

DETAILED REVIEW OF THE EIA			
Review Question	Relevant? Y/N Y: yes N: no	Evaluation (C/A/I) C: Complete / comprehensive A: Adequate or acceptable I: Inadequate	Comments
A. SCOPING REPORT			
1. If scoping was applicable, was a scoping report submitted?	Y	I	The scoping report submitted is inadequate.
2. Does it include details of the EAP who prepared the report and his/her expertise?	Y	I	The scoping report does not contain details of the expertise of the EAP who prepared the report (pg. iii).
3. Does it contain an identification of all legislation and guidelines that are applicable to the preparation of the scoping report?	Y	I	The scoping report does not contain an identification of all legislation and guidelines that are applicable to the preparation of the scoping report.
4. Does it contain a description of the proposed activity?	Y	I	The descriptions of the activities are vague and incomplete.
5. Does it contain a description of the property on which the activity is to be undertaken and map the location of the activity on the property?	Y	I	A description of the property is provided but it inadequately portrays the locations of specific activities.
6. Does it contain any reasonable or feasible alternatives that have been considered?	Y	I	The scoping report references "further investigations" on the subject (pg. 41).

7. Details of the public participation process undertaken, including a summary of the issues raised by I&As, date of receipt and response to the issues?	Y	I	The scoping report is vague about the process of public participation.
8. Does it contain a description of the environment that may be affected by the activity and the manner in which the physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity?	Y	I	Additional analysis on several aspects of the environment is necessary.
9. Does it contain a description of environmental issues and potential impacts, including cumulative impacts that have been identified?	Y	I	Additional analysis and description of the environmental issues and potential impacts, including cumulative impacts is necessary.
10. A Plan of Study for the EIA which sets out the proposed approach to the EIA, including the tasks to be undertaken, specialist studies, method of assessment of impacts and assessment of alternatives, and public participation to be undertaken during the EIA?	Y	I	Additional analysis and description of the tasks to be undertaken, specialist studies, method of assessment of impacts and assessment of alternatives, and public participation to be undertaken is necessary.
11. Was the Scoping Report and Plan of Study accepted by the competent authority?			Unknown

B. DETAILED ENVIRONMENTAL IMPACT ASSESSMENT REPORT, draft NOVEMBER, 2013 and final JANUARY 2014, ENTITLED "The Environmental impacts assessment report and environmental management plan for the proposed Platreef underground mine".

1. NON-TECHNICAL SUMMARY

<p>1.1. Is there a non-technical summary that will easily be understood by a layperson?</p>	<p>Y</p>	<p>I</p>	<p>The report is exceptionally badly structured, which makes it difficult to read and impossible for a layman to understand. It is clear that the consultant has attempted to conceal information about the real impacts of the proposed mine by flooding the report with unnecessary information, whilst overlooking other significant facts and information.</p>
<p>1.2. Does the summary contain a brief but concise description of the need for the project, the proposed activity, the environment, an account of the main issues and impacts and mitigation measures to be undertaken, and a description of any remaining or residual impacts?</p>	<p>Y</p>	<p>I</p>	<p>The EIA does not comply with this item. For instance, the cost-benefit analysis has not been carried out. Vague language is used and the criteria and standards used are not specified and explained.</p>

<p>1.3. Does the summary include a brief explanation of the overall approach to the assessment?</p>	<p>Y</p>	<p>I</p>	<p>The entire report is written in vague and non-committal language with the words 'may', 'recommended' and 'anticipated' used much too frequently. It is difficult to differentiate between what is recommended by the consultant to the mine and what activities the mine is actually committing to. It is, therefore, impossible to submit final comment on the report. The EMP/EIA should be seen as a work programme for the mine, with the affected community being provided with sufficient information to know exactly what activities, impacts and mitigation measures they can expect, accompanied with a timeframe for these activities. This information is not provided.</p>
<p>1.4. Does the summary provide an indication of the confidence which can be placed in the results?</p>	<p>Y</p>	<p>I</p>	<p>The summary does not provide an indication of the confidence which can be placed in the results. Its language is vague and non-committal.</p>
<p>1.5. Does the summary indicate whether the project is or is not environmentally acceptable?</p>	<p>Y</p>	<p>I</p>	<p>The summary does not indicate whether the project is or is not environmentally acceptable. For instance, all management and mitigation measures are still only proposals. Final mitigation measures must be included in the report. The mitigation measures proposed are also too vague and more details are required.</p>

