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**SITE SENSITIVITY VERIFICATION
AND
AGRICULTURAL COMPLIANCE STATEMENT
FOR A PROPOSED 40MW PHOTOVOLTAIC PLANT ACROSS SITES 2B, 3B, 3C, 4B AND 5B
ASSOCIATED WITH THE TUBATSE FERROCHROME PLANT
STEELPOORT, LIMPOPO PROVINCE**

**Report by
Johann Lanz**

13 October 2023

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EXECUTIVE SUMMARY

The overall conclusion of this assessment is that the proposed development is acceptable because it leads to no loss of potential, productive agricultural land and therefore no loss of future agricultural production potential.

The site is classified as high agricultural sensitivity by the screening tool. This has been confirmed by this assessment, because of the climate, terrain, and soil suitability. However, despite the natural agricultural resources, the site's agricultural potential is completely limited, and the high sensitivity rating is therefore not relevant to an assessment of the agricultural impact.

Agriculture is not possible on the sites while Samancor and related industries are operating there, and the land therefore effectively has zero current potential for agricultural production. The natural agricultural resources of the land must however still be conserved for a potential future time when agricultural use may again become possible.

Due to the fact that the proposed development will not result in the loss of any viable, productive agricultural land, the overall negative agricultural impact of the development (loss of future agricultural production potential) is assessed here as being of low significance and as acceptable. From an agricultural impact point of view, it is recommended that the proposed development be approved.

1 INTRODUCTION

Environmental authorisation is being sought for a proposed 40mw photovoltaic plant across sites 2b, 3b, 3c, 4b and 5b associated with the Tubatse Ferrochrome Plant Steelpoort, Limpopo Province (see location in Figure 1). In terms of the National Environmental Management Act (Act No 107 of 1998 - NEMA), an application for environmental authorisation requires an agricultural assessment. In this case, because of limitations to the agricultural production potential of the site, the impact can confidently be assessed based on existing information, without the detailed site investigation that is required for an Agricultural Agro-Ecosystem Specialist Assessment (see Sections 7, 8 and 9). This assessment is therefore done by way of an Agricultural Compliance Statement.

