
EXTERNAL REVIEW DRAFT SCOPING REPORT (DSR)

BOTSWANA SOUTH AFRICA (BOSA) TRANSMISSION PROJECT

July 2017

Prepared by



GLOBAL GREEN

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EXECUTIVE SUMMARY

Global Green Environmental Consultants in association with the Environmental Assessment Research Group (EARG) from the North West University (Potchefstroom campus) was appointed by Aurecon, in accordance with GNR 982, Regulation 13(2), to conduct an external review of the Draft Scoping Report (DSR) for the Botswana South Africa (BOSA) Transmission Project. The review was conducted by two reviewers according to the NWU Report Quality Review Package, adapted to also include DBSA and IFC Standards. The review concludes as follows:

- The DSR contains sufficient information to inform decision making by the competent environmental authority and complies with minimum legal requirements in terms of the 2014 NEMA EIA Regulations (in particular Regulation 21 and Appendix 2). Review of compliance with public participation requirements will be done following the commenting period on the DSR.
- The DSR successfully incorporated DBSA and IFC standard requirements. Review of compliance with these standards can only be concluded at the end of the EIA process.

Although the report complies with the minimum legal requirements and standards, a number of recommendations are made towards improving the content of the DSR. If there are any uncertainties or additional information required please feel free to contact the undersigned.



Prof Francois Rieff

Lead Reviewer
28-07-2017

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DOCUMENT CONTROL			
Project	BOSA Transmission Project – External Review		
GG reference ID	GGR-28/07/2017	Client	Aurecon
Lead reviewer	Prof F P Retief	Client Contact	Diane Erasmus Tel: 083 3086750
2nd Reviewer	Me C Cilliers	Documents Reviewed	DSR and related Annexures
Date of the Review	24-28 July 2017	Reviewed against	NEMA, EIA Regulations 2014 and relevant Guidelines, DBSA Safeguard Standards, IFC Performance Standards

1. INTRODUCTION AND BRIEF

Global Green Environmental Consultants was appointed by Aurecon as external reviewer for the Botswana South Africa (BOSA) Transmission Project, in accordance with GNR 982, Regulation 13(2), which states that:

“In the event where the EAP or specialist does not comply with subregulation (1)(a), the proponent or applicant must prior to conducting public participation as contemplated in chapter 5 of these Regulations, appoint another EAP or specialist to externally review all work undertaken by the EAP or specialist at the applicant’s cost.”

The external review was conducted in collaboration with the Environmental Assessment Research Group (EARG) of the North West University (NWU). In this regard we confirm that Global Green and NWU act independently and has no vested interest in the development project under review. External review and specifically report quality review is a particular focus of Global Green and the EARG. Various review reports as well as peer reviewed papers have been published which include comparative report quality reviews between different EIA regimes (Kidd and Retief, 2009; Retief et al, 2011; Sandham et al, 2012); report quality within specific provinces in South Africa (Sandham et al, 2005; Sandham and Pretorius, 2008); quality related to specific industries such as mining (Sandham et al, 2008a), as well as report quality related to specific sectors such as water management (Sandham et al 2008b), biodiversity and conservation (Hallat et al, 2015), biological control (Sandham et al, 2010), manufacturing (Sandham et al, 2013), etc.

As an introduction to the review this section briefly introduces the agreed scope of work as well as the individual reviewers, namely Prof Francois Retief and Me Charlotte Cilliers.

1.1 SCOPE OF WORK – REVIEW OF DRAFT SCOPING REPORT

The overall scope of work as specified in the signed sub-consultancy agreement dated 21st February 2017 which includes the following seven deliverables. However, this particular report only relates to the review of the draft scoping report and therefore deliverable 1. The review of the adequacy of the stakeholder engagement and public participation process in relation to deliverable 5 can only be concluded once the commenting period has lapsed and all comments have been received and incorporated into the final draft scoping report which will be reviewed in relation to deliverable 2.