2. ADMINISTRATIVE, LEGAL AND POLICY REQUIREMENTS			
<i>Properties and Land Ownership</i>			
2.1. Have the properties and land ownership status been properly described and mapped?	Y	I	The properties and land ownership status have not been properly described and mapped.
2.2. If applicant is not the owner of the land on which the activity is to be undertaken, is the written consent of the landowner included in the application?	Y	I	No. Ownership of the land is inadequately addressed. Consent has not been obtained.
<i>The EIA Administrative Process</i>			
2.3. Has the EIA administrative process been described together with project compliance?	Y	I	The EIA administrative process has not been described together with project compliance. For instance, see page 1, pp. 4 of the EIA.
2.4. Does the EIA contain details of the EAP who compiled the report?	Y	C	The EIA does contain details of the EAP who compiled the report (pg. v).
2.5. Does the EIA contain details of the expertise of the EAP to compile the report?	Y	I	The EIA does not contain details of the expertise of the EAP to compile the report.
2.6. Does the Report contain a declaration that the compiler is independent in the form as specified by the competent authority?	Y	I	The Report does not contain a declaration that the compiler is independent in the form as specified by the competent authority.
2.7. Are the credentials of the report authors and specialists presented, with a clear indication of their respective contributions?	Y	C	The credentials of the report authors and specialists are presented with a clear indication of their respective contributions.
<i>International, National, Provincial and Local Legislation, Policy, Regulations and Guidelines</i>			

2.9. Have the relevant international treaties, conventions and agreements been listed with reference to where and how these obligations have been met on this project?	Y	I	Not all relevant international treaties, conventions and agreements have been listed with reference to where and how these obligations have been met on this project.
2.10. Have the relevant laws and regulations of the country been listed, with reference to project compliance?	Y	I	Not all relevant laws and regulations of the country have been listed with reference to project compliance.
2.11. Have the relevant policies of the country been listed with reference to where and how the obligations have been met on this project?	Y	I	Not all relevant policies of the country have been listed with reference to where and how the obligations have been met on this project.
2.12. Have relevant standards and guidelines applicable to the project been listed with reference to where and how these standards and guidelines have been met on this project?	Y	I	Not all relevant standards and guidelines applicable to the project have been listed with reference to where and how these standards and guidelines have been met on this project
2.13. Have local, regional and national plans e.g. SEAs, structure plans, integrated development plans, environmental action plans, zoning plans, etc. been reviewed in order to place the project into context?	Y	I	Local, regional and national plans e.g. SEAs, structure plans, integrated development plans, environmental action plans, zoning plans, etc have not been reviewed in order to place the project into context.
3 PUBLIC PARTICIPATION PROCESS CONDUCTED			
3.1. Did the EIA process include stakeholder consultation?	Y	I	The stakeholder consultation process was poorly conducted and it is therefore insufficient.
3.2. Were the general public and/or affected communities included in the consultation?	Y	I	The general public and/or affected communities were not properly included in the consultation.

3.3. Were relevant authorities or organs of state that may have jurisdiction over any aspect of the activity included in the consultation? Was notice given in writing to these bodies?	Y	I	Not all the authorities or organs that may have jurisdiction were included. Indications were not provided of where the mine will work with local and regional government.
3.4. Does the report include lists of I&APs consulted?	Y	I	No.
3.5. Does the report include copies of submissions, objections and comments from I&APs?	Y	I	No.
3.6. Does the report include a list of issues that were identified based on the public participation, date of receipt and response to the issues?	Y	C	The report does include a list of issues that were identified based on the public participation, date of receipt and response to the issues.
3.7. Were the inputs of stakeholders used to identify potential alternatives to the project?	Y	I	The inputs of stakeholders have not been used to identify potential alternatives to the project. "The community voices are clear in that they want to maintain their agricultural practices. The desires of the people are being overridden by the interests of the mining company."
3.8. Have the views of stakeholders been considered and meaningfully incorporated into the impact assessment and used to identify potential environmental impacts?	Y	I	The views of stakeholders have not been considered and meaningfully incorporated into the impact assessment and used to identify potential environmental impacts.
3.9. Were capacity building programmes required to enable informed stakeholder involvement and are they described?	Y	I	Capacity building programmes required to enable informed stakeholder involvement have not been conducted.