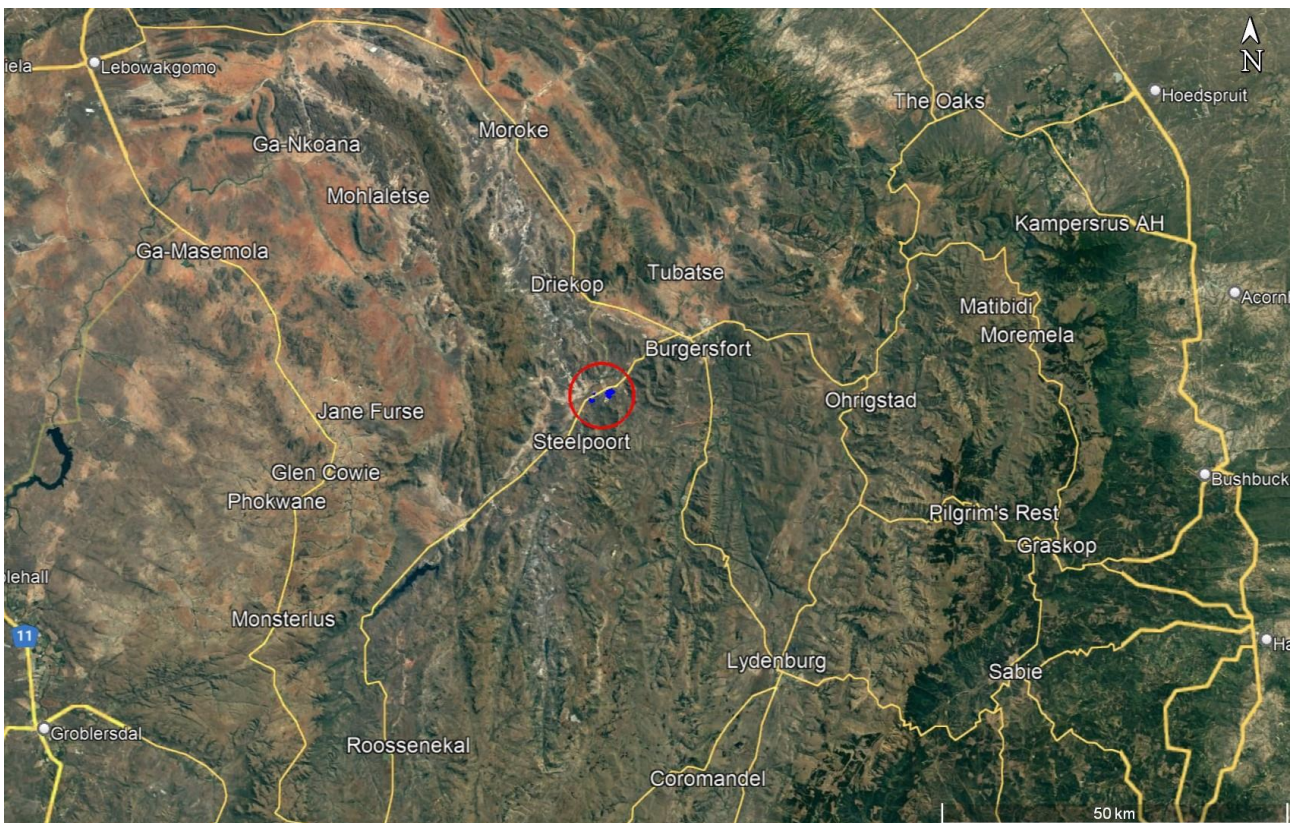


Figure 1. Locality map of the assessed site (dark blue outline within red circle) north-east of Steelpoort.

The purpose of an agricultural assessment is to answer the question:

Will the proposed development cause a significant reduction in agricultural production potential, and most importantly, will it result in a loss of arable land?

Section 9 of this report unpacks this question, particularly with respect to what constitutes a significant reduction. To answer the above question, it is necessary to determine the existing agricultural production potential of the land that will be impacted, and specifically whether it is

viable arable land or not. This is done in Section 8 of this report. Section 8, 9, and the conclusion of this report directly address the above question and therefore contain the essence of the agricultural impact assessment.

As is shown in Section 9, this assessed development will not result in a loss of viable arable land and therefore poses minimal threat to agricultural production potential.

2 PROJECT DESCRIPTION

The proposed facility will be combined with the already authorised 60MW facility on sites 2 to 5 (DFFE Ref: 14/12/16/3/3/2/2079). The proposed facility will consist of the standard infrastructure of a PV energy facility including PV arrays; inverters; cabling; battery energy storage system (BESS); auxiliary buildings; access and internal roads; on-site substation; 33kV overhead HOs between the various sites and the Tubatse East and -West substation buildings; temporary construction laydown areas; and perimeter fencing. The facility will have a total generating capacity of up to 40MW.

The exact nature and layout of the different infrastructure within the boundary fence of a solar energy facility has absolutely no bearing on the significance of agricultural impacts. It is therefore not necessary to detail this design and layout of the facility any further in this assessment. All that is of relevance is simply the total footprint of the facility that excludes agricultural land use or impacts agricultural land, referred to as the agricultural footprint. This is the area within the facility fence. Whether that footprint comprises, for example, a solar array, a road or a BESS is irrelevant to agricultural impact.

This assessment includes the power lines. However, these have negligible agricultural impact and are therefore not considered to be part of the agricultural footprint of a renewable energy facility, in keeping with NEMA's agricultural protocol.

3 TERMS OF REFERENCE

The terms of reference for this study are to fulfil the requirements of the *Protocol for the specialist assessment and minimum report content requirements of environmental impacts on agricultural resources by onshore wind and/or solar photovoltaic energy generation facilities where the electricity output is 20 megawatts or more*, gazetted on 20 March 2020 in GN 320 (in terms of Sections 24(5)(A) and (H) and 44 of NEMA, 1998).

The terms of reference for an Agricultural Compliance Statement, as stipulated in the agricultural protocol, are listed below, and the section number of this report which fulfils each stipulation is given after it in brackets.

