



REFERENCE: 16/3/3/1/D2/20/0014/18
NEAS REFERENCE: WCP/EIA/0000442/2018
ENQUIRIES: Malcolm Fredericks
DATE OF ISSUE: 23 APRIL 2019

ENVIRONMENTAL AUTHORISATION

APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014: PROPOSED EXPANSION OF THE GEORGE CREMATORIUM ON ERF 15092, GEORGE

With reference to your application for the abovementioned, find below the outcome with respect to this application.

DECISION

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment ("EIA") Regulations, 2014, the Competent Authority herewith **grants Environmental Authorisation** to the applicant to undertake the listed activities specified in section B below with respect to the preferred Activity & Location Alternative 1, as described in the Final Basic Assessment Report ("BAR"), dated 12 December 2018, prepared and submitted by the environmental assessment practitioner, Cape Environmental Assessment Practitioners.

The applicant for this Environmental Authorisation is required to comply with the conditions set out in section E below.

A. DETAILS OF THE APPLICANT FOR THIS ENVIRONMENTAL AUTHORISATION

Ms Irene Vermeulen
George Crematorium
PO Box 231
GEORGE
6530

Tel: (082) 375 3245

Fax: (044) 878 2333

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as "**the holder**".

B. LIST OF ACTIVITIES AUTHORISED

Listed Activities	Activity/Project Description
Environmental Impact Assessment Regulations Listing Notice 1 of 2014 (Government Notice No. 983 of 4 December 2014)	
Activity Number: 34 Activity Description: <i>The expansion of existing facilities or infrastructure for any process or activity where such expansion will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the release of emissions, effluent or pollution</i>	The George crematorium is proposing an expansion to their current capacity by adding a second furnace to the existing facility. This additional furnace requires an amendment to their existing Air Emissions License (AEL). In addition, they are proposing a new chapel facility and a reconfiguration of their access and parking areas.

The abovementioned list is hereinafter referred to as "**the listed activities**".

The holder is herein authorised to undertake the following alternative that includes the listed activities as it relates to the development:

Preferred Location and Activity Alternative:

According to the Final BAR the preferred alternative site is Erf 15092, as it is the location of the existing crematorium. The expansion will only require $\pm 130\text{m}^2$ of additional space. The area is already significantly transformed and the expansion will not affect the biodiversity of the site. The preferred alternative proposes the expansion of the existing crematorium to double the current capacity. Currently the crematorium is able to cremate up to 8 cadavers per day or up to an equivalent of 440kg of veterinary material. The expansion will include a second retort with the same capacity as the existing unit, thus allowing 16 cremations per day and a small animal cremation unit capable of cremating a maximum of 30 carcasses per day. A small chapel and memorial area will also be developed on the site.

C. SITE DESCRIPTION AND LOCATION

The activity is being proposed on the existing site and requires an expansion of $\pm 130\text{m}^2$ of physical construction. The site is already significantly transformed and consists of building, landscaped lawns and screening trees around the erf. Erf 15092 is bordered by

Pacaltsdorp Industrial Area, both east and south, with the existing grave yard north of the site.

The SG digit codes for the relevant properties is:

C02700020000046400000

C02700020000595000000

Coordinates of all the proposed activities on the property or properties (sites):

Points:	Latitude (S):			Longitude (E):		
1	33°	59'	18.93"	22°	26'	33.75"
2	33°	59'	18.72"	22°	26'	35.33"
3	33°	59'	20.12"	22°	26'	35.65"
4	33°	59'	20.29"	22°	26'	33.98"

Refer to Annexure 1 of this Environmental Authorisation: Locality Plan.

The above is hereinafter referred to as "**the site**".

D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

Cape EAPrac Environmental Assessment Practitioners

PO Box 2070

GEORGE

6530

Tel: 044-874 0365

Fax: 044-874 0432

E. CONDITIONS OF AUTHORISATION

Scope of authorisation

1. The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the following preferred Activity Alternative as described in Section B above:

The proposal entails the expansion of the existing crematorium to double the current capacity. Currently the crematorium is able to cremate up to 8 cadavers per day or up to an equivalent of 440kg of veterinary material. The expansion will include a second retort with the same capacity as the existing unit, thus allowing 16 cremations per day and a small animal cremation unit capable of cremating a maximum of 30 carcasses per day. A small chapel and memorial area will also be developed on the site.

