DRAFT SCOPING REPORT
DEA&DP: REF. NO. NONE PROVIDED DURING APPLICATION.

in support of an

ENVIRONMENTAL AUTHORIZATION

for

THE PROPOSED VEGETATION CLEARING OF APPROXIMATELY 93 HA (CONSISTING OF THREE AREAS OF 5HA, 46 HA AND 30HA) HISTORICALLY PLOUGHED LAND WHERE THE TOPSOIL WAS NOT LEGALLY DISTURBED THE LAST 10 YEARS ON REMAINDER OF FARM SCHALKENBOSCH 229, TULBAGH.

Prepared for: Die Karla en Anke Trust
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Executive Summary

The owners propose to clear vegetation of approximately 81 ha (consisting of three areas of 5ha, 46 ha and 30ha) historically ploughed land where the topsoil was not legally disturbed the last 10 years on remainder of farm Schalkenbosch 229, Tulbagh. The property is zoned Agriculture and is located outside an urban area.

Enviro-EAP is appointed as independent Environmental Assessment Practitioners to undertake the Environmental Impact Assessment Process for the proposed development.

This Environmental Authorization is undertaken in terms of the National Environmental Management Act 107 of 1998 and the EIA regulations 2014 as amended. Listed activities in terms of these regulations have been identified. The National Environmental Management Laws Amendment Act, Act 2 of 2022 (NEMLAA), came into effect on 30 June 2023. This Act added sub-section 24C(11) to the National Environmental Management Act, Act 107 of 1998, as amended (NEMA) which requires that *"a person who requires an environmental authorisation which also involves an activity that requires a licence or permit in terms of any of the specific environmental management Acts (i.e., NWA), must simultaneously submit those applications to the relevant competent authority or licensing authority, as the case may be, indicating in each application all other licences, authorisations and permits applied for"*.

The nature of the activities to be undertaken requires that a Scoping and Environmental Impact Assessment (EIA) process be undertaken.

Below is a summary of some of the main anticipated impacts related to the proposed vegetation clearing:

- Increased erosion risk due to the clearing of land for the proposed vegetation clearing leading to increase in storm water flow;
- Biodiversity/ecological impacts on i.e. terrestrial indigenous vegetation and habitat
- Social impacts i.e. temporary and permanent job creation;

The EIA will be evaluated by DEA&DP who will either issue an Environmental Authorization (usually with conditions), or alternatively, refuse the application for authorization.

The nature and extent of this development, as well as potential environmental impacts associated with the development phase (vegetation clearing for agricultural purposes) are explored in more detail in the Scoping Report.

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LIST OF APPENDICES

GLOSSARY

"Activity"means an activity identified in any notice published by the Minister or MEC in terms of section 24D (1) (a) of the Act as a listed activity.
"Alternatives", in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to property, activity, design, operation or technology.
"Applicant" means a person who has submitted or intends to submit an application.
"Application" means an application for an Environmental Authorization in terms of the EIA regulations, 2014 as amended.
"Associated Infrastructure," means any building or infrastructure that is necessary for the functioning of a facility or activity or that is used for an ancillary service or use from the facility.
"Biodiversity" The variety of life occurring in an area, including the number of different species, the genetic wealth within each species, and the natural habitat where they are found.
"Cultural significance" This means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance.
"Cumulative impact" in relation to an activity, means the impact of an activity that in itself may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.
"Environmental Impact Assessment" in relation to an application to which

scoping must be applied, means the process of collecting, organizing, analysing, interpreting and communicating information that is relevant to the consideration of that application.
“Environment” The environment has been defined as “The external circumstances, conditions and objects that affect the existence and development of an individual, organism or group”. These circumstances include biophysical, social, economic, historical, cultural and political aspects.
“Environmental Assessment Practitioner” Person or company, independent of the applicant (developer), that manages the environmental assessment process of a proposed project on behalf of the applicant.
“Environmental Impact Report” In-depth assessment of impacts associated with a proposed development. This forms the second phase of an Environmental Impact Assessment and follows on from the Scoping Report.
"Environmental Management Programme" means a programme presenting management and mitigation measures in relation to identified or specified activities envisaged in Chapter 5 of the National Environmental Management Act and described in regulation 34.
“Heritage resources” This means any place or object of cultural significance. It also includes archaeological resources.
"Interested and Affected Party" means an interested and affected party contemplated in section 24(4) (d) of the Act, and which in terms of that section includes - (a) Any person, group of persons or organization interested in or affected by an activity; and (b) Any organ of state that may have jurisdiction over any aspect of the activity.
"Public Participation Process" means a process in which potential interested and affected parties are given an opportunity to comment on, or raise issues relevant to, specific matters; *"Registered Interested and Affected Party", in relation to an application, means an interested and affected party whose name is recorded in the register opened for that application in terms of regulation 57.*
“Species of Conservation Concern” All those species included in the categories of endangered, vulnerable or rare, as defined by the International Union for the Conservation of Nature and Natural Resources.
"Significant impact" means an impact that by its magnitude, duration, intensity or probability of occurrence may have a notable effect on one or more aspects of the environment.

ABBREVIATIONS

CBA:	Critical Biodiversity Area
DFFE:	Department of Forestry, Fisheries and Environment
DEA&DP	Department of Environmental Affairs and Development Planning
DWS:	Department of Water and Sanitation
EMF:	Environmental Management Framework
EAP:	Environmental Assessment Practitioner
EMP:	Environmental Management Programme
EIA:	Environmental Impact Assessment
EIR:	Environmental Impact Report
FSR:	Final Scoping Report
HIA:	Heritage Impact Assessment

I&APs: Interested and Affected Parties
IDP: Integrated Development Plan
MAR: Mean Annual Rainfall
NEMA: National Environmental Management Act No. 107 of 1998
NWA: National Water Act No. 36 of 1998
PPP: Public Participation Process
PHRA: Provincial Heritage Resources Agency
SACNASP: South African Council for Natural Scientific Professions
SANBI: South African National Biodiversity Institute
SDF: Spatial Development Framework
ToR: Terms of Reference

SCOPING REPORT

SECTION 1: INTRODUCTION

This report has been prepared in compliance with the requirements of the following legislation:

- The National Environmental Management Act, 1998 (Act No. 107 of 1998) ["NEMA"];
- The Environmental Impact Assessment ("EIA") Regulations contained in Government Notice (GN) No. R983, 984 and 985 of 2014 as promulgated in terms of the NEMA ["EIA Regulations"] as amended on 11 June 2021.

The purpose of these Regulations is to regulate procedures and set criteria as contemplated in Chapter 5 of the Act to enable the submission, processing, consideration and decision-making regarding applications for environmental authorization of activities and matters pertaining thereto.

1.1 APPLICATION FOR ENVIRONMENTAL AUTHORIZATION AND PROPOSED PROJECT DESCRIPTION

The owners propose to clear Breede Shale fynbos and Breede Shale Renosterveld both with an endangered ecosystem protection status vegetation of approximately 81 ha (consisting of three areas of 5ha, 46 ha and 30ha) historically ploughed land where the topsoil was not legally disturbed the last 10 years on remainder of farm Schalkenbosch 229, Tulbagh. The property is zoned Agriculture and is located outside an urban area.

Table 1: Listed activities identified are as follows:

Activity No(s):	Provide the relevant **Basic Assessment Activities** as set out in **Listing Notice 1**	Describe the portion of the <u>proposed development</u> to which the applicable listed activity relates.
N/A		
Activity No(s):	Provide the relevant **Basic Assessment Activities** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity 12: The clearance of an area of 300 square metres or more of indigenous vegetation ~~except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.~~ <u>(i) Western Cape</u> (i) Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area		Approximately 81 ha of Breede Shale fynbos and Breede Shale Renosterveld both with an endangered ecosystem protection status will be cleared.

that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ~~(ii) Within critical biodiversity areas identified in bioregional plans;~~ ~~(iii) Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;~~ ~~(iv) On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or~~ ~~(v) On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.~~		
Activity No(s):	Provide the relevant **Scoping and EIR Activities** as set out in **Listing Notice 2**	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity 15: The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.		Approximately 81 ha of Breede Shale fynbos and Breede Shale Renosterveld both with an endangered ecosystem protection status will be cleared.
Note: • Only those activities listed which will be applied for shall be considered for authorisation. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. Environmental Authorisation must be obtained prior to commencement with each applicable listed activity. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. • The Minister responsible for mineral resources is the Competent Authority to deal with all applications where the listed or specified activity is directly related to- (a) prospecting or exploration of a mineral or petroleum resource; or (b) extraction and primary processing of a mineral or petroleum resource.		

Coordinates of the proposed site(s) for all alternatives: Area 1			
Latitude (S)	33º	18‘	43.66“
Longitude (E)	19º	11‘	39.96“
Coordinates of the proposed site(s) for all alternatives: Area 2			
Latitude (S)	33º	19‘	03.69“
Longitude (E)	19º	12‘	06.77“
Coordinates of the proposed site(s) for all alternatives: Area 3			
Latitude (S)	33º	19‘	12.64“
Longitude (E)	19º	12‘	21.70“

1.2 BACKGROUND AND PURPOSE OF THE SCOPING REPORT

In accordance with the requirements of the EIA Regulations (“The investigation, assessment and communication of the potential impact of activities must follow the procedure as prescribed in regulations 21, 22, 23 and 24 of the Environmental Impact Assessment Regulations published in terms of sections 24(5) of the Act, unless otherwise indicated by the Minister in a government notice”) as amended on 11 June 2021, also having considered the provisions of Section 24(5) of NEMA, it was determined that a scoping process be undertaken.

This report fulfils the requirement of the EIA Regulations for the documentation in the scoping phase. The structure of this report is based on regulation 21 of GN R.982 (“A scoping report must contain all information set out in Appendix 2 to these Regulations or comply with a protocol or minimum information requirements relevant to the application as identified and gazetted by the Minister in a government notice”), of the EIA Regulations as amended on 11 June 2021, which clearly specifies the required content of a scoping report.

1.3 ENVIRONMENTAL ASSESSMENT PRACTITIONER

1.3.1 Role and Competence of the EAP

The role of the Environmental Assessment Practitioner (“EAP”) is to manage the application for an Environmental Authorization (EA) on behalf of the applicant. The EAP must adhere to all relevant legislation and guidelines, ensuring that the reports contain all the necessary and relevant information required by the competent authority to decide. It is the responsibility of the EAP to perform all work relating to the application in an objective, appropriate and responsible manner. The EAP must comply with Regulation 13 of the EIA Regulations R982 of 2014 as amended, detailing the requirements for an EAP.

Nicolaas Hanekom of Enviro-EAP drafted the scoping report and is the registered EAP on the project.

Enviro EAP (Pty) Ltd is an environmental consultancy practice that is well placed to assist clients with:

- Environmental Management Systems and Programmes (Implementation and Auditing);

- Integrated Waste Management Plans;
- Environmental Compliance Auditing;
- Environmental Impact Assessments;
- Environmental Control Officers;
- On-Site Environmental Management;
- Ecology Specialist Studies (Terrestrial and Fresh Water Ecology)
- Air Quality Monitoring;
- Atmospheric emissions License Applications
- Water Use Authorization administration
- Search and rescue
- Freshwater and Terrestrial Ecology Monitoring
- Training Workshops Incorporating Environmental Compliance Matters.
- Game Farm management and monitoring
- Game introduction programmes

1.3.2 Professional Team

The following are the project team members:

- Nicolaas Hanekom –Environmental Assessment Practitioner
- Terrestrial Biodiversity and Plant Species Specialist (Ecology) – Dr Jan-Hendrik Keet
- Animal Species Specialist – To be appointed for assessment and report and detail included in draft EIR

Nicolaas Hanekom is a qualified Environmental Assessment Practitioner and a registered Professional Natural Scientist (Ecologist) who holds a M. Tech, Nature Conservation from the CPUT. Nicolaas Hanekom is a registered Professional Natural Scientist in the ecological science field with the South African Council for Natural Scientific Professions ("SACNASP"), Pri Sci Nat (Reg. No. 004415) Ecological Science (Pri.Sci.Nat); Aquatic Science & Conservation Science (Cand.Sci.Nat) and a qualified registered Environmental Assessment Practitioner ("EAP") who holds a Masters Technologiae, Nature Conservation ("Vegetation Ecology and Biodiversity Assessment") degree from the Cape Peninsula University of Technology (Refer to Appendix A, CV). Nicolaas Hanekom is suitably qualified SACNASP registered specialist. He further qualified in Environmental Management Systems ISO 14001:2004 and completed the Internal Auditors Course to ISO 19011:2003 level, at the North-West University, qualifying him to audit to ISO/SANS environmental compliance and EMS standards. As the principal EAP, he is responsible for EIAs, waste licence and atmospheric emission licence and Section 24G applications. He also implements environmental management systems. Nicolaas conducts both fresh water and biodiversity assessments as well as baseline air quality monitoring.

