impacts to date.

The public participation process will help identify any additional potential concerns, risks and impacts (both positive and negative) that may arise from this development proposal.

- Air pollution risk associated with emissions i.e. health risk
- Odours associated with emissions and operations
  - Time frames for holding remains prior to cremation
  - Conditions where remains will be kept prior to cremation
- Providing a service that does not exist in the immediate Mossel Bay area (closest crematorium is located in George)
- Ensuring compliance with conditions of approval
- Measures available to enforce conditions or approval and/or how to deal with non-compliance if nuisance or prescribed emission/odour levels are exceeded

**Table 22: Key impacts/risks associated with the proposed development as broken up into specific disciplines.**

Possible Constraints	Specialist Input
Air quality	Detailed air quality impact assessment to consider the level of emissions, control and monitoring standards, the dispersion of potential emissions and the level of significance of such, recommendations on design and/or mitigating measures that must be taken into account, as well as long-term monitoring requirements and conditions that will be important to ensure compliance should the development activity be authorised.
Operational controls	Details to be provided on operational protocols that must be adhered to.



## 11 ALTERNATIVES

### 11.1 ALTERNATIVE 1 (STATUS QUO)

The existing building on erf 50 located in the MossDustria industrial complex will continue to be used for industrial activities (activities unknown).

It is noted however that the Applicant has entered into a Lease Agreement with the Land Owner for the purposes of developing and operating a Crematorium in this location.

Furthermore, the Mossel Bay Municipality advised the Applicant that only within MossDustria will the Municipality consider the development and operation of a Crematorium. The absence of other alternative locations therefore favours MossDustria as suitable for such an activity.

### 11.2 ALTERNATIVE 2 (PREFERRED ALTERNATIVE)

The proposal allows for the development of a crematorium within an existing building of erf 50. The building footprint will not be increased and the only external change to the building will be the mounting of a 14-meter-high stack on an outside wall of the building.

The proposed activity will not result in the removal of any vegetation or natural habitat since modifications required to accommodate the crematorium within an existing building (concrete floor) are limited to the existing building only.

The location of the proposed crematorium within a designated Industrial Park (with zoning Industrial Zone II) is deemed appropriate by the Mossel Bay Municipality which advised the Applicant to select a site in this industrial complex rather than elsewhere.

**The outcome of the scoping process will help determine whether any other reasonable and/or feasible alternatives must be considered and investigated.**

## 12 PUBLIC PARTICIPATION PROCESS

Section 41 in Chapter 6 of regulation 982 details the public participation process that has to take place as part of an environmental process. The Environmental Process for the proposed development intends to **comply** with the public participation process (PPP) requirements as stipulated in the Regulations.

In accordance with the Regulations, the Full Scoping & Impact Assessment process must comply with the following:

1.	In terms of Regulation 41 of the EIA Regulations, 2014 (as amended) -			
(a)	fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of -			
(i)	the site where the activity to which the application relates is or is to be undertaken; and	YES	EXEMPTION	
(ii)	any alternative site.	YES	EXEMPTION	
(b)	giving written notice, in any manner provided for in section 47D of the NEMA, to –			
(i)	the occupiers of the site and, if the applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	YES	EXEMPTION	N/A

(ii)	owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	YES	EXEMPTION	
(iii)	the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;	YES	EXEMPTION	
(iv)	the municipality (Local and District Municipality) which has jurisdiction in the area;	YES	EXEMPTION	
(v)	any organ of state having jurisdiction in respect of any aspect of the activity; and	YES	EXEMPTION	
(vi)	any other party as required by the Competent Authority;	YES	EXEMPTION	N/A
(c)	placing an advertisement in -			
(i)	one local newspaper; or	YES	EXEMPTION	
(ii)	any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	YES	EXEMPTION	N/A
(d)	placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken.	YES	EXEMPTION	N/A
(e)	using reasonable alternative methods, as agreed to by the Department, in those instances where a person is desirous of but unable to participate in the process due to— (i) illiteracy;(ii) disability; or (iii) any other disadvantage.	YES	EXEMPTION	N/A
If you have indicated that "EXEMPTION" applies to any of the above, then the exemption notice must be attached as Appendix H				
2.	The NEM: AQA requires that a notice must be placed in at least two newspapers.			
If applicable, have/will an advertisement be placed in at least two newspapers?		YES	NO	