External review deliverables:

1. **The peer review shall ascertain whether or not the draft version of the Scoping Report contains sufficient information to inform decision making by the competent environmental authority, and the Peer Review Report shall specify the nature of any information gaps (if any).**
2. The peer review shall ascertain whether or not the draft version of the Final Scoping Report meets the minimum legal requirements for a Scoping Report in terms of the 2014 NEMA EIA Regulations (refer to Regulation 21), and the Peer Review Report shall specify the nature of any minimum requirement that has not been complied with (if any).
3. The peer review shall ascertain whether or not the draft versions of the Final Environmental Impact Report (EIR) and Environmental Management Programme (ESMP) meet the minimum legal requirements for an EIR and ESMP in terms of the 2014 NEMA EIA Regulations (refer to Regulations 23), and the Peer Review Report shall specify the nature of any minimum requirement that has not been complied with (if any).
4. The peer review shall ascertain whether or not the draft versions of the EIA and ESMP contain sufficient information to inform decision making by the competent environmental authority, and the Peer Review Report shall specify the nature of any information gaps (if any).
5. The peer review shall ascertain whether or not the Stakeholder Engagement followed during the environmental impact assessment process were adequate in terms of the 2014 NEMA EIA Regulations (Refer to Chapter 6 of the Regulations) and the IFC Performance Standards, specifically whether issues raised have received adequate attention, and where necessary have been adequately addressed.
6. The peer review shall also ascertain at a high level, whether or not the Scoping Report, EIR and EMP comply with IFC Performance Standards, as based on the Equator Principles.
7. Aquatic aspects will be addressed in such a manner so that the Water Use Licence Applications requirements would be addressed should these be required.

1.2 REVIEWERS

The following two reviewers took part in the external review for the BOSA Transmission Project (see Annexure A for CV summaries):

- Prof Francois Retief – Global Green and NWU
- Me Charlotte Cilliers – Global Green

2. EXTERNAL REVIEW METHODOLOGY

Various international packages and guidelines have been developed for EIA report quality review. The Lee-Colley package (Lee and Colley, 1992) is probably the most well-known and widely applied. In terms of South Africa, extensive progress has been made to adapt international report review packages to the local context (see for example Retief 2007; Sandham and Pretorius 2008; Sandham et al, 2012). The review package used for this review is the so-called 'NWU Report Quality Review Package' adapted from the Lee-Colley package and continually updated as policy and legislation changes. The most recent version of the package has been adapted to the 2014 EIA Regulations and subsequent 2017 amendments. However, for the purpose of this review the package was also adapted to include DBSA and IFC standards as per the scope of work described in section 1.1. The 'NWU Report Quality Review Package' has been successfully applied to EIA quality review – the results of which have been published in various reports and peer reviewed academic journals as highlighted in section 1.

The review criteria included under section 3.2 and summarised in Table 3.2 deal specifically with the requirements for Scoping as per deliverable 1. We therefore did not include the content of the entire review package at this stage of the review process.

2.1. CONTENT OF THE REVIEW PACKAGE

The NWU Report Quality Review Package is intended for use by competent authorities, developers and consultancies, statutory consultees and non-governmental organisations and researchers involved in environmental assessment. It is designed as a self-contained package with the following components:

- a list of criteria (called Review Areas and Categories) to be used in each report review;
- an evaluation sheet/table on which to record the findings from applying the criteria.

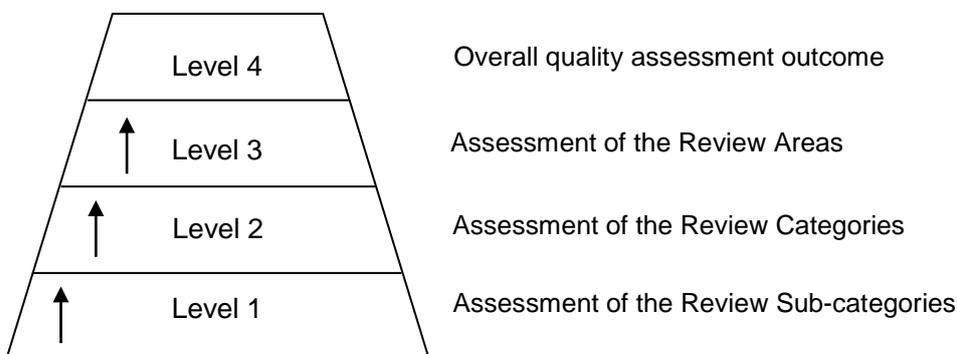
It was decided that the criteria should, as far as possible, satisfy the following requirements:

- each should be well defined and unambiguous;
- each should be capable of reasonably consistent and objective application;
- each should serve a distinct purpose different from the purposes of other criteria;
- each should be considered sufficiently important to merit influencing the ultimate assessment of report quality;

- the number of criteria should be as few as possible, consistent with covering all topics identified as essential (judged, in this instance, by reference to the South African legislative minimum requirements and DBSA / IFC standards);

To facilitate their use, the criteria are arranged in a hierarchical (or pyramidal) structure. The reviewer commences the review at the lowest level, i.e. the base of the pyramid, which contains simple criteria relating to specific tasks and procedures. Then, drawing upon these assessments, he/she progressively moves upwards from one level to another in the pyramid applying more complex criteria to broader tasks and procedures in the process until the overall assessment of has been completed (see Figure 2.1).