4 DESCRIPTION OF THE ENVIRONMENT			
4.1. Does the EIA Report contain a description of the environment that may be affected by the activity, and the manner in which the physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity?	Y	I	There are several shortcomings in the description of the environment that may be affected by the activity.
4.2. Have the areas expected to be significantly affected by the various aspects of the project been indicated with aid of suitable maps?	Y	I	No.
4.3. Have the land uses on the project site(s) and in the surrounding areas been described and their use and non-use values adequately assessed?	Y	I	The land uses on the project site(s) and in the surrounding areas have not been properly described and their use and non-use values have not been adequately assessed. For instance, the summary at page 149 states that the communal land is underdeveloped, but does not explain the criteria used to determine it so. Besides, "land should not be designated as undeveloped if it serves the vital purpose of providing arable land for subsistence farming activities and domesticated livestock with grazing areas." (CALS).

4.4. Have the biophysical components of the environment likely to be affected by the project been identified and described sufficiently for the prediction of impacts?			
4.4.1. <i>Climate (wind, precipitation, temperature, evaporation, etc.)</i>	Y	I	The report describes the climate (wind, precipitation, temperature and humidity) - but provides insufficient information to predict the impacts.
4.4.2. <i>Geology (rock type, structure, geochemistry, etc.)</i>	Y	I	The geochemistry is not sufficiently explained either in the report nor in its attachments.
4.4.3. <i>Soils (agricultural and rehabilitation potential)</i>	Y	I	The report does not adequately describe the soils or provide information of the rehabilitation potential. Bias is demonstrated in the description of the condition of the communal grazing areas. The aim appears to be to describe land that is of no agricultural value. There will therefore be no obligation by the mine to rehabilitate to pre-mining conditions.
4.4.4. <i>Topography (slopes, sight lines)</i>	Y	I	The report describes the topography, but insufficiently to predict the impacts.
4.4.5. <i>Surface hydrology (flood lines, runoff, flows, supply, users, wetlands, dams, lakes)</i>	Y	I	The report fails to compare the surface water for the alternative mining sites.
4.4.6. <i>Groundwater (aquifers, yields, permeability, users, etc.)</i>	Y	I	The report fails to compare groundwater for alternative mining sites.
4.4.7. <i>Hydrochemistry (organic, inorganic, physical)</i>	Y	I	The report's description of groundwater is inadequate.

4.4.8. Air quality (ambient and seasonal dust, odour, etc.)	Y	I	The report's description of air quality is inadequate. The report does not describe odour and the dust fallout monitoring that "will be conducted". Therefore, there is insufficient data.
4.4.9. Biodiversity including flora (vegetation types, diversity, endemic, endangered, alien and invasive spp), terrestrial fauna (populations, diversity, endemic, endangered, alien and invasive spp) and aquatic ecology (populations, diversity, endemic, endangered, alien and invasive spp).	Y	A	Endemic species have not been described.
4.4.10 Palaeontology	Y	I	The report describes palaeontology but does so insufficiently and without providing expert studies.
4.5. Have the social components of the environment likely to be affected by the project been identified and described sufficiently for the prediction of impacts?			
4.5.1 Social structure of local community	Y	I	The social structure of the local community has not been sufficiently described.
4.5.2. Demographics	Y	I	The report describes demographics but does so incorrectly.
4.5.3. Skills and employment	Y	I	The report describes skills and employment, but gives no adequate explanation or detail of its study.
4.5.4. International, national, provincial and local legislation, policy, regulations and guidelines	Y	I	The report does not describe international, national, provincial and local legislation, policy, regulations and guidelines.

