EXECUTIVE SUMMARY

1. INTRODUCTION

This Executive Summary provides a synopsis of the Scoping Report prepared as part of the Scoping and Environmental Impact Assessment (S&EIA) process that is being undertaken of Rhino Oil and Gas Exploration South Africa (Pty) Limited's (Rhino Oil and Gas) proposal to continue exploration within Exploration Right (ER) 294 (ER reference: 12/3/294) located within the Free State Province. Rhino Oil and Gas have proposed the drilling of several exploration wells to test for the presence, quantity and quality of gas within specific Target Areas within the ER 294 area (see Figure 1).

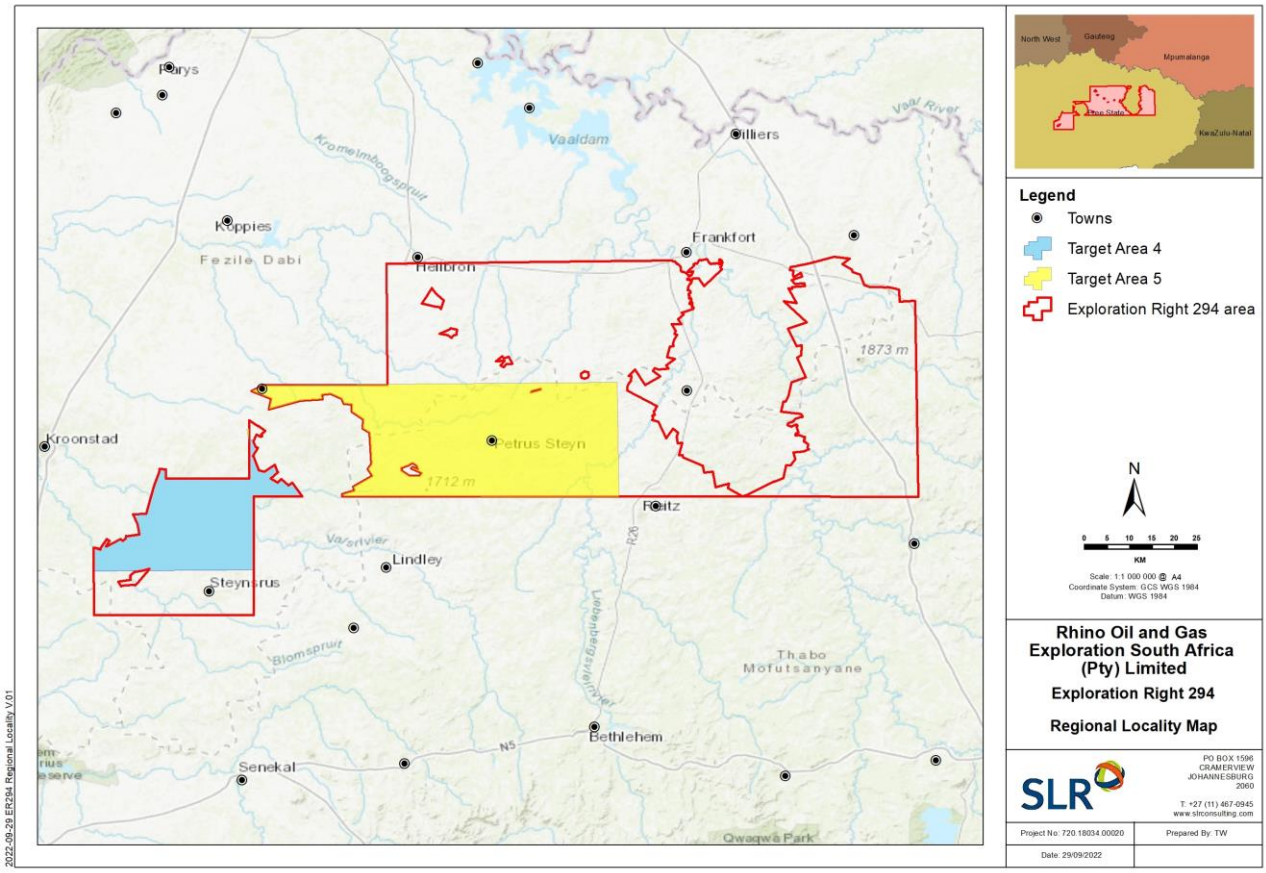

FIGURE 1: Locality of Rhino Oil and Gas's exploration well Target Areas within ER 294