1. The Agricultural Compliance Statement must be prepared by a soil scientist or agricultural specialist registered with the South African Council for Natural Scientific Professions (SACNASP) **(Appendix 3)**.
2. The compliance statement must:
 1. be applicable to the preferred site and proposed development footprint **(Figures 2 and 3)**;
 2. confirm that the site is of “low” or “medium” sensitivity for agriculture **(Section 7)**; and
 3. indicate whether or not the proposed development will have an unacceptable impact on the agricultural production capability of the site **(Section 12)**.
3. The Agricultural Compliance Statement must contain, as a minimum, the following information:
 1. details and relevant experience as well as the SACNASP registration number of the soil scientist or agricultural specialist preparing the statement including a curriculum vitae **(Appendix 1)**;
 2. a signed statement of independence by the specialist **(Appendix 2)**;
 3. a map showing the proposed development footprint (including supporting infrastructure) with a 50 m buffered development envelope, overlaid on the agricultural sensitivity map generated by the screening tool **(Figure 2)**;
 4. calculations of the physical development footprint area for each land parcel as well as the total physical development footprint area of the proposed development including supporting infrastructure **(Section 11.3)**;
 5. confirmation that the development footprint is in line with the allowable development limits contained in Table 1 of the protocol **(Section 11.3)**;
 6. confirmation from the specialist that all reasonable measures have been taken through micro-siting to avoid or minimize fragmentation and disturbance of agricultural activities **(Section 11.1)**;
 7. a substantiated statement from the soil scientist or agricultural specialist on the acceptability, or not, of the proposed development and a recommendation on the approval, or not of the proposed development **(Section 12)**;
 8. any conditions to which this statement is subjected **(Section 12)**;
 9. in the case of a linear activity, confirmation from the agricultural specialist or soil scientist, that in their opinion, based on the mitigation and remedial measures proposed, the land can be returned to the current state within two years of completion of the construction phase **(Section 11.2)**;
 10. where required, proposed impact management outcomes or any monitoring requirements for inclusion in the EMPr **(Section 10)**; and
 11. a description of the assumptions made and any uncertainties or gaps in knowledge or data **(Section 5)**.

4 METHODOLOGY OF STUDY

The assessment was based on a verification of current agricultural land use on the site and was informed by existing climate, soil, and agricultural potential data for the site (see references). The level of agricultural assessment is considered entirely adequate for an understanding of on-site agricultural production potential for the purposes of this assessment.

5 ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE OR DATA

There are no specific assumptions, uncertainties or gaps in knowledge or data that affect the findings of this study.

6 APPLICABLE LEGISLATION AND PERMIT REQUIREMENTS

The project may require agricultural approval (or at least comment from Department of Agriculture) as part of the required approval in terms of applicable municipal land use legislation, as well as in terms of the Subdivision of Agricultural Land Act (Act 70 of 1970 - SALA), if the property is currently zoned for agriculture.

7 SITE SENSITIVITY VERIFICATION

A specialist agricultural assessment is required to verify the agricultural sensitivity of the development site as per the sensitivity categories used by the web-based environmental screening tool of the Department of Forestry, Fisheries and the Environment (DFFE). However, such an exercise is of very limited value once the agricultural assessment, which supersedes any screening tool result, has been done. What is of much more importance to this assessment than the site sensitivity verification, is its assessment of the cropping potential (see Section 8) and its assessment of the impact significance (see Section 9).

The screening tool classifies agricultural sensitivity according to two independent criteria, from two independent data sets, both of which may be indicators of the land's agricultural production potential but are limited in that the first is outdated and the second relies on fairly course data. The two criteria are:

1. whether the land is classified as cropland or not on the field crop boundary data set, and
2. its land capability rating on the land capability data set

All classified cropland is, by definition, either high or very high sensitivity. Land capability is defined as the combination of soil, climate, and terrain suitability factors for supporting rain-fed agricultural

production. It is rated by the Department of Agriculture's updated and refined, country-wide land capability mapping, released in 2016. The higher land capability values (≥ 8 to 15) are likely to indicate suitability as arable land for crop production, while lower values (< 8) are only likely to be suitable as non-arable grazing land. The direct relationship between land capability rating and the screening tool's agricultural sensitivity is shown in Table 1.

Table 1: Relationship between land capability and agricultural sensitivity as given by the screening tool.

Land capability value	Agricultural sensitivity
1 - 5	low
6 - 8	medium
9 - 10	high
11 - 15	very high

The agricultural sensitivity of the site, as given by the DFFE screening tool, is shown in Figure 2.

The screening tool classifies the assessed area as ranging from low to high agricultural sensitivity. None of the land is classified as cropland and the rating of agricultural sensitivity is therefore purely a function of classified land capability as per Table 1 above. The high sensitivity classification is due to that land being classified with a land capability of 9 and 10.