4.5.5. <i>Settlement patterns</i>	Y	I	The report fails to indicate what proportion of the proposed mining area is under land claim and how the mine intends to compensate new landowners should the land claims be successful.
4.5.6. <i>Aesthetics (visual, sense of place, noise, quality of life, etc.)</i>	Y	I	The report does not describe aesthetic. For instance, information on sense of place and quality of life are not presented.
4.6. Have the cultural components of the environment likely to be affected by the project been identified and described sufficiently for the prediction of impacts?			
4.6.1. <i>Sites of spiritual and/or religious significance</i>	Y	I	The report does not describe sites of spiritual and/or historical significance sufficiently for the prediction of impacts.
4.6.2. <i>Sites of cultural and historical significance</i>	Y	I	The report describes sites of cultural and historical significance but fails to attach the necessary significance or weight to these descriptions.
4.6.3. <i>Archaeological sites</i>	Y	I	The report describes archaeological sites but fails to attach the necessary significance to them and does not provide required expert studies.
4.7. Have the economic components of the environment likely to be affected by the project been identified and described sufficiently for the prediction of impacts?			
4.7.1. <i>Local, regional and national economic indicators</i>	Y	I	The report does not describe sufficiently local, regional and national economic indicators.

4.7.2. <i>Import and export potential</i>	Y	I	The report does not contain sufficient information on import and export potential.
4.7.3. <i>Sectoral strengthening</i>	Y	I	The report does not contain sufficient information on sectoral strengthening.
4.7.4. <i>Local spending</i>	Y	I	The report does not contain sufficient information of local spending.
4.7.5. <i>Multiplier effect</i>	Y	I	The report does not contain sufficient information on multiplier effect.
4.7.6. <i>Forward and backward linkages</i>	Y	I	The report does not contain sufficient information on forward and backward linkages.
4.7.7. <i>Tax base and revenue generation</i>	Y	I	The report does not contain sufficient information on tax base and revenue generation.
4.7.8. <i>Resource economics</i>	Y	I	The report does not contain sufficient information on resource economics.
4.7.9. <i>Cost-benefit analysis based on MCDA</i>	Y	I	The report does not contain a cost-benefit analysis based on MCDA.
5 ALTERNATIVES			
5.2. Were alternatives to the activity considered in the EIA?	Y	I	Alternatives to the activity were not considered in the EIA properly. For instance, there is bias in the analysis of agriculture importance, which is clearly underestimated.

5.3. Were alternatives with regard to the property or location on which the activity is proposed, considered?	Y	I	In the report, alternatives with regard to the property or location on which the activity is proposed were not seriously considered. For instance, the report fails to compare land use and land capacity for the alternative mining sites.
5.4. Were alternatives with regard to the type of activity considered?	Y	I	Alternatives to the activity were not considered in the EIA properly. For instance, agriculture importance is clearly underestimated.
5.5. Were alternatives with regard to the design or layout of the activity considered?	Y	I	Alternatives with regard to the design or layout of the activity were not considered.
5.6. Were alternatives with regard to the technology to be used for the activity considered?	Y	I	Alternatives with regard to the technology to be used for the activity were not considered.
5.7. Were alternatives with regard to the operational aspects of the activity considered?	Y	I	Alternatives with regard to the operational aspects of the activity were not considered.
5.8. If alternatives are described, have their main environmental impacts been compared clearly and objectively with those of the proposed project?	Y	I	The main environmental impacts on the alternative sites have not been compared clearly and objectively with those of the proposed area of the project.
5.9. Does this Report contain a description and comparative assessment of all identified alternatives?	Y	I	The report does not contain sufficient description and comparative assessment of all identified alternatives.

5.10. If alternatives were considered, are the reasons for selecting the proposed alternative adequately described, with a motivation as to how it can be regarded as the BPEO?	Y	I	The reasons for selecting the proposed alternative were not adequately described, with a motivation as to how it can be regarded as the BPEO.
5.11. Has a prediction of the likely future environmental conditions in the absence of the project been developed (no go option)?	Y	I	The EIA / EMP has failed to address this adequately or at all.
6. DESCRIPTION OF THE PROJECT (PREFERRED ALTERNATIVE)			
<i>Land requirements</i>			
6.2. Has the land required for the project and any associated services, been described and clearly mapped at an appropriate scale?	Y	I	The land needed has not been properly described. For instance, the land is treated as vacant and derelict, which is clearly not the case.
<i>Project description</i>			
6.3. Have the technologies to be used been described, including suitable diagrams and layout plans?	Y	A	The technologies to be used have been described but require independent review.
6.4. Have all the process life cycle components been described, including, e.g., a process flow sheet, water balance, mass and material balances, etc.?	Y	I	The process life cycle components have not all been described, including, e.g., a process flow sheet, water balance, mass and material balances, etc.
6.5. Has the project life cycle been described for each project phase: construction, operation, decommissioning and closure?	Y	I	The project life cycle has not been described with timeframes.