Dr. Jan-Hendrik Keet [BSc, BSc Hons, MSc (University of the Free State), PhD (Stellenbosch University); SACNASP Pr.Sci.Nat: 121678 (Botanical Science)]

1.3.3 Terms of Reference

Enviro-EAP is appointed as environmental consultant with the following Terms of Reference:

- Undertake an environmental evaluation of the applicable options and sites to get an understanding of biophysical characteristics and natural processes prevailing and to assess the proposed development proposals in terms of environmental characteristics by assessing the constraints and opportunities of the situation;
- Identify any anticipated impacts that might be considered at this early stage of the EIA process to suggest any specialist studies that may be required to provide additional information on the significance of these impacts and mitigation that may be necessary to reduce negative impacts and enhance positive impacts of the proposed development;
- Co-ordinate the early start of the recommended specialist studies with the view to informing the compilation of the initial Environmental Opportunities and Constraints;
- In association with the specialist consultants, assist the development of the optimum vegetation clearing areas that will have the least impact on the both the biophysical and social environments. It is understood that as more detailed information is provided by the various specialist studies and I&APs, that the Environmental Opportunities and Constraints may need revision, and similarly, the vegetation clearing areas may need to be adapted;
- Undertake the applicable Scoping and EIA Process in terms of the Regulations of the NEMA to provide the relevant information for the DEA&DP and any other government officials, to be able to make informed decisions and to issue an Environmental Authorisation for the proposed development;
- As part of the Scoping and EIA Process, a comprehensive public participation process must be entered into. This process is to provide all the relevant information to the public, NGO's, CBO's and government officials, and to allow for adequate time for the public to respond to such information. The issues as raised by I&AP's must be taken into consideration in assessing the impacts of the proposed development and, making amendments to the proposed development;
- Assess alternative development options for the property in order to reduce any significant impacts that may arise. Prescribe the necessary mitigation to enhance any positive impacts and reduce any negative impacts that may arise as a result of the proposed development must be suggested;
- Facilitate any additional specialist studies that may be required to assist with the planning and future management of the proposed development; and
- Make the necessary environmental management recommendations (mitigation/ enhancement) for the clearing of vegetation area, to ensure a sustainable and protected biodiversity in the future.

1.4 LEGISLATIVE ASPECTS

1.4.1 Legislation

The following legislation is applicable to this project and has been considered in the preparation of the Scoping Report.

Table 2: Applicable legislation

List any other legislation that is applicable to the proposed activity or development.		
LEGISLATION	**ADMINISTERING AUTHORITY and how it is relevant to this application**	**TYPE Permit/license/authorisation/comment / relevant consideration**
Constitution of the Republic of South Africa, 1996	General application to individual rights of all on and adjacent to the sites.	Public Participation Process to be conducted
National Environmental Management Act, 1998 (Act No. 107 of 1998) [NEMA] and relevant regulations	Western Cape Department of Environmental Affairs and Development Planning	Environmental Authorisation Application
National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) [NEMWA] and relevant regulations	Department of Environmental Affairs	Waste management requirements.
National Environmental Management: Biodiversity Act 10 of 2004 [NEMBA]	Western Cape Department of Environmental Affairs and Development Planning	N/A
National Water Act, 1998 (Act No. 36 of 1998) [NWA] and relevant regulations	Department of Water Affairs	No activities within water courses or impacting on water features. Only clearing of indigenous vegetation to re-establish old agricultural lands. 32m buffer areas maintained to protect water courses.
Conservation of Agricultural Resources Act, 43 of 1983 [CARA]	National Department of Agriculture, forestry and Fisheries Western Cape Department of Agriculture	Clearing of indigenous vegetation to re-establish old agricultural lands. Agriculture erosion protection contours will be used and fixed where necessary to prevent erosion.

National Health Act, 61of 2003 [NHA]		N/A
National Building Regulations and Building Standards Act 103 of 1977 [NBRBSA] and relevant regulations		N/A
National Heritage Resources Act 25 of 1999 [NHRA]	Heritage Western Cape South African Heritage Resource Agency	NID
National Veld and Forest Fire Act 101 of 1998 [NVFFA]		N/A
Western Cape Noise Control Regulations [P.N. 200/2003]		NA

Protocols

The protocol (Published in Government Notice No. 648 GOVERNMENT GAZETTE 4542110 MAY 2019. Published in Government Notice No. 1150 GOVERNMENT GAZETTE 43855 30 October 2020. Published in Government Notice No. Government Notice No. 320, Government Gazette 43110: 20 March 2020. These gazettes are also available free online at www.gpwonline.co.za) provides the criteria for the reporting of requirements for the assessment and reporting of impacts as identified in the DEA Screening tool report. Published in Government Notice No. 320 GOVERNMENT GAZETTE 43110 20 MARCH 2020 GAZETTED FOR IMPLEMENTATION: BIODIVERSITY PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON TERRESTRIAL BIODIVERSITY Published in Government Notice No. 320 GOVERNMENT GAZETTE 43110 20 MARCH 2020 GAZETTED FOR IMPLEMENTATION: BIODIVERSITY PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON AQUATIC BIODIVERSITY Published in Government Notice No. 1150 GOVERNMENT GAZETTE 43855 30 OCTOBER 2020 GAZETTED FOR IMPLEMENTATION: PLANT SPECIES PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON PLANT SPECIES

Published in Government Notice No. 1150 GOVERNMENT GAZETTE 43855 30 OCTOBER 2020 GAZETTED FOR IMPLEMENTATION: ANIMAL SPECIES PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON ANIMAL SPECIES

1.4.2 Policies

An environmental policy is derived from the guiding principle whereby an organization first defines the scope of its commitment to the environment. The policy is a public document that communicates the organization's overall approach to managing its interaction with the environment.

Various components of Environmental Management are strongly influenced by the environmental policies in terms of their scope and level of resource allocation. As a rule, objectives and targets are set to achieve compliance with the environmental policy, and overall environmental performance is evaluated against the organization's stated intent reflecting a level of commitment.

Policy must meet the following criteria:

- It must be relevant to the nature of an organization's activities, and the specific environmental aspects associated with those activities;
- It must consider specific local environmental conditions;
- It must consider relevant environmental legislation;
- It must define and formulate the organization's fundamental approach to environmental management; and
- It must set a precedent for communication and liaison with all stakeholders.

Policies considered in the compilation of this document include:

- National Spatial Development Framework;
- Provincial Spatial Development Framework for the Western Cape;
- CapeNature (2024). 2023 Western Cape Biodiversity Spatial Plan and Guidelines. Biodiversity Capabilities.

1.4.3 Guidelines

The following guidelines are applicable to this project, and have been considered in the preparation of the Scoping Report:

- Guideline on Public Participation;
- Information of Generic Terms of Reference and Project Schedules;
- Circular EADP 0028/2014: One Environmental Management System;
- Guideline for Involving a Heritage Specialist in an EIA Process (2005);
- Guideline for the Review of Specialist Input in the EIA process (June 2005);
- Guideline for Environmental Management Plans (June 2005);
- Guideline on Alternatives (March 2013); and
- Guideline on Need and Desirability (March 2013).
- The National Biodiversity Offset Guideline (23 June 2023)

1.5 SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

Appendix D, Comments and response table will include detail on competent authority requirements once available.

SECTION 2: DESCRIPTION OF THE PROPERTY

2.1 PROPERTY DESCRIPTION AND LOCATION

The site is situated South of Tulbagh and access via existing farm gravel roads of Van Der Stel Street. The property is located in the Cape Winelands District Municipality of the Western Cape Province and falls under the jurisdiction of the Witzenberg Local Municipality. Vegetation clearing of approximately 93 ha (consisting of three areas of 5ha, 51 ha and 37ha) historically ploughed land where the topsoil was not legally disturbed the last 10 years is proposed on the remainder of farm Schalkenbosch 229, Tulbagh. Property SG code is C07500000000022900000.

2.2 GENERAL CHARACTERISTICS AND LAND USE

The property consists of agricultural zone land and is used for agricultural purposes. Area 1 (15ha) was ploughed in 2006. Area 2 ploughed in 2002 with approximately 12 ha of the 51 ha again in 2006. Area 3 ploughed before 2000 and approximately 8.8 ha in 2006. Currently all three areas are used for agriculture purposes, namely grazing for livestock. Because of its high soil fertility, it is probable that all the herds of large game in the Fynbos Biome occurred in Renosterveld. *Dicerothamnus rhinocerotis* are largely unpalatable and ignored by livestock and therefore lead to increasing dominance of the vegetation structure by *Dicerothamnus rhinocerotis* shrubs. The current landowner managed the veld and brush cut some areas to remove vegetation cover as a result of the regrowth of mainly *Dicerothamnus rhinocerotis*. Brush cutting can be used as a management technique in renosterbos veld to mimic the effects of large ungulates (grazing mammals) by reducing the dominance of overgrown shrubs and encouraging the growth of grasses. Large areas, especially where area 2 was not brush cut. Most of area 1 was brush cut. Selective areas on area 3 were brush cut. The rest of the areas no management actions took place, and the areas are dominated by *Dicerothamnus rhinocerotis*.

The proposed activities specifically involve clearing indigenous vegetation that has established on previously ploughed land so the area can be returned to agricultural use. Three disjunct areas were assessed, named Driehoekkamp, Damkamp, and Agterstekamp.

The desktop data, which classified the area as having Very High Biodiversity Theme Sensitivity, was partially contradicted by on-site observations. Fieldwork confirmed that the area does not contain the mapped Breede Alluvium Fynbos and Breede Shale Fynbos, nor does the current Secondary Renosterveld (which has developed over the historic fields) fully conform to true Breede Shale Renosterveld due to past ploughing and the extremely high dominance of renosterbos. Thus, it also does not qualify as being classified as either CBA1 or CBA2 areas. However, it nonetheless holds ecological value.

The most critical finding is the presence of six Species of Conservation Concern (SCC), three of which are Endangered, predominantly in the eastern sections of Damkamp and Agterstekamp. Notably, a large and valuable population of the Near Threatened Babiana villosa was recorded. The presence of these species, along with the area's function as a supporting area for the adjacent Witzenberg Nature Reserve, justifies reclassifying the intact portions of Secondary Renosterveld as Ecological Support Area 1 (ESA1). Consequently, the true Site Ecological Importance (SEI) for the Secondary Renosterveld units, particularly the eastern parts of Damkamp as well as the entire Agterstekamp, is scored as Medium.

The most significant negative direct impacts of the proposed construction activities, primarily involving ploughing, are the complete loss of plant communities and ESA1 areas, and potential loss of SCC. Before mitigation, the significance of these impacts is assessed as High. To address this, the report proposes establishing No-Go areas encompassing the easternmost parts of Agterstekamp and Damkamp where SCC are concentrated, as well as the section overlapping the Witzenberg Nature Reserve. Furthermore, buffer zones around watercourses may require a Water Use Licence. Implementing the No-Go areas would effectively reduce the significance of the loss of SCC from High to Low. However, the residual impact on the loss of plant communities and ESA1 areas remains Medium, indicating that while critical species are protected, the overall ecological impact on Secondary Renosterveld is only partially mitigated. Active management, including the control of invasive alien plant species, is also a necessary mitigation for a Low residual impact. The cumulative impact on provincial and national conservation targets can also be mitigated from Medium-High to Low by preserving the proposed No-Go areas.

Refer to Appendix F (Keet, J-H (2025) Plant Species and Terrestrial Biodiversity Impact assessment for vegetation clearing on farm Schalkenbosch 229, Tulbagh, Western Cape. Report prepared for Enviro EAP. Draft Report, Version 1.0. Reference: PR.25.038 for more detail.

AREA 1 (15 HA)

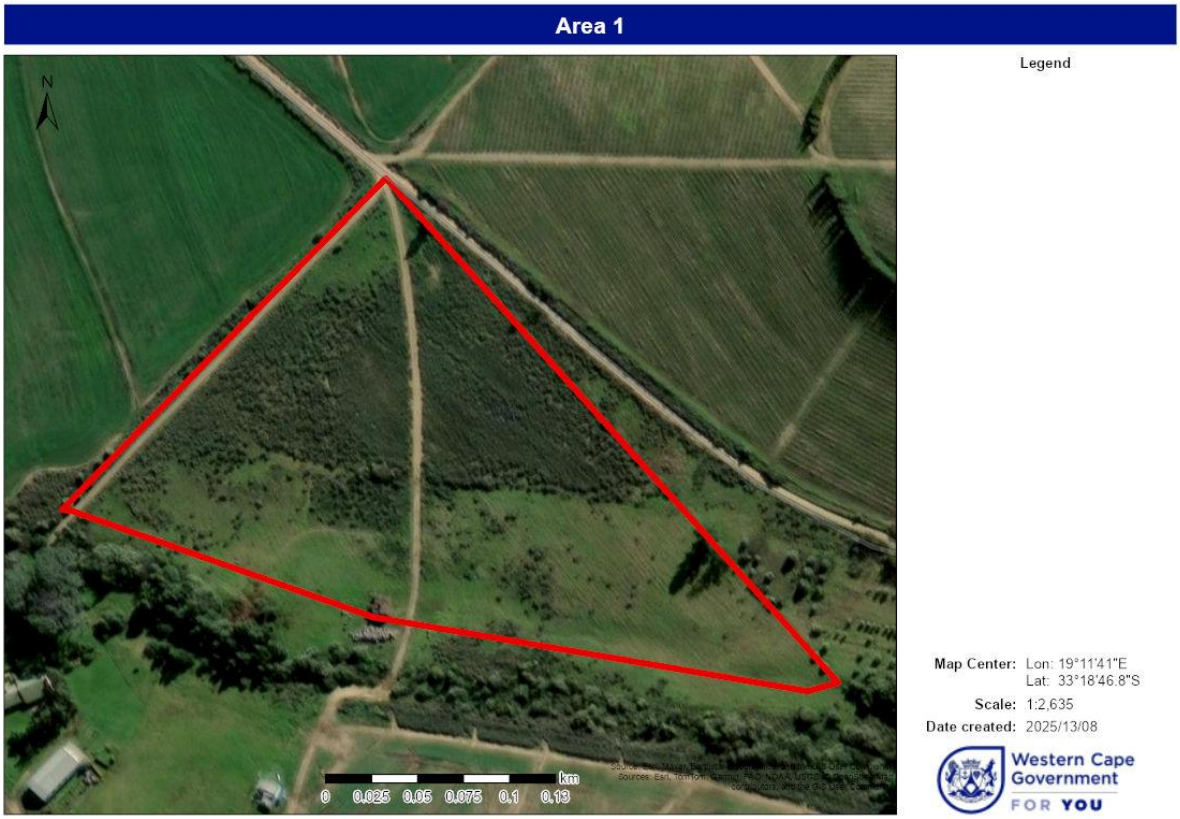


Figure 1: Google earth image of area 1.

