



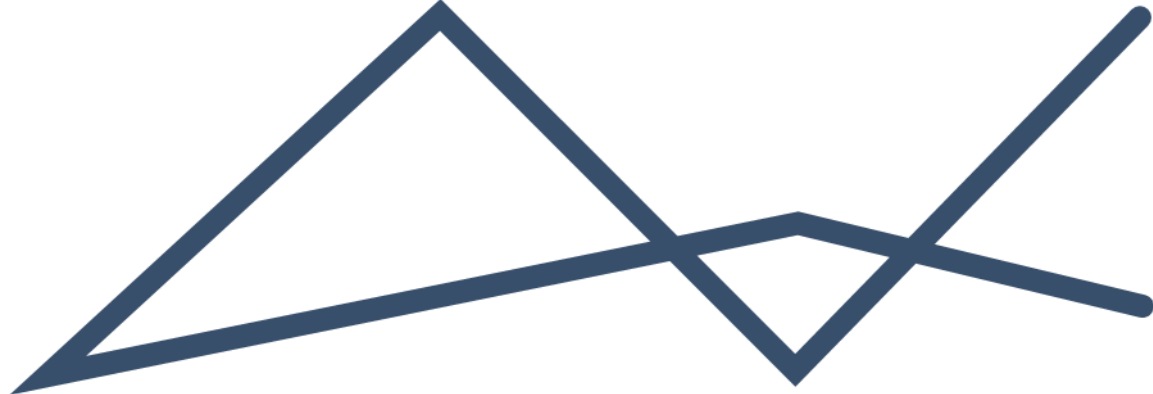
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SITE SENSITIVITY AND VERIFICATION REPORT

CHAR TECHNOLOGY VCN BA AEL PROJECT



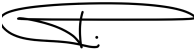



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1 SCOPE AND PURPOSE

Regulation 16(1)(b)(v) of the Environmental Impact Assessment Regulations (GNR 982 promulgated under the National Environmental Management Act (Act 107 of 1998-NEMA)), requires that a Screening Report to be generated by the national web-based environmental screening tool for the specific site and activity must accompany any application for Environmental Authorization.

The Screening Report identifies preliminary development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmentally sensitive features on the site based on the site sensitivity screening. On the basis of the sensitivities identified in the site sensitivity screening, a list of preliminary specialist studies required to be considered in the Impact Assessment process are provided. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

Prior to commencing with a specialist assessment identified in the Screening Report, the current use of the land and the environmental sensitivity of the site, must be confirmed by undertaking a site sensitivity verification. The site sensitivity verification must be undertaken by an environmental assessment practitioner or a specialist. The site sensitivity verification must be undertaken through the use of:

- a) a desk top analysis, using satellite imagery;*
- b) a preliminary on-site inspection; and*
- c) any other available and relevant information.*

This Site Sensitivity and Verification Report (SSVR) is a record of the outcome of the site sensitivity verification in compliance with the requirements of the procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of Sections 24(5)(a) and (h) and 44 of the NEMA. The SSVR aims to:

- a) confirm or disputes the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.;*
- b) contain motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity; and*
- c) be submitted together with the relevant assessment report prepared in accordance with the requirements of the Environmental Impact Assessment Regulations (EIA Regulations).*



2 PROJECT BACKGROUND

2.1 PROJECT ASPECTS

The Applicant proposes the addition of a Vanadium Carbonitride (VCN) furnace onto the existing licensed facility. The facility currently operates under an approved Atmospheric Emissions Licence (AEL) with reference number NDM/AEL/MP312/13/06. The proposed VCN furnace will not be newly constructed on site, but assembled and installed on the existing structural footprint with minor refurbishments required; these include refurbishing current structures and paving of a short internal road section between the gate and loading area. The introduction of the new furnace/process constitutes a Listed Activity and presents a change to the approved operational processes; accordingly, an amendment to the existing AEL will be required to authorise the proposed activity.

The applicant wishes to install and operate a continuous, zoned hydraulic pusher furnace to produce VCN at a design capacity of up to 6 t/day. Briquetted raw Vanadium-bearing materials (V_2O_5 flakes and V_2O_3), carbon powder, and a small amount of iron powder will be supplied to Char Technology from a licensed facility in the form of mixed and pressed briquettes of ~45mm in size. These will be preheated to remove moisture/volatiles, then processed through the primary furnace under a controlled high-temperature profile (~600–1,500°C) in an excess nitrogen atmosphere to enable reduction and carbonitriding. The product will then be cooled through rapid water-assisted cooling, packaged to customer specifications, and dispatched.