1.1 Opportunity to Comment

This Scoping Report is being distributed for a 30-day comment period from **10 October to 9 November 2022** to provide I&APs with an opportunity to comment on any aspect of the proposed project and the findings of the S&EIA process to date. Copies of the full report are available electronically on the SLR website (at **https://www.slrconsulting.com/en/public-documents/Rhino-well-ER294**) and in hard copy at the following locations:

Name of Facility	Physical Address and telephone number
Petrus Steyn Public Library	Address: Groenewalt Street, Petrus Steyn, 9640 Tel: 058 871 3131
Petrus Steyn: Nketoana Municipality	Address: Corner Voortrekker and Church Street, Reitz, 9810 Tel: 058 863 2811
Edenville Public Library	Address: 588 Moshoeshoe Street, Edenville, 9535 Tel: 073 838 5936
Edenville Municipality Building	Address: 18 Jordaan Street, Edenville, 9535 Tel: 056 631 0015
Steynrus Public Library	Address: Matlwangtlwang, Steynrrus, 9515 Tel: 056 471 0006
Steynsrus: Moqhaka Local Municipality	Address: Van Riebeeck Street, Steynsrus, 9515 Tel: 056 216 9600

Any comments should be forwarded to SLR at the address, telephone number or e-mail address shown below by no later than **9 November 2022** for them to be included in the updated Scoping Report. All comments received during the review process will be included in the Scoping Report.

SLR Consulting (South Africa) (Pty) Ltd
Attention: Theo Wicks or Gugu Dhlamini
PO Box 1596, Cramerview 2060 (if using post please call SLR to notify us of your submission)
Tel: (011) 467 0945
Whatsapp: 066 313 7574
E-mail: **RhinoER294@slrconsulting.com**

1.2 Project Background

In 2019, Rhino Oil and Gas was granted an Environmental Authorisation (EA) and ER, permitting their exploration for natural gas using non-invasive techniques within ER 294. Exploration was to be undertaken in terms of an approved EWP, over an initial period of three (3) years. The initial EWP entailed: (i) the review of existing literature and datasets from historic drilling campaigns by other exploration companies (Years 1 and 2); (ii) procurement of geological core samples from the Council for Geoscience (Year 3) and (iii) the acquisition of airborne geophysical data. This exploration and analysis has furthered confidence regarding the presence of natural gases within the ER 294 area.

Thus, Rhino Oil and Gas have made applications to renew the ER for a further two (2) year duration and update the exploration work programme (EWP) to allow for the drilling of several exploration wells. Although Rhino Oil and Gas hold an approved EA for exploration in ER 294, the current EA is limited to the use of non-intrusive techniques.

1.3 Summary of Authorisation Requirements

In order to include well drilling in an updated EWP, it is necessary for Rhino Oil and Gas to apply for, and obtain, further EA in terms of Chapter 5 of the National Environmental Management Act, 1998 (No. 107 of 1998) (NEMA). As exploration activities conducted in terms of an ER are listed in Environmental Impact Assessment (EIA) Regulations Listing Notice 2, 2014 (GN R984) an application for EA is required to be informed by a S&EIA process.

Rhino Oil and Gas's exploration activities are being undertaken in terms of a series of sequential approval and authorisation processes based on the activities included in their exploration work programme (EWP):

- Further non-intrusive works (e.g. aerial surveys) will be undertaken in terms of the existing EA and approved Environmental Management Programme (EMPr) granted in 2019, via the pending ER renewal application made in terms of Section 81 of the Mineral and Petroleum Resources Development Act (MPRDA), 2002 (Act 28 of 2002) in January 2022; and
- Exploration well drilling and testing would be undertaken in terms of an EA and EMPr, which are the subject of the current EA application, made in terms of NEMA and submitted to PASA on 30 September 2022.

2. EIA METHODOLOGY

2.1 Scoping Phase

2.1.1 Land owner identification

The Applicant appointed a land surveyor to identify all properties (including farms and portions) that are included in the proposed Target Areas and search against the Deeds Office records to identify the landowner and contact information (where such information was available in the Deeds Office for the landowner). The landowner database included private persons, trusts, communal property associations, companies, organs of State and various government departments.