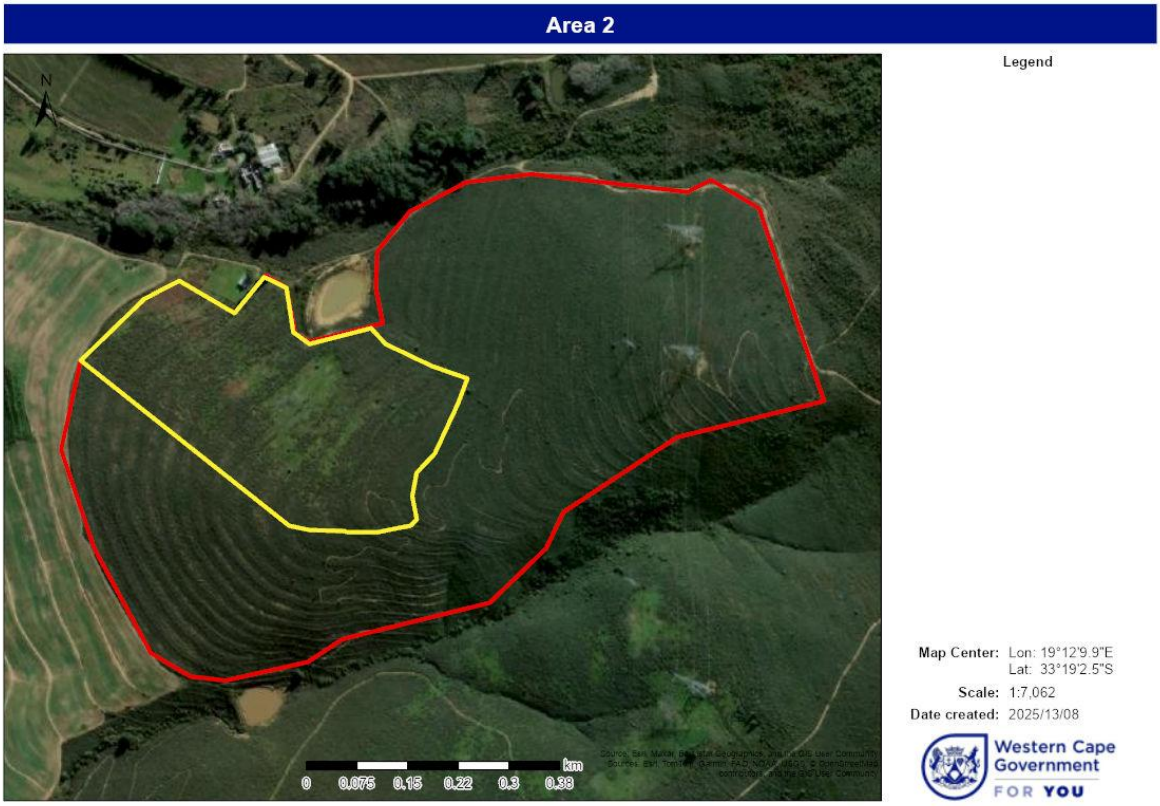
Photograph 1: View of area 1. Brush cut areas and areas consisting of *Dicerothamnus rhinocerotis* visible in google earth image.

Photograph 2: View of area 1. Areas with *Dicerothamnus rhinocerotis* visible in google earth image.

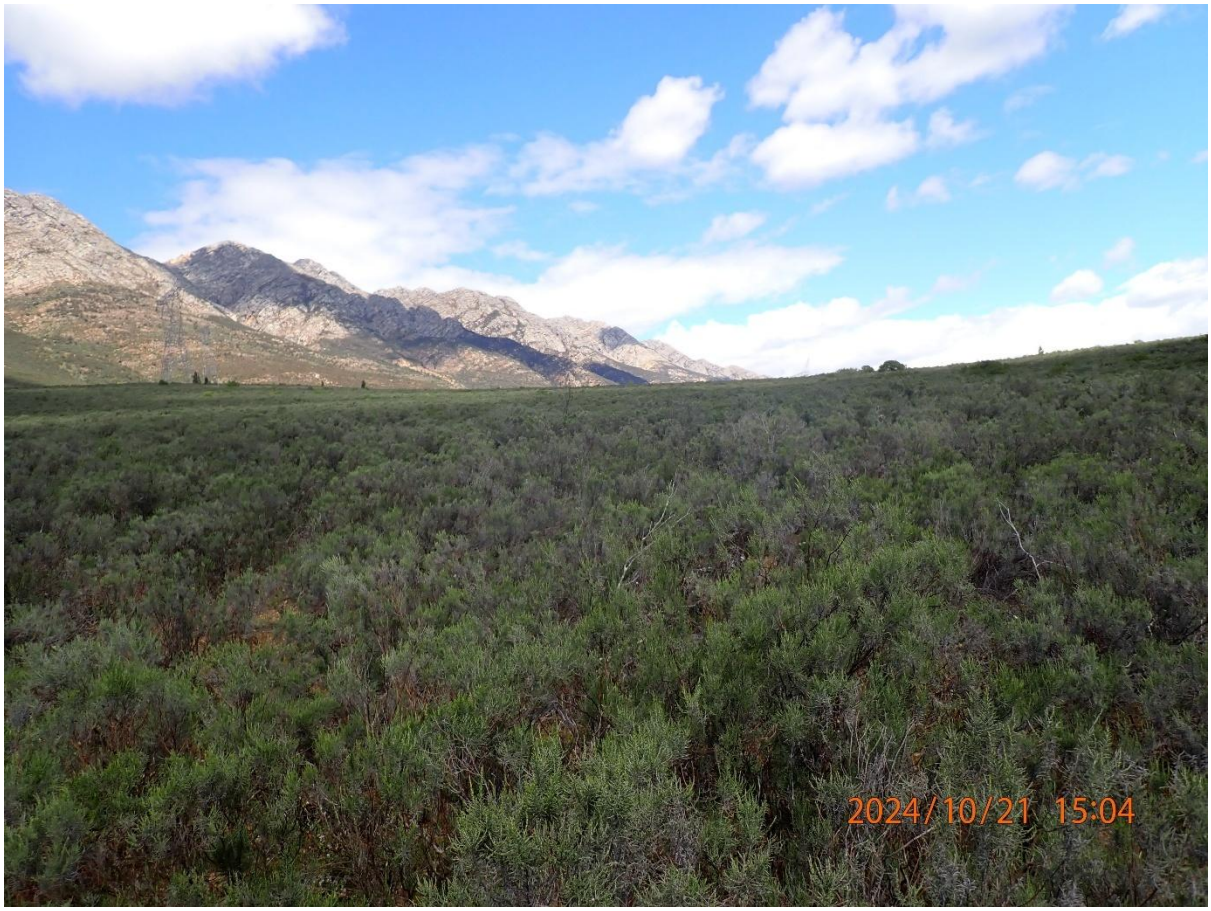
Photograph 3: View of area 1. Brush cut areas and areas consisting of *Dicerothamnus rhinocerotis* visible in google earth image.

Photograph 4: View of area 1. Areas bush cut visible in google earth image.

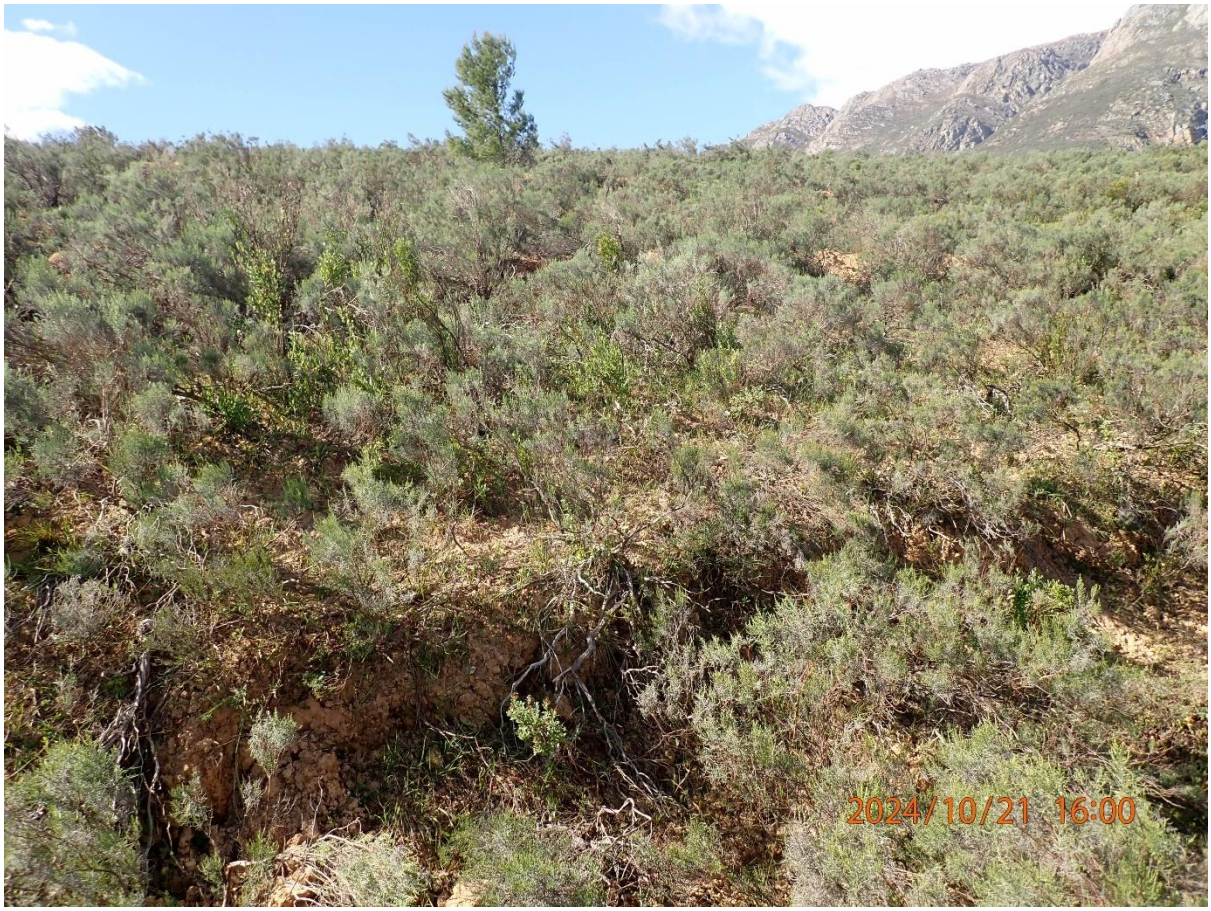
AREA 2 (46HA)



Photograph 5: View of area 2. Areas with *Dicerothamnus rhinocerotis* visible in google earth image.

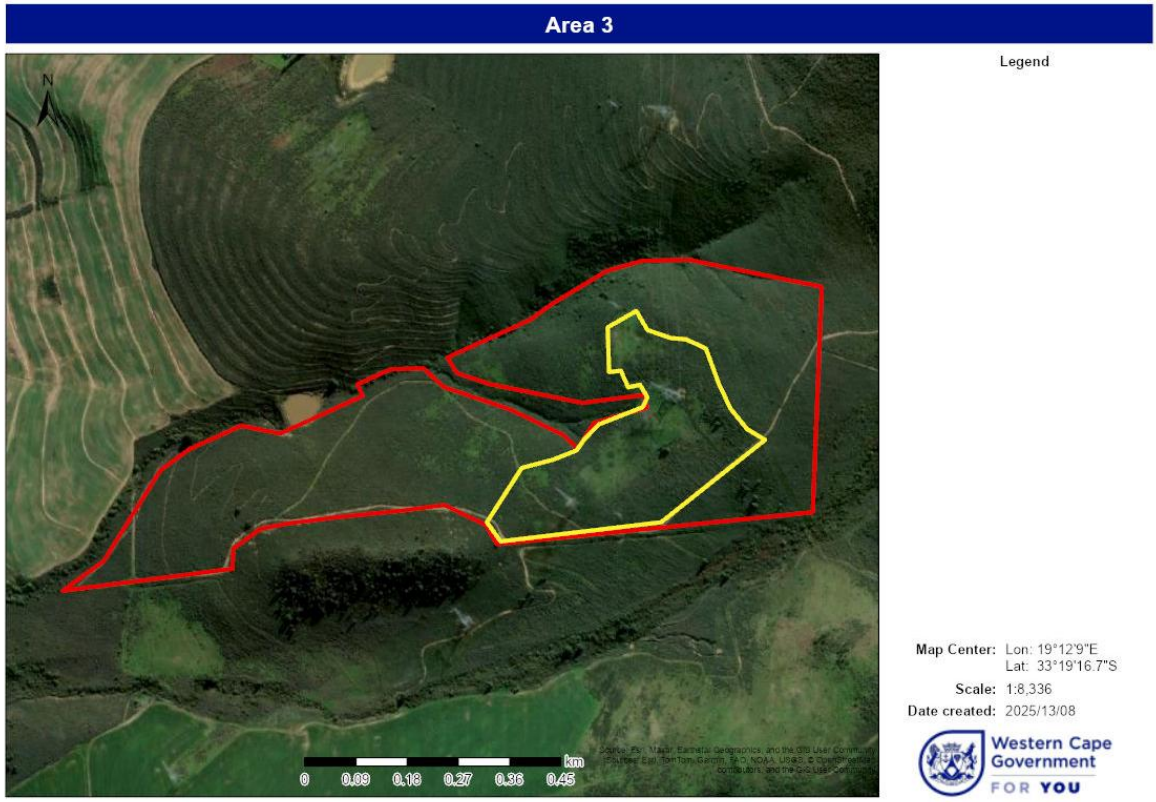


Photograph 6: View of area 2. Areas with *Dicerothamnus rhinocerotis* visible in google earth image.