The proposed project is located on Erf No 43 and 44, Ferrobank Township, on 9 Noble Road, Ferrobank, Emalahleni Local Municipality, Mpumalanga. The site is approximately 5km North West of eMalahleni Central Business District. The centre point of the site is 25°51'09.01"S; 29° 09'52.59"E, please refer to Section 2.2 for further locality details and map.

2.2 SITE LOCALITY AND LAYOUT

The proposed project is located on Erf No 43 and 44, Ferrobank Township, on 9 Noble Road, Ferrobank, Emalahleni Local Municipality, Mpumalanga. The site is approximately 5km North West of eMalahleni Central Business District. Figure 1 illustrates the site location in relation to the Terrestrial and Aquatic Mpumalanga Biodiversity Sector Plans (MBSP). According to the MBSP, the site is situated within areas classified as *Heavily Modified*. The centre point of the site is 25°51'09.01"S; 29° 09'52.59"E, please refer to Figure 1 for further locality details and Appendix 3 for the proposed layout of the proposed development.

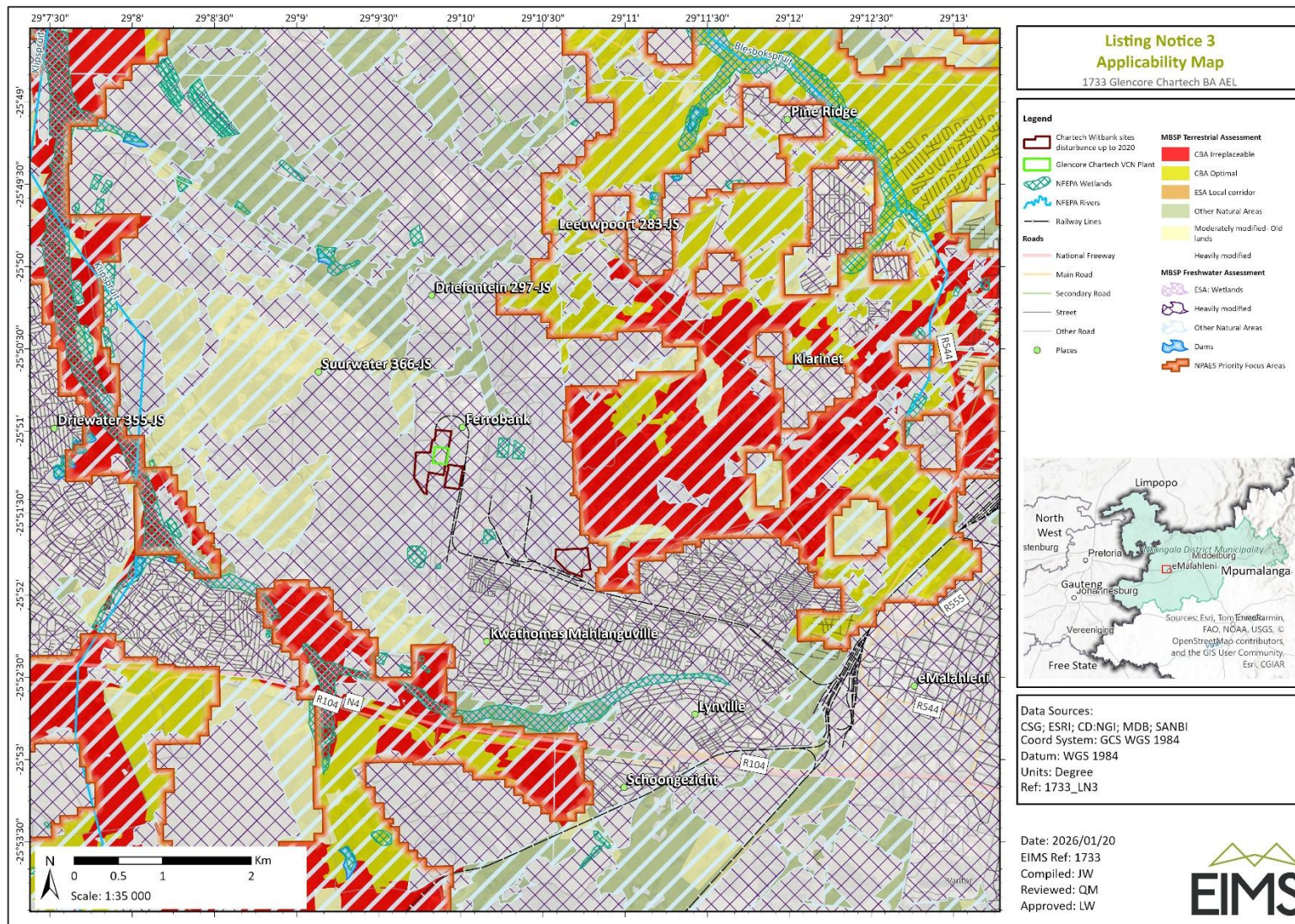


Figure 1: Site locality /Listing Notice 3 map.



2.3 DFFE SCREENING TOOL ASSESSMENT

Regulation 16(1)(b)(v) of the Environmental Impact Assessment Regulations (GNR 982 promulgated under the National Environmental Management Act (Act 107 of 1998-NEMA)), requires that a Screening Report generated by the national web-based environmental screening tool for the specific site and activity must accompany any application for Environmental Authorization.

The Screening Report identifies preliminary development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmentally sensitive features on the site based on the site sensitivity screening. On the basis of the sensitivities identified in the site sensitivity screening, a list of preliminary specialist studies required to be considered in the Impact Assessment process are provided. Table 1 provides the proposed development area environmental sensitivity as provided by the national web-based environmental screening tool.

As noted in the Screening Tool Report, *‘it is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation’*.

Table 1: Screening Tool Report- Proposed development area environmental sensitivity.

Aspect	Very High	High	Medium	Low
Agriculture Theme	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Animal species Theme	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Aquatic Biodiversity Theme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Archaeological and Cultural Heritage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Civil Aviation Theme	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Defence Theme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Palaeontology Theme	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plant Species Theme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Terrestrial Biodiversity Theme	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3 SITE ASSESSMENT