2. The non-operational component of the Environmental Authorisation is subject to the following:
 - 2.1. The holder must commence with all the listed activities and conclude the development activities (construction phase) within a period of **five (5) years** from the date of issue of this Environmental Authorisation; and
3. The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.
4. Any changes to, or deviations from the scope of the alternative described in Section B above must be accepted or approved, in writing, by the Competent Authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

Written notice to the Competent Authority

5. The holder of the environmental authorisation must provide the Competent Authority proof of compliance with the following specified conditions of authorisation within **sixty (60)** calendar days of the date of issue of this decision:

Conditions: **7** and **8**

6. **Seven (7)** calendar days' notice, in writing, must be given to the Competent Authority before commencement of construction activities.

The notice must also include proof of compliance with the following conditions described herein:

Conditions: **10** and **12**

Note: All notices to the Competent Authority must make clear reference to the site details and EIA Reference number given above.

Notification and administration of appeal

7. The holder must in writing, within 14 (fourteen) calendar days of the date of this decision—
 - 7.1. notify all registered Interested and Affected Parties ("I&APs") of –
 - 7.1.1. the decision reached on the application;

- 7.1.2. the reasons for the decision as included in Annexure 2;
- 7.1.3. the date of the decision; and
- 7.1.4. the date when the decision was issued.

7.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section G below;

7.3. draw the attention of all registered I&APs to the manner in which they may access the decision;

7.4. provide the registered I&APs with the:

- 7.4.1. name of the holder (entity) of this Environmental Authorisation,
- 7.4.2. name of the responsible person for this Environmental Authorisation,
- 7.4.3. postal address of the holder,
- 7.4.4. telephonic and fax details of the holder,
- 7.4.5. e-mail address, if any, of the holder,
- 7.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations (as amended).

8. The listed activities, including site preparation, must not commence within thirty-nine (39) calendar days from the date of issue of this Environmental Authorisation. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided (i.e. the listed activities, including site preparation, must not commence until the appeal is decided).

Management of activity

9. The proposed upgrade activities must be implemented in accordance with the approved final Environmental Management Programme ("EMPr").

10. The final EMPr submitted as part of the application for Environmental Authorisation must incorporate the conditions of this environmental authorisation as an appendix to ensure that all contractors are fully informed and comply with the conditions of this EA, prior to commencement of construction activities.

11. The final approved EMPr must be included in all contract documentation for all phases of implementation.

Monitoring

12. The holder must appoint a Site Agent or Environmental Control Officer ("ECO") before commencement of any land clearing or construction activities to ensure compliance with the conditions of this EA and provisions of the EMPr.
13. The Site Agent or ECO must–
 - 13.1. be appointed prior to commencement of any site demarcation/clearing or construction activities commencing;
 - 13.2. ensure compliance with the conditions of this EA and provisions of the EMPr;
 - 13.3. keep record of all activities on site; problems identified; transgressions noted and a task schedule of tasks undertaken by the Site Agent or ECO;
14. A copy of the Environmental Authorisation, EMPr, audit reports and compliance monitoring reports must be kept at the site of the authorised activities, and must be made available to anyone on request, including a publicly accessible website (if applicable).
15. Access to the site referred to in Section C must be granted and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.

Auditing

16. The holder must, for the period during which the environmental authorisation and EMPr remain valid ensure that compliance with the conditions of the environmental authorisation and the EMPr, is audited.
17. The environmental audit report must be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise.

The holder must, **within 7 days** of the submission of the environmental audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable).

18. The Environmental Audit Report must contain all the information required in **Appendix 7** of the Environmental Impact Assessment Regulations, 2014.
19. During the construction phase, the holder must undertake annual environmental audit(s) and submit these Environmental Audit Report(s) to the Competent Authority.