The applicant subsequently identified, and continues to do so, the owners of properties where they may potentially drill wells. Through this process further landowner contacts were obtained. SLR was provided with this database and continues to identify contact information for each landowner of properties adjacent to the properties where Rhino Oil and Gas may potentially drill wells.

It is pointed out that property information was not available for every land parcel, owner information was not available for every property and contact information was not available for every landowner. It is acknowledged that it has not been possible to source contact information for all landowners and occupiers within the Target Areas, and thus certain landowners and occupiers have not been directly notified. However, the task of identifying and notifying landowners and occupiers will be on-going during the course of the EIA process.

2.1.2 Pre-Application Public Participation Process

Although this step is not a legislated requirement of the EIA Regulations 2014 (as amended), a pre-application public participation process was undertaken. This provided an opportunity to notify identified landowners (see above) and other key stakeholders of the proposed project and for them to raise any initial issues or concerns regarding the proposed project. The pre-application public participation process included the following:

- I&AP notification and distribution of a Background Information Document (BID);
- Advertisements in local newspaper and Government Gazette;
- Site notices were placed at various locations within the identified target areas;
- Two stakeholder meetings were held.

All written comments received during the pre-application public participation process have been collated, and responded to, in a Comments and Responses Report attached to the Draft Scoping Report.

2.1.3 Authority Consultation and Application

An "Application Form for Environmental Authorisation" was submitted to PASA on 30 September 2022.

2.1.4 Compilation and Review of Scoping Report

This draft Scoping Report has been prepared in compliance with Appendix 2 of the EIA Regulations 2014 and has been informed by comments received during the pre-application public participation process. This report provides an opportunity for I&APs to comment on the proposed project, findings of the scoping public participation process and the scope of work for the next phase of the EIA.

2.1.5 Completion of the Scoping Phase

After closure of the comment period, the Scoping Report will be updated to incorporate the comments received. The updated Scoping Report will be submitted to DMRE for acceptance. If the Scoping Report is accepted, the project will proceed onto the EIA Phase.

2.2 EIA Phase

2.2.1 Specialist Studies

Four (4) specialist studies will be commissioned to address the key issues that require further investigation and detailed assessment, namely an Aquatic Ecology (including wetlands), Terrestrial Ecology, Geohydrology and Cultural Heritage. The specialist scopes will be focussed on proposed well site locations and outputs will be used to inform micro-siting of well sites to avoid environmental sensitivities.

2.2.2 Land owner and Stakeholder notification

Rhino Oil and Gas and SLR will continue to source contact information for and notify landowners and potential I&APs of the well drilling ER application and the S&EIA process.

2.2.3 Integration and Assessment

The specialist information and other relevant information will be integrated into an EIA Report, which will include an Environmental Management Programme report (EMPr). The EIA Report will be released for a 30-day comment period and all I&APs on the project database will be notified when the EIA Report is available for comment.

2.2.4 Completion of the EIA

After closure of the comment period, all comments received on the draft report will be incorporated and responded to in a Comments and Responses Report. The draft report will then be updated to a final report, which will include the Comments and Responses Report, and will be submitted to DMRE for consideration and decision-making.

3. NEED AND DESIRABILITY

South Africa, like the rest of the world, is vulnerable to climate change. There is thus global concern of the need to reduce carbon emissions and achieve carbon neutrality by 2050. However, the rapid transition to carbon neutrality presents a potential risk to economic growth and sustainable development. As such, South Africa has committed to a "just" transition in achieving net-zero emission and a climate resilient society, whereby the need to reduce emissions is balanced with the need to grow the economy and create jobs. In this regard, South African Government policy currently promotes the use of natural gas as part of the energy mix up to 2030 to serve as a transition to a carbon-neutral goal and provide the flexibility required to complement renewable energy sources. The proposed project will increase South Africa's understanding as to whether there are any potential biogenic gas, helium and geological hydrogen resources that could be exploited in the future to assist in the just transition process.