Photograph 7: View of area 2. Areas with *Dicerothamnus rhinocerotis* visible in google earth image.

Area 3 (30ha)



Photograph 8: View of area 3. Areas with *Dicerothamnus rhinocerotis* visible in google earth image. Area two in background of picture with visible agricultural engineered contours.

Photograph 9: View of area 3. Areas with *Dicerothamnus rhinocerotis* visible in google earth image.

Photograph 10: View of area 3. Areas with *Dicerothamnus rhinocerotis* and previously ploughed and brush cut visible in google earth image.

Photograph 11: View of area 1. Areas with *Dicerothamnus rhinocerotis* visible in google earth image.

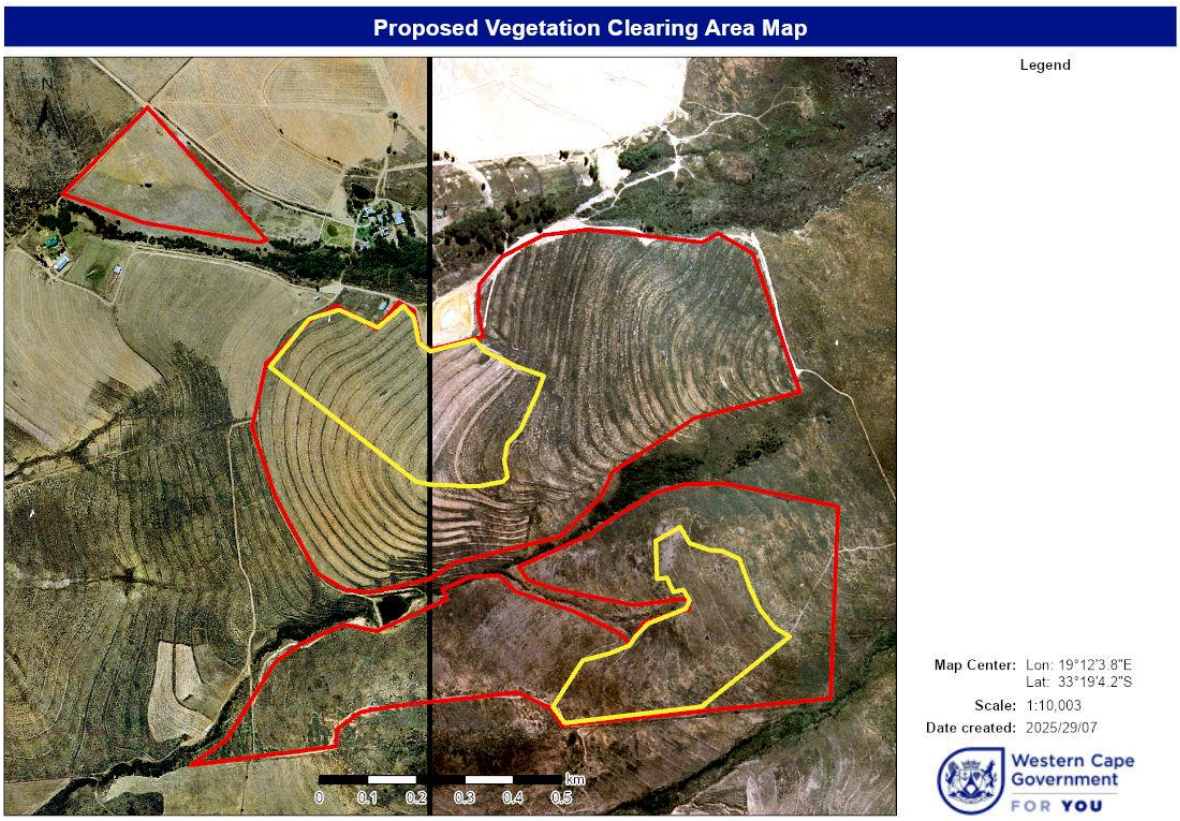


Figure 2: Arial photograph dated 2000 of the three areas.

2.3 SPECIFIC CHARACTERISTICS

2.3.1. Biophysical Elements

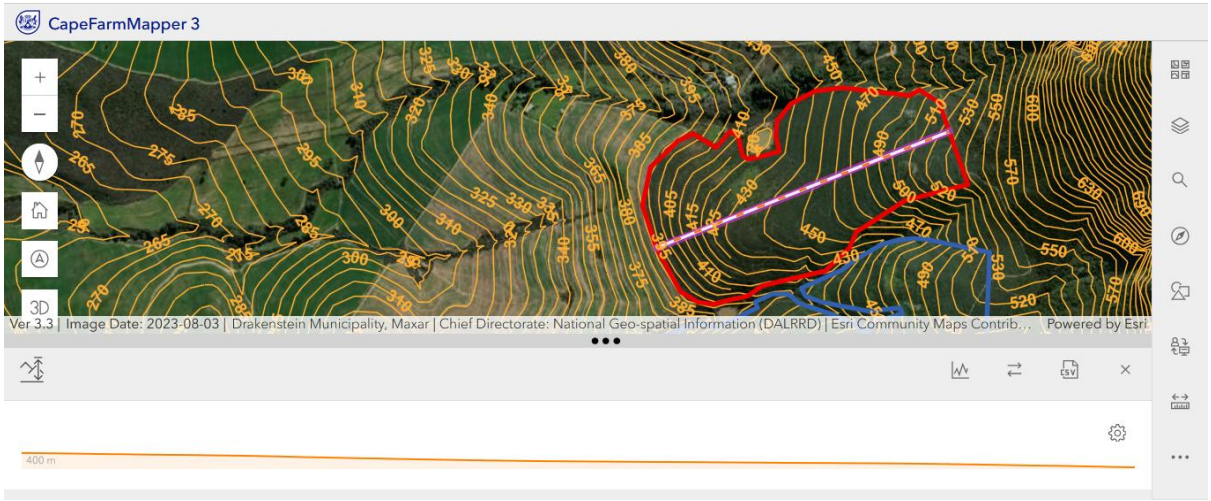
2.3.1.1 Climate

Tulbagh, South Africa experiences a Mediterranean climate, characterized by hot, dry summers and mild, wet winters. The property is situated in a valley surrounded by mountains, which influences its weather patterns. Temperatures can range from highs of 34°C in summer to lows of 6°C in winter.

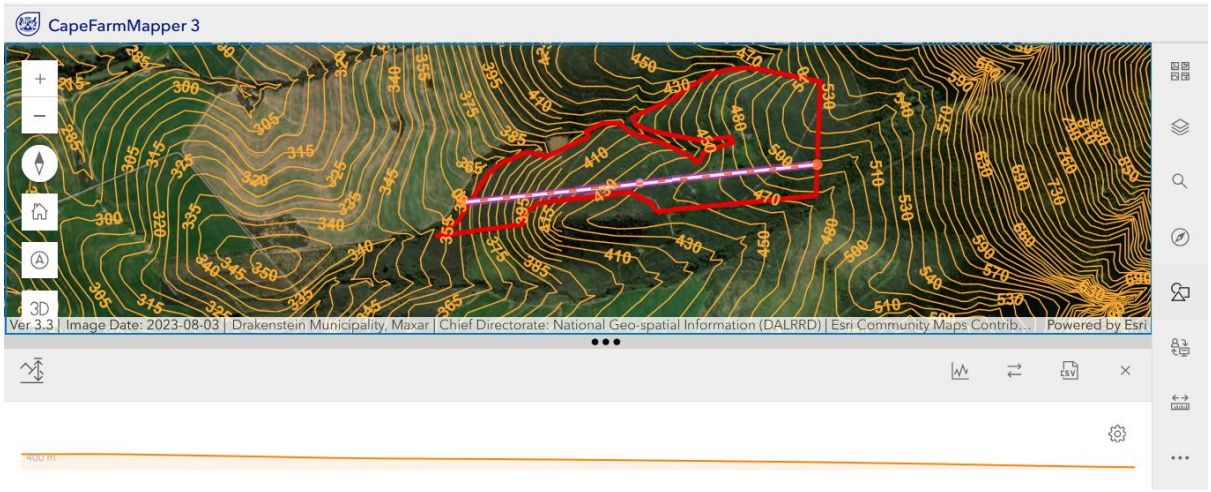
2.3.1.2 Topography

Area 1 has a low to moderate slope
Slope %: 14.99

Area 2 has a steep slope.
% Slope: 23.34
Slope Degrees: 13.14
Slope Classification (%): 3.00



Area 3 has a steep slope.
Slope Degrees: 20.84
Slope %: 38.06
Slope Classification (%): 4.00



2.3.1.3 Geology and Geohydrology

Broad Soils Classification (ENPAT)
Soil Type: Glenrosa and/or Mispah forms (other soils may occur), lime rare or absent in the entire landscape
Geology: Phyllite shale, schist and greywacke of the Porterville Formation, Malmesbury Group, partly covered by talus gravel.
Soil Clay & Depth
Symbol: EA
Class: Soils with limited pedological development
Description: Soils with minimal development, usually shallow on hard or weathering rock, with or without intermittent diverse soils. Lime rare or absent in the landscape
Depth: >= 450 mm and < 750 mm
Clay: >= 15% and < 35%
Soil Types
Symbol: EA
Class: Soils with limited pedological development
Description: Soils with minimal development, usually shallow on hard or weathering rock, with or without intermittent diverse soils. Lime rare or absent in the landscape
Depth: >= 450 mm and < 750 mm
Clay: >= 15% and < 35%
Land Types
Land Type: Fa191
Description: Lime rare or absent in the entire landscape
Class: GLENROSA AND/OR MISPAH FORMS (other soils may occur)
Area (Ha): 6634.128
Soil Erodibility
Erodibility: High
Erodibility Factor: 0.53
Source: CapeFarmMapper dated 1 August 2025

Geohydrology

Aquifer Susceptibility: High
Groundwater Recharge (mm/a): 64.92
Groundwater Quality EC (mS/m): 0 - 70

Aquifer Type and Yield
Classification: Fractured 0.5 - 2.0 l/s
Depth to Groundwater
Depth (mbgl): 13.42
Aquifer Classification
Classification: Major
Aquifer Vulnerability
Vulnerability: Most
Source: CapeFarmMapper dated 1 August 2025

Agriculture potential
Agriculture Enterprises: Fruit and grain
Cultivated Fields (2021) Category: Rainfed Annual Crop Cultivation / Planted Pastures
Land Capability (DAFF 2016)
Land Capability (1-15): 07. Low-Moderate
Soil Capability (1-9): 04. Low-Moderate
Terrain Capability (1-9): 06. Moderate-High
Climate Capability (1-9): 06. Moderate-High
Grazing Capacity (2018)
Ha/Large Stock Unit: 108
Dryland Potential Index
Potential: Very High
Source: CapeFarmMapper dated 1 August 2025

2.3.1.4 Surface Water Features

There is no river, water courses or wetlands inside the three areas. A small tributary originally occurred on area 2, but this non-perennial river does not exist anymore as a result of the historical agricultural lands and engineered contours with a dam in its catchment.

Non perennial rivers, which are tributaries of the Boontjiesrivier with their catchment areas in the mountain, is located on the edges of the proposed areas to be cleared. The proposed vegetation clearing areas are however located outside the 32m buffer area.

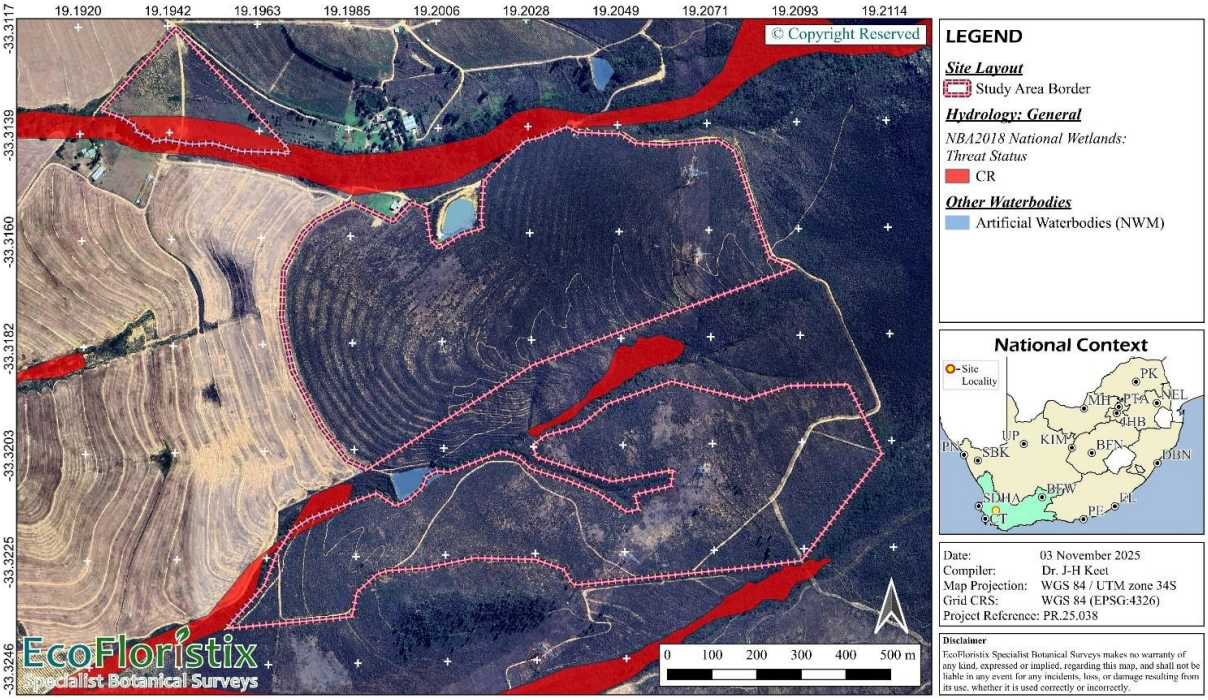


Figure 3: Freshwater Ecological Features

2.3.1.5 Flora

The official National Vegetation Map of Southern Africa, Lesotho, and Swaziland (Mucina & Rutherford, 2006) with subsequent updates (Dayaram et al., 2018) mapped three vegetation types that will be impacted by the three proposed vegetation clearing areas, namely Breede Shale Fynbos, Breede Shale Renosterveld and Breede Alluvium Fynbos, all three with an endangered ecosystem status in the revised national list of ecosystems that are threatened and in need of protection, published under the National Environmental Management: Biodiversity Act, 2004 (Act No.10 of 2004), published under government gazette no. 2747, dated 18 November 2022.