Figure 2.1. The review pyramid (environmental assessment reports)



2.2 APPLYING THE REVIEW PACKAGE

EIA reports should be reviewed independently by at least two persons and any significant differences in the review results should be systematically examined by them to see whether they can be resolved. As already indicated in section 1.2, two reviewers took part in this particular review. The evaluation resulting from applying each criterion is recorded by the reviewers on the evaluation table using a standard list of assessment symbols as described in Table 2.1. 'Letters' rather than 'numbers' are used as symbols to discourage reviewers from crude aggregation to obtain assessments at the higher levels in the pyramid. The evaluation table should not only be used to record the chosen assessment symbols, but also to record, in a brief summary, the principal justification for the evaluation score. This discourages 'over-mechanical' reviews.

The current version of NWU Report Quality Review Package has been extensively tested, particularly at the higher levels in the assessment pyramid (see for example Sandham and Pretorius 2008; Sandham et al, 2008a, 2008b, 2010, 2012). The results show a substantial level of

agreement in the assessments made by different reviewers of the same report. Subsequent experience in using the Review Package has supported earlier conclusions on its consistency.

Table 2.1. List of evaluation symbols

Symbol	Explanation
A	Relevant tasks well performed, no important tasks left incomplete.
B	Generally satisfactory and complete, only minor omissions and inadequacies.
C	Can be considered just satisfactory despite omissions and/or inadequacies.
D	Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions or inadequacies.
E	Not satisfactory, significant omissions or inadequacies.
F	Very unsatisfactory, important task(s) poorly done or not attempted.
NA	Not applicable. The Review Topic is not applicable or it is irrelevant in the context of this Statement.

The draft scoping report was evaluated against review areas and categories derived from GNR 982 and specifically Regulation 21, which describes the purpose and content requirements for scoping reports. In line with the scope of work DBSA and IFC standards were also included as well as any relevant guideline documents. The ultimate aim of the review was to determine to what extent the reports provide sufficient information for decision making and if the reports comply with minimum legal requirements.

3. REVIEW RESULTS

This section deals with results of the external review for the DSR. In line with the methodology described in the previous section the results are presented as ‘main results’ in relation to the different Review Areas (section 3.1) and ‘detailed results’ in terms of the different Review Categories (section 3.2).

3.1 MAIN RESULTS

Table 3.1 provides a summary of the main review results. Measured against the designed review categories it is concluded that *the report quality is generally satisfactory and complete, only minor omissions and inadequacies (grade B)*.

Table 3.1: Summary of main review results for the DSR

SUMMARY OF REVIEW AREAS		A	B	C	D	E	F
1	Description of the activity and decision making context		X				
2	Motivation of need and desirability		X				
3	Key issues and impacts identified		X				
4	Public participation and stakeholder engagement	To be completed					
5	Plan of Study for EIA		X				
FINAL GRADE			X				

The main recommendations in relation to the different Review Areas are the following:

- **Review Area 1: Description of the activity and decision making context**

- The Guideline on the determination of need and desirability has been updated in 2017. The final Scoping Report might want to reflect this latest 2017 version.
- Important municipal development planning policy and legislation (such as SPLUMA, etc.) are not included? According to section 2.4 the relevant IDPs will only be considered as part of the Assessment Phase – but should really also guide scoping. Moreover, no mention is made of SDFs?
- In terms of the strategic context an SEA was conducted for the Ramotshere Moiloa Local Municipality in 2007 as part of the development of their SDF. Admittedly this is now a 10 year old document but would still be appropriate for the EIA to refer to it and/or reflect on its outcomes and/or justify the non-inclusion. The SEA set about identifying strategic locations sensitive to certain land uses such as mining, agriculture, urban development, etc.