6.6. Have direct and indirect/secondary effects of constructing, operating, and, where relevant, after use of decommissioning of the project been clearly explained (including both positive and negative effects)?	Y	I	Direct and indirect/secondary effects of constructing, operating, and, where relevant, after use of decommissioning of the project have not been clearly explained (including both positive and negative effects).
6.7. Is there a life cycle analysis?	Y	I	There is not a life cycle analysis.
6.8. Have the social and institutional issues related to the project been described e.g. number of permanent and temporary employees, % from local community, transportation, accommodation, support services, recreation facilities, management and employment structures, skills breakdown, BEE, training, skills transfer, etc.?	Y	I	The social and institutional issues related to the project have not been adequately described.
Project inputs			
6.9. Are the nature and quantities of materials needed during construction and operation, clearly indicated e.g. water, power, lubricants, raw materials, ore, structural components, fill, etc.?	Y	I	The nature and quantities of materials needed during construction and operation, are not clearly indicated. A particular concern is how much water will be consumed by the mine and its impact.
6.10. Have the sites from where these materials will be sourced been identified in the EIA report?	Y	I	The sites from where these materials will be sourced have not been adequately identified in the EIA report.
6.11. Have the means of transporting materials, products, workers, and visitors to and from the site during construction and operation, including additional roads, been discussed?	Y	I	The means of transporting materials, products, workers, and visitors to and from the site during construction and operation, including additional roads, have not been sufficiently discussed.

Waste and emissions			
6.12. Have the sources, types and quantities of waste generated during different scenarios for construction and operation been estimated e.g. air emissions, process effluent, runoff, noise and vibrations, odour, liquid and solid waste?	Y	I	The sources, types and quantities of waste generated during different scenarios for construction and operation have not been adequately estimated e.g. air emissions, process effluent, runoff, noise and vibrations, odour, liquid and solid waste.
6.13. Have the predictions in the report been scientifically calculated, with the results clearly presented for different scenarios?	Y	I	There is not sufficient information to understand if the predictions in the report have been scientifically calculated. The results have not been clearly presented for different scenarios.
6.14. Has a risk assessment been performed, including the identification of exposure pathways, probability and consequences?	Y	I	A risk assessment has not been performed, including the identification of exposure pathways, probability and consequences.
6.15. Does the report discuss ways in which the wastes can be reduced, recycled or re-used?	Y	I	The report does not discuss ways in which the wastes can be reduced, recycled or re-used.
6.16. Have the ways in which the wastes will be stored, handled or treated prior to disposal been explained?	Y	I	The ways in which the wastes will be stored, handled or treated prior to disposal have not been sufficiently explained.
6.17. Has the receiving environment where such waste will be disposed been identified and described?	Y	I	The receiving environment where such waste will be disposed has not been sufficiently identified and described.