Prior to confirming the list of specialists and commencing with a specialist assessments identified in the Screening Report, the current use of the land and the environmental sensitivity of the site, must be confirmed by undertaking a site sensitivity verification. The site sensitivity verification must be undertaken by an EAP or a specialist. The site sensitivity verification must be undertaken through the use of:

- a desk top analysis, using satellite imagery;
- a preliminary on-site inspection; and
- any other available and relevant information.

The sub-sections below aim to provide context of the existing site conditions to support the site sensitivity and verification.



3.1 GRADIENT

The general gradient characteristics of the site:

<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

3.2 SENSITIVE AREAS

<i>Is the site located in the immediate vicinity of the following:</i>	Yes	No	Comment
Erosion Channels or areas of severe erosion/ destabilized soils	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is located within an Industrial Park. No signs of erosion were noted in and around the site. The existing facility has a formal stormwater management system that separates dirty and clear stormwater. Dirty water is contained on site.
Wetlands (within 32m)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No wetlands occur within and around the proposed project area. Desktop assessments and site sensitivity verification inspection did not identify any wetlands. Within 32 m of the site. The site is located within an Industrial Park and will entail the installation of a furnace into an existing structure/building, paving of existing road and minor refurbishments of the building structures. The planned works are located at least 1.6 km from the closest non-perennial tributary of the Brugspruit.
Unstable slopes or geological features (rocky outcrops)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is located within a brownfield site in an Industrial Park. No unstable slopes/geological features were



<i>Is the site located in the immediate vicinity of the following:</i>	Yes	No	Comment
			identified. However, at least 300m west of the site surface mining works have been noted, however will not affect the site located within the Ferrobank Industrial Park.
Bare areas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site is mainly covered by existing structures, buildings, concrete open areas and some lawn grass. Some sections of the site consist of unpaved roads.
Other Sensitive or risk areas?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	None
Are any existing servitudes and structures directly or indirectly affected by the proposed sites and routes (e.g. Eskom, public road servitudes and restrictions-60m from National Road, farmer's water/irrigation supplies, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site is accessed from an existing local road. However, the project will not affect any existing servitudes.