- **Review Area 2: Motivation of need and desirability**

- The strategic context in terms of energy is well covered especially in the attached Inception Report – Annexure H. However, there seems to be scant reflection on the strategic development planning context in terms of the local municipal and provincial IDPs and SDFs? These documents provide important context for the consideration of need and desirability.
- Section 1.3 of the DSR acknowledges the limitation in terms of dealing with climate change in the impact assessment up to this point in the process and provision is

made in the DSR for a statement on climate change in the EIA phase It is unclear what is meant by a 'statement' in the DSR – but we would like to highlight recent South African case law in the matter of Earthlife Africa, Johannesburg v The Minister of Environmental Affairs and others - which confirmed the requirement to assess climate change implications in EIA for developments of this nature. The implications for climate change is a particular consideration dealing with the timing of the development.

- **Review Area 3: Key issues and impacts identified**

- The MCDM methodology for identifying the preferred alignment and corridor seems to focus mainly on existing constraints, and did not seem to incorporate and/or consider the possible future constraints reflected in the local, district and provincial authorities strategic planning, and in particular their SDFs? It would seem to have made sense to also overlay the various corridor options with the different spatial development visions for the area as reflected in the SDFs?

- ***Review Area 4: Public participation and stakeholder engagement***

- This review area will be dealt with as part of the external review of the draft final scoping report.

- **Review Area 5: Plan of Study for EIA**

- The final scoping report needs to ensure that the issues identified in relation to the different DBSA and IFC standards, described as 'relevance to the project' in section 2.3, are incorporated in the plan of study for EIA, otherwise they are flagged but not addressed. So for the final Scoping Report check if there are issues or actions raised under 'relevance to the project' which are not explicitly included in the plan of study for EIA. For example – has provision been made for a livelihoods restoration plan (DBSA safeguard 3) in the plan of study?

3.2 DETAILED REVIEW RESULTS

This section presents the detailed review results per Review Area and Review Category. Table 3.2 summarises the results and provide brief justification for the review scores. The results reflect the combined views of the two reviewers.

Table 3.2: Detailed review results for the DSR

Reference	Review Areas and Categories	Evaluation Symbols							Review Comments and Justification	
		A	B	C	D	E	F	N/A		
Review Area 1: Description of the activity and decision making context										
GNR 982 Appendix 2(1)(a)	1.1 Was the relevant policies and legislation relevant to the activity identified?		X							The strategic context in terms of energy is well covered especially in the attached Inception Report – Annexure H. However, there seems to be scant reflection on the strategic development planning context in terms of the local municipal and provincial IDPs and SDFs?
GNR 982 Appendix 2(1)(c)	1.2 Was the preferred activity and technology alternative identified and confirmed through an impact and risk assessment and ranking process?		X							The DSR clearly explains the preferred activity and corridor alternative – see Annexure F and H.
GNR 982 Appendix 2(1)(d)	1.3 Has the preferred site been identified and confirmed, through a detailed site selection process, which includes an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified alternatives focusing on the geographical, physical, biological, social, economic, and cultural aspects of the environment?	X								See section 4 and Annexure F A high level analysis has been conducted which justifies the preferred corridor. Cumulative impacts have not been explicitly addressed as part of the corridor selection process, although cumulative thinking is reflected in the analysis.
GNR 982 Reg 8(a)	1.4 Were the details of the applicant and consulting team provided?	X								See section 1.2.1 and 1.2.3
GNR 982 Appendix 2(2)(a)(i)(ii)	1.5 Were the details of the EAP who prepared the report; and the expertise of the EAP, including a curriculum vitae included?	X								See Annexure A
GNR 982 Appendix 2(2)(b)(i)(ii)(iii)	1.6 Was the location of the activity, including the 21 digit Surveyor General code of each cadastral land parcel included, and where available, the physical address and farm name?	X								See section 4.1 and Annexure D
GNR 982 Appendix 2(2)(c)(i)(ii)	1.7 Was a plan included which locates the proposed activity or activities applied for at an appropriate scale, or, if it is a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or on land where the property has not been defined, the coordinates within which the activity is to be undertaken?	X								See section 4.1 and Annexure D
GNR 982 Appendix 2(2)(d)	1.8 Was a description of the scope of the proposed activity provided, including a description of all listed and specified activities triggered; and/or a description of the activities to be undertaken, including associated structures and infrastructure?	X								See sections 2.3.3 and 4.2 and 4.3 It was agreed at the pre-application meeting that Activity 12 of GNR 983 be added as a listed activity – which was done as part of the DSR.