The proposed project has no direct influence on South Africa's reliance on hydrocarbons and their contribution to the countries' energy mix. These aspects are influenced by South Africa's energy and climate change related policy, the financial costs of the various energy sources and consumer choices in this regard. These National strategic policy issues relating to energy and climate change fall beyond the scope of this exploration project EIA.

4. PROJECT DESCRIPTION

4.1 The applicant

Applicant details	
Company name	Rhino Oil and Gas Exploration South Africa (Pty) Ltd
Registration no:	2013/096757/07
Contact person	Travis Smithard
Postal address	3rd Floor, Icon Building, 24 Hans Strijdom Avenue, Foreshore, Cape Town
E-mail	info@rhinoresourcesltd.com
Web address	http://www.rhinoresourcesltd.com/

4.2 Exploration Right application area

The extent of ER 294 includes ~ 3 000 properties (farms and portions) over an area of ~ 6 600 ha (see regional setting in Figure 1-2).

Based on the outcome of prior exploration, Rhino Oil and Gas has identified two (2) Target Areas within which the updated well drilling EWP intends to focus. The Target Areas include:

- **Target Area 4** extends for an area of ~550 km^2, approximately 10 km north of Steynrus and 10 km east of Kroonstad. The Target Area 4 includes ~ 300 properties;
- **Target Area 5** of ~1 300 km^2, which is in the central part of ER294, with Petrus Steyn right in its centre. Target Areas 5 extends across ~ 1 000 properties.

The location of well drilling sites is subject to a process of geological review, landowner consent and environmental considerations. Areas that are unsuitable will be eliminated from further consideration.

4.3 Description of the Exploration Work Programme

The Drilling Program and Time Schedule proposed by Rhino Oil and Gas is to start drilling at least ten exploration wells (i.e. three to four in each of the Target Areas) within the ER in 2023. If any of the first ten exploration wells result in the identification of commercially viable commodities (hydrocarbons, helium, or hydrogen), Rhino Oil and Gas's Drilling Program and Project Schedule would be updated to include the drilling of additional exploration wells at different locations within the Target Areas.

Completed exploration wells will be tested to evaluate their commerciality. At the end of operations, unsuccessful wells will be plugged and abandoned ("decommissioned"). The drilling time to complete one well is estimated to take approximately 3 to 4 weeks. The results of the first few wells drilled within the Target Areas will influence the positioning and pace of the rest of the drilling campaign based on the interpretation of the geological, geophysical, fluid sampling data. The sequencing of the drilling campaign will be dynamic and influenced by the learnings of each new well.

Based on the overall subsurface rock in each area of interest, it is anticipated that exploratory drilling will be conducted using a truck mounted drilling rig with air and mud drilling capabilities. The truck mounted drilling rig has minimal area of disturbance due to its compact footprint and is highly mobile providing operational flexibility by being able to move from location to location without the need of additional truck support.

Project activities associated with drilling include the following phases:

- Mobilisation of the truck mounted rig and supply trucks from drilling contractor base located near Pretoria to the Rhino Oil and Gas Target Area in the Free State Province;
- Well drilling;
- Well execution (logging, completion) options;
- Well testing for successful well options;
- Well abandonment for unsuccessful well (Plug and Abandonment "decommissioning"); and
- Demobilisation of the drill rig, supply truck and local logistics base.

4.4 Summary of project alternatives

One of the objectives of an EIA is to investigate alternatives to the project. Despite many advances in geophysical data acquisition and analysis, currently no alternatives exist to definitively establish the presence of hydrocarbon reserves other than through exploration drilling. No activity alternatives have therefore been assessed.

With respect to alternative sites, the selection of each well site location will follow an iterative process based on:

- Lawful entitlement in terms of the MPRDA, namely the full extent of Rhino Oil and Gas's ER;
- Prospective geology identified as part of previous geophysical surveys;
- Desktop GIS environmental sensitivity taking into consideration hydrological, geohydrological, ecological and cultural heritage constraints and opportunities;
- Consultation with landowners to agree access to the proposed sites; and

- Micro siting by petroleum geologist and environmental specialists considering the local situation and landowner preferences.

In terms of technology alternatives for the drilling rig, Rhino Oil and Gas's preference is to use the hybrid air/mud drilling rig provided by the local South Africa experienced drilling contractor.