3.3 VEGETATION

<i>Which of the listed descriptions best describes the general groundcover on and around the site?</i>				
<input type="checkbox"/> Natural veld - good condition	<input type="checkbox"/> Natural veld with scattered aliens	<input type="checkbox"/> Natural veld with heavy alien infestation	<input type="checkbox"/> Veld dominated by alien species	<input type="checkbox"/> Gardens
<input type="checkbox"/> Sport field	<input type="checkbox"/> Cultivated land	<input type="checkbox"/> Paved surface	<input checked="" type="checkbox"/> Building or other structure	<input type="checkbox"/> Bare soil
Comments on vegetation composition:		The site is located within the Ferrobank industrial park and exists as a heavily modified environment. The proposed project will mainly be within the existing building, with concrete and already disturbed areas. However, desktop assessment and a site sensitivity verification noted limited grass cover on the site mainly purposed for landscaping and trees along the site boundary. The tree species noted <i>Albizia amara</i> (Bitter false thorn).		
Comments on weed species/type		The site is in a heavily modified state with minimal vegetation, as such, there is a minimal risk of weeds. However, it was noted that weed species do occur on site and where identified are eliminated/controlled in line with CharTech's alien vegetation control plan.		

3.4 LAND COVER / USE DESCRIPTION

The SSVR aims to:



- confirm or dispute the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.; and
- contain motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity.

The Char Tech site is located within an established industrial area and is currently developed and operational under an approved AEL. The dominant land use is industrial, with existing infrastructure including processing facilities, furnaces, associated plant equipment, internal access roads, hard-stand areas, and utility connections. The proposed VCN furnace will be installed within the existing buildings, within the existing developed footprint, with no expansion into undeveloped land.

In terms of land cover, the site is transformed, consisting primarily of impervious surfaces such as buildings, concrete slabs, and compacted gravel areas. Natural vegetation has been removed as a result of historical industrial development, and any remaining vegetation is limited to disturbed or ornamental/landscaping occurring along site margins or unused areas. No intact natural habitats, wetlands, or watercourses occur within the project footprint or within close proximity.

Surrounding land uses are also predominantly industrial, reinforcing the highly transformed character of the area. It is noteworthy that at least 300m west of the proposed project area, there are existing surface mine workings. The proposed activity does not result in a change to the existing land use or land cover, nor does it encroach on sensitive ecological features. The development represents an intensification of existing industrial land use rather than a change in land cover type. Refer to Appendix 2 for the Land Use Land Cover map.



Table 2: Site photographs.



Figure 2: Western view of the proposed structure into which the VCN furnace will be installed with compacted gravel access roads

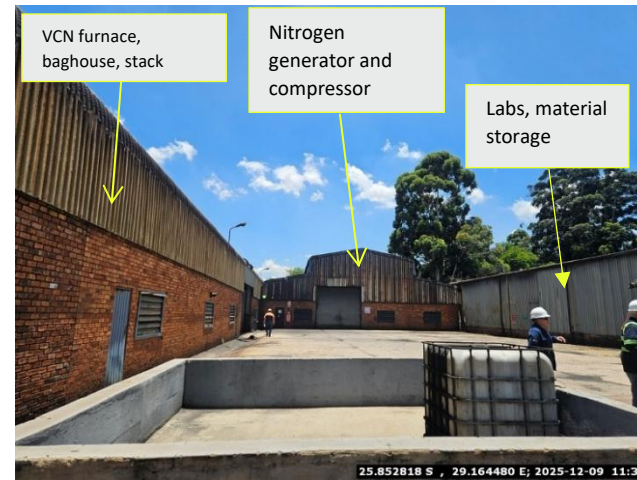


Figure 3: Northward view of the existing structure onto which the VCN furnace will be installed (Furnace to be installed on the west wing with stack and baghouse, Nitrogen generator and compressor in the north wing of the building, and Labs, material storage on east wing)



Figure 4: View of east wing/laboratory and material storage area



Figure 5: Southward view towards proposed loading bay area



Figure 6: View of existing laboratory infrastructure



Figure 7: View towards eastern site boundary (Noble Road)



Figure 8: View of existing gravel site access road (towards noble road, to be paved)



Figure 9: Inside view of north wing where nitrogen generator and compressor is to be installed



Figure 10: Inside view of existing laboratory



Figure 11: Inside view of existing laboratory and equipment



Figure 12: Inside view of west wing where VCN furnace will be installed and operated



Figure 13: Inside view of west wing where VCN furnace will be installed and operated