										<p>GNR 983, Activity 27 is explicitly excluded for linear activities - so not sure why this activity is listed? Maybe based on discussions with DEA which is not reflected in the documentation?</p> <p>In terms of associated structures and infrastructure it is assumed that the development of the Watershed B substation will require a separate environmental authorisation. Ideally the substation authorisation should have been included in the application for the transmission line.</p>
GNR 982 Appendix 2(2)(e)	1.9 Was a description of the policy and legislative context within which the development is proposed been provided, 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?			X						<p>The legislative framework is well described in section 2.3 – also in relation to the DBSA and IFC standards.</p> <p>However, important municipal development planning policy and legislation (such as SPLUMA, etc.) are not included? According to section 2.4 the relevant IDPs will only be considered as part of the Assessment Phase – but should really also guide scoping. Moreover, no mention is made of SDFs?</p> <p>In terms of environmental strategic planning instruments an SEA was conducted for the Ramotshere Moiloa Local Municipality in 2007. Admittedly this information would be dated by now and the relevance could be questionable ten years later. However, it would be good to mention the existence of the SEA.</p> <p>The DSR did well to consider the NW Biodiversity Conservation Assessment Report. No EMFs exist for the study area.</p> <p>The Guideline on the determination of need and desirability has been updated in 2017. The final Scoping Report might want to reflect this latest version.</p>
GNR 982 Appendix 2(2)(j)(i)(ii)(iii)	1.10 Was an undertaking under oath or affirmation by the EAP provided in relation to the correctness of the information in the report; the inclusion of comments and inputs from stakeholders and interested and affected parties; and 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 included?	X								See Annexure B
GNR 982 Appendix 2(2)(k)	1.11 Was 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 included?	X								See Annexure B

Review Area 2: Motivation of need and desirability							
GNR 982 Appendix 2(1)(b)&(f)	2.1 Was the need and desirability of the proposed activity motivated, including the need and desirability of the activity in the context of the preferred location?		X				<p>The Final Inception Report included in Annexure H provides a detailed justification (i.e need) for the proposed project from an energy planning perspective. However, the implications from a municipal and provincial development planning perspective, as reflected in IDPs and SDFs is not well addressed.</p> <p>In terms of the strategic context for the development we confirm that an SEA was conducted in 2007 for the Ramotshere Moiloa Local Municipality as part of the development of their SDF. Admittedly this is now a 10 year old document but would still be appropriate for the EIA to refer to it and include its outcomes or justify the non-inclusion. The SEA set about identifying strategic locations sensitive to certain land uses such as mining, agriculture, urban development, etc.</p> <p>There is also an initiative underway regarding the establishment of a Biosphere Reserve and expanding the existing promulgated Protected Environments (PE) around Zeerust and Groot Marico, which is not reflected on the sensitivity map. The cadastral information for the latter can be obtained from Dr Dirk Cilliers, NWU at dirk.cilliers@nwu.ac.za The location of preferred corridor does not seem to traverse the biosphere initiative footprint – although it might be good to acknowledge its existence since it is a key conservation initiative for the province and local municipality.</p>
DEA 2017 ISBN: 978-0-9802694-4-4	2.2 Has the timing of the development been motivated?		X				<p>The justification for the project in terms of energy planning over time in the region is well motivated in the Final Inception Report included as Annexure H.</p> <p>However, Section 1.3 of the DSR acknowledges the limitation in terms of dealing with climate change in the impact assessment up to this point in the process. Therefore provision is made in the DSR for a statement on climate change in the EIA phase going forward – in particular:</p> <ul style="list-style-type: none"> • The potential impact of climate change on the project • How the project may contribute to climate change <p>It is unclear what is meant by a 'statement' in the DSR – but we would like to highlight recent South African case law in the matter of Earthlife Africa, Johannesburg v The Minister of Environmental Affairs and others - which confirmed the requirement to assess climate change implications in EIA for developments of this nature.</p>

