APPENDIX K: NEED AND DESIRABILITY

Introduction:

This document focuses on the application for the establishment of a new Free-Range Poultry Broiler Facility on the Remainder of Farm Number 563, 564, 565 and the Farm Kleinfontein Number 954, Worcester, and evaluates the proposed development in the context of 'need and desirability'.

About Elgin Free Range Chicken:

Elgin Free Range Chicken (EFRC) are South Africa's leading and most trusted free-range supplier. According to EFRC, day-old broiler chicks are purchased and immediately placed in chicken sheds for a short brooding period. During the brooding period, the baby chicks are kept indoors, and heaters are used to keep the sheds and the baby chicks warm and safe. This brooding period is typically also the same period that a chick will be protected under its mother's wing in nature. Once the brooding period has been completed, the pop holes are opened, and the birds have the freedom to naturally migrate and roam outdoors during the day on the grass pasture.

Once outside, chickens have the freedom to roam, peck, and dust-bathe which helps them preen and maintain their feathers, soothes their skin and cools them down on hot days. At night the chickens naturally migrate back to their houses for warmth and safety. This is also where they keep themselves dry when it's raining or unpleasant outside. EFRC ensure that they have at least 6 hours of continuous darkness at night to ensure adequate rest. During this time, no bright lights are allowed to be turned on around the chicken houses. The atmosphere of the chicken sheds is not controlled, and the birds breathe normal fresh air.

All chicken waste is managed responsibly and sustainably with minimal to zero impact on the environment (soil, air, water). Chicken manure in the sheds at the end of the cycle is used for composting. According to EFRC: "*We are committed, and this is the reason why we supply top retailers, food service and hospitality partners, wholesales as well as our own Factory Shops with the best quality and most trusted free-range chicken*." (https://www.freerangechickens.co.za/about-us/#our_story)

Proposed Development:

EFRC Agri Operations (Pty) Ltd. (Elgin Free Range Chickens) propose the development of a Free-Range Poultry Broiler Facility. The Broiler Facility will involve the establishment of 20 Broiler Houses with free range pasture located at the side of each house. Each facility will house approximately 17 000 birds. An Ablution facility, Guard House, Spray Race and Refrigerated Container will be located at the entrance to the site. Furthermore, an additional Ablution Facility and Residential Dwelling will be located at the broiler facilities. An existing access road will be utilised, and numerous internal roads will be upgraded and realigned (6m width required) where applicable for biosecurity reasons, to improve traffic flow and safety, and to improve river crossings. Four watercourse crossings are required, two are existing crossings and two are new crossings within the proposed road alignment. Three of the structures proposed will be low waterway bridges and one will be a suspended bridge structure.

Based on the electrical equipment that would be installed inside each one of the 20 broiler houses, the broiler houses will have a total peak power requirement of around 301.5kVA, including the new infrastructure at the entrance of the farm and requirement of the existing infrastructure, the total load requirement for the farm is estimated to be 312kVA. Solar panels are proposed on the roofs of the chicken houses. At a designated area close to the delivery point of Eskom the containerised solar batteries (distribution station) will be placed, and a generator room will be built to house the backup generators. A bunded Diesel Tank (2200L) will also be located within close vicinity of the Generator Room. A low voltage (LV) underground cable will go from the existing Eskom point/transformer, via a trench, to the distribution station. A step-up transformer and 11KV overhead line will then distribute power from the distribution station to the proposed facilities. The existing Eskom supply will therefore be supplemented with solar energy which is more sustainable.

A Water Treatment Plant is proposed to treat the water from the existing Boreholes (BH1 & BH2) which will be fed via a pipeline from the boreholes to the Water Treatment Plant. Thereafter, treated water will be sent to two proposed reservoirs (300kl each) on site. Water will be sent from the reservoirs directly to the broiler houses. Water storage tanks will be located at each chicken house (1 x 5000 L & 1 x 1000 L). All water pipelines will run, as far as possible, on the side of existing and the new roads.

Underground collection/treatment tanks will be located at all new ablution and domestic houses to manage domestic sewerage. Cold storage will be utilised as temporary storage for mortalities which will then be disposed of at a bio-approved landfill site or processed at an existing rendering plant (off-site). Organic materials will be composted onsite as part of each households composting arrangement. The remaining solid waste will be separated into recycled and non-recycled materials and removed from the site on a weekly basis to the local municipal waste facility.