Figure 14: View of existing laboratory facilities



Figure 15: View of building containing transformer through which electricity will be supplied



Figure 16: View of existing bathroom facilities



Figure 17: View along the northern boundary of the existing building



Figure 18: View of grass patch on site/minimal vegetation around the building/concrete slabs



Figure 19: General view of the site, with concrete slabs cover



Figure 20: General view of recent alien vegetation control measures implemented on site



Figure 21: Ornamental tree species noted Albizia amara (Bitter false thorn)



Figure 22: View of access to Char Techon Van Eck Drive



Figure 23: View of Noble Road to be used to access the VCN site



4 VERIFICATION FINDINGS AND MOTIVATION

The Screening Report identifies preliminary development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmentally sensitive features on the site based on the site sensitivity screening (Section 2.3). On the basis of the sensitivities identified in the site sensitivity screening, a list of preliminary specialist studies required to be considered in the Impact Assessment/ Basic Assessment process are provided. Table 3 below lists the screening tool identified specialist studies and associated screening tool sensitivity. Based on the findings of the site verification process (Section 3) a verified, or suggested revised sensitivity is provided together with an associated motivation.

Based on the selected classification, and the known impacts associated with the proposed development, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.



Table 3: Assessment for specialist studies and motivation.

Screening Tool Specialist Study Required	Screening Tool Level of Sensitivity	Suggested Sensitivity	Required level of Assessment	Motivation
Agriculture Impact Assessment	High	None	None	The proposed development is to be located within a heavily modified industrial site. The proposed development entails the assembly and installation of a VCN furnace into an existing building. The building floors are on concrete foundations. Around The site is mostly covered by concrete and compacted gravel and is surrounded by such similar land uses, and mining activities at least 300 m located to the west. Apart from the indirect atmospheric pathways through the facility air emissions, there are no other foreseeable impact pathway to the soil receptors. The air emissions from the facility and alignment with National Emissions Standards will be assessed in detail in the Specialist Air Quality Impact Assessment Report. No agricultural and/or soil impacts are anticipated to emanate from the proposed VCN furnace project, and consequently it is the EAPs opinion that neither a dedicated Agricultural Impact Assessment or even a compliance statement is required for this activity.
Landscape/Visual Impact Assessment	-	Low	None	The Char TechVCN Project is located within an established brownfield industrial site surrounded by similar industrial land uses, where the visual environment is already highly modified. The proposed furnace installation will occur within existing industrial structures, with the addition of a baghouse and an approximately 35 m stack that is consistent in form and scale with surrounding infrastructure and is anticipated to be equal to or smaller than existing industrial elements in the area. As such, the proposed development will not alter the existing visual character of the site or its surroundings, and the site is therefore considered to have low landscape and visual sensitivity, with no significant visual impacts anticipated. It is the EAPs opinion that a dedicated Visual Impact Assessment is not warranted for this activity.
Archaeological and Cultural Heritage Impact Assessment	Low	None	None	The proposed project is located within an industrial site, on an existing industrial building and will not change the character of the site. Minor refurbishments of an existing industrial building, including installation of a stack and baghouse. The building on which the furnace



Screening Tool Specialist Study Required	Screening Tool Level of Sensitivity	Suggested Sensitivity	Required level of Assessment	Motivation
				<p>will be installed was constructed after 1974 and is therefore approximately 50 years old. As such, it does not qualify as a heritage resource and is not considered a heritage feature.</p> <p>All works will be confined to the existing building footprint, and no deep excavations or ground disturbances are planned. The project is therefore excluded from the Chance Finds Protocol. Given that the project will not alter the character of the site and no heritage resources are present or expected to be impacted, a Heritage Impact Assessment is not required, and no heritage-related impacts are anticipated.</p>
Palaeontology Impact Assessment	Very High	None	None	<p>The proposed project is located within an industrial site, on an existing industrial building and mainly on concrete. Although the proposed project also includes the paving of an existing gravel access road, no excavations will be undertaken for this project and as such, no palaeontology related impacts are anticipated. It is the EAPs opinion that a dedicated Palaeontology Impact Assessment is not warranted for this activity.</p>
Terrestrial Biodiversity Impact Assessment	Very High	None	None	<p>The screening tool has identified the sensitivity of the site as very high due to the Endangered (EN) Eastern Highveld Grassland Ecosystem. This ecosystem is listed in the Department of Forestry, Fisheries and Environment's (DFFE) Revised National List of Ecosystems that are Threatened and, in Need of Protection published in 2022 under the National Environmental Act: Biodiversity Act (Act 10 of 2004). The site sensitivity verification undertaken confirmed that the site exists in a heavily modified environment within an existing industrial park. The proposed project is within an existing building, mainly with concrete floors, existing access roads and will not require any clearance of vegetation/ecosystem disturbance. Apart from the indirect atmospheric pathways through the facility air emissions, there are no other foreseeable impact pathway to the terrestrial biodiversity receptors. The air emissions from the facility and alignment with National Emissions Standards will be assessed in detail in the</p>