7 ASSESSMENT OF IMPACTS			
Does the report contain a description of all environmental issues and impacts that were identified during the EIA process, and an investigation of these impacts?			
<i>Impact identification and investigation</i>			
7.1. Have trans-boundary impacts been identified and investigated (i.e. impacts on neighbouring countries)?	Y	I	Trans-boundary impacts have not been identified and investigated (i.e. impacts on neighbouring countries).
7.2. Are cumulative impacts identified?	Y	I	Not all cumulative impacts have been identified. Cumulative impacts that have been identified have been done wholly inadequately.
7.3. Have impacts been identified and investigated in so far as they affect the following:			
<i>7.3.1. Air quality: dust and odours</i>	Y	I	This description is wholly inadequate.
<i>7.3.2. Noise and vibration</i>	Y	I	This description is wholly inadequate.
<i>7.3.3. Soils</i>	Y	I	This description is wholly inadequate.
<i>7.3.4. Ground water</i>	Y	I	This description is wholly inadequate.
<i>7.3.5. Surface water</i>	Y	I	This description is wholly inadequate.
<i>7.3.6. Aquatic ecology</i>	Y	I	This description is wholly inadequate.
<i>7.3.7. Vegetation, terrestrial ecology and biodiversity</i>	Y	I	This description is wholly inadequate.
<i>7.3.8. Land use</i>	Y	I	This description is wholly inadequate.
<i>7.3.9. Landscape and visual impacts</i>	Y	I	This description is wholly inadequate.
<i>7.3.10. Historic and cultural heritage</i>	Y	I	This description is wholly inadequate.
<i>7.3.11. People, communities and public health</i>	Y	I	This description is wholly inadequate.
<i>7.3.12. Sense of place</i>	Y	I	Sense of place impacts have not been identified and investigated.
<i>7.3.13. Transportation and traffic</i>	Y	I	This description is wholly inadequate.

7.3.14. <i>Local, regional and national economic indicators</i>	Y	I	Local, regional and national economic indicators have not been identified and investigated.
7.4. Was the list of issues raised by the public participation used to identify impacts?	Y	I	The list of issues raised by the public participation has not been used to identify impacts.
7.5. Have the impacts on sites from where raw materials will be sourced, been investigated in the EIA report?	Y	I	The impacts on sites from where raw materials will be sourced have not been investigated in the EIA report.
7.6. Have the impacts of transportation of all materials, personnel and visitors to the project site during construction and operation been determined?	Y	I	The impacts of transportation of all materials, personnel and visitors to the project site during construction and operation have not been determined.
7.7. Have the impacts of the environment on the construction and operation of the project been considered?	Y	I	The impacts of the environment on the construction and operation of the project have not been sufficiently considered.
7.8. Has consideration been given to impacts which might arise from non-standard operating conditions, accidents and emergencies (i.e. risk assessment for equipment failure of unusual environmental conditions such as flooding or fire)?	Y	I	Consideration has not been given to impacts which might arise from non-standard operating conditions, accidents and emergencies (i.e. risk assessment for equipment failure of unusual environmental conditions such as flooding or fire).

8. SCIENTIFIC ASSESSMENT PROCESS: Does the report contain an assessment of identified impacts, and a determination of the significance of each identified impact?			
8.1. Have the authors of the EIA Report adequately consulted the latest literature and/or unpublished reports and/or data relevant to the study and cited their sources?	Y	I	No
8.2. Does the report set out the assumptions and limitations of the EIA?	Y	I	Not adequately
8.3. Does the report indicate what data is inadequate or absent?	Y	I	Not adequately
<i>Assessment of impacts</i>			
8.4. Have the methods to predict the nature, size and scale of impacts been described and are they appropriate to the importance of each projected impact?	Y	I	The methods to predict the nature, size and scale of impacts have not been clearly described.
8.5. Where possible, have predictions of impact been provided? Is the level of uncertainty attached to the results described?	Y	I	Not adequately
8.6. Where quantitative predictions have been provided, is the level of uncertainty attached to the results described?	Y	I	Quantitative predictions have not been provided with the level of uncertainty attached to the results described.
8.7. Are impacts assessed in terms of the nature and magnitude of the change occurring and the nature (location, number, value, sensitivity) of the affected receptors?	Y	I	The report does not comply with this item. For instance, impacts are not assessed considering the sensitivity of the affected receptors.
8.8. Has the timescale over which the effects will occur been predicted such that it is clear whether impacts are short, medium or long term, temporary or permanent?	Y	I	No