The classified land capability of the site ranges from 4 to 10. This assessment verifies that the site is not within crop boundaries and verifies that the classified land capability is likely to be accurate. This assessment therefore confirms the high sensitivity rating by the screening tool, based on natural agricultural resources. However, despite the natural agricultural resources, the site's agricultural potential is limited, and the high sensitivity rating is therefore not relevant to an assessment of the agricultural impact (see following section).

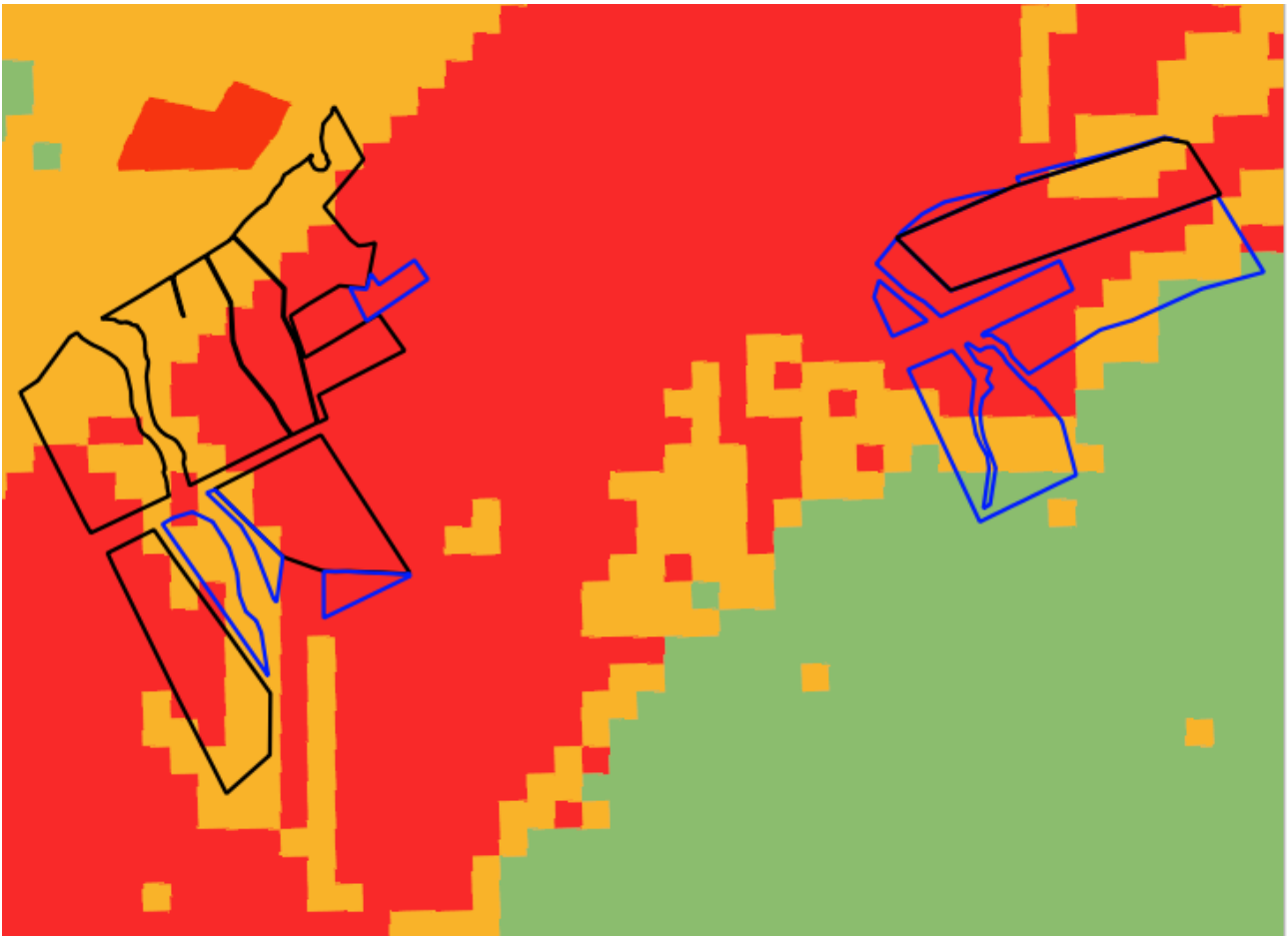


Figure 2. The assessed area (blue outline) and previously authorised area (black outline) overlaid on agricultural sensitivity, as given by the screening tool (green = low; yellow = medium; red = high; dark red = very high). The screening tool's high sensitivity is confirmed by this assessment, but is not relevant to an assessment of the agricultural impact.