With respect to Item #1b(e) and #2:

- In addition to the Cape EAPrac website, the availability of the document has also been advertised on the Garden Route District Municipality and Mossel Bay Municipality websites to ensure transparency;
- The processes have been advertised in the *Mossel Bay Advertiser* and *Suid-Kaap Burger* on Friday, 14 April 2023.

## 13 NEED AND DESIREABILITY

In keeping with the requirements of an integrated Environmental Impact process, the DEA&DP *Guidelines on Need and Desirability (2010 & 2011 & 2013)* were referenced to provide the following estimation of the activity in relation to the broader societal needs. The concept of need and desirability can be explained in terms of its two components, where *need* refers to *time* and *desirability* refers to *place*. Questions pertaining to these components are answered in the Sections below.

### 13.1.1 Need (time)

**Is the land use considered within the timeframe intended by the existing approved Spatial Development Framework (SDF)? (I.e. is the proposed development in line with the projects and programmes identified as priorities within the credible IDP?)**

Yes.

Erf 50 is located in an existing industrial park (MossDustria) and is zoned as Industrial Zone II which permits a crematorium according to the Mossel Bay Zoning Scheme regulations. The proposed crematorium will be located within an existing building located on the property.

**Should the development occur here at this point in time?**

To be determined.

The location of the proposed crematorium within a designated Industrial Park is deemed appropriate by the Mossel Bay Municipality which advised the Applicant to select a site in this industrial complex. There is a need for additional cremation services within the Garden Route District.

**Does the community / area need the activity and the associated land use concerned?**

To be determined.

Stakeholders that register for EIA processes typically do so because of concerns they may have about a particular activity. It is not often that a stakeholder who favours an activity of this nature will register and/or participate in the process.

The outcome of the stakeholder engagement/scoping phase will help determine whether there is any aspects of the proposed activity the community may be concerned about. Such aspects will inform the remainder of the Full Scoping & Impact Assessment as well as the AEL application processes.

**Are the necessary services with adequate capacity currently available?**

Yes.

The proposed crematorium will be on erf 50 which is located in the well established MossDustria industrial complex. Erf 50 is a developed site with numerous buildings individually being leased for various purposes. The complex, erf 50 and the existing building that will be used for the crematorium is fully serviced (municipal) in terms of water, electricity, sewage, solid waste and stormwater. The MossDustria complex has a fully developed municipal road network that provides access to the various businesses located within the complex including erf 50.

**Is this development provided for in the infrastructure planning of the municipality?**

Yes.

Because Erf 50 is located in an existing industrial park (MossDustria) and is zoned as Industrial Zone II which permits a crematorium according to the Mossel Bay Zoning Scheme regulations.

**Is this project part of a national programme to address an issue of national concern or importance?**

No.

### 13.1.2 Desirability (place)

**Is the development the best practicable environmental option for this land / site?**

To be determined.

Because the proposed crematorium will be housed within an existing building located on Erf 50 in an existing industrial park (MossDustria) and is zoned as Industrial Zone II which permits a crematorium according to the Mossel Bay Zoning Scheme regulations, it is deemed a compatible land use within an area designated for nuisance activities.

A Crematorium would not be supported in proximity to permanent residential areas, thus the location i.e. place, is deemed suitable.

**Would the approval of this application compromise the integrity of the existing approved and credible municipal IDP and SDF?**

No.

The proposed crematorium will be housed within an existing building located on Erf 50 in an existing industrial park (MossDustria) and is zoned as Industrial Zone II which permits a crematorium according to the Mossel Bay Zoning Scheme regulations.