The No-Go alternative entails no change to the status quo, in other words the proposed exploration drilling activities will not be conducted in ER 294. As such, the No-Go Alternative will leave the areas of the potential drilling sites in their current environmental state, with the biogenic gas, helium and geological hydrogen potential remaining unknown. The EIA Regulations, 2014 (as amended) require that the No-Go alternative is assessed.

4.5 Related Applications

Rhino Oil and Gas is also the holder of ER 318, which is located to the west of ER 294. As with ER 294, Rhino Oil and Gas has made application for the renewal of ER 294 and is also applying for Environmental Authorisation for well drilling. SLR is undertaking the S&EIA process for ER 294 concurrently with the application in ER 318. The Drilling Program proposed by Rhino Oil and Gas would see activities being undertaken in both ERs concurrently.

4.6 Further exploration or future production

If the exploration well drilling activities were to confirm the presence of a potential resource, then Rhino Oil and Gas would need to seek further approval from PASA for the additional exploration work required to appraise the resource. Any further approval would be subject to an additional environmental assessment process with further public consultation. Approvals are also likely to be required in terms of other legislation.

Similarly, if the later exploration led to the discovery of a commercial resource suitable for development then Rhino Oil and Gas would need to secure a production right from DMRE. An application for a production right has to be subject to an EIA process with further public consultation. Approvals are also likely to be required in terms of other legislation.

5. DESCRIPTION OF THE AFFECTED ENVIRONMENT

General information on relevant environmental (geographical, physical, biological, social, economic, heritage and cultural) aspects associated with the ER and Target Areas have been included in the Scoping Report using information sourced from studies that have been conducted by various government departments and non-government environmental organisations responsible for the area covered by the Well Drilling ER application.

5.1 Climate

Rainfall across the Target Areas is limited to the summer months and is mostly in the form of thunderstorms. Regional Mean Annual Precipitation can vary between 544 mm to 668 mm per annum. Day temperatures reach a maximum of up to 28°C in the months of January and December (the hottest months of the year), whilst the lowest night temperatures can drop to a minimum of -5°C.

5.2 Geology

The ER area lies in the north east of the Karoo Basin which formed as a result of compression during the assembly of the Gondwana super-continent. The Karoo Basin represents a diverse and complex suite of rock units with an aerial extent of roughly 600 000 square kilometres.

Resource assessments of the Karoo Basin have historically emphasised the world-class coal reserves that have dominated the energy history of South Africa. Some limited onshore exploration for hydrocarbon occurrences was undertaken in the 1960s, but no commercial hydrocarbon occurrences were discovered. However, it is expected that the north-east Karoo Basin has potential for a tremendous diversity of hydrocarbon resources including shale oil and shale gas, coalbed methane, helium and biogenic gas.

In general, the ER area is not located in a region with high levels of seismicity although minor earth tremors have been recorded in the recent past.

5.3 Soils and Land Capability

Soils across the ER area are extremely diverse with soils ranging in structure and composition. The majority of soils within the study area are considered Lithic and Duplex and to lesser degree Oxidic. Lithic soils are young soils with orthic topsoil but weakly developed subsoil. Oxidic and Duplex soils both have orthic topsoils and are soils with a special subsoil relating to their pedogenic accumulation. Other less common or in lesser concentration soils include Cumulic and Gleyic soils. Land capability of the region is largely tied to topography (slope), rainfall and altitude. Regions with steeper gradients and higher altitudes generally have lower agricultural potential.

5.4 Land Cover

The main towns located within the proposed Well Drilling exploration area include Kroonstad, Wesselsbron; and Odendaalsrus. Numerous tarred provincial roads are located within the proposed exploration area. These include the following, the R76 from Kroonstad to Viljoenskroon, the R30 from Bothaville to Odendaalsrus and Welkom and the R719 between Bultfontein and Wesselsbron.

The ER area is home to significant commercial agriculture activities comprising a combination of crop production, animal production, horticulture, dairy farming, game farming, aquaculture, fruit production and agro-processing. Major crops are maize, soybeans, wheat, sorghum, sunflowers, potatoes, groundnuts and wool. The large majority of the land is used for extensive livestock grazing (cattle and sheep).