									See http://cer.org.za/wp-content/uploads/2017/03/Judgment-Earthlife-Thabametsi-Final-06-03-2017.pdf . for more information on the particular case. A summary of the outcome of the case is also included in section 27.5.3.7 of Kidd, M. Retief, F. and Alberts, R (2017) 'Integrated Environmental Impact Assessment and Management'. in Strydom, H, King, N, and Retief, F. (eds) <i>Environmental Management in South Africa</i> , Juta Publishing, Cape Town.
DEA 2017 ISBN: 978-0-9802694-4-4	2.3 Has the location for the activity been motivated?		X						<p>The rational and outcome of the evaluation of the different corridor alternatives is well described in Annexure F.</p> <p>However, the MCDM methodology for identifying the preferred alignment and corridor seems to focus mainly on existing constraints – and did not seem to incorporate and/or consider the possible future constraints reflected in the local, district and provincial authorities strategic planning – and in particular their SDFs? It would seemed to have made sense to also overlay the various corridor options with the different development visions for the area as reflected in the SDFs?</p> <p>The MCDM process did not include public and/or IAP involvement or input. Therefore the public was not part of the location alternative evaluation. They will however have access to the outcome of the corridor evaluation outcome and have the opportunity to comment via the DSR. Be interested to see if any comments and/or opposition emerge from the PP process on the preferred corridor?</p>
Review Area 3: Key issues and impacts identified									
GNR 982 Appendix 2(1)(e)	3.1 Have the key issues to be addressed in the assessment phase been identified?		X						<p>All key issues are identified and described in the PoS for EIA – see sections 6 and 8.</p> <p>However, the next round of review need to check if any additional key issues were raised as part of the public participation process, which then will have to be incorporated in the final scoping report.</p>
GNR 982 Appendix 2(1)(g)	3.2 Have suitable measures to avoid, manage or mitigate identified impacts been identified and the extent of the residual risks that need to be managed and monitored been determined?							NA	<p>The MCDM process used to identify the preferred corridor did apply avoidance as a particular consideration – see Annexure F.</p> <p>However, suitable measures for mitigation etc. will only be dealt with as part of the EIA phase – as discussed during the pre-application meeting. See review categories 3.7 below.</p> <p>The latter recommendation is in line with international best practice understanding of scoping.</p>

GNR 982 Appendix 2(2)(h)(iv)	3.3 Was a description provided of the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects?	X							<p>The MCDM process / methodology relied on various specialist inputs related to geographical, physical, biological, social, economic, heritage and cultural aspects.</p> <p>Moreover, the specialist studies included under Annexure G covers a range of high level descriptive specialist inputs related to the preferred corridor.</p> <p>The different specialist studies did not seem to have worked from the same project description and corridor alignment – see for example the Heritage Specialist Study. This need to be acknowledged and dealt with in the final Scoping Report.</p>
GNR 982 Appendix 2(2)(h)(v)	3.4 Was a description provided of 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- can be reversed; may cause irreplaceable loss of resources; and can be avoided, managed or mitigated?						NA	<p>The applicability of this requirement was included for discussion in the agenda of the pre-application meeting with DEA dated 12-12-2016. It seems from the record of the pre-application meeting that DEA agreed with the approach proposed by Aurecon – to deal with the impacts as part of the Assessment Phase.</p> <p>The latter recommendation is also in line with international best practice understanding of scoping.</p> <p>However, aspects and impacts were identified at a high level in section 8.5.4 and Table 3.2 – which should guide a more detailed assessment in the next phase of the process.</p>	
GNR 982 Appendix 2(2)(h)(vi)	3.5 Was a description provided of 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?		X					<p>The MCDM process / methodology to identify the preferred corridor alternative is well described in Annexure F.</p> <p>The way 'significance' is dealt with under section 8.5 is in line with the terminology of Appendix 2 of GNR 982 and the general understanding of the term in the impact assessment literature. However, the understanding of significance in the DSR excludes the term 'magnitude' which is included in the definition of 'significant impact' in GNR 982. It seems that 'consequence' were used instead of 'magnitude' so this does not seem wrong. As it stands the understanding of significance in the Regulations is not helpful in ensuring consistent application and understanding of significance.</p> <p>A word of caution in terms of the methodology proposed in section 8 which translates subjective judgements into numerical ratings and then ends up with a significance 'score'. This is risky and could be fatally flawed – depending on how the outcome is interpreted.</p>	