8 BASELINE DESCRIPTION OF THE AGRO-ECOSYSTEM

The purpose of this section of an agricultural assessment report is to present the baseline information that controls the agricultural production potential of the site so that an assessment of that potential can be made. Agricultural production potential, and particularly cropping potential is one of three factors that determines the significance of the agricultural impact, together with size of footprint and duration of impact (see Section 9).

A satellite image map of the assessed area is given in Figure 3. Its agricultural production potential is not limited by natural agricultural resources. The site has a high land capability rating. The terrain and climate are undoubtedly suitable for cultivation and the indications of soil potential from the land type data are that dominant soil types are deep, well-drained Hutton soils that are suitable for cultivation, although shallower soils do also occur.

However, there are other factors, apart from the natural agricultural resources, that limit the agricultural potential of the land on this site. Agriculture is not possible on the sites while Samancor and related industries are operating there. One of the restrictions to agricultural activities is that Samancor utilises boreholes on the sites for their water supplies and therefore have strict controls over land use. The current owners of the land (Samancor) are not interested in using it for agriculture and the land around the sites is broken up by mining and smelting related industry which makes it impractical to use as farmland. The agricultural production potential of the entire assessed area is low because of these limitations.

The site falls outside of an area that is classified as a Protected Agricultural Area. A Protected Agricultural Area is a demarcated area in which the climate, terrain, and soil are generally conducive for agricultural production and which, historically, has made important contributions to the production of the various crops that are grown across South Africa. Within Protected Agricultural Areas, the protection, particularly of arable land, is considered a priority for the protection of food security in South Africa, but the protection of land outside of these areas is generally not considered a food security priority.



Figure 3. Satellite image map of the assessed area.

9 ASSESSMENT OF THE AGRICULTURAL IMPACT

9.1 Impact identification and assessment

It should be noted that an Agricultural Compliance Statement is not required to formally rate agricultural impacts by way of impact assessment tables.

An agricultural impact is a change to the future agricultural production potential of land. In most developments, including the one being assessed here, this is primarily caused by the exclusion of agriculture from the footprint of the development. Soil erosion and degradation may also contribute to loss of agricultural production potential. The significance of an agricultural impact is a direct function of the following three factors:

1. the size of the footprint of land from which agriculture will be excluded (or the footprint that will have its potential decreased)
2. the baseline production potential (particularly cropping potential) of that land
3. the length of time for which agriculture will be excluded (or for which potential will be decreased).

The most significant loss of agricultural land possible, for any development anywhere in the country, is of high yielding cropland, and the least significant possible, is of low carrying capacity grazing land.

Cropping potential is highlighted in factor 2, above, because the threshold, above which it is a priority to conserve land for agricultural production, is determined by the scarcity of arable crop production land in South Africa (approximately only 13% of the country's surface area) and the relative abundance of land that is only good enough to be used for grazing (the remaining 87% of the country). If land can support viable and sustainable crop production, then it is considered to be above the threshold and is a priority for being conserved as agricultural production land. If land is unable to support viable and sustainable crop production, then it is considered to be below the threshold and of much lower priority for being conserved.

In this case, as discussed above, the assessed area has low agricultural production potential. It does not therefore make sense to prevent other land uses on the grounds that it is being conserved for agricultural use. It is important to note that the need to conserve arable land is not only relevant to the present, but also to the future. The natural agricultural resources of this land must be conserved for a potential future time when the mining and smelting related industries no longer occupy the site and agricultural use may again become possible. The proposed development is associated with those industries and so if they cease to occupy the site, the proposed development will also cease to occupy the site. Its impact does not therefore prevent future agricultural use.

Due to the fact that the proposed development will not result in the loss of any viable, productive agricultural land, the overall negative agricultural impact of the development (loss of future agricultural production potential) is assessed here as being of low significance and as acceptable.