Screening Tool Specialist Study Required	Screening Tool Level of Sensitivity	Suggested Sensitivity	Required level of Assessment	Motivation
				Specialist Air Quality Impact Assessment Report. It is the EAPs opinion that a dedicated Terrestrial Ecological Impact Assessment is not warranted for this activity.
Aquatic Biodiversity Impact Assessment	Low	Low	None	The proposed Char Tech Project is located within an established brownfield industrial site, with no wetlands or watercourses located within 500 m of the site, being the regulated area of a watercourse. As a result, no aquatic features occur within or adjacent to the site that could be affected by the proposed installation of the VCN furnace and associated infrastructure. The operation of the VCN furnace will not result in the release of effluent or contaminated runoff, and therefore no interaction with aquatic systems is anticipated. The site is accordingly considered to have no aquatic biodiversity sensitivity, and no aquatic biodiversity impacts are expected to result from the proposed development. It is the EAPs opinion that a dedicated Aquatic and/or Wetland Impact Assessment is not warranted for this activity.
Hydrology Assessment	-	None	None	<p>The proposed Char Tech Project is located within an established industrial park and involves the installation of a furnace within an existing building, along with paving of existing internal roads and minor refurbishment of current structures. The site is situated approximately 1.6 km from the nearest non-perennial tributary of the Brugspruit, and no surface water features occur within or adjacent to the site.</p> <p>The Char Techsite is serviced by an existing formal stormwater management system, which captures and conveys runoff from roofed areas and paved surfaces via kerbing/channelisation and/or stormwater inlets and pipes to designated discharge points. The primary project activities (installation of the furnace and associated infrastructure) will occur within the existing building footprint (under roof), and will therefore not be directly exposed to rainfall-driven hydrological pathways.</p> <p>External works are limited to paving/upgrade of existing internal roads and a loading bay, which will comprise additional or improved hardstanding within an already transformed (brownfield) industrial environment. These works are not expected to significantly alter</p>



Screening Tool Specialist Study Required	Screening Tool Level of Sensitivity	Suggested Sensitivity	Required level of Assessment	Motivation
				<p>catchment-scale runoff patterns, nor create pathways to watercourses, given the absence of nearby surface water features and the presence of established stormwater infrastructure.</p> <p>Given the brownfield nature of the site, the absence of nearby watercourses, and the limited extent of additional hard infrastructure, the site is considered to have low hydrological sensitivity, and no significant hydrological impacts are anticipated as a result of the proposed development.</p>
Noise Impact Assessment	-	Low	None	<p>The proposed activities do not involve any significant noise-generating processes. Anticipated noise sources are limited to standard construction activity, light-industrial equipment, and occasional vehicle movement, all of which fall within typical operational parameters for the area.</p> <p>Furthermore, the site is located away from noise-sensitive receptors such as residences, schools, or medical facilities, and the project is expected to operate within the existing acoustic character of the already transformed environment. No material change to the ambient noise climate is anticipated; therefore, a Noise Impact Assessment is not required for the Char TechVCN project.</p>
Traffic Impact Assessment	-	Low	None	<p>The proposed Char TechVCN project will generate negligible traffic volumes during both construction and operation. Construction activities will involve limited vehicle movements associated with material delivery and contractor access, all of which fall within normal thresholds for small-scale industrial developments. During operation, the facility will have a low staff complement and minimal logistics requirements, resulting in no meaningful increase in daily traffic on the surrounding road network. It is anticipated that during operation the site will receive 3 trucks per week, each delivering 30 tons of briquettes and 2 trucks will be dispatched with 30 tons of product per week (total 5 trucks per week). The project is located within an existing industrial/previously transformed area that is already serviced by adequate road infrastructure, and no congestion or capacity constraints have been identified in proximity to the site.</p>