GNR 982 Appendix 2(2)(h)(vii)	3.6 Was a description provided of 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?								NA	The applicability of these requirements was included in the agenda of the pre-application meeting with DEA dated 12-12-2016. It seems from the record of the pre-application meeting that DEA agreed with the approach proposed by Aurecon which is to deal with this particular requirement as part of the EIA phase. The external review would strongly supports this view.
GNR 982 Appendix 2(2)(h)(viii)	3.7 Was a description provided of the possible mitigation measures that could be applied and level of residual risk?								NA	
GNR 982 Appendix 2(2)(h)(ix)	3.8 Was a description provided of the outcome of the site selection matrix?	X								See Annexure F.
GNR 982 Appendix 2(2)(h)(x)	3.9 Was a motivation provided if no alternatives, including alternative locations for the activity, were investigated?								NA	Alternative locations / corridors for the development were extensively investigated – see Annexure F
GNR 982 Appendix 2(2)(h)(xi)	3.10 Was a concluding statement provided indicating the preferred alternatives, including preferred location of the activity?	X								See section 4.1 and Annexure F.
DBSA SS1	3.11 Have key issues in relation to environmental and social risks and impacts been identified?	X								See section 2.3.1
DBSA SS2	3.12 Have key issues in relation to protection of biodiversity and sustainable management and use of natural resources been identified?	X								See section 2.3.1
DBSA SS3	3.13 Have key issues in relation to involuntary resettlement as well as economic and/or physical displacement been identified?	X								See section 2.3.1
DBSA SS4	3.14 Have key issues in relation to community engagement, especially with vulnerable communities, been identified?	X								See section 2.3.1
DBSA SS5	3.15 Have key issues in relation to the use of pesticides been identified?	X								See section 2.3.1
DBSA SS6	3.16 Have key issues in relation to protection of heritage resources been identified?	X								See section 2.3.1
IFC PS2	3.17 Have key issues in relation to labour and working conditions been identified?	X								See section 2.3.2
IFC PS3	3.18 Have key issues in relation to resource efficiency and pollution prevention been identified?	X								See section 2.3.2
IFC PS4	3.18 Have key issues in community health, safety and security been identified?	X								See section 2.3.2

Review Area 4: Public participation and stakeholder engagement									
GNR 982 Appendix 2(2)(h)(ii)	4.1	Was a full description provided of the details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs?							To be reviewed as part of the Final Draft Scoping Report in line with deliverable 2 and 5
GNR 982 Appendix 2(2)(h)(iii)	4.2	Was a summary provided 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?							
Review Area 5: Plan of Study for EIA									
GNR 982 Appendix 2(1)(f)	5.1	Has the level of assessment to be undertaken been agreed, including the methodology to be applied, the expertise required as well as the extent of further consultation to be undertaken to determine the impacts and risks the activity will impose on the preferred site through the life of the activity, including the nature, significance, consequence, extent, duration and probability of the impacts to inform the location of the development footprint within the preferred site?		X					<p>See section 8</p> <p>Some of the specialist studies in section 8 are referred to as 'status quo reports' – which seems strange when the main purpose of specialist studies should be to determine the significance of impacts related to the particular key issues?</p> <p>The final scoping report needs to make sure that the issues identified in relation to the different DBSA and IFC standards – summarised as 'relevance to the project' – described in section 2.3 – are incorporated in the ToR for the specialist studies, otherwise they are flagged but not addressed. So for the final Scoping Report check if there are issues or actions raised under 'relevance to the project' which are not explicitly included in the plan of study for EIA. For example – has provision been made for a livelihoods restoration plan (DBSA safeguard 3) in the plan of study?</p>
GNR 982 Appendix 2(2)(i)(i)	5.2	Was a plan of study for undertaking the environmental impact assessment process to be undertaken been described, including a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity?	X						See section 8.2
GNR 982 Appendix 2(2)(i)(ii)	5.3	Was a description of the aspects to be assessed as part of the environmental impact assessment process been included?		X					<p>See section 8.3 and 8.5.4 and Table 32</p> <p>The use of the word 'aspects' in the regulations is somewhat problematic if it is to be understood in line with ISO 14001 definitions of aspects and impacts. Such an understanding would mean that impact assessment is essentially required during the scoping phase already. The external review is satisfied that aspects and impacts identified is acceptable to inform the scoping phase.</p>
GNR 982 Appendix 2(2)(i)(iii)	5.4	Was aspects to be assessed by specialists been included?	X						See section 8.3

GNR 982 Appendix 2(2)(i)(iv)	5.5 Was 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 been included?	X								See section 8.5
GNR 982 Appendix 2(2)(i)(v)	5.6 Was a description of the proposed method of assessing duration and significance provided?	X								See section 8.5
GNR 982 Appendix 2(2)(i)(vi)	5.7 Was an indication provided of the stages at which the competent authority will be consulted?	X								See section 8.6
GNR 982 Appendix 2(2)(i)(vii)	5.8 Were particulars of the public participation process that will be conducted during the environmental impact assessment process provided?	X								See section 8.7
GNR 982 Appendix 2(2)(i)(viii)	5.9 Was a description of the tasks that will be undertaken as part of the environmental impact assessment process provided?	X								See section 8.4
GNR 982 Appendix 2(2)(i)(ix)	5.10 Were suitable measures to avoid, reverse, mitigate or manage identified impacts identified and the extent of the residual risks that need to be managed and monitored determined?							NA		This will form part of the EIA phase – see Review categories 3.6 and 3.7 above.