This ecological assessment report details the findings of a botanical survey and ecological evaluation conducted on 10 October 2025 for the farm Schalkenbosch 229, Tulbagh, Western Cape province. The proposed activities specifically involve clearing indigenous vegetation that has established on previously ploughed land so the area can be returned to agricultural use. Three disjunct areas were assessed, named Driehoekkamp, Damkamp, and Agterstekamp.

The desktop data, which classified the area as having Very High Biodiversity Theme Sensitivity, was partially contradicted by on-site observations. Fieldwork confirmed that the area does not contain the mapped Breede Alluvium Fynbos and Breede Shale Fynbos, nor does the current Secondary Renosterveld (which has developed over the historic fields) fully conform to true Breede Shale Renosterveld due to past ploughing and the extremely high dominance of renosterbos. Thus, it also does not qualify as being classified as either CBA1 or CBA2 areas. However, it nonetheless holds ecological value.

The most critical finding is the presence of six Species of Conservation Concern (SCC), three of which are Endangered, predominantly in the eastern sections of

Damkamp and Agterstekamp. Notably, a large and valuable population of the Near Threatened Babiana villosa was recorded. The presence of these species, along with the area's function as a supporting area for the adjacent Witzenberg Nature Reserve, justifies reclassifying the intact portions of Secondary Renosterveld as Ecological Support Area 1 (ESA1). Consequently, the true Site Ecological Importance (SEI) for the Secondary Renosterveld units, particularly the eastern parts of Damkamp as well as the entire Agterstekamp, is scored as Medium.

The most significant negative direct impacts of the proposed construction activities, primarily involving ploughing, are the complete loss of plant communities and ESA1 areas, and potential loss of SCC. Before mitigation, the significance of these impacts is assessed as High. To address this, the report proposes establishing No-Go areas encompassing the easternmost parts of Agterstekamp and Damkamp where SCC are concentrated, as well as the section overlapping the Witzenberg Nature Reserve. Furthermore, buffer zones around watercourses may require a Water Use Licence. Implementing the No-Go areas would effectively reduce the significance of the loss of SCC from High to Low. However, the residual impact on the loss of plant communities and ESA1 areas remains Medium, indicating that while critical species are protected, the overall ecological impact on Secondary Renosterveld is only partially mitigated. Active management, including the control of invasive alien plant species, is also a necessary mitigation for a Low residual impact. The cumulative impact on provincial and national conservation targets can also be mitigated from Medium-High to Low by preserving the proposed No-Go areas.
Refer to Appendix F (Keet, J-H (2025) Plant Species and Terrestrial Biodiversity Impact assessment for vegetation clearing on farm Schalkenbosch 229, Tulbagh, Western Cape. Report prepared for Enviro EAP. Draft Report, Version 1.0. Reference: PR.25.038 for more detail.

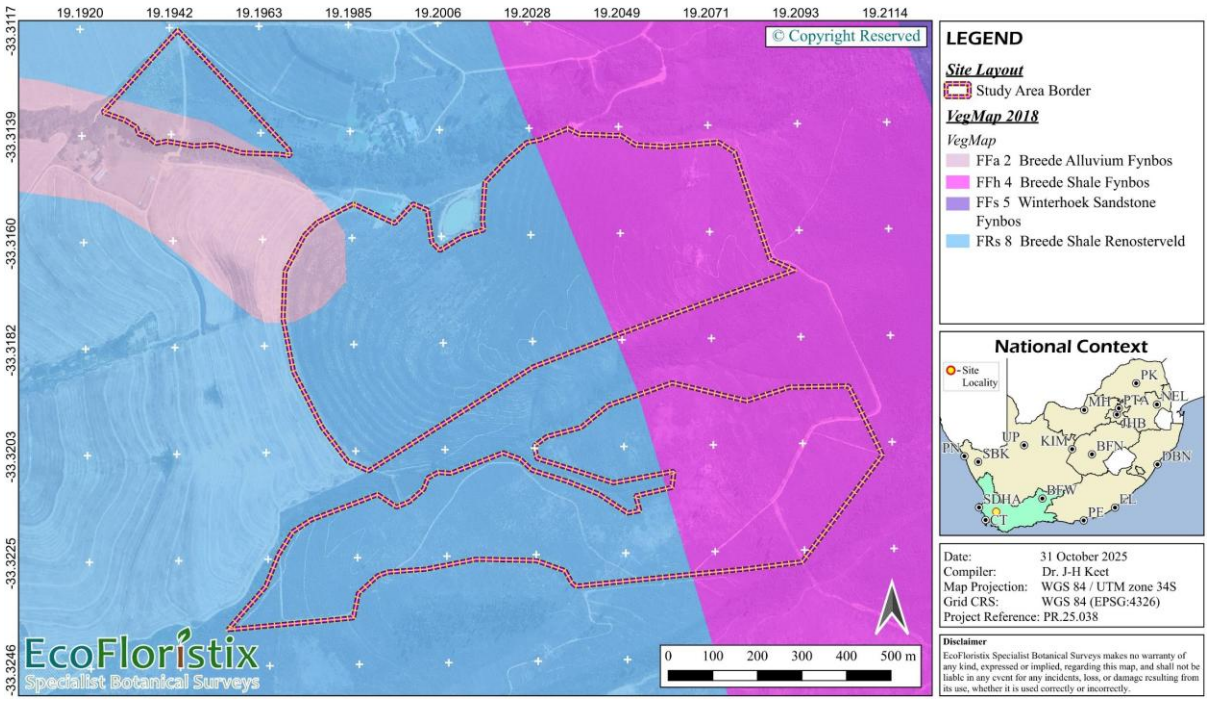


Figure 4: National Vegetation Types

2.3.1.6 Fauna

The environmental screen tool report listed - *Circus maurus* (high sensitivity), and *Sarothrura affinis, Sensitive species 19, Conocephalus peringueyi* and *Brinckiella aptera* (medium sensitivity). None of the above species were recorded or observed at the time of the field surveys.

Description of the Animal (Fauna) Species

Fauna occurring on site include assemblages within the ecosystem and these could include mammals, birds, reptiles, amphibians, fish and invertebrates.

The following sensitive species were recorded in the environmental screen report:

(Aves) Black Harrier *Circus maurus*

Black Harriers are southern Africa's rarest endemic raptor and have been uplisted from Vulnerable to Endangered in South Africa and Namibia in 2015. These top predators are a rare endemic to the southern African sub region with fewer than 1000 mature breeding birds left in the population. Studies have shown that there is little genetic variation across the population, indicating that this species is not in good shape and needs some serious conservation assistance going forward. Black Harriers breed in the montane fynbos, renosterveld and strandveld habitats of the Western Cape and many individuals disperse into the karoo and grassland habitats during the autumn and winter months. The breeding success of Black Harriers is largely driven by winter rainfall in the Western Cape according to PhD student Marie-Sophie Garcia-Heras' work at the Fitzpatrick Institute of African Ornithology at the University of Cape Town. Through the analysis of 400 nests over 15 years, her work has shown that the amount of rainfall which falls between April to September has a direct relationship with clutch size – more rain equals more eggs. Geographic location also influenced breeding behaviour with inland birds breeding over a shorter period than coastal birds. Inland harriers have a small window in which to breed and will thus lay larger clutches earlier in the season, however, this subpopulation has shown declines over time. Coastal birds, however, exploit the more benign weather conditions and feed on larger proportions of mice which allow them to produce more young over a longer period. The coastal population is believed to contribute the most number of new individuals to the overall population. The inland populations of Black Harriers have become increasingly fragmented through habitat loss and population declines and it is vital that conservation efforts invest in preventing fragmentation of coastal populations[1].

No Black Harriers were recorded at the time of the survey. However, they were previously observed foraging in the surveyed area. However, due to the small area to be impacted and the extended habitat in the area, the proposed mining activity will not result in a loss or decline in the conservation status of this species.

Sarothrura affinis[2] (VU)

Rationale (Changed due to Not applicable)

[1] https://www.birdlife.org.za/what-we-do/landscape-conservation/what-we-do/raptors/black-harrier/
[2] https://speciesstatus.sanbi.org/assessment/last-assessment/3160/

The regional population of Striped Flufftail *Sarothrura affinis* is suspected to be undergoing a decline as a result of habitat loss, such that 10% of the regional population may have been lost in the last three generations, qualifying the species as regionally Vulnerable. Throughout its fragmented range, suitable grassland habitat is under severe threat from unsuitable burning regimes, heavy grazing, agriculture and afforestation.

Distribution
In its extensive but fragmented Afrotropical range, the Striped Flufftail occurs in six isolated relict populations in montane grassland habitats. The race antonii occurs from South Sudan to the highlands of western and central Kenya and the Kenya-Tanzania border, as well as in southern Tanzania, Malawi and adjacent Zambia, and at three localities in the highlands of eastern Zimbabwe (Irwin 1981, Taylor 1994). There are no records from adjacent Mozambique (Parker 1999).

The nominate race is endemic to South Africa, Swaziland and, at least formerly, Lesotho. In South Africa, this taxon occurs from the Cape Peninsula eastwards along mountain ranges in Western Cape, at scattered localities throughout Eastern Cape (although it is uncommon to rare in the former Transkei; Quickelberge 1989) to southern KwaZulu-Natal and the Drakensberg. It is also known from south-eastern Mpumalanga (Kaapschehoop, Belfast, Graskop areas) and adjacent Swaziland, where it is apparently restricted to Malolotja National Park (Parker 1994).

In Limpopo Province, there are few records, although Allan (1988) mentions its occurrence at Serala (Wolkberg), and a specimen was collected at Woodbush in 1905 (Tarboton et al. 1987); the species does still persist in that area, as evidenced by a December 2014 photographic record from the Haenertsburg area (D. Vasapolli pers. comm.). The northern population was previously thought to be isolated from populations in KwaZulu-Natal, but a 1907 specimen from Zuurbron, east of Wakkerstroom, Mpumalanga (Taylor 1994), and recent records from the eastern Free State (Botha 1997, 1999) suggest that the range may be more continuous than previously thought (Hockey 2005). A record from Teyateyaneng, Lesotho was rejected by Winterbottom (Bonde 1993), but is probably acceptable, and the species may still occur in that country (Taylor 1994).

By combining the surface areas of all sites known to support this species, Taylor (2000) estimated the total area of occupancy at 24 500 km2, but cautioned that this an overestimate as only a fraction of this area holds suitable habitat, and that a revised total AoO of 2 400 km2 is more appropriate. Although a comparison of the SABAP1 and SABAP2 data sets suggests a decrease of c. 10% in the regional AoO, this estimate is probably still valid.

Population
The global population size is unknown. Striped Flufftails are generally considered uncommon to rare, but are certainly widely overlooked due to their extremely secretive and elusive nature (Graham and Ryan 1984, Tarboton et al. 1987). Quantitative surveys by experienced observers may reveal that the species is more numerous and widespread than currently thought (Taylor 2000). Surveys are best conducted during the summer breeding season, when males often sing throughout the night (with the

hooting call audible at up to 2 km on a still night). Both sexes also frequently give piercing territorial calls during the day (Taylor 1994).

The species can occur at high local densities in well-managed protected areas. For example at one study site (Mount Currie Nature Reserve IBA SA084), 59 territories were located, of which 16-33 were occupied in a season; the maximum breeding population for the reserve was 33 pairs in one summer, occurring at a density of 1 pair/21 ha of suitable habitat, and a maximum of 1 pair/11 ha (Taylor 1994, 2000). Territories are 1.05-2.30 ha (1.64 ± 0.36 ha) in extent, while home ranges are 2.00-3.24 ha (2.58 ± 0.38 ha) in size. It has recently been recorded at a number of new localities in Western Cape (Graham and Ryan 1984, Ryan 1987, Taylor 2000) and is described as fairly common in some areas of that province (Hockey 1989). Barnes (1998) estimated the regional population occurring in IBAs at 466-618 breeding pairs or 1 203-1 895 birds. Additional populations from non-IBA sites (Taylor 1997) raises this total to 586-738 breeding pairs or 1 443-2 135 birds. Recent population estimates are unavailable, but it is unlikely that these figures have changed significantly. The regional population is thus estimated at c. 1 730 (range 1 440-2 150) mature individuals (Taylor 2000). Confidence in this estimate is medium.

Population trend
The global population trend is decreasing (BirdLife International 2014). The regional population is also suspected to be undergoing a decline owing to ongoing habitat loss, degradation and fragmentation (Taylor 2000), but the extent and rate of this decline are unknown.