5.5 Hydrology

The well drilling ER area falls within the Middle Vaal Water Management Area (WMA). The Middle Vaal WMA covers a catchment area of approximately 44 803 km^2. The Vaal River is located within the ER and is one of South Africa's strongest-flowing rivers, however, the Vaal dam itself falls outside of the ER. Several other small dams and numerous farm dams are located within the proposed Well Drilling ER area, which are largely used for livestock and domestic purposes.

Based on the National Freshwater Ecosystem Priority (NFEPA) wetland database (2011) the Target Areas include a significant number of wetlands ranging in hydrogeomorphic classification, including:

- Channelled valley-bottom wetlands;
- Depressions;
- Flat;
- Floodplain wetlands;
- Seep;
- Unchannelled valley-bottom wetlands; and
- Valleyhead seeps.

Surface water use consists of a combination of domestic, livestock use and irrigation for crop production on farms. Rivers within the Target Areas are tributaries of the Vaal Dam which is utilised for domestic, industrial and recreational purposes such as water sports and fishing. The Vaal Dam is a vital resource for water supply to Gauteng.

5.6 Groundwater

The Target Areas are located within an area classified as a minor aquifer region, which implies a moderately yielding aquifer system of variable water quality in terms of the Aquifer Classification Map of South Africa. Certain parts of the Well Drilling ER area are classified as poor aquifer regions, which implies a low to negligible yielding aquifer system with moderate to poor water quality. Although borehole yields in the deeper aquifer are generally, considered low, structural features such as faults and fractures can produce higher yielding boreholes.

In terms of national mapping, the ER area is deemed to have 'least' and 'moderate' aquifer vulnerability, be a 'low' to 'medium' susceptibility aquifer and have groundwater quality of electrical conductivity concentrations from low (0 – 70 mS/m) to 150 – 370 mS/m where the water will have a noticeable salty taste.

There is significant groundwater use at a local scale with many farmers dependent on the abstraction of groundwater for both potable water as well as for stock watering and in some cases irrigation. More detailed information will be provided in the EIA report, following the Geohydrology Study.

5.7 Air Quality

The majority of the ER area is rural in nature and is comprised mostly of small towns, isolated farmsteads, scattered communities and agricultural activities such as livestock grazing and crop cultivation. It follows that the air quality associated with majority of the area is expected to be good. Existing emission sources include fugitive dust from paved and unpaved roads, wind erosion from open areas, household fuel combustion (fuel and coal), vehicle exhaust emissions and smoke from veld fires in winter and stack emissions from industries.

5.8 Biodiversity

The proposed Target Areas are located within the Grassland Biome and the Savannah Biome. The Grassland Biome comprises the Dry Highveld Grassland Biogregion and Sub-escarpment Savanna including an Inland Azonal Vegetation area.

Numerous faunal species such as birds, amphibians, reptiles, mammals, fish and insects are associated with the various vegetation units located in the ER area. Various species of concern are considered likely to occur within the proposed Target Areas. The Target Areas also overlap with several areas classified by the Free State Biodiversity Sector Plan, 2016 as Critical Biodiversity Areas and Ecological Support Areas, however the majority of the Target Areas are mapped as Degraded or Other. It is noted that the final locations for well sites would be adjusted to avoid locations that host flora and/or fauna of conservation concern.

5.9 Heritage

The Target Areas are likely to include numerous heritage sites that are documented in the national and provincial heritage databases as well as many undiscovered sites. The Target Areas are also located in an region that is generally regarded as having a very high to moderate palaeontological sensitivity. It follows that there is a high likelihood of fossil occurrence within most of the ER application area.

5.10 Socio-Economic Environment

The ER area is largely located within three Local Municipalities in the Free State Province, namely the Moqhaka Local Municipality, Ngwathe Local Municipality and Nketoana Local Municipality.

The population of the Moqhaka Local Municipality has decreased by 3.61% from 2011 to 2016. The population of the Ngwathe Local Municipality has increased remained largely the same over the last 20 year period.

With respect to employment, the Ngwathe and Moqhaka Local Municipalities have an unemployment rate of 35.2%. In the Nketoana Local Municipality, 41,6% of the economically active youth are unemployed.

In all three municipalities, the average household size varies from 3.2 to 3.5 persons. More than 80% of households in all three municipalities have access to drinking water.