8.9. Was the spatial extent of the impact considered?	Y	I	No
8.10. Was the probability of impacts occurring determined?	Y	I	Not adequately
8.11. Was the degree to which impacts can be reversed evaluated?	Y	I	Not adequately
8.12. Was the degree to which impacts may cause irreversible loss of resources evaluated?	Y	I	Not adequately
8.13. Have the magnitude, extent and duration of the impact been discussed in the context of the value, rarity and sensitivity of the receptors or the receiving environment?	Y	I	The sensitivity of the receptors or receiving environment has not been discussed.
Significance of impacts			
8.14. Does the report contain an indication of the methodology used in determining the significance of potential impacts?	Y	I	The methodology is insufficiently described and explained.
8.15. Does the information include a clear indication of which impacts may be significant and which may not?	Y	I	The significant rating is unclear and unscientific.
8.16. Has the significance of impacts been discussed taking account appropriate national and international standards or norms, where these are available?	Y	I	The significance of impacts has not been discussed taking in account appropriate national and international standards or norms.
8.17. Where there are no generally accepted standards or criteria for the evaluation of significance, is a clear distinction made between fact, assumption and professional judgement?	Y	I	Where there are no generally accepted standards or criteria for the evaluation of significance, the report does not contain a clear distinction made between fact, assumption and professional judgement.

8.18. Is the assessment of impacts appropriate to their significance and importance for the decision, avoiding unnecessary information and concentrating on the key issues?	Y	I	The assessment of impacts is not clear neither is it appropriate to their significance and importance for the decision. It does not avoid unnecessary information and does not concentrate on the key issues.
9 MITIGATION, MANAGEMENT AND MONITORING			
<i>Description of mitigation measures</i>			
9.1. Has the mitigation of negative impacts been considered and, where feasible, have specific measures been proposed to address each impact?	Y	I	Where specific measures are proposed to address each impact the language used in the tables is vague.
9.2. Where mitigating measures are proposed, has the significance of residual impacts remaining after mitigation been determined?	Y	I	The significance of residual impacts remaining after mitigation has not been sufficiently determined.
9.3. Was the degree to which each impact can be mitigated described?	Y	I	Insufficiently.
9.4. Is it clear to what extent the mitigation measures are likely to be effective?	Y	I	It is not clear to what extent the mitigation measures are likely to be effective.
9.5. Where appropriate, do mitigation measures considered include modification of project design, construction and operation, the replacement of facilities/resources, and the creation of new resources from the re-use of wastes?	Y	I	Mitigation measures considered do not include modification of project design, construction and operation, the replacement of facilities/resources, and the creation of new resources from the re-use of wastes.
9.6. Has the method of rehabilitation of all disturbed areas been described together with a programme for implementation and a vision of future (post closure) land use options of the disturbed areas?	Y	I	The method of rehabilitation of all disturbed areas has not been described together with a programme for implementation and a vision of future (post closure) land use options of the disturbed areas.

9.7. Has the EIA report clearly explained what the costs of mitigation are likely to be, and compared these to the benefits (including the costs of non-mitigation)?	Y	I	The EIA report does not clearly explain what the costs of mitigation are likely to be, and compared these to the benefits (including the costs of non-mitigation).
<i>Environmental Effects of Mitigation</i>			
9.8. Have any adverse environmental effects of mitigation measures been investigated and described?	Y	I	Adverse environmental effects of mitigation measures have not been investigated nor described.
9.9. Have the potential for conflict between the benefits of mitigating measures and their adverse impacts been considered?	Y	I	The potential for conflict between the benefits of mitigating measures and their adverse impacts have not been considered.
<i>Commitment to implementation of Mitigation in an Environmental Management Plan</i>			
9.10. Have details of how the mitigation will be implemented and function over the time span for which they are necessary been presented in a draft Environmental Management Plan (EMP)?	Y	I	No
9.11. Does the EIA Report contain a draft EMP which summarises mitigation measures and allocate roles, responsibilities and timeframes to the implementation of mitigation measures, as well as propose monitoring to determine the effectiveness of mitigation?	Y	I	No
9.12. Does the draft EMP contain a signed management commitment?	Y	I	The draft EMP does not contain a signed management commitment.