Threats
As with other threatened grassland species, the main threat to the Striped Flufftail is the continued degradation and loss of its upland grassland habitat through unsuitable burning practices, intensive grazing, agricultural practices and commercial afforestation (Taylor 2000). Particularly in coastal areas, urban settlement has also destroyed much former habitat. Although the species remains relatively numerous in a few well-managed protected areas, its range has become more fragmented and it has disappeared from many regions.

Inappropriate fire regimes, including fast-moving and/or high-intensity fires, are likely to cause local population decreases. The species appears to be adapted to both fire climax and post-fire climax vegetation, occurring in both short pure grassland and longer grass associated with scrub and forest edges. In KwaZulu-Natal, burns immediately reduce the breeding density, but the breeding population increases during the second season after a burn (Taylor 1994); periodic burning (or grazing) is thus necessary to maintain optimal habitat. Habitats not burned for 3-4 years develop a dense layer of moribund ground cover, only becoming suitable for occupation by flufftails again after several years when grass tufts become taller and less impenetrable.

Likewise, although a relatively high proportion of Mountain Fynbos is under formal conservation, inappropriate fire frequency and intensity is also considered a threat to this species in the Fynbos Biome. Very rapidly-moving and intense fires, especially in moribund vegetation, also pose a direct mortality risk, and there is one anecdotal account of a bird that died due to injuries sustained during a fire. It appears that the

reluctance of flufftails to fly to escape fires may be fatal, e.g. Red-chested Flufftails have been recorded running ahead of fires for long distances instead of flushing; when they eventually emerged onto a road they appeared dazed and confused by the smoke and could be caught by hand (or waiting natural predators such as Black-headed Herons Ardea melanocephala). Flufftails have also been recorded hiding inside dense tussocks of rushes to escape fires, or even enter rodent burrows (Taylor 1994). Slower and cooler burns tend to burn more patchily, leaving unburned spots that are probably important refuges for flufftails and other species.

The potential effects of climate change on this species have not been fully investigated, but may constitute a considerable cause for concern, given the Striped Flufftail's mountain habitats and occurrence in the Fynbos Biome (Simmons et al. 2004). Severe weather conditions also pose a local threat. Being highly sought-after by birdwatchers, avitourism may pose a limited local threat through disturbance, excessive playback of calls and trampling at popular birding sites. There are records of predation by Domestic cats *Felis catus*, and Lanner Falcon *Falco biarmicus*, while Black Harrier *Circus maurus* and Slender Mongoose *Herpestes sanguinea* are apparently attracted to Striped Flufftail vocalisations (Taylor 1994).

Conservation
No conservation measures are currently underway.

Proposed. Taylor (1994) summarised suggested conservation priorities, and identified key conservation areas, particularly the uKhahlamba-Drakensberg Park (IBA SA064) which holds 68% of the region's known breeding pairs. Although accurate population estimates have not been calculated for many reserves, the future of this species and its upland grassland habitat is relatively secure in formally conserved upland grassland. However, the wintering areas may lie at lower elevations outside such protected areas, and habitat loss at these lower altitude sites could contribute to regional population declines, even if the breeding habitat is managed correctly. Notwithstanding the considerable difficulties in such a task, a priority should be an investigation of the extent of seasonal movements, the identification of significant wintering areas, and the effective management of such sites (Taylor 2000). A good first step would be to survey suitable habitat in the mildest climatic conditions at low elevations within the uKhahlamba-Drakensberg Park (Taylor 1994).

In farming areas suitable habitat patches could be created by encouraging land-owners to practise less intensive and continuous grazing, adoption of a biennial burning cycle and leaving some areas ungrazed for 1-2 years (Taylor 1994). Even a patch as small as 1.5-2 ha (e.g. on stream valley slopes or near moist depressions, in bracken-briar stands, or Leucosidea/Buddleja patches), will create suitable habitat and have a minimal effect on a farm's grazing potential (Taylor 2000). In terms of burning frequency, the best strategy is to mimic natural burns by establishing a mosaic of burned and unburned patches, thereby promoting growth of fire climax grassland on a biennial cycle, and establishment of post-fire climax areas of rank tall grass and scrub (Taylor 1994).

Conocephalus peringueyi **[3](VU)**

Rationale
Peringuey's Meadow Katydid is Vulnerable under criteria B1 and B2, because its extent of occurrence and area of occupancy are relatively small (5,065 and 32 km^2, respectively), it has only been recorded in six known locations, and area and extent of its habitat are estimated to be in decline due to climate change and habitat destruction.

Distribution
Peringuey's Meadow Katydid (*Conocephalus peringueyi*) is known only from the mountains of the southwestern Cape, Western Cape Province, South Africa.

Habitat
Terrestrial
This species is only known from mountains in the Fynbos biome, South Africa.

Population trend
No information on population sizes or trends is available.

Threats
The greatest threats to this species are habitat destruction due to livestock grazing and habitat shifts caused by climate change. Because this species is a mountain specialist, as temperatures rise and suitable conditions are found at higher elevations, this species will have nowhere to go since it is already found at high elevations.

***Brinckiella aptera*[4] (VU)**

Rationale
The Mute Winter Katydid (*Brinckiella aptera*) is Vulnerable under criterion B1 because its extent of occurrence is relatively small (~12,500 km^2), it has only been recorded in four locations, and its habitat quality is estimated to be in decline. This species occurs within the Fynbos and Succulent Karoo biomes, both of which are notable biodiversity hotspots, naturally geographically restricted and under anthropogenic stress. This habitat type is predominantly utilized for livestock grazing, cultivation with annual crops, and urban development which may be detrimental to the host plants of the species. The genus of this species experienced an adaptive radiation in the region, with at least 9 species known in a relatively small geographic area. This species is not known to occur within any protected areas.

Distribution
The Mute Winter Katydid is endemic to the Northern and Western Cape Provinces of South Africa.

Habitat
Terrestrial

[3] https://speciesstatus.sanbi.org/assessment/last-assessment/4223/
[4] https://speciesstatus.sanbi.org/assessment/last-assessment/4298/

This species is endemic to the Fynbos and Succulent Karoo biomes. It probably feeds on flowers and leaves of a very narrow range of host plants and occurs primarily on low, herbaceous shrubs. This species feeds and stridulates at night but can be found basking in the daytime on sunny days during the winter and early spring, from August until October, a time when very few insects are active. Very unusually for the genus and for katydids in general, this species is the first in its subfamily to display a complete lack of stridulatory organs, raising interesting evolutionary questions regarding mate attraction and intraspecies communication (Naskrecki and Bazelet 2009).

Population trend
No information on population sizes or trends is available.

Threats
The principal threat to this species is habitat destruction by cultivation with annual crops, over-grazing, urban development or alien species invasion. Climate change is also likely to effect the distribution of the species host plants by altering rainfall patterns and ambient temperatures.

Sensitive Species 19 (CR)
As per the best practise guideline that accompanies the Animal and Plant Species Protocol for the screening tool, please, remember that the name of the sensitive species may not appear in the final EIA report nor any of the specialist reports released into the public domain. It should be referred to as sensitive plant or sensitive animal and its threat status may be included, e.g. critically endangered sensitive plant or endangered sensitive animal.

2.3.2. Historical and Archaeological Characteristics

Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), is applicable to the proposed development. No archaeologically significant resources were found during the foot survey. The development will not impact on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 or impact on any building or structure older than 60 years in any way. A HWC NID will be submitted to request comment confirm HWC if a Heritage Impact Assessment is required. This is as a result of the previous and historic cultivations of the area.

2.3.3. Terrestrial Biodiversity

According to the CapeNature (2024). 2023 Western Cape Biodiversity Spatial Plan and Guidelines. Biodiversity Capabilities, CapeNature. Link: https://www.capenature.co.za/western-cape-biodiversity-spatial-plan, area 3 was mapped as an terrestrial CBA.

Critical Biodiversity Areas
Name: Breede Shale Fynbos
Condition: Natural
Category 1: CBA: Terrestrial
Category 2: CBA: Threatened Ecosystem
Definition: Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

Objective: Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

Biodiversity Priorities	Hectares Lost	Is the proposed development aligned with the land management objectives	Proximity to Biodiversity Priority Area
CBA1	30	Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.	Located inside CBA area
CBA2	NA		
ESA1	NA		
ESA2	NA		
PA	NA		
Forest	NA		
River NFEPA including 32m buffer	The southern edge of area 1 is located on the edge. A portion of the southern boundary and edge has been located falls inside this 32m area		
Strategic water source area	All three sites are located inside the Boland SWSA Surface Water and SWSA Groundwater Tulbagh-Ashton Valley		
Threatened species and Red Data listed	None recorded, but specialist studies must still be conducted		

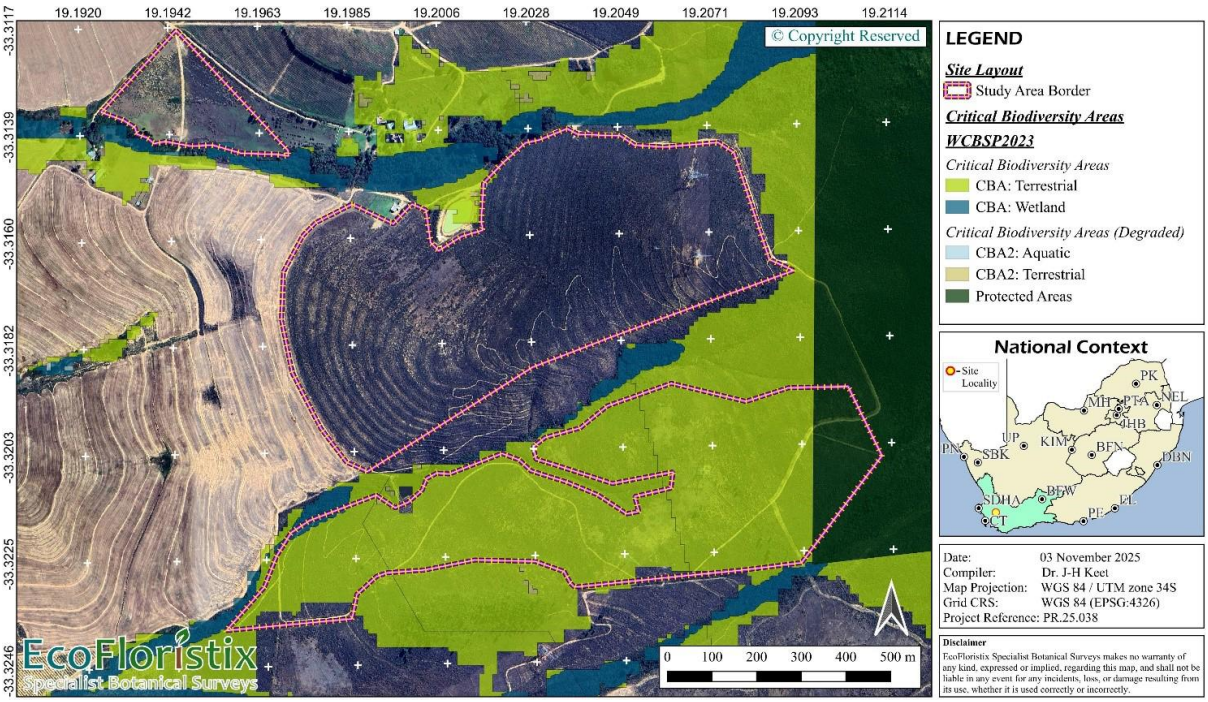


Figure 5: Biodiversity Map

2.3.4. Socio-Economic Elements

The climate in Witzenberg is known for its hot and dry summer days. Winds are seasonal and generally north-westerly or south-easterly. The average annual rainfall in Ceres is about 1 088 mm and the average temperature range is 2,4°C to 29,9°C. Located in the picturesque and fertile Breede Valley, Witzenberg is best known for its fruit and wine products. The region is also well-known for producing other agriculture-linked products such as olives and grain, as well as for producing beef and pork products. Horse and cattle stud farms are also found within the municipal area. In 2022, the Witzenberg municipal area boasted 8 fixed primary healthcare clinics and 6 mobile/satellite clinics. Additionally, it houses 1 district hospital, 7 Antiretroviral Treatment (ART) sites, and 16 Tuberculosis (TB) clinics. This signifies a comprehensive healthcare infrastructure within the municipal area, constituting 17.9 per cent of the total healthcare facilities in the Cape Winelands District. The allocation of resources to health facilities underscores the commitment to public health, contributing to the overall well-being of the population. However, a decrease in the number of patients receiving ART treatment raises concerns about sustained viral suppression, emphasizing the importance of continuous care in mitigating the transmission of HIV and managing healthcare costs. Between 2023 and 2025, the total number of employed individuals increased by 3 888, with agriculture, forestry and fishing contributing more than 40.2 per cent of new jobs (1 556 jobs). This growth marked further progress in the journey to pre-COVID levels of economic performance. The positive trends in labour force participation (up by 3.8 percentage points) and labour absorption (4.8 percentage points) point to a decrease in both the economically inactive population and the unemployment rate (which fell by 1.3 percentage points in 2023). An analysis of the spatial tax data that assesses the jobs growth based on the number of establishments in a region shows a different view. This data reveals that Witzenberg only grew by 0.7 per cent of the total FTE in 2023, after being on an upward trajectory in 2022. The recent job losses seem to be the culmination of a loss of land due to excessive fires and flooding, coupled with dilapidated

infrastructure and financial constraints. However, Witzenberg recorded just under 41 000 FTE jobs. Notably, the municipal area now has more jobs than in the pre-COVID period[5].