**Would the approval of this application compromise the integrity of the existing approved environmental management priorities for the area?**

There is no approved EMF for the area.

**Do location factors favour this land use at this place?**

Yes.

The proposed crematorium will be located within an existing industrial park, apart from residential areas. Industrial Parks are designed, in particular, to accommodate activities that may be deemed a nuisance activity i.e. result in noise, odour impacts.

Furthermore ambient air quality within an Industrial Park, in proximity to PetroSA which also influence air quality in this location, must be measured to still ensure compliance with acceptable emission standards.

**How will the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas?**

Highly unlikely.

The proposed development falls within an existing industrial complex (MossDustria) and will be contained within an existing building on Erf 50. The property has a gravel surface and contains existing infrastructure with associated industrial activities that take place on-site that already affects the cultural landscape.

The proposed activity will not result in the removal of any vegetation or natural habitat since modifications required to accommodate the crematorium within an existing building (concrete floor) are limited to the existing building and immediate surrounding transformed areas only.

**How will the development impact on people's health and wellbeing?**

To be confirmed.

Odour and health risks are known impacts resulting from Crematoriums. The air quality specialist study to be undertaken must determine the acceptable levels of impact through dispersion modelling and health risk assessments. Recommendations to design and/or operational monitoring will be important as outcomes to inform decision-making.

**Will the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?**

Unlikely.

Considering that the proposed crematorium will be on erf 50 which is located in the well-established MossDustria industrial complex designated for nuisance activities, the associated impacts are likely to be manageable through design/operational mitigation measures.

**Will the proposed land use result in unacceptable cumulative impacts?**

Unlikely.

Considering that the proposed crematorium will be on erf 50 which is located in the well-established MossDustria industrial complex designated for nuisance activities, the associated impacts are likely to be manageable through design/operational mitigation measures.

## **14 ASSUMPTIONS AND LIMITATIONS**

This section provides a brief overview of *specific assumptions and limitations* having an impact on this environmental application process:

- It is assumed that the information on which this report is based (specialist studies and project information, as well as existing information) is **correct, factual and truthful**.
- It is assumed that all the relevant **mitigation measures** and agreements by specialists will be implemented in order to ensure minimal negative impacts and maximum environmental benefits.
- It is assumed that Stakeholders and Interested and Affected Parties notified during the public participation process will submit all relevant **comments within the designated 30-days** review and comment period so that these can be included in future documentation associated with the Environmental Process.

## **15 PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT**

In compliance with section (i) of Appendix 2 of the 2014 Environmental Regulations, the following plan of study for undertaking the Environmental Impact Assessment Report is provided. In terms of these regulations the following must be included in this plan of study.

- (i) a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity [No-Go Alternative];
- (ii) a description of the aspects to be assessed as part of the environmental impact assessment process;
- (iii) aspects to be assessed by specialists;
- (iv) a description of the proposed method of assessing the environmental aspects, including a description of the proposed method of assessing the environmental aspects including aspects to be assessed by specialists;
- (v) a description of the proposed method of assessing duration, significance, nature, status, risk and consequences;
- (vi) an indication of the stages at which the competent authority will be consulted;
- (vii) particulars of the public participation process that will be conducted during the environmental impact assessment process; and
- (viii) a description of the tasks that will be undertaken as part of the environmental impact assessment process;
- (ix) identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

### **15.1 DESCRIPTION OF THE ALTERNATIVES TO BE CONSIDERED AND ASSESSED**

Although alternatives can include technology, site and location options, the assessment will focus on the comparative assessment of the following development alternatives unless otherwise determine through the assessments of specialists studies:

- Alternative 1 (no-go alternative)
- Alternative 2 (preferred alternative)

The possibility of additional alternatives identified through the scoping exercise is not excluded.

### **15.2 ASPECTS TO BE ASSESSED**

All potential impacts on social, biophysical and historical environments have been considered and reported on in the scoping report, as being unlikely.