Manure will be dry swept and cleaned out of the chicken houses whereafter high-pressure hoses (washing pumps) will be used to clean the pens with any residual water lost through evaporation. Chicken Manure will be used directly in the agricultural industry to be collected by surrounding farmers for crop fertilisation.

Need & Desirability:

In response to the growing demand for affordable protein and the need to support a stable food supply, the applicant wishes to development a broiler facility to expand its overall production capacity.

The proposed development footprint is located within old agricultural fields that have been under cultivation since before 1966. In addition, the remaining infrastructural requirements will be undertaken within the farm werf itself. The farm werf is currently a cluster of dwellings, sheds and related infrastructure. Furthermore, the location and layout of the preferred development alternative has been developed based on existing access routes, service availability, prevailing wind directions, environmental sensitivities and biosecurity requirements.

The proposed development site is zoned Agriculture 1. The application is for agricultural purposes and is therefore in line with current land use zoning for the site. In terms of the Municipality Zoning Scheme By-Law, a Consent Use on Agriculture for 'Intensive Animal farming', is required. Approval for consent use (intensive feed farming) is still to be obtained.

The "need and desirability" will be evaluated by considering the broader community's needs and interests as reflected in a credible Integrated Development Plan (IDP), Spatial Development Framework (SDF) etc as well as determined by the Basic Assessment process.

The following policies were considered:

- Western Cape Land Use Planning Guidelines Rural Areas, March 2019
- Western Cape Provincial Spatial Development Framework (PSDF) (2014)
- Breede Valley Municipality IDP 2022 – 2027
- Breede Valley Municipality SDF 2020
- Western Cape Biodiversity Spatial Plan (2023)

Western Cape Land Use Planning Guidelines Rural Areas, March 2019:

According to this rural guideline, "*cultivatable soils and mineral resources are non-renewable assets that are important underpinnings of the Western Cape economy. As agricultural output is the foundation of the Western Cape's rural economy and an important input to the urban economy, safeguarding the Province's agricultural resources, and productively using them without compromising biodiversity, heritage and scenic resources, remains a key challenge. There is limited suitable land available for extension of the Province's agricultural footprint, and water availability limits the use of cultivatable soils. Ineffective and inefficient farming practices impinge on agricultural productivity and contribute to the loss of valuable topsoil*."

"*The evaluation of sustainable land management is an integral part of the process of harmonizing agriculture and food production with the, often conflicting, interests of urban development, economics and the environment. To ensure sustainable use of agricultural land and to build resilience, land management practices (e.g. maintaining and enhancing the production potential of soil, including grazing carrying capacity by introducing correct cropping systems such as conservation agriculture, veld rotation and rehabilitation, and eradication of declared weeds and invasive plants), control processes of land degradation (e.g. salination, erosion) and their efficiency in this respect will largely govern the sustainability of a given land use*."

"*The basis of sustainable agriculture, is implementing agricultural activities, that combine technology, policies and activities to integrate natural resources with socio-economic principles by:*

- *Productivity: Maintaining or enhancing services and the biological productivity of the land.*
- *Security: Reducing all levels of production risk to ensure security (socio-economic and natural resources).*
- *Protection: Maintaining the quality and functions of natural resources through the protection of the potential of the soil and water quality.*

- *Viability: Ensuring economically viability.*
- *Acceptability: Implementing actions that are socially acceptable and responsible.*

A good balance must be found between these five principles, as the basic 'pillars' on which sustainable land management for agriculture must be constructed."

"*In approving development applications, authorities must consider the impact that a development may have on the municipality, agriculture and the rural landscape and must ensure through appropriate conditions and other measures that activities are appropriate in a rural context, that the development generate positive socio-economic returns, and do not compromise the environment or ability of the municipality to deliver on its mandate*."

As mentioned 'agricultural output is the foundation of the Western Cape's rural economy and an important input to the urban economy' therefore 'safeguarding the Province's agricultural resources, and productively using them without compromising biodiversity, heritage and scenic resources' forms the basis of this EIA.

The development will play an important role in increasing the agricultural potential of the property and the long-term economic viability of the existing farming operation – which will help to sustain existing and future employment opportunities. Through implementation of suitable mitigation and management measures, the establishment and operation of the proposed development will not negatively impact the natural environment or surrounding land users. As such, all three pillars of sustainability can be promoted within the development proposal.