The final construction phase Environmental Audit Report(s) must be submitted to the Competent Authority within six (6) months of completion of construction;

Specific Conditions

20. The holder must ensure that all sewage-infrastructure that supports the approved expansion of the crematorium facility is connected to the George Municipal sewerage network.
21. Should any onsite storage of human remains take place on the premises, the holder must ensure that provision is made for adequate storage fridges in the design of the proposed expansion of the crematorium facility, prior to construction activities commencing.
22. Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape.

Heritage remains include: meteorites, archaeological and/or palaeontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.

23. A qualified archaeologist and/or palaeontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority.

F. GENERAL MATTERS

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.
2. Non-compliance with a condition of this Environmental Authorisation or EMPr may render the holder liable to criminal prosecution.
3. If the holder does not conclude an authorised listed activity within the period referred to in Par 2.1 of Section E, this Environmental Authorisation shall lapse for that activity, and a new application for Environmental Authorisation must be submitted to the relevant Competent Authority.

If the holder wishes to extend a validity period specified in the Environmental Authorisation, an application for amendment in this regard must be made to the relevant Competent Authority prior to the expiry date of such a period.

Note:

- (a) Failure to lodge an application for amendment prior to the expiry of the validity period of the Environmental Authorisation will result in the lapsing of the Environmental Authorisation.
 - (b) It is an offence in terms of Section 49A(1)(a) of NEMA for a person to commence with a listed activity if the competent authority has not granted an Environmental Authorisation for the undertaking of the activity.
4. The holder is required to notify the Competent Authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated.

In assessing whether it requires an amendment of the EA, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

The onus is on the holder to verify whether such changes to the environmental authorisation must be approved in writing by the relevant competent authority prior to the implementation thereof.

5. The manner and frequency for updating the EMPr is as follows:
- (a) Any further amendments to the EMPr, other than those mentioned above, must be approved in writing by the relevant competent authority.
 - (b) An application for amendment to the EMPr must be submitted to the Competent Authority if any amendments are to be made to the impact management outcomes of the EMPr. Such amendment(s) may only be implemented once the amended EMP has been approved by the competent authority.

The onus is however on the holder to confirm the legislative process requirements for the above scenarios at that time.

6. Where an amendment to the impact management outcomes of an EMPr is required before an environmental audit is required in terms of the environmental authorisation, an EMPr may be amended on application by the holder of the environmental authorisation.

Compliance with Environmental Authorisation and EMPr

7. Non-compliance with a condition of this environmental authorisation or EMPr is an offence in terms of Section 49A(1)(c) of the National Environmental Management Act, 1998 (Act no. 107 of 1998, as amended).

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By facsimile: (021) 483 4174; or

By hand: Attention: Mr Jaap de Villiers (Tel: 021 483 3721)
Room 809
8th Floor Utilitas Building,
1 Dorp Street,
Cape Town,
8001

Note: For purposes of electronic database management, you are also requested to submit electronic copies (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Authority to the address listed above and/ or via e-mail to Jaap.DeVilliers@westerncape.gov.za.

5. A prescribed appeal form as well as assistance regarding the appeal processes is obtainable from Appeal Authority at: Tel. (021) 483 3721, E-mail Jaap.DeVilliers@westerncape.gov.za or URL <http://www.westerncape.gov.za/eadp>.

H. DISCLAIMER

The Western Cape Government, the Local Authority, committees or any other public authority or organisation appointed in terms of the conditions of this Environmental Authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Your interest in the future of our environment is appreciated.