Aspects to be assessed by specialists include amongst others the following:

#### **15.2.1 Air quality**

An **Air Quality Impact Assessment** must be undertaken due to the requirement of an Air Quality Emissions Licence that must be obtained in terms of the National Environmental Air Quality Act, 2004 (Act No. 39 of 2004).

As a minimum, this assessment must consider:

- Climatic conditions with a focus on wind directions
- Health risk & health impacts

- Emission dispersion modelling
- Stack conditions
- Emission rates
- Controlled pollutants
- Overall air quality
- Ground level concentrations
- Design / Operational requirements

### 15.2.2 ASSESSMENT METHODOLOGY

All possible impacts need to be assessed – the **direct, in-direct as well as cumulative impacts**. Impact criteria should include the following:

- **Nature of the impact:** impacts associated with the proposed Public Safety Centre development have been described in terms of whether they are negative or positive and to what extent.
- **Duration of impacts: Impact were assessed in terms of their anticipated duration:**
  - Short term (e.g. during the construction phase)
  - Medium term (e.g. during part or all of the operational phase)
  - Permanent (e.g. where the impact is for all intents and purposes irreversible)
  - Discontinuous or intermittent (e.g. where the impact may only occur during specific climatic conditions or during a particular season of the year)
- **Intensity or magnitude: The size of the impact (if positive) or its severity (if negative):**
  - Low, where the receiving environment (biophysical, social, economic, cultural etc) is negligibly affected or where the impact is so low that the remedial action is not required;
  - Medium, where the receiving environment (biophysical, social, economic, cultural etc) is altered, but not severely affected, and the impact can be remedied successfully; and
  - High, where the receiving environment (biophysical, social, economic, cultural etc) would be substantially (i.e. to a very large degree) affected. If a negative impact, could lead to irreplaceable loss of a resource and/or unacceptable consequences for human wellbeing.
- **Probability: Should describe the likelihood of the impact actually occurring indicated as:**
  - Improbable, where the possibility of the impact 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; or
  - Definite, where the impact will occur regardless of any prevention measures.

- **Significance: The significance of impacts can be determined through a synthesis of the assessment criteria. Significance can be described as:**
  - Low, where it would have negligible effect on the receiving environment (biophysical, social, economic, cultural etc), and on the decision;
  - Medium, where it would have a moderate effect on the receiving environment (biophysical, social, economic, cultural etc), and should influence the decision;
  - High, where it would have, or there would be a high risk of, a large effect on the receiving environment (biophysical, social, economic, cultural etc). These impacts should have a major influence on the decision;
  - Very high, where it would have, or there would be a high risk of, an irreversible negative impact on the receiving environment (biophysical, social, economic, cultural etc) and irreplaceable loss of natural capital/resources or a major positive effect on human well-being. Impacts of very high significance should be a central factor in decision-making.
  - Provision should be made for with and without mitigation scenarios.
- **Confidence: The level of confidence in predicting the impact can be described as:**
  - Low, where there is little confidence in the prediction, due to inherent uncertainty about the likely response of the receiving ecosystem, or inadequate information;
  - Medium, where there is a moderate level of confidence in the prediction, or
  - High, where the impact can be predicted with a high level of confidence
- **Consequence: What will happen if the impact occurs**
  - Insignificant, where the potential consequence of an identified impact will not cause detrimental impact to the receiving environment;
  - Significant, where the potential consequence of an identified impact will cause detrimental impact to the receiving environment.
  - Provision must be made for with and without mitigation scenarios.

The impacts must also be assessed in terms of the following aspects:

- **Status of the impact**

The specialist should determine whether the impacts are negative, positive or neutral (“cost – benefit” analysis). The impacts are to be assessed in terms of their effect on the project and the environment. For example, an impact that is positive for the proposed development may be negative for the environment. It is important that this distinction is made in the analysis.

- **Cumulative impact**

Consideration must be given to the extent of any accumulative impact that may occur due to the proposed development. Such impacts must be evaluated with an assessment of similar developments planned and already in the environment. Such impacts will be either positive or negative, and will be graded as being of negligible, low, medium or high impact.