The proposed development site is a working farm located within an agriculturally dominated landscape. The location of the property is thus suitable for the expansion of agricultural activities that will support local economic development and generate employment opportunities within the agricultural sector. Furthermore, the proposed agricultural activities (poultry production) are not currently a main commodity in the region and will assist in diversification of the local agricultural sector. The proposed agricultural development will also run year-round and provide more permanent job opportunities compared to the traditional forms of agriculture in the region. Lastly, poultry broiler facilities produce a valuable byproduct in the form of nutrient rich manure which can be used in the existing farming undertaken on the property or surrounding areas thereby facilitating sustainable, circular agricultural practices.

Western Cape Provincial Spatial Development Framework (PSDF) (2014)

The Western Cape PSDF is a planning document that guides district and local spatial initiatives such as IDP's and SDF's. It aims to create a coherent framework for the province's urban and rural areas. The PSDF aims to guide the location and form of public investment in the western cape's urban and rural areas. Whilst it cannot influence private sector investment patterns, it has an important contribution in terms of reducing business risk by providing clarity and certainty on where public Infrastructure investment will be targeted, thereby opening new economic opportunities in these areas. The current economic state with increasing levels of unemployment, and recent job losses in agriculture, all add to the high levels of rural poverty and unemployment. The provincial SDF emphasizes the importance and need for economic

growth, job creation and poverty alleviation. The proposed development will create new direct and indirect job opportunities during the construction and operational phase of the development.

Agricultural output is foundational to the rural economy in the Western Cape. However, there is limited suitable land available for the expansion of agricultural activities and using these land areas without compromising biodiversity, heritage, and scenic resources, remains a key challenge. The property on which the development activities are proposed, is a working farm located in a broader agricultural landscape. The location of the proposed new development is on old agricultural fields, does not coincide with archaeological and cultural heritage resources and given the development location, it is unlikely that any palaeontological resources will be impacted. The development activity is thus in line with the PSDF in that it will allow feasible expansion of agriculture within the Western Cape and facilitate job creation within this sector.

Furthermore, the PSDF promotes sustainable development which requires that economic, social, and environmental aspects relating to a development proposal are considered. The development will play an important role in increasing the agricultural potential of the property and the long-term economic viability of the existing farming operation – which will help to sustain existing and future employment opportunities. Through implementation of suitable mitigation and management measures, the establishment and operation of the proposed development will also not negatively impact the natural environment or surrounding land users. As such, all three pillars of sustainability can be promoted within the development proposal.

Breede Valley Municipality IDP 2022 – 2027:

The Breede Valley Municipality IDP (2022-2027) encourages local economic development with a focus on creating employment opportunities for residents. One of the 6 Strategic Objectives of the IDP is "*to create an enabling environment for employment and poverty eradication through proactive economic development and tourism (SO2)*" through:

- *Creating a healthier investor-friendly environment;*
- *Market Breede Valley as a a preferred area for business investment; and*
- *Strengthen relations with business chambers, tourism and agricultural sectors*.

Furthermore, Programme 5.9A specifically looks at "*expanding Rural and Agricultural development*". The proposed development site is a working farm located within an agriculturally dominated landscape. The location of the property is thus suitable for the expansion of agricultural activities that will support local economic development and generate employment opportunities within the agricultural sector. Furthermore, the proposed agricultural activities (poultry production) are not currently a main commodity in the region and will assist in diversification of the local agricultural sector. The proposed agricultural development will also run year-round and provide more permanent job opportunities compared to the traditional forms of agriculture in the region. Lastly, poultry broiler facilities produce a valuable byproduct in the form of nutrient rich manure which can be used in the existing farming undertaken on the property or surrounding areas thereby facilitating sustainable, circular agricultural practices.

Programme 5.7 (A) looks at Development of Alternative Energy Sources. In order to address the challenges of climate change, Breede Valley Municipality will increasingly have to transition to a Green Economy in the future. The current crisis in the electricity sector relates to electricity supply shortages and an increasing carbon footprint. It is imperative that the green economy concept be regarded and pursued as a tool to transform the current state of the local economy to one that is more sustainable from an economic, social and environmental perspective. The proposed development will include the installation of Solar Panels to supplement the energy requirements of the Broiler Facilities and therefore reduce the demand on Eskom. The proposed activities are thus well aligned with the IDP of the local municipality.