The local economy of the Witzenberg municipal area is driven by the agriculture, forestry and fishing sector (17.3 per cent), the wholesale and retail trade, catering and accommodation sector (16.9 per cent), the finance and business services sector (15.4 per cent) and the manufacturing sector (14.2 per cent). Combined, these sectors contribute more than R5.0 billion to the economy.

Approximately 93ha of agricultural lands to plant grains were not ploughed for 10 years. Without these agricultural fields not panted for longer than 10 years, the financial viability of the property is compromised.

SECTION 3: NEED AND DESIRABILITY

3.1 NEED AND DESIRABILITY

MOTIVATION FOR APPLICATION:

The purpose of this application is to clear approximately 81 ha (consisting of three areas of 5ha, 46 ha and 30ha) historically ploughed land where the topsoil was not legally disturbed the last 10 years on remainder of farm Schalkenbosch 229, Tulbagh. No rezoning or consent of the area is required from Witzenberg Municipality. The whole property is zoned Agriculture 1 and used for agricultural purposes.

The farm is approximately 218ha in size. Approximately 95% of the farm was historically ploughed and cultivated. Of this approximately 50% is still being cultivated and planted with winter rain crops. The clearing of the vegetation will ensure that the agricultural lands become available again to plant grains. Without this agricultural fields not planted for longer than 10 years, the financial viability of the property is compromised. The clearing of the 81ha old lands to put it into agricultural production will ensure the financial viability of the farm.

SECTION 4: ALTERNATIVES ASSESSMENT

Regulation 21(3) of EIA Regulations, 2014 as amended requires that the Scoping Report include a description of any feasible and reasonable alternatives that have been identified. Regulation 1 of EIA Regulations, 2014 as amended defines alternatives as follows:

“alternatives”, in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to the—
(a) property on which or location where the activity is proposed to be undertaken,
(b) type of activity to be undertaken,
(c) design or layout of the activity,
(d) technology to be used in the activity, or
(e) operational aspects of the activity,

[5] Witzenberg Municipality Review Integrated Development Plan 2025-2026

and includes the option of not implementing the activity.

The alternatives considered for this project are described below.

4.1 PROPERTY AND LOCATION/SITE ALTERNATIVES

DETAILS OF ALTERNATIVES
LOCATION / SITE / PROPERTY ALTERNATIVE

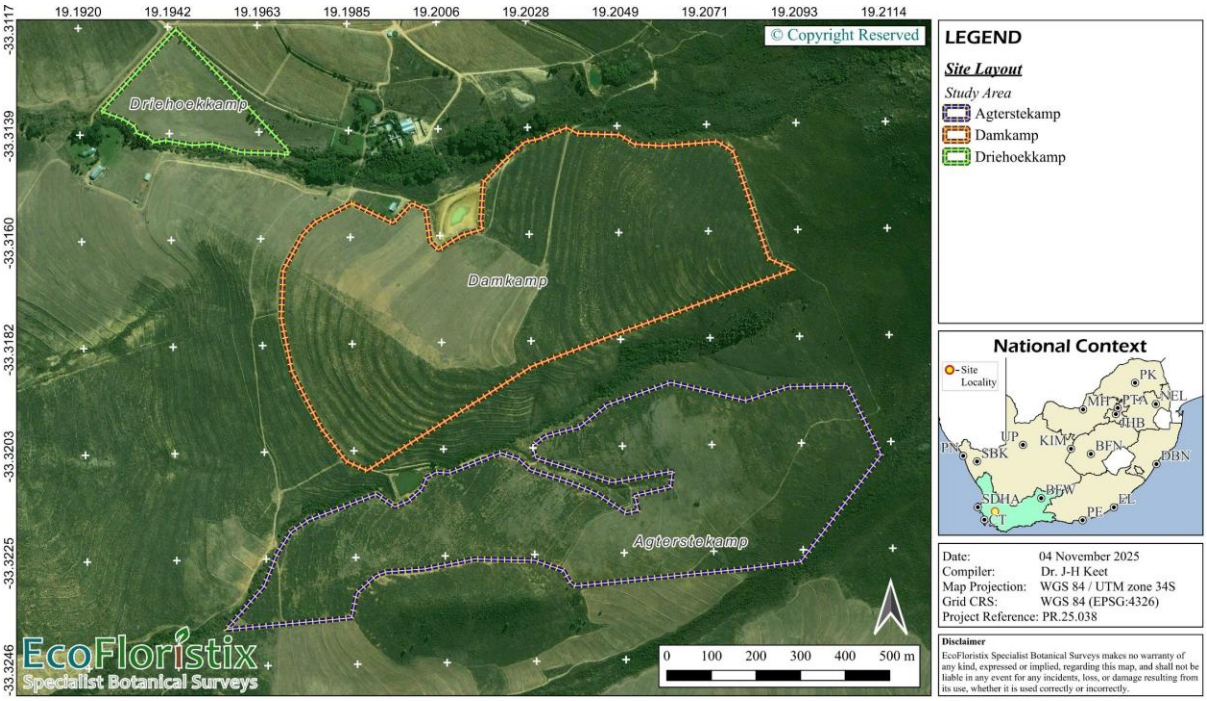
Three areas of approximately 81 ha (5ha, 46 ha and 30ha) were identified on the remainder of farm Schalkenbosch 229, Tulbagh.

4.2 ACTIVITY ALTERNATIVES

The only activity alternative is to clear historically ploughed land where the topsoil was not legally disturbed the last 10 years on remainder of farm Schalkenbosch 229, Tulbagh in order to reinstate the old agricultural lands for ploughing and cultivation purposes.

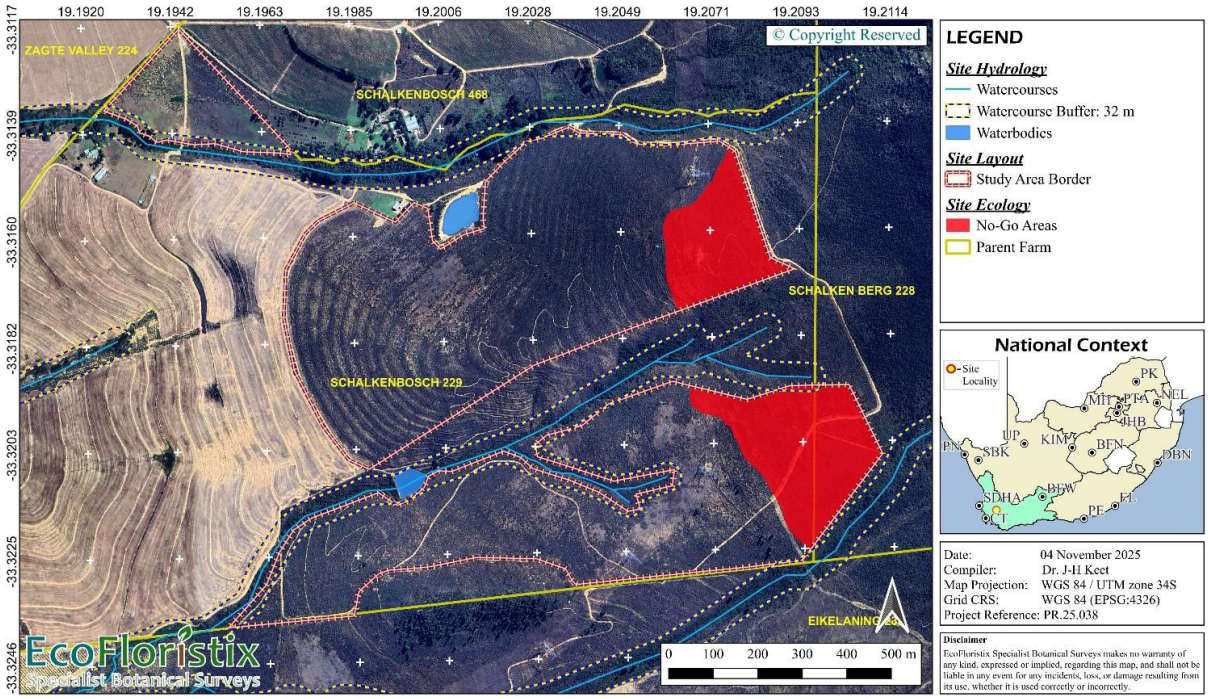
4.3 DESIGN OR LAYOUT ALTERNATIVES

Two layout alternatives will be assessed.
The alternative layout is to clear approximately 93 ha (consisting of three areas of 5ha, 51 ha and 37ha) historically ploughed land where the topsoil was not legally disturbed the last 10 years on remainder of farm Schalkenbosch 229, Tulbagh in order to reinstate the old agricultural lands for ploughing and cultivation purposes.



The preferred layout is to clear approximately 81 ha (consisting of three areas of 5ha, 46 ha and 30ha) historically ploughed land where the topsoil was not legally disturbed the last 10 years on remainder of farm Schalkenbosch 229, Tulbagh. The property is

zoned Agriculture and is located outside an urban area. The preferred alternative accommodate and exclude no go areas as identified by Dr Keet in the terrestrial biodiversity and plant species impact assessment.



Environmental Opportunities and Constraints associated with the site to be taken in consideration when the specialist assess the proposed clear areas.

Location
The property belong to the applicant and due to its location on existing old ploughed and cultivated lands with constructed agricultural contour structures to control erosion the proposed clearing of the three areas is perfectly located.

Species of Conservation Concern
Species of conservation concern were recorded and excluded from the proposed clearing areas.

4.4 TECHNOLOGY ALTERNATIVES

No feasible or reasonable technology alternatives applicable. The application is to clear vegetation to re-establish the old agricultural lands.

4.5 OPERATIONAL ALTERNATIVES

No feasible or reasonable operational alternatives applicable. The application is to clear vegetation to re-establish the old agricultural lands.

4.6 THE OPTION OF NOT IMPLEMENTING THE ACTIVITY (THE NO-GO OPTION)

The No-Go option will result in the site remaining as it is presently. The vegetation will not be cleared in order to cultivate the areas.

4.7. "(G) A FULL DESCRIPTION OF THE PROCESS FOLLOWED TO REACH THE PROPOSED PREFERRED ACTIVITY, SITE AND LOCATION OF THE DEVELOPMENT FOOTPRINT WITHIN THE SITE, INCLUDING—

(V) THE IMPACTS AND RISKS WHICH HAVE INFORMED THE IDENTIFICATION OF EACH ALTERNATIVE, INCLUDING THE NATURE, SIGNIFICANCE, CONSEQUENCE, EXTENT, DURATION AND PROBABILITY OF SUCH IDENTIFIED IMPACTS, INCLUDING THE DEGREE TO WHICH THESE IMPACTS—

(AA) CAN BE REVERSED;

(BB) MAY CAUSE IRREPLACEABLE LOSS OF RESOURCES; AND

(CC) CAN BE AVOIDED, MANAGED OR MITIGATED;

(VIII) THE POSSIBLE MITIGATION THAT COULD BE APPLIED AND LEVEL OF RESIDUAL RISK;

(IX) THE OUTCOME OF THE SITE SELECTION MATRIX."

4.7.1. IMPACTS AND RISKS ASSOCIATED WITH EACH ALTERNATIVE

The potential impacts and risks as identified by the EAP has been summarised for the alternative and preferred alternative described above.

4.7.2. POSITIVE AND NEGATIVE IMPACTS ASSOCIATED WITH EACH ALTERNATIVE

Refer to the assessment of alternatives in section 6.1. of the report which assesses the positive and negative impacts associated with all alternatives assessed.

4.7.3. MITIGATION MEASURES

The mitigation measures to reduce negative impacts will be informed by the specialist investigations (where required) as well as standard EMPr conditions as set out by applicable legislation, guidelines, policy and through consultation with stakeholders and I&APs to reduce negative impacts where such impacts could not be avoided. This will be detailed in the EIR phase report.

4.7.4. OUTCOME OF SITE SELECTION MATRIX

Three areas of approximately 81 ha (5ha, 46 ha and 30ha) were identified on the remainder of farm Schalkenbosch 229, Tulbagh.

4.7.5. MOTIVATION FOR NOT CONSIDERING ALTERNATIVES

No feasible or reasonable alternatives applicable. The application is to clear vegetation to re-establish the old agricultural lands.

IMPACTS AND RISKS ASSOCIATED WITH EACH ALTERNATIVE

The potential impacts and risks as identified by the EAP have been summarised for the following alternatives:

Impact Summary vegetation clearing phase:

Soil erosion and dust - (Low impact before mitigation and low impact with mitigation

measures);
Impact of clearing activities on surface and underground water pollution - (Low impact before mitigation and low impact with mitigation measures);
Impact of clearing activities on surface and underground water pollution - (Medium impact before mitigation and low impact with mitigation measures);
Waste Impacts - (Low impact before mitigation and low impact with mitigation measures);
Noise due to machinery - (Low impact before mitigation and low impact with mitigation measures);
Animal Species Impacts - (Medium impact before mitigation and low impact with mitigation measures);
Plant Species Impacts - (Medium impact before mitigation and low impact with mitigation measures);
Terrestrial Biodiversity Impacts - (High impact before mitigation and low impact with mitigation measures);

Operational phase:
Soil erosion and dust - (Low impact before mitigation and low impact with mitigation measures);
Increased jobs - (No impact before mitigation and positive impact with mitigation measures);

Decommissioning phase:
Similar to impacts associated with construction phase.

No Go or No Development option:
The No-Go option will result in the site remaining as is presently.

SECTION 5: PUBLIC PARTICIPATION PROCESS

5.1 INTRODUCTION

Public participation is an integral part of the environmental assessment process and affords potentially interested and affected parties (I&APs) an opportunity to participate in the EIA process, or to comment on any aspect of the development proposals. The public participation process to be undertaken for this project complies with the requirements of the EIA Regulations. The description of the public participation process as included below specifies the steps and actions undertaken to date and as appropriate at this stage of the project.