Care must be taken to ensure that where cumulative impacts can occur that these impacts are considered and categorised as **additive** (incremental or accumulative); **interactive**, **sequential** or **synergistic**.

Based on a synthesis of the information contained in the above-described procedure, the specialists are required to assess the potential impacts in terms of the following significance criteria:

- **No significance:** The impacts do not influence the proposed development and/or environment in any way.
- **Low significance:** The impacts will have a minor influence on the proposed development and/or environment. These impacts require some attention to modification of the project design where possible, or alternative mitigation.
- **Moderate significance:** The impacts will have a moderate influence on the proposed development and/or environment. The impact can be ameliorated by a modification in the project design or implementation of effective mitigation measures.
- **High significance:** The impacts will have a major influence on the proposed development and/or environment.

### **15.3 CONSULTATION WITH COMPETENT AUTHORITY**

The competent authorities has been identified as the Provincial Department of Environmental Affairs & Development Planning (DEA&DP) and Garden Route District Municipality (AEL).

Engagement with the competent authorities will be on-going throughout the Environmental Process and will include the following as a minimum:

- Provided with a copy of the Draft Scoping Report for review and comment;
- Provide with copy of Final Scoping Report for consideration;
- Provided with a copy of the draft and final Environmental Impact Report / Environmental Management plan with specialist Air Emission Impact Assessment and Air Emission License application, for review and decision making;

### **15.4 STAKEHOLDER ENGAGEMENT TO BE CONDUCTED DURING THE EIA**

The public participation process (PPP) for the proposed development will comply with the requirements for PPP as set out in Section 41 of **Chapter 6 of Regulation 982** of the 2014 EIA Regulations.

Below is a quick reference to the public participation requirements (Chapter 6 of GN R.982) which the Environmental Process intends to comply with:

**40.** (1) If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for an environmental authorisation in respect of such activity, obtain the written consent of the landowner or person in control of the land to undertake such activity on that land.

(2) Subregulation (1) does not apply in respect of- (a) linear activities;

**41.** (2) The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act

and must give notice to all potential interested and affected parties of an application or proposed application which is subjected to public participation by -

(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of -

(i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and

(ii) any alternative site;

(b) giving written notice, in any of the manners provided for in section 47D of the Act, to –

(i) the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;

(ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;

(iii) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;

(iv) the municipality which has jurisdiction in the area;

(v) any organ of state having jurisdiction in respect of any aspect of the activity; and

(vi) any other party as required by the competent authority;

(c) placing an advertisement in -

(i) one local newspaper; or

(ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;

(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official Gazette referred to in paragraph (c)(ii);and

(e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to -

(i) illiteracy;

(ii) disability; or

(iii) any other disadvantage

- 3) A notice, notice board or advertisement referred to in subregulation (2) must -
- (a) give details of the application or proposed application which is subjected to public participation; and
  - (b) state -
    - (i) whether basic assessment or S&EIR procedures are being applied to the application;
    - (ii) the nature and location of the activity to which the application relates;
    - (iii) where further information on the application or proposed application can be obtained; and
    - (iv) the manner in which and the person to whom representations in respect of the application or proposed application may be made.
- (4) A notice board referred to in subregulation (2) must -
- (a) be of a size at least 60cm by 42cm; and
  - (b) display the required information in lettering and in a format as may be determined by the competent authority.
- (5) Where public participation is conducted in terms of this regulation for an application or proposed application, subregulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public participation process contemplated in regulations 19(1)(b) or 23(1)(b) or the public participation process contemplated in regulation 21(2)(d), on condition that -
- (a) such process has been preceded by a public participation process which included compliance with subregulation (2)(a), (b), (c) and (d); and
  - (b) written notice is given to registered interested and affected parties regarding where the -
    - (i) revised impact report or, EMPr or closure plan, as contemplated in regulation 19(1)(b);
    - (ii) revised environmental impact report or EMPr as contemplated in regulation 23(1)(b); or
    - (iii) environmental impact report and EMPr as contemplated in regulation 21(2)(d);
- may be obtained, the manner in which and the person to whom representations on these reports or plans may be made and the date on which such representations are due.
- 6) When complying with this regulation, the person conducting the public participation process must ensure that -
- (a) information containing all relevant facts in respect of the application or proposed application is made available to potential interested and affected parties; and
  - (b) participation by potential or registered interested and affected parties is facilitated in such a manner that all potential or registered interested and affected parties are

provided with a reasonable opportunity to comment on the application or proposed application