While no specific EMF has been outlined for the region, several strategic documents for the area include environmental management aspects. The Breede Valley IDP includes "to ensure a safe, healthy, clean and sustainable external environment for all Breede Valley's people" (SO3) as one of the 6 Strategic Objectives of the IDP. One of the aims is to "ensure the optimal use of land within a political, social, cultural, environmental and economic context". The proposed development allows for intensification of agricultural practices on non-productive land within an existing farm and thus minimises the transformation of additional land, whilst protecting and promoting food production.

In response to aspects of water scarcity and drought the IDP encourages the Investigation of the possible use of alternative water resources i.e. groundwater and increased rainwater harvesting. The proposed chicken farm intends to use Groundwater from existing boreholes on the property. Furthermore, Rainwater harvesting will be encouraged throughout the farm.

Breede Valley Municipality Spatial Development Framework:

The development principles are the guiding factors that will endeavour to assist with the spatial structuring of the urban environment, which will further shape Breede Valley Municipality into a place where people can live, work, play and visit. Development Principle 1 is 'Economic development': "*A diverse economic base attracts new business and investment. The Breede Valley Municipality promotes local talent and provides various opportunities for everyone to start and grow business ventures. This development principle will be achieved through:*

- *The establishment of a secondary commercial hub;*
- *Identifying niche market opportunities;*
- *Revitalisation of the Central Business District (CBD); and*
- *The protection of agricultural land as an economic contributor*."

Agricultural is one of the spatial structuring elements of the SDF: According to Section 3.1.4 (Agriculture) Historically agricultural land has not played a significant role in urban structuring. This is based on the need for agricultural production areas in close proximity to the settlements on account of cost advantages due to proximity to the market, direct and indirect employment opportunities for the inhabitants, stimulation of secondary business activities (e.g. marketing) and food security. These areas should be reserved as prime agricultural land in the municipality and be protected from any development or land uses that may have a negative impact on the agricultural potential of the area.

Under Key Typologies, 'Agriculture' is defined as "*The cultivation of land for crops and plants or the breeding of animals or the operation of a game farm on an extensive basis on natural veld or land*." The proposed Broiler Facility is therefore in keeping with the SDF.

Western Cape Biodiversity Spatial Plan (WCBSP) (2023):

The 2023 Western Cape Biodiversity Spatial Plan (WCBSP) was formally adopted into law on 13 December 2024 (Gazette Extraordinary No. 9017), in terms of the Western Cape Biodiversity Act (Act No. 6 of 2021). This plan supersedes the 2017 WCBSP and now serves as the official spatial framework for biodiversity conservation and land-use decision-making in the province. Based on the 2023 WCBSP map, several terrestrial Critical Biodiversity Areas (CBA's) were found along the remaining natural areas on the property. These areas are areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure, and such areas are to be maintained in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate. Furthermore, aquatic Ecological Support Areas (ESA1: Ground Water Source) were also indicated specifically towards the south and east of the property. These areas play a vital role in helping to sustain the baseflow of surrounding rivers, wetlands, and streams during dry periods.

As confirmed by the site visit and desktop information, the proposed development will largely be located within fallow agricultural fields and the existing Farmyard. The proposed activities fall outside the Riviersonderend Mountain Catchment Area (marked as a Protected Area) as well as the Cape Winelands Biosphere Reserve. Furthermore, the majority of the proposed activities all fall outside the areas indicated as CBAs and ESAs. Minor associated infrastructure might overlap with a CBA area however this is addressed as follows:

- The proposed road (orange lines) and river crossings were assessed by the Freshwater Specialist.
- BH1 and BH2 already exist and are currently utilised by the Farm for the purposes of distributing water where required.

Freshwater Ecosystem Priority Areas (FEPAs) are strategic spatial priorities identified to support the long-term conservation of freshwater ecosystems and the sustainable use of water resources. According to the National Freshwater Ecosystem Priority Areas (NFEPA) dataset and the National Wetlands Map (NWM5), the broader catchment in which the project site is located is classified as a FishFEPA (Fish support area). FishFEPAs, or fish sanctuaries, are sub-quaternary catchments that are critical for the protection of threatened and near-threatened freshwater fish species indigenous to South Africa. These catchments are denoted by either a red or black fish symbol on the map. The sub-quaternary catchment associated with the project area is marked with a black fish, indicating the presence of at least one population of vulnerable or near-threatened fish species, or a population of special concern. The primary objective of FishFEPAs is to prevent further decline in the condition of aquatic ecosystems, particularly those supporting sensitive fish species. As such, no further deterioration in river condition should occur within fish sanctuaries, and no new permits should be issued for the introduction or stocking of invasive alien fish species in these catchments.