Yours faithfully



MR. GAVIN BENJAMIN

DIRECTOR: DEVELOPMENT MANAGEMENT (REGION3)

DATE OF DECISION: 23 APRIL 2019

Copy: Ms Melisa McKay
Mr Clinton Peterson

Cape EAPrac
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EIA REFERENCE NUMBER: 16/3/3/1/D2/20/0009/18
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ANNEXURE 2: REASONS FOR THE DECISION

In reaching its decision, the Competent Authority considered, inter alia, the following:

- a) The information contained in the Application Form dated 5 September 2018, the Final Basic Assessment Report (BAR) dated 12 December 2018 and the Final EMPr submitted together with the aforementioned Final BAR;
- b) Relevant information contained in the Departmental information base, including the Guidelines on Public Participation and Alternatives (dated March 2013);
- c) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the National Environmental Management Act, 1998 (Act No. 107 of 1998);
- d) The comments received from I&APs and responses to these, included in the Final BAR dated 12 December 2018;
- e) The balancing of negative and positive impacts and proposed mitigation measures.

A site visit was conducted by the case officer (Marianne Lesch) and the Competent Authority had sufficient information before it to make an informed decision.

All information presented to the Competent Authority was taken into account in the consideration of the application for Environmental Authorisation. A summary of the issues that were considered to be the most significant for the decision is set out below.

1. Public Participation

The public participation process is regarded to fulfil the process requirements of the Environmental Impact Assessment Regulations, 2014.

Site notices notifying potential I&APs of the proposed application were placed on site and an advertisement was published on 04 October 2018 in "Die Burger" newspaper notifying the public of the EIA process and providing an opportunity for Interested and Affected Parties (I&APs) to register and participate.

According to the Final BAR three stakeholders responded with comments in writing. These were the Department of Health, the Garden Route District Municipality and Cape Nature. The following issues were raised:

Department of Health:

- Adequate services (water, sanitary, sewage and refuse removal) must be in place.
- Adequate refrigeration must be available.
- GRDM License conditions must be adhered to.

Garden Route District Municipality (GRDM):

- Concern that no emissions data was undertaken for 2018 and the 2017 data was undertaken by an unqualified service provider and that this may affect the impact ratings, although recognition was given that the specialist is wont to take a conservative approach.
- The applicant must adhere to the conditions of the current license.

Cape Nature:

- Alien invasive plant management on the site must be exercised.

The GRDM indicated that the 2018 emissions monitoring data had not been submitted by the George Crematorium. In response, the applicant has appointed Yellow Tree to undertake the emissions monitoring. The monitoring was undertaken on the 15th and 16th of November 2018 and has been used to inform the Final BAR, as well as the AEL Renewal Application that has been completed. The Environmental Assessment Practitioner recommended in the Final BAR that the EA includes a condition which stipulates that emissions monitoring must be implemented. This Department is however of the opinion that the conditions stipulated in the AEL will adequately address the operational aspects (e.g. emissions monitoring).

This Department has reviewed the Comments and Responses Report, as contained in the Final BAR and is satisfied that all the concerns raised by Interested and Affected Parties ("I&APs") were responded to and adequately addressed by the Environmental Assessment Practitioner during the public participation process. Specific conditions, management and mitigation measures have been included in this Environmental Authorisation and in the approved EMPr to adequately address the concerns raised.

The Competent Authority concurs with the Environmental Assessment Practitioner's responses to the issues raised during the public participation process and has included appropriate conditions in this Environmental Authorisation to ensure that the EMPr gives effect to these, in addition to the provisions contained therein.

2. Alternatives

(a) Alternative 1: (Preferred Location Alternative)

According to the Final BAR the preferred alternative site is Erf 15092, as it is the location of the existing crematorium. The expansion will only require $\pm 130\text{m}^2$ of additional space. The area is already significantly transformed and the expansion will not affect the biodiversity of the site. This Department concurs that this is the most appropriate and environmentally suitable site, as it will not negatively impact on the receiving environment from a biophysical perspective and is also compatible with the existing surrounding land use. The site also already contains an existing crematorium facility and there is sufficient space to accommodate the proposed expansion.

(b) Alternatives 2: (Preferred Activity Alternative)

According to the Final BAR the preferred alternative proposes the expansion of the existing crematorium to double the current capacity. Currently the crematorium is able to cremate up to 8 cadavers per day or up to an equivalent of 440kg of veterinary material. The expansion will include a second retort with the same capacity as the existing unit, thus allowing 16 cremations per day and a small animal cremation unit capable of cremating a maximum of 30 carcasses per day. A small chapel and memorial area will also be developed on the site.