5.2 IDENTIFICATION AND REGISTRATION OF KEY DEPARTMENTS AND OTHER I&APS

Liaison with the relevant authorities plays a crucial role in the successful completion of any environmental assessment process. In addition to the DEA&DP, the key departments such as the provincial departments having jurisdiction in respect of any aspect of the project, the local municipality and municipal councillor as well as other potentially affected I&APs, including adjacent property owners and dwellers, were identified.

The parties listed in the table below were identified as potential I&APs to date as per the requirements of the Regulation 42 of R982 of 2014 as amended. A list with complete details of the I&APs is kept by the EAP and will be updated as the project progresses. Refer to Appendix D.

Key Departments identified to date
DEA&DP: Development Management
CapeNature
DEA&DP: Pollution & Chemicals Management
DEA&DP: Waste Management
Department of Agriculture, Western Cape
Heritage Western Cape
Cape Winelands District Municipality
Department of Water and Sanitation
Witzenberg Municipality
ESKOM

5.3 NOTIFICATION OF I&APS

Potential I&AP's were notified about the project. The notification took place in the following manner (this is in compliance with Regulation 41 of the EIA Regulations, 2014).

- Fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of the site where the activity to which the application relates is or is to be undertaken and any alternative site;
- Written notifications sent to potential I&APs inviting them to register and give comments on the proposed development. These notifications were in line with the requirements of Regulation 41 of GN R982 of 2014 as amended; and
- Placing an advertisement in the local newspaper in compliance with Regulation 41(2)(c)(i) of GN R982 of 2014 as amended.

All potential I&APs are afforded the opportunity to register for the project. All registered I&APs will be informed of further activities regarding the project.

5.4 PUBLIC MEETINGS AND WORKSHOPS

No public meetings have been held yet and none required or requested.

5.5 AVAILABILITY OF THE SCOPING REPORT

As per the requirements of Regulation 43 of GN R982 of 2014 as amended, the draft Scoping Report was made available for a 30-day commenting period. A copy of the draft scoping report and EIR will be made available on the Enviro-EAP website.

The report will be included for statutory comment with the written notice as sent to the commenting organs of state.

Electronic copies (CDs) will be made available to any I&AP on request. Proof of

delivery and document placement will be attached to the final Scoping Report. Additionally, the report will be made available to any I&AP upon request, as advised on the notice boards, notices and advertisements referred to in Section 5.3 above.

5.6 COMMENTS AND REPONSES DURING THE SCOPING PHASE

Comments received will be responded to as per the requirements of Regulation 44 of GN R982 of 2014 as amended. The comments and response report as well as all comments received will be attached to the Scoping Report.

5.7 PUBLIC PARTICIPATION DURING THE EIA PHASE

Public participation during the EIA phase involves submitting the draft EIR to the registered I&AP's and Key Departments for a 30-day period to discuss the findings of the report. Once all comments have been received, the EIR will be finalised considering the comments.

The final EIR will then be submitted to the DEA&DP for approval. As per the requirements of GN R982 of 2014 as amended, should any additional comments be received during this stage, these will be submitted to DEA&DP.

5.8 DECISION AND APPEAL PERIOD

Once DEA&DP has reviewed the final EIR and are satisfied that it contains sufficient information to make an informed decision, they will use the information contained within the EIR to determine the environmental acceptability of the applicant's preferred options. A decision on the applications and associated reports will be made by the DEA&DP based on the findings of the EIR.

Following the issuing of the decision, I&APS will be notified. All I&APs will be provided with the opportunity to appeal the decision to the Minister in terms of the NEMA.

SECTION 6: ENVIRONMENTAL ISSUES IDENTIFIED TO DATE

The potentially significant impacts associated with the proposed development have been identified by the EAP. Issues identified by Key Departments and I&APs will be considered in the determination of impacts. A detailed impact assessment and environmental impact statement will be provided in the EIA. The assessment will be based on the criteria as set out below in the Plan of Study (PoS).

6.1 DEVELOPMENT PHASE IMPACTS

- Possible impacts on soil where soil disturbances will occur;
- Increased erosion risk due to the clearing of land for the proposed development leading to increase in storm water flow;
- Fauna and flora may be affected by the development.
- Water quality of the downstream water bodies may be affected due to storm water flow from clearing site;
- Noise Impacts
- Heritage Impacts

- Biodiversity Impacts such as clearing of or impacts on indigenous vegetation habitat

6.2 OPERATIONAL PHASE IMPACTS

- Erosion risk or surrounding areas due to hardened developed areas
- Biodiversity/ecological impacts on habitat
- Social impacts i.e. permanent job creation; impact on income, sales and GGP; noise nuisance impacts; changes in health and social wellbeing; impact on demand for services and amenities etc.

6.3 CLOSURE AND DECOMMISSIONING PHASE IMPACTS

It is not anticipated that decommissioning will occur in the near future. Should decommissioning occur, the expected impacts are similar to those listed in the development phase above with the additional positive impact of rehabilitating the decommissioned area to a near natural/indigenous state.

SECTION 7: PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT

7.1 TASKS TO BE UNDERTAKEN

The EIA report is informed by the scoping phase. Should the need for specialist studies be identified, input from specialists will be obtained to further advise on the potential impacts that may occur due to the proposed activities. The specialists will identify opportunities and constraints as associated with the site and the proposed development and provide their input to the concept design.

The following steps will be undertaken as part of the EIA phase:

- Alternatives will be further investigated, in a re-iterative manner, so as to avoid or minimize negative impacts and maximize potential benefits;
- The entire project team, including the specialist consultants, will be involved in the evaluation of alternatives;
- Statements regarding the potential significance of residual impacts, taking into account proposed mitigation measures will be provided in the EIA; and
- An Environmental Management Programme (EMP) covering construction, operational and decommissioning phases of the proposed development will be prepared after input from specialists, incorporating recommendations for mitigation, monitoring and evaluation are received.

7.2 CONSULTATION WITH COMPETENT AUTHORITY

DEA&DP as the Competent Authority regarding the Environmental Authorization application will be consulted throughout the application process.

All documentation (Draft and Final) will be sent to DEA&DP. Communication with DEA&DP will be attached to the documents to be submitted.

7.3 ASSESSMENT OF ENVIRONMENTAL ISSUES AND ALTERNATIVES

The objective of an impact assessment is to find the alternative having the least negative environmental impact, and which best benefits society. The assessment and evaluation of potential impacts associated with the development would thus be undertaken in a re-iterative manner, to optimally inform pro-actively the development proposal. The following methodology for assessing alternatives has been developed and will be used during the application process. GN R982 of 2014 as amended requires, in part, that the Scoping and EIA Reports include a description of any feasible and reasonable alternatives that have been identified. Regulation 1 of GN R982 of 2014 as amended defines alternatives as follows:

"alternatives", in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to –
(a) the property on which or location where it is proposed to undertake the activity (alternative properties as well as alternative sites on the same property);
(b) the type of activity to be undertaken
(c) the design or layout of the activity;
(d) the technology to be used in the activity (consideration of such alternatives is to include the option of achieving the same goal by using a different method or process); and
(e) the operational aspects of the activity;

The following additional alternative types (as applicable to this project) have also been suggested for inclusion, where applicable, by both the Department of Environmental Affairs (DEA) and the Department of Environmental Affairs and Development Planning (DEA&DP) in their EIA guidelines and information documents on alternatives. These alternatives are discussed where applicable.

Demand - when a demand for a certain product or service can be met by some alternative means;
Input - applicable to applications that may use different raw materials or energy sources in their process;
Scheduling and Timing - a number of measures might play a part in an overall programme, but the order in which they are scheduled will contribute to the overall effectiveness of the end result; and
Scale and Magnitude - activities that can be broken down into smaller units and can be undertaken on different scales, each may have a different impact.

These were considered as well.

All the above alternative types, including the no-go option (i.e. the option of not implementing the activity) have been investigated according to the methodology described below.

7.3.1 Alternative determination methodology

Alternatives are described in terms of the various types of alternatives ("alternative types") as listed above, as well as the proposed and alternative project activity(ies) ("project alternatives") which includes a combination of all the separate factors. Both

the identification, investigation, and assessment of alternatives, and the generation and consideration of modifications and changes to activities must be well documented. A reasoned explanation as to why an alternative was or was not found to be reasonable and feasible has been provided for each alternative type. The criteria in 6 was used during the identification and assessment of alternatives.

7.3.2 Role of the various parties in the consideration of alternatives

7.3.2.1 The role of the Applicant

- Consider the strategic planning and environmental context within which the development and alternatives are to be considered;
- Consider all feasible and reasonable alternatives (not only the preferred option); and Provide the EAP with access to all information at the disposal of the applicant regarding the application.

7.3.2.2 The role of the EAP

- Consider the strategic planning and environmental context within which the development and alternatives are to be considered;
- Identify, investigate and assess alternatives;
- Afford opportunities for interested and affected parties to provide input into the identification, investigation and assessment of alternatives;
- Disclose all information relevant to the consideration of alternatives to the applicant and competent authority;
- Document the process of identification, investigation and assessment of alternatives (including providing the methodology and criteria used, and how the level of investigation applied to each alternative was established); and
- Provide a comprehensive consideration of the impacts of each of the alternatives assessed.

7.3.2.3 The role of specialists

Assess impacts, especially the direct footprint as well as indirect and potential cumulative impacts of the development;
Take into account the context and the intensity of the impact as related to their specific field of expertise;
Highlight any impacts that could be irreversible or result in an irreplaceable loss of resource;
Evaluate the significance of residual impacts associated with the proposed development, taking into account scientific information, local community and societal values attached to the environment as being impacted upon;
Use accepted or formal standards, thresholds or targets for environmental quality, where available, as a key indicator of potential significance, since these measures reflect societal values. Where these benchmarks are absent, specialists should draw on a combination of criteria used to assess potential impacts, to indicate their potential significance, as well as feedback from key stakeholders; and
Assess and respond to all comments made by Key Departments and Registered I&APs.

7.3.2.4 The role of I&APs

Declare their interests;
Assist in the identification, investigation and assessment of alternatives, particularly where local knowledge is required;
Within the specified timeframes, provide comment on the consideration of alternatives.

Table 3: Alternatives assessment methodology

Criteria	General description / methodology for alternatives assessment	Project specific action taken for alternatives assessment
Identification of alternatives	Alternatives have been identified as early as possible in the process (planning and design phase). Alternatives will further be considered and assessed throughout the project life as amendments to the alternatives are made. Assessment of the alternatives will only cease once final alternatives have been decided upon. These will be the final alternatives for which Environmental Authorisation will be applied for. The identification of alternatives should be broad, objectively done and well documented.	Due to the nature of the project, not all alternative types as listed above could be assessed as some of the activities have only one option for implementation. Where possible, alternatives were considered.
Comparative assessment	The project alternatives will be determined according to the alternative types identified as feasible and reasonable and assessed comparatively.	
Reasonability and feasibility	All alternatives were considered in terms of reasonability, feasibility, practicability, relevancy and viability. As determined throughout the process, not all alternatives will be reasonable or feasible. These will in subsequent reports be mentioned as being considered but will not be described in detail.	Only alternatives considered reasonable and feasible at the scoping phase have been included in this report. Alternatives discarded prior to this phase have not been included and will not be considered further.
Sustainability considerations and effectiveness of alternatives	The alternatives identified have taken into account the triple bottom-line of sustainability i.e. meeting the socio-economic and ecological needs of the public. The alternatives aim to maximise the benefits and avoid or minimise the negative impacts. The primary objective has been to avoid all negative impacts (where possible), rather than to	Alternatives with regards to the proposed development considered the best practical environmental option in terms of timeframes and implementation methods/ designs.

Criteria	General description / methodology for alternatives assessment	Project specific action taken for alternatives assessment
	minimise them. The alternatives further took into consideration the need to maximise resource use efficiency.	
Discrete vs. incremental alternatives	Initial alternatives identified, also known as discrete alternatives were identified during the early stages of a project (pre-feasibility and feasibility) and comparatively assessed during the assessment phases. During subsequent consideration, as the project progresses, incremental modifications and changes to activities will occur. These incremental changes will be considered during the amendment to the project activities during project progression. Impacts and issues of these changes will also be considered, as and when they are identified	
Advantages and disadvantages	For each alternative, the related advantages and disadvantages have been considered for each alternative type. These have not been discussed in terms of the project alternatives.	
Impacts and aspects	Impacts and aspects related to the implementation of each alternative are listed with the alternative type descriptions. Detailed impacts are described in Section 7 for each project alternative. The aim is to address the key impacts of the proposed alternative by maximising benefits and avoiding or minimising the negative impacts. The primary objective must be to avoid all negative impacts, rather than to minimise them.	Main impacts identified to be considered in determining alternatives are as follows: • fauna and flora • Surface water quality • Health and safety • Social aspects
Other considerations	The “feasibility” and “reasonability” of and the need for alternatives should be determined by considering, amongst others: (a) the general purpose and requirements of the activity; (b) need and desirability; (c) opportunity costs; (d) the need to avoid negative impact altogether; (e) the need to minimise unavoidable negative impacts; (f) the need to maximise benefits;, and	The need and desirability of the project took into account various strategic planning documents applicable to the area as well as socio-economic priorities. This determined the feasibility and reasonability of the project. The need and

Criteria	General description / methodology for alternatives assessment	Project specific action taken for alternatives assessment
	(g) the need for equitable distributional consequences. Also refer to Section 4 for a detailed description of the need and desirability of the project.	desirability influenced the timeframes and design specifications considered for the project.
I&APs	I&APs have to be notified of both the preferred and alternative activities. They should also