In addition to the above, the National Wetlands Map classifies the Ratel River and its larger associated floodplain as East Coast Shale Renosterveld Floodplain wetland, currently in a C condition (FEPA rank 5). These wetlands are marked as being critically endangered – both from a vegetation and wetland ecosystem perspective. The aquatic ecosystems have been assessed in the Freshwater Impact Assessment.

In terms of the Basic Assessment process the following was found:

The proposed development is planned on previously disturbed, unproductive agricultural land, repurposing an area no longer viable for high-yield farming. This approach avoids impacting undisturbed ecosystems and makes efficient use of degraded land. Strategically located near essential service infrastructure, including water (existing boreholes) and electricity (combination of existing Eskom and new solar facility), the development can integrate into existing networks, reducing the need for extensive new installations. Existing farm roads and water crossings are being utilised where possible.

Vegetation associated with the project site is largely classified as the Critically Endangered Breede Shale Renosterveld. However, considering the location of the development footprint within lands that have been cultivated since before 1966 and with the remaining infrastructure falling within the existing farm werf, limited indigenous vegetation will be disturbed. The upgrading of the river crossings would result in the disturbance of indigenous vegetation and these botanical impacts have been assessed in the Freshwater Impact Assessment. Vegetation found within the affected freshwater features ranged from being in a largely natural state to being largely to seriously modified condition at places. Terrestrial riparian vegetation generally found within the healthier riparian areas included: Sandolien (*Dodonaea viscosa var. angustifolia*), Taaibos (*Rhus undulata*), Bittergombos (*Lycium ferocissimum*), Kraalbos (*Aizoon africanum L.*), Renosterbos (*Elytropappus rhinocerotis*), *Pteronia sp.* and Cotton Milkweed (*Gomphocarpus fruticosus*). Vegetation marking wetter areas included *Ischyrolepis gaudichaudiana, Platycaulos major, Cyperus congestus, Merxmuellera stricta, Juncus sp.* and the common reed (*Phragmites australis*). This impact has however been rated LOW should all mitigation measures be implemented. Although the general condition of Stream C was found to be in a largely natural state with high EIS, the proposed road crossing will be located at an existing informal crossing that has already undergone vegetation clearance and soil compaction. The formalisation of this crossing, combined with the rehabilitation of the surrounding disturbed areas, is anticipated to result in a long-term, low to medium positive impact on the directly surrounding section of the stream.

The proposed activities are largely taking place within fallow agricultural fields, as confirmed by a site visit and aerial imagery. Considering the agricultural nature of the development, its location within agricultural fields and within the existing farmyard it is thus improbable that the faunal species listed would be present within the development site and the Animal Species Sensitivity of the site is considered LOW. No aquatic-dependent fauna of special concern was observed during the field survey; however, several bird species were noted in the wetter areas. As the site borders a protected area to the southeast, the stream corridors are also expected to serve as migration routes for surrounding wildlife. This was assessed as part of the Freshwater Impact Assessment.

The current groundwater requirement for the Kleinfontein Farm is 49 458 m^3/a. The boreholes have been correctly tested and if the boreholes are pumped (according to the guidelines), a volume of 154 526 m^3/a can be abstracted. This volume requested is 68% less than what the boreholes can deliver. If groundwater abstraction stays within these volumes, sustainable abstraction is possible. The aquifer is considered to have a "low" to "medium" vulnerability to contamination as it is a fractured aquifer. According to the Geohydrologivcal Specialist development of the property may proceed on the basis that the groundwater management plan (that forms part of the EMPr) is implemented. Impacts associated with geohydrological aspects are deemed low after mitigation.

A Heritage Screener was completed for input at an early stage. The screener confirmed that it is it is unlikely that significant heritage resources will be negatively impacted by the proposed development and as such, no further heritage studies were recommended. HWC confirmed that no Heritage resources are likely to occur on site and that no further studies will be required.