9.2 Cumulative impact assessment

Specialist assessments for environmental authorisation are required to assess cumulative impacts. The cumulative impact of a development is the impact that development will have when its impact is added to the incremental impacts of other past, present, or reasonably foreseeable future activities that will affect the same environment.

The most important concept related to a cumulative impact is that of an acceptable level of change to an environment. A cumulative impact only becomes relevant when the impact of the proposed development will lead directly to the sum of impacts of all developments causing an acceptable level of change to be exceeded in the surrounding area. If the impact of the development being assessed does not cause that level to be exceeded, then the cumulative impact associated with that development is not significant.

The potential cumulative agricultural impact of importance is a regional loss (including by degradation) of future agricultural production potential. The defining question for assessing the cumulative agricultural impact is this:

What loss of future agricultural production potential is acceptable in the area, and will the loss associated with the proposed development, when considered in the context of all past, present or reasonably foreseeable future impacts, cause that level in the area to be exceeded?

Department of Forestry, Fisheries and the Environment (DFFE) requires compliance with a specified methodology for the assessment of cumulative impacts. This is positive in that it ensures engagement with the important issue of cumulative impacts. However, the required compliance has some limitations and can, in the opinion of the author, result in an over-focus on methodological compliance, while missing the more important task of effectively answering the above defining question.

This cumulative impact assessment will determine the quantitative loss of agricultural land if all renewable energy project applications within a 30 km radius become operational. The quantification of the cumulative impact will be done in detail in the EIA phase. This is highly likely to confirm that the cumulative impact of loss of future agricultural production potential is low. The development is highly likely to have an acceptable impact on the agricultural production capability of the area and therefore be recommended for approval from a cumulative agricultural impact point of view.

9.3 Assessment of alternatives

Specialist assessments for environmental authorisation are required to assess the impacts of alternatives including the no-go alternative. As already noted, the exact nature and layout of the different infrastructure within the boundary fence of a solar energy facility has absolutely no bearing on the significance of agricultural impacts. Any alternative layouts within the boundary fence will have equal impact and are assessed as equally acceptable.

All technology alternatives will also have no bearing on the significance of agricultural impacts. All will have equal impact and are assessed as equally acceptable.

The no-go alternative considers impacts that will occur to the agricultural environment in the absence of the proposed development. There are no agricultural impacts of the no-go alternative, but this is not significantly different from the very low impacts of the development and there is therefore no preferred alternative between the development and the no-go, if assessed purely from an agricultural impact perspective.

10 MITIGATION MEASURES

Generic mitigation measures that are effective in preventing soil degradation are all inherent in the project engineering and/or are standard, best-practice for construction sites.

- A system of storm water management, which will prevent erosion on and downstream of the site, will be an inherent part of the engineering design on site.
- Any excavations done during the construction phase, in areas that will be re-vegetated at the end of the construction phase, must separate the upper 30 cm of topsoil from the rest of the excavation spoils and store it in a separate stockpile. When the excavation is back-filled, the topsoil must be back-filled last, so that it remains at the surface. Topsoil should only be stripped in areas that are excavated. Across most of the site, including construction lay down areas, it will be much more effective for rehabilitation, to retain the topsoil in place. If levelling requires significant cutting, topsoil should be temporarily stockpiled and then re-spread after cutting, so that there is a covering of topsoil over the entire cut surface. It will be advantageous to have topsoil and vegetation cover below the panels during the operational phase to control dust and erosion.

11 ADDITIONAL ASPECTS REQUIRED IN AN AGRICULTURAL ASSESSMENT

11.1 Micro-siting

The agricultural protocol requires confirmation that all reasonable measures have been taken through micro-siting to minimize fragmentation and disturbance of agricultural activities. As already discussed in the section above, micro-siting within the footprint will make no material difference to agricultural impacts and disturbance.

11.2 Confirmation of linear activity impact

The protocol requires confirmation, in the case of a linear activity, that the land can be returned to the current state within two years of completion of the construction phase. This is not relevant in this case because the proposed development is not limited to being a linear one.