The following key stages form part of the cremation process:

According to the Final BAR (Page 43 of 91) an individual coffin containing the deceased is placed into the oven. The oven is sealed and cremation is undertaken at a temperature of 900 degrees Celsius. The fuel used to fire the oven consists entirely of LPG Gas. The LPG gas is stored within an enclosed area outside the building. An afterburner is situated above the oven, before emissions enter the main stack. The afterburner is also fuelled with LPG gas and has been designed to burn off volatile gaseous emission before discharge through the stack. Emissions are discharged through a stack that is approximately 12m high. The following unit processes form part of the activities at George Crematorium:

- Bodies are received from undertaking / veterinary companies.
- Documentation is checked before accepting the bodies.
- Cremation takes place.
- After Burning of Emissions to remove any volatile emissions.
- Remaining bones are milled to a fine powder.
- Returning of cremains to family members and disposal of wood ash in designated grave
- Cleaning of the kiln before reuse.

According to the Final BAR cremations are now being promoted, because of social, technological and philosophical reasons. The Final BAR submits that due to rapid industrialization, there is a need for more land. There are also concerns about public hygiene, because of corpses buried near the surface of the earth. In addition, technological advancement has led to the creation of modern cremation equipment that can help reduce the body to its basic elements. Nevertheless, there are environmental concerns associated with emission of gases released during cremations. These are however managed by means of the Atmospheric Emissions License and to date the George Crematorium has been found have emissions well below the official limits.

This Department concurs with the abovementioned submission, as there are a number of environmental factors, in addition to the availability of suitable land for new graveyards that needs to be considered to prevent and ensure that there are no negative impacts on the receiving biophysical environment, which could subsequently also impact negatively on the socio-economic environment.

(c) Burial Alternative

The Final BAR submits that an alternative to the expansion of the crematorium is burial. The Applicant does not have nor is she in charge of any land that has been identified for burial. The service that is provided is purely cremation of human and animal cadavers and veterinary waste. Thus as the applicant, this activity is not feasible. In terms of an activity, burial requires significant amounts of land. The development and management of cemeteries are considered to be a municipal mandated function. According to the Final BAR the Municipal Integrated Development Plan (IDP) has already identified that there is limited space remaining at the existing municipal cemeteries, and these are currently beset by vandalism and flooding. No new land parcels have been identified for burial purposes, and the demand for housing land is far more critical at this current time. Thus to consider burial for this application as an alternative is unfeasible, unreasonable and not achievable in the near future. Furthermore, the impacts on biodiversity will be significantly higher when considering new land parcels as opposed to expanding the existing crematorium. This option will thus not be considered any further.

(d) Design or Layout Alternatives

According to the Final BAR there were no design or layout alternatives considered as the equipment requires very specific design to function correctly e.g. the second retort must be located near to the existing stack and fuel source.

(e) "No-Go" Alternative

According to the Final BAR the increase in the regional population increases the mortality rate. Thus the demand for expanded death services has increased. The No-Go would be to leave the crematorium at its currently capacity, but the demand for the service clearly overrides this option. It must be noted that since the demand to expand is there, if this is not acted on, the storage of cadavers destined for cremation becomes a problem. According to the owner, in winter there is a significant increase of mortalities and cremations are delayed by up to 7 weeks due to the backlog as a result of the current capacity. This option is thus not sustainable in the long run.

3. Impact Assessment and Mitigation measures

3.1 Impact Assessment

According to the Final BAR two Air Emissions Monitoring Reports were used to assess the potential impacts of the crematorium emissions, namely EOHS and Yellow Tree Reports. Yellow Tree conducted emissions monitoring of the facility on 15th and 16th November 2018, which are reflected on page 50 of the Final BAR (Table 1: Cremation Emissions, Yellow Tree Report dated 12 December 2018). These indicate the emissions recorded in comparison to the NEM: AQA current and future limits. However, the GRDM rejected the 2017 EOHS monitoring data as not being compliant with the requirements of the NEM: AQA. According to the Final BAR the LAQS Air Quality Impact Assessment made use of the data, but also took a very conservative approach to the dispersion modelling that was undertaken. According to the Final BAR the GRMD was satisfied that the same results will be obtained as indicated by the Air Quality specialist, as long as the abatement measures suggested in the Yellow Tree

report are implemented. Therefore, GRMD have confirmed that there is no need to update the Air Quality Impact Assessment at this stage.