Screening Tool Specialist Study Required	Screening Tool Level of Sensitivity	Suggested Sensitivity	Required level of Assessment	Motivation
Health Impact Assessment	-	Unknown	Undertaken as part of the AQIA	A full DFFE compliant Air Quality Impact Assessment (AQIA) will be undertaken and will cover the health risks/aspects associated with the development of the Char Tech VCN project human health risk and nuisance impact screening assessment based on NAAQS and dispersion simulation results will form part of the AQIA.
Socio-Economic Assessment	-	Low	None	The proposed VCN project is an addition to the existing Char Tech facilities within the Ferrobank Industrial Park. This project is anticipated to maintain existing employment, whilst also providing limited new opportunities during the construction phase. Char Tech has an existing stakeholder engagement and communication. As such, a socio-economic study was not deemed necessary for this project. It is the EAPs opinion that a dedicated Socio-economic Impact Assessment is not warranted for this activity.
Ambient Air Quality Impact Assessment	-	Unknown	Undertaken as part of the AQIA	An Air Quality Impact Assessment will be undertaken by a suitably qualified specialist. The ambient air quality will be assessed as part of the Air Quality Impact Assessment/study.
Air Quality Impact Assessment	-	Unknown	Full Assessment	An Air Quality Impact Assessment will be undertaken by a suitably qualified specialist.
Plant Species Assessment	Low	None	None	The site sensitivity verification undertaken confirmed that the site exists in a heavily modified environment within an existing industrial park. The proposed project is within an existing building, mainly with concrete floors, existing access roads and will not require any clearance of vegetation/ecosystem disturbance. It is the EAP's opinion that there is no sensitivity on the development site. Apart from the indirect atmospheric pathways through the facility air emissions, there are no other foreseeable impact pathway to the terrestrial biodiversity receptors (including flora). The air emissions from the facility and alignment with National Emissions Standards will be assessed in detail in the Specialist Air Quality Impact Assessment Report. It is the EAPs opinion that a dedicated Plant Species Impact Assessment is not warranted for this activity.



Screening Tool Specialist Study Required	Screening Tool Level of Sensitivity	Suggested Sensitivity	Required level of Assessment	Motivation
Animal Species Assessment	Low	None	None	The site sensitivity verification undertaken confirmed that the site exists in a heavily modified environment within an existing industrial park. The proposed project is within an existing building, mainly with concrete floors, existing access roads and will not require any clearance of vegetation/ecosystem disturbance. It is the EAP's opinion that there is no sensitivity on the development site. Apart from the indirect atmospheric pathways through the facility air emissions, there are no other foreseeable impact pathway to the terrestrial biodiversity receptors (including fauna). The air emissions from the facility and alignment with National Emissions Standards will be assessed in detail in the Specialist Air Quality Impact Assessment Report. It is the EAPs opinion that a dedicated Animal Species Impact Assessment is not warranted for this activity.



5 CONCLUSION

A Screening Tool Report for the proposed Char Technology VCN Project was generated on the DFFE Screening Tool on 01 December 2025. Following this, a desktop sensitivity analysis and site sensitivity verification were undertaken by the EAP on 9 December 2025.

The site sensitivity verification confirmed that the proposed development area is situated entirely within an existing, established industrial site and is predominantly underlain by hardened, previously transformed surfaces. No deep excavations are planned, and only limited civil works are required to facilitate the installation of the VCN Furnace and associated machinery. Based on the verified ground conditions and the brownfield nature of the site, the sensitivities identified by the Screening Tool were reviewed and, where applicable, disputed with supporting motivation in accordance with the requirements of the EIA Regulations and associated protocols.

The EAP has confirmed that, among the specialist studies originally flagged, only a DFFE- AQIA, including both an Ambient Air Quality Impact Assessment and a Health Impact Assessment, is required to support the Basic Assessment process for the project.

Accordingly, this Site Sensitivity Verification Report provides sufficient justification for the amended list of specialist requirements and confirms that the environmental sensitivities associated with the proposed development are accurately reflected and appropriately addressed.



6 APPENDICES

Appendix 1: Locality/Listing Notice 3 Map

Appendix 2: Land Use/ Land Cover Map

Appendix 3: Engineering Design/Site Layout