The chicken farm and proposed additions provide socio-economic benefits for the region in terms of job creation, economic growth and food security. The intention is facilitating production of free-range chickens in response to the growing market need for free range chicken. A number of job opportunities will be provided during the construction phase (approximately 100 jobs) and an additional 40 job opportunities will result directly from the operational phase of the development. Furthermore, additional job opportunities will result in the Elgin Free Range Hatcheries and the associated supply chain. It is estimated that the farm turnover will amount to an estimated R55 million per annum with the farm producing 4 359 168 kg of poultry meat per annum once in operation. Furthermore, the farm will require the use of 6 357 tons of feed and a number of products that will benefit from the supply chain. The proposed development will have knock-on effect for trade in local economy of the surrounding area, facilitate the provision of more affordable protein to local markets, have direct and indirect employment opportunities (temporary and permanent) and allow for skills transfers to new employees. The development would therefore address the needs of the local community in the form of job creation, skills development and contributing significantly to the local economy resulting in the upliftment of the area.

The land use of the property and surrounding area is primarily agricultural in nature. The proposed broiler facilities are located centrally within the property and are therefore located well away from the boundary of the site. The natural topography is undulating and will therefore partially screen the development from the majority of visual receptors. The proposed development is unlikely to be visually intrusive within the agricultural landscape. According to the Heritage Specialist "the landscape in which the proposed development falls is one of agriculture, with most of the nearby structures being farm buildings. The chicken farm platforms fall within cultivated land, and the satellite imagery and topographical maps indicate no existing structures within any of the proposed platform areas. The proposed guardhouse and associated facilities are also located within existing agricultural fields. Some of the other proposed developments (containers - solar batteries/generator, reservoirs, pipelines, boreholes, and water treatment plant) are located around the Kleinfontein werf. Due to their distance to existing infrastructure, no impact is anticipated." The sense of place of the farm within the surrounding agricultural setting will therefore be maintained.

Noise from inside the units will be largely contained as the units are completely enclosed. Noise from agricultural activities on site is deemed acceptable in the current setting. The proposed land use is agricultural and is compatible with the surrounding rural/ agricultural area. No significant odours will emanate from the proposed activities as the Broiler Facilities are well maintained to ensure biosecurity concerns are met. Biosecurity refers to measures taken to prevent the introduction and spread of harmful organisms (such as diseases, pests, and invasive species) to humans, animals, plants, and the environment. These measures are crucial for protecting agriculture, food safety, public health, and the environment from biological threats.

The poultry broiler operation incorporates sustainable waste management practices, supporting circular agriculture by using the chicken manure as compost onsite as well as supplying it to growers within the surrounding area. The manure is directly applied to agricultural lands. The operation prioritizes minimizing new materials brought onsite, maximizing recycling and waste separation, and reusing existing materials where possible. Organic domestic waste will be composted on site with solid waste being separated into recycled and non-recycled waste to be removed on a weekly basis to the local municipal facility. These measures effectively reduce, reuse, and recycle waste while promoting sustainability.

Conclusion:

All potential impacts on people's health and wellbeing are anticipated to be low through the implementation of the Environmental Management Programme (EMPr) (Annexure H).

The development plan adheres to existing land use rights and diversifies the property's agricultural activities while minimizing environmental impact. The proposed layout ensures compliance with biosecurity requirements. This alternative represents the most viable option for the Applicant, effectively balancing operational efficiency with sustainability and regulatory compliance.

The 'No-Go' option, where the development of the poultry broiler facility is not pursued, was evaluated. This alternative would result in the loss of positive socio-economic opportunities in the form of significant income generating employment opportunities and a significant financial contribution within the local economy. The company needs to expand its chicken broiler operations to meet the growing demand in the market and this will not be realised within the no-go alternative. Minor negative environmental impacts are associated with the Preferred Alternative however these have been avoided or mitigated to be of a LOW significance. The no-go option will result in the loss of the Medium – High positive socio-economic impacts associated with the proposed activities. Therefore, the No-Go option is not considered the best-practicable environmental option. The no-go option identifies the most beneficial or least damaging option for the environment, considering both short-term and long-term impacts and emphasizes a holistic approach, balancing environmental, economic, and social factors.

EFRC is dedicated to managing the property responsibly to ensure sustained agricultural productivity while preventing environmental impacts from ongoing operations.