7) Where an environmental authorisation is required in terms of these Regulations and an authorisation, permit or licence is required in terms of a specific environmental management Act, the public participation process contemplated in this Chapter may be combined with any public participation processes prescribed in terms of a specific environmental management Act, on condition that all relevant authorities agree to such combination of processes.

The Department of Environmental Affairs approved the Public Participation Plan for this application.

### **15.5 TASKS TO BE UNDERTAKEN IN THE EIA PHASE**

In terms of the 2014 EIA regulations, 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;

(b) the location of the activity, 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 property or properties;

(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;

(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;

(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;

(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 location;

(g) a motivation for the preferred development footprint within the approved site;

(h) a full description of the process followed to reach the proposed development footprint within the approved site, 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;
- (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;
- (iv) the environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;
- (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 locations for the activity were investigated, the motivation for not considering such; and
- (x) a concluding statement indicating the preferred alternative development location within the approved site;

(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 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;

(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;
- (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;
- (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 site 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;
- (m) based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr as well as for inclusion as conditions of authorisation;
- (n) the final proposed alternatives which respond to the impact management measures, avoidance, and mitigation measures identified through the assessment;
- (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) a description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed;
- (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;
- (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;
- (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;

The Environmental Impact Report for the proposed Development will consider and comply with the legislated requirements.

## **16 CONTENTS OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

The final impact assessment report must, as a minimum include the following sections:

- Executive Summary;
- Introduction And Description Of Study;
- Overview of the process followed to date;
- Methodology for impact assessments undertaken;
- Technical and specialist reporting;
- Assessment of Impacts (Direct, In-direct & Cumulative, including mitigation measures to reduce negative impacts and measures to enhance positive impacts and the completion of impact tables);
- Comparative Assessment between project Alternatives;
- Public Participation / Stakeholder Engagement reporting;
- Discussion and Recommendation for Preferred Alternative;
- Specialist recommendation for Pre-Construction, Construction and Operational Phase mitigation to inform the Environmental Management Plan; and;
- Conclusion

## **17 CONCLUSION**

The scoping exercise is undertaken to present concept proposals to the public and potential Interested & Affected Parties and to help identify environmental issues and concerns raised as a result of the proposed development alternatives to date.

The scoping phase allows potential and registered Interested & Affected Parties (I&APs), authorities, the project team, as well as specialists to provide input and raise issues and concerns, based on the information presented in this report.

Anticipated risks, impacts and consequences associated with the proposed development have been identified and will be assessed through an Air Quality Impact Assessment specialist during the impact assessment phase of the development. In the event that any new issues are raised during the course of the scoping phase, such will be considered and reflected on in the impact assessment phase.

It is submitted, based on the site sensitivity verification, that there are no biophysical elements likely to be negatively affected by the proposed activity. The utilisation of an existing build structure is practical and selection of an industrial park for the proposed land use is supported.

*Cape EAPrac* is of the opinion that the information contained in this draft Scoping Report and the documentation attached hereto is sufficient to allow the general public and key

stakeholders to apply their minds to the potential negative and/or positive impacts associated with the development, in respect of the activities applied for.

The draft Scoping Report is available for stakeholder review and comment for a period of 30-days that extending from **19 April 2023 – 22 May 2023**. All comments received during this period will be considered, captured and are reflected in the Final Scoping Report.

Registered I&APs will be kept informed throughout the remainder of the environmental impact assessment and AEL processes that followed on this draft Scoping Report phase.

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