Monitoring proposals			
9.13. Has the EIA proposed practical monitoring arrangements to check the environmental impacts resulting from the implementation of the project and their conformity with the predictions made?	Y	I	"Specific requirements for environmental management relative to specific areas of construction and subsequent operation will be detailed in the respective contracts of sub-contractors [...]".
9.14. Has the EIA proposed Limits of Acceptable Change that the developer can use to track impacts and trigger management intervention?	Y	I	The EIA has not proposed Limits of Acceptable Change that the developer can use to track impacts and trigger management intervention.
9.15. Does the scale of any proposed monitoring arrangements correspond to the potential scale and significance of deviations from expected impacts?	Y	I	No
10 CONCLUSIONS AND RECOMMENDATIONS			
10.1. Have prominence and emphasis been given to severe adverse impacts, to substantial environmental benefits, and to controversial issues?	Y	I	The report does not give prominence or emphasis to severe adverse impacts, to substantial environmental impacts , and to controversial issues.
10.2. Does the report contain an opinion as to whether the activity should or should not be authorised, and if the opinion is that it should be authorised, does it indicate any conditions that should be made in respect of that authorisation?	Y	I	No
10.3. Does the report contain an environmental impact statement, which contains:			
<i>10.3.1. a summary of the key findings of the EIA.</i>	Y	I	The report does not comply with this item.

10.3.2. a comparative assessment of the positive and negative implications of the proposed activity and identified alternatives?	Y	I	The report does not comply with this item.
10.4. Has information and analysis been offered to support all conclusions drawn?	Y	I	Information and analysis has not been offered to support all conclusions drawn.
11. GENERAL APPROACH AND METHODOLOGY			
<i>Organisation of the information</i>			
11.1. Is the information logically arranged in sections?	Y	I	Even though the information is arranged in sections, it's not easily found in the report, which has been structured in a confused manner.
11.2. Is the location of information identified in a table of contents?	Y	I	The location of information is identified in a table of contents but it is exceedingly difficult to find details searched for.
11.3. Does the report or appendices contain the Terms of Reference for the EIA?	Y	I	Neither the report nor the appendices contain the Terms of Reference for the EIA.
11.4. When information from external sources has been introduced, has a full reference to the source been included?	Y	I	When information from external sources has been introduced, a full reference to the source has not been included.
<i>Presentation of the information</i>			
11.5. Does the EIA report clearly explain the methodology used in the EIA, public participation process and in each specialist study?	Y	I	The EIA report does not adequately explain the methodology used in the EIA, public participation process and in each specialist study.
11.6. Has superfluous information (i.e. information not needed for the decision) been avoided?	Y	I	Superfluous information (i.e. information not needed for the decision) has not been avoided.

11.7. Is the information presented in an objective manner?	Y	I	The information is not presented in an objective manner.
11.8. Has information and analysis been presented so as to be comprehensible to the non-specialist, using maps, tables and graphical material as appropriate?	Y	I	Information and analysis has not been presented so as to be comprehensible to the non-specialist, using maps, tables and graphical material as appropriate.
12 SPECIALIST STUDIES			
12.1. Were specialist studies conducted to address specific issues or data gaps?	Y	I	Yes, but not for all data gaps.
12.2. Does the report contain a summary of the findings and recommendations of each specialist study?	Y	C	Yes - of the specialist studies that have been undertaken.
12.3. Are all the specialist studies and appendices present?	Y	I	No
12.4. Do the specialist studies contain details of the person(s) who compiled the specialist study and their expertise?	Y	C	Yes
12.5. Do the specialist studies contain a declaration that the person is independent in the form as specified by the competent authority?	Y	I	No
12.6. Do the specialist studies contain an indication of the scope of, and the purpose for which, the report was prepared?	Y	I	No
12.7. Do the specialist studies set out the assumptions and limitations?	Y	I	Not adequately
12.8. Do the specialist studies indicate what data is inadequate or absent and what uncertainties exists?	Y	I	Not adequately
12.9. Do the specialist studies clearly explain the methodology used in each specialist study?	Y	I	Not adequately

12.10. Do the specialist studies contain a description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment?	Y	I	Not adequately
12.11. Do the specialist studies contain recommendations in respect of any mitigation measures that should be considered by the applicant and the competent authority?	Y	I	Not adequately
12.12. If any, a description of any consultation process that was undertaken during the specialist study, and a summary and copies of comments received during any such consultation process?	Y	A	No minutes of stakeholder meetings have been provided.
12.13. Have the specialist studies been peer reviewed?	Y	I	No
12.14. Have the outcome of the specialist studies been integrated into the EIA report?	Y	I	Not adequately