6. POTENTIAL PROJECT ISSUES AND IMPACTS

A scoping-level identification of environmental impacts (physical, biological, social and economic) associated with the proposed well drilling has been undertaken. A number of potential impacts that could potentially result from the proposed exploration activities have been identified for further assessment during the EIA phase are summarised below.

ASPECT	POTENTIAL IMPACTS
Geology	Remote risk of destabilising certain geologies, underground caverns or mine workings.

ASPECT	POTENTIAL IMPACTS
Soils	Project activities may result in contamination of soils. Vehicles and project activities on soils may damage soil structure and/or cause compaction or erosion.
Groundwater	Contamination of groundwater by drilling fluids, accidental spills and other sources.
Freshwater	Contamination of freshwater by drilling fluids, accidental spills and other sources. Physical disturbances of the beds and banks of watercourses.
Noise	Project activities could result in changes to the ambient noise levels during operation around the proposed well drilling site.
Air Quality	Project activities could result in changes to the ambient air quality during operation around the proposed well drilling site.
Health Risks	Activities may pose a risk of injury to public.
Ecology and Biodiversity	Damage or destruction of the vegetation, habitat and the disturbance or loss of species of conservation concern.
Heritage and Palaeontology	Disturbance of heritage resources by exploration.
Land Use	Access to private land and the associated inconvenience, damage to infrastructure, interference with land use, safety and security risk.
Contribution to Local Economy	Project activities would contribute to local economy through payment of local service providers.

7. PLAN OF STUDY FOR EIA

7.1 Method of Impact Assessment

The identification and assessment of environmental impacts is a multi-faceted process, using a combination of quantitative and qualitative descriptions and evaluations. It involves applying scientific measurements and professional judgement to determine the significance of environmental impacts associated with the proposed exploration programme. The process involves consideration of, inter alia: the purpose and need for the project; views and concerns of I&APs; social and political norms, and general public interest.

Identified impacts will be described in terms of the nature of the impact, compliance with legislation and accepted standards, receptor sensitivity and the significance of the predicted environmental change (before and after mitigation). Mitigation measures may be existing measures or additional measures that were identified through the impact assessment and associated specialist input. The impact rating system considers the confidence level that can be placed on the successful implementation of mitigation. SLR's standard convention for assessing the significance of impacts in included in Section 9.3.8 of the Scoping Report.

7.2 Key Tasks (and Indicative Timing) of the EIA Phase

The EIA Phase approach has been developed to ensure that it complies with Section 23 of GN R326 and in particular Appendices 3 and 4 to the EIA Regulations 2014 (as amended). The various tasks / activities (including the indicative timing thereof) that will be undertaken during the EIA Phase are described in the table below.

TABLE 7-1: EIA TASKS AND TIMING

Phase	EAP activity	Opportunities for Consultation and Participation		Schedule
		Competent Authorities	I&APs, State Departments and Organs of State	
Scoping	Submit Final Scoping Report to authority by 14 November 2022.	Authority to Accept scoping report OR Refuse environmental authorisation (43 days of receipt)	Advise I&APs of authority decision on Scoping Report	Nov 2022 to January 2023
Specialist Assessments	EAP to manage specialist activities and receive inputs for EIA.		Ongoing consultation, particularly with key stakeholders and potentially affected land owners	January to March 2023
EIA Phase	Assess environmental impacts and identify management measures. Compile draft EIA Report (including EMPr)			January to March 2023
	Submit draft EIA report to I&APs & authorities.	Review of draft EIA report (30 days). Comments to EAP	Review of draft EIA report (30 days). Comments to EAP	March to April 2023
	Address public comment and finalise EIA and EMPr reports			April to May 2023
Authority review and Authorisation Phase	Final EIA report to Authority (106 days from acceptance of scoping).	Authority Acknowledge Receipt of EIA report (10 days).		May 2023
		Environmental Authorisation Granted / Refused (107 days).	Notifications to I&APs regarding environmental authorisation (granted or refused).	September 2023
Appeal Phase	EAP to provide guidance regarding the appeal process as and when required.	Consultation during processing of appeal if relevant.	Submit appeal in terms of National Appeal Regulations	20 days from date of notification of decision to grant/refuse EA