11.3 Compliance with the allowable development limits

The agricultural protocol stipulates allowable development limits for renewable energy developments of > 20 MW. Allowable development limits refer to the area of a particular agricultural sensitivity category that can be directly impacted (i.e. taken up by the physical footprint) by a renewable energy development. The agricultural footprint is defined in the protocol as the area that is directly occupied by all infrastructures, including roads, hard standing areas, buildings, substations etc., that are associated with the renewable energy facility during its operational phase, and that result in the exclusion of that land from potential cultivation or grazing. It excludes all areas that were already occupied by roads and other infrastructure prior to the establishment of the energy facility but includes the surface area required for expanding existing infrastructure (e.g. widening existing roads). It excludes the corridor underneath overhead power lines but includes the pylon footprints. It therefore represents the total land that is actually excluded from agricultural use as a result of the renewable energy facility (the agricultural footprint).

For a solar energy facility, the footprint is considered to be the total area inside the security fence of the facility.

The purpose of the allowable development limits is to conserve higher potential, predominantly arable, agricultural land by steering renewable energy development off such land and onto lower potential land. In this case the facility is proposed on land that effectively has no current agricultural production potential. Compliance with the allowable development limits is therefore unnecessary because there is no need to steer the renewable energy facility off the proposed land to conserve it as agricultural production land.

12 CONCLUSION: AGRICULTURAL COMPLIANCE STATEMENT

The overall conclusion of this assessment is that the proposed development is acceptable because it leads to no loss of potential, productive agricultural land and therefore no loss of future agricultural production potential.

The site is classified as high agricultural sensitivity by the screening tool. This has been confirmed by this assessment, because of the climate, terrain, and soil suitability. However, despite the natural agricultural resources, the site's agricultural potential is completely limited, and the high sensitivity rating is therefore not relevant to an assessment of the agricultural impact.

Agriculture is not possible on the sites while Samancor and related industries are operating there, and the land therefore effectively has zero current potential for agricultural production. The natural agricultural resources of the land must however still be conserved for a potential future time when agricultural use may again become possible.

Due to the fact that the proposed development will not result in the loss of any viable, productive agricultural land, the overall negative agricultural impact of the development (loss of future agricultural production potential) is assessed here as being of low significance and as acceptable. From an agricultural impact point of view, it is recommended that the proposed development be approved. The conclusion of this assessment on the acceptability of the proposed development and the recommendation for its approval is not subject to any other conditions other than recommended mitigation.

13 REFERENCES

Department of Agriculture, Forestry and Fisheries (DAFF). 2017. National land capability evaluation raster data layer, 2017. Pretoria.

Department of Agriculture, Forestry and Fisheries (DAFF). 2002. National land type inventories data set. Pretoria.

Department of Agriculture, Land Reform and Rural Development (DALRRD). 2020. Protected agricultural areas – Spatial data layer. 2020. Pretoria.

DEA. 2015. Strategic Environmental Assessment for wind and solar photovoltaic development in South Africa. CSIR Report Number CSIR: CSIR/CAS/EMS/ER/2015/001/B. Stellenbosch.

Schulze, R.E. 2009. South African Atlas of Agrohydrology and Climatology, available on Cape Farm Mapper. Available at: <https://gis.elsenburg.com/apps/cfm/>

Soil Classification Working Group. 1991. Soil classification: a taxonomic system for South Africa. Soil and Irrigation Research Institute, Department of Agricultural Development, Pretoria.

APPENDIX 1: SPECIALIST CURRICULUM VITAE

Johann Lanz Curriculum Vitae

Education

M.Sc. (Environmental Geochemistry)	University of Cape Town	1996 - 1997
B.Sc. Agriculture (Soil Science, Chemistry)	University of Stellenbosch	1992 - 1995
BA (English, Environmental & Geographical Science)	University of Cape Town	1989 - 1991
Matric Exemption	Wynberg Boy's High School	1983

Professional work experience

I have been registered as a Professional Natural Scientist (Pri.Sci.Nat.) in the field of soil science since 2012 (registration number [REDACTED]) and am a member of the Soil Science Society of South Africa.

Soil & Agricultural Consulting Self employed 2002 - present

Within the past 5 years of running my soil and agricultural consulting business, I have completed more than 170 agricultural assessments (EIAs, SEAs, EMPRs) in all 9 provinces for renewable energy, mining, electrical grid infrastructure, urban, and agricultural developments. I was the appointed agricultural specialist for the nation-wide SEAs for wind and solar PV developments, electrical grid infrastructure, and gas pipelines. My regular clients include: Zutari; CSIR; SiVEST; SLR; WSP; Arcus; SRK; Environamics; Royal Haskoning DHV; ABO; Enertrag; WKN-Windcurrent; JG Afrika; Mainstream; Redcap; G7; Mulilo; and Tiptrans. Recent agricultural clients for soil resource evaluations and mapping include Cederberg Wines; Western Cape Department of Agriculture; Vogelfontein Citrus; De Grendel Estate; Zewenwacht Wine Estate; and Goedgedacht Olives. In 2018 I completed a ground-breaking case study that measured the agricultural impact of existing wind farms in the Eastern Cape.