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ANNEXURE A: CV SUMMARIES OF REVIEWERS

CURRICULUM VITAE



Personal Details:

Name: Prof Francois P Retief
Date of birth: 8 Nov 1974
Nationality: RSA
Experience: 20 years

Position:

Professor in Environmental
Management with
specialisation in Environmental
Assessment

Director: Global Green
Environmental Consultants

Highest Academic Qualification:

PhD – University of
Manchester, UK



NORTH-WEST UNIVERSITY
YUNIBESITI YA BOKONE-BOPHIRIMA
NOORDWES-UNIVERSITEIT
POTCHEFSTROOM CAMPUS

Main Qualifications:

- **2005: Doctor of Philosophy (Ph.D), School of Environment and Development, University of Manchester, United Kingdom**
- 2001: Masters in Environmental Management (M.EM), University of the Free State (UFS), South Africa
- 1998: Masters in Town and Regional Planning (M.TRP), University of the Free State (UFS), South Africa
- 1996: Baccalaureus Artium, Geography and Economics, University of the Free State (UFS), South Africa

EXPERIENCE

Prof Retief completed his PhD at the University of Manchester on the quality and effectiveness of environmental assessment. After completion of his PhD he joined the North West University as senior lecturer and in 2008 he was promoted to Associate Professor. Between 2009 and 2011 he served as Subject Chair for Geography and Environmental Management and between 2012 and 2015 as the first School Director of the newly formed School of Geo and Spatial Sciences. In March 2015, he was promoted to Professor and took up a new position within the Research Unit for Environmental Science and Management responsible for managing taught master's programmes.

He has contributed to 43 research papers in peer-reviewed journals, 11 book chapters and 80 conference contributions (47 South African and 33 international). He has a 'C1' research rating from the NRF and a Scopus *h-index* of 14. To date he has successfully supervised 33 Masters (M.Env.Man and MSc) and three PhDs. His students have won a number of awards most notably from the South African Geographic Society (SAGS) and the South African chapter of the International Association for Impact Assessment (IAIASa). Prof Retief serves on the editorial boards of all three leading international environmental assessment journals (EIA Review, JEAPM and IAPA) and between 2009 and 2014 he also acted as co-editor of one of these journals namely, Impact Assessment and Project Appraisal (IAPA). As co-editor off IAPA Francois was involved in successfully processing more than 240 paper submissions. At the 2015 annual international IAIA conference in Florence, Italy, Francois shared the '*Outstanding Service to IAIA Award*' with Prof Angus Morrison-Saunders in recognition of their excellent work as co-editors of IAPA. He has also been invited to present as key note speaker, most recently at the IAIASa conference in 2015. Francois is continually recognised as a top 10% researcher within the research unit and has in the past received awards for best overall paper presentation at the annual IAIASa conference, as well as the NWU Vice Chancellors Award for Community Service. Overall, Francois is acknowledged as a leading scholar and researcher in the field of environmental assessment.

CURRICULUM VITAE



Personal Details:

Name: Me Charlotte Cilliers
Date of birth: 14 Oct 1987
Nationality: RSA
Experience: 5 years

Position with Global Green:

Director

Highest Academic Qualification:

Masters in Environmental
Management – *cum laude*



GLOBAL GREEN
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Main Qualifications:

- **2016: Masters in Environmental Management, North West University, Potchefstroom campus – *cum laude***
- 2012: BSc Town and Regional Planning, North West University, Potchefstroom campus

EXPERIENCE

Me Cilliers started her professional career as a town and regional planner. She has been working in the field of environmental assessment since joining Global Green in 2012. Under the supervision of Prof Retief, she completed her Masters in Environmental Management (*cum laude*) at the North West University (NWU) focussing on the capacity of local government to deliver on their environmental management mandate.

Over the past five years she has been involved in a wide range of impact assessments in the following sectors:

- Housing,
- Agriculture,
- Energy,
- Bulk services infrastructure,
- Waste management,
- Tourism.

She has also been involved in EIA external review projects and therefore is experienced in EIA evaluation and review methodologies.