In addition, the Final BAR submits that the results of the original dispersion modelling study show that the estimated maximum ground-level concentrations of all pollutants as a result of maximum allowed emissions from the George Crematorium (GC) were all below ambient air quality standards. As these standards have been set at levels that do not pose a threat to human health, the potential impacts of the estimated ground level concentrations do not warrant further investigation at this stage. The point of maximum impact is modelled to George Crematorium Expansion (Final BAR, GEO501/06, October 2017 Page 51 of 91) occur approximately 50 metres east of GC's operations, on vacant land. In addition, all concentrations at the nearest residential areas were also estimated to be well below the ambient air standards, even though emission were overestimated. The LAQS also concludes that the actual impact of GC's emissions on air quality in the residential area north-west of the plant will be low and that an increase in stack height is not warranted at this stage. The estimated ground-level concentrations of Hg and PCDD/F emissions are very low and, in the LAQS's opinion, do not pose a health risk to the community. This Department concurs with the aforementioned findings and conclusions made by the aforementioned specialist.

3.2 Activity need and desirability

According to the Final BAR the Crematoria offers basic human development services and are supported by the PSDF. The 2017 – 2022 IDP and the SDF have confirmed that the municipality is actively having to identify land for expansion of cemeteries. Cremation has been offered as a solution to the land issue. The Final BAR further submits that the erf is currently the site of the existing crematorium and its expansion provides for future population growth and mortality. According to the Final BAR the population growth, and conversely mortality within the George Municipality demands an expanded service for cremation. Death is an inevitable national occurrence and the societal norm of burial has led to severe constraints on available land that is a burning issue for the municipality to contend with. The expansion of the crematorium supports logistical, environmental, religious and financial societal priorities.

3.3 Biophysical

According to the Final BAR and inputs from Cape Nature the vegetation unit which is supposed to be present on the erf is the Critically Endangered Garden Route Granite Fynbos (Hardly Protected). This unit is listed as a threatened ecosystem in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEM: BA). However, because the site has been transformed, occupied and utilised as a crematorium facility, none of the aforementioned vegetation is present on the site. Cape Nature does however recommend that the landowner attempt to keep as much locally indigenous vegetation on his erf as possible and seek to rehabilitate any open space areas. The Final BAR further submits that according to the surveyor general data, there is also no watercourses on the subject property or erf.

3.4 Regional/ planning context

The property is zoned Industrial Zone III (noxious trade) in terms of the 2017 George Integrated Zoning Scheme By-Law, which includes crematoria. According to the Final BAR the Crematoria offers basic human development services and are supported by the PSDF. The George crematorium is an existing facility located inside the delineated urban edge. This Department is of the opinion that the current location is compatible with the surrounding land use and that the proposed expansion will simply continue to exercise the current land use.

3.5 Socio-economic

As already stated above and in the Final BAR, the population growth, and conversely mortality within the George Municipality demands an expanded service for cremation. Death is an inevitable national occurrence and the societal norm of burial has led to severe constraints on available land that is a burning issue for the municipality to contend with. The expansion of the crematorium supports logistical, environmental, religious and financial societal priorities.

4. National Environmental Management Act Principles

The National Environmental Management Principles (set out in section 2 of the NEMA, which apply to the actions of all organs of state, serve as guidelines by reference to which any organ of state must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the selection of the best practicable environmental option.

5. Conclusion

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the provisions of the final EMPr, the Competent Authority is satisfied that the proposed listed activities will not conflict with the general objectives of integrated environmental management stipulated in Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and that any potentially detrimental environmental impacts resulting from the listed activities can be mitigated to acceptable levels.

----- END -----