Soil Science Consultant Agricultural Consultors International (Tinie du Preez) 1998 - 2001

Responsible for providing all aspects of a soil science technical consulting service directly to clients in the wine, fruit and environmental industries all over South Africa, and in Chile, South America.

Contracting Soil Scientist De Beers Namaqualand Mines July 1997 - Jan 1998

Completed a contract to advise soil rehabilitation and re-vegetation of mined areas.

Publications

- Lanz, J. 2012. Soil health: sustaining Stellenbosch's roots. In: M Swilling, B Sebitosi & R Loots (eds). *Sustainable Stellenbosch: opening dialogues*. Stellenbosch: SunMedia.
- Lanz, J. 2010. Soil health indicators: physical and chemical. *South African Fruit Journal*, April / May 2010 issue.
- Lanz, J. 2009. Soil health constraints. *South African Fruit Journal*, August / September 2009 issue.
- Lanz, J. 2009. Soil carbon research. *AgriProbe*, Department of Agriculture.
- Lanz, J. 2005. Special Report: Soils and wine quality. *Wineland Magazine*.

I am a reviewing scientist for the *South African Journal of Plant and Soil*.



forestry, fisheries & the environment

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APPENDIX 2: SPECIALIST DECLARATION FORM AUGUST 2023

Specialist Declaration form for assessments undertaken for application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

REPORT TITLE

40mw photovoltaic plant across sites 2b, 3b, 3c, 4b and 5b associated with the Tubatse Ferrochrome Plant Steelpoort, Limpopo Province

Kindly note the following:

- This form must always be used for assessment that are in support of applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting, where this Department is the Competent Authority.
- This form is current as of August 2023. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.dffe.gov.za/documents/forms>.
- An electronic copy of the signed declaration form must be appended to all Draft and Final Reports submitted to the department for consideration.
- The specialist must be aware of and comply with 'the Procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the act, when applying for environmental authorisation - GN 320/2020', where applicable.

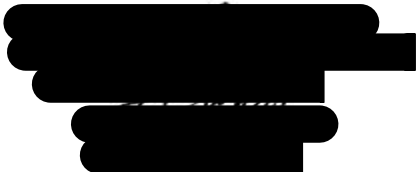
1. SPECIALIST INFORMATION

Title of Specialist Assessment	Agricultural Assessment
Specialist Company Name	Not applicable – sole proprietor
Specialist Name	Johann Lanz
Specialist Identity Number	██████████
Specialist Qualifications:	M.Sc. (Environmental Geochemistry)
Professional affiliation/registration:	Registered Professional Natural Scientist (Pr.Sci.Nat.) Reg. no. ██████████ Member of the Soil Science Society of South Africa
Physical address:	██
Postal address:	██
Telephone	Not applicable
Cell phone	██
E-mail	██

2. DECLARATION BY THE SPECIALIST

I, **Johann Lanz** declare that –

- I act as the independent specialist in this application;
- I am aware of the procedures and requirements for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the National Environmental Management Act (NEMA), 1998, as amended, when applying for environmental authorisation which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”) and in Government Notice No. 1150 of 30 October 2020.
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing –
 12. any decision to be taken with respect to the application by the competent authority; and;
 13. the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of Regulation 48 and is punishable in terms of section 24F of the NEMA Act.



Signature of the Specialist

Johann Lanz – Soil Scientist (sole proprietor)

Name of Company:

19 September 2023

Date

SPECIALIST DECLARATION FORM – AUGUST 2023

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, **Johann Lanz**, swear under oath that all the information submitted or to be submitted for the purposes of this application is true and correct.

[Redacted Signature]

Signature of the Specialist

Johann Lanz – Soil Scientist – sole proprietor

Name of Company

2023/09/19

Date

[Redacted Signature]

Signature of the Commissioner of Oaths

2023-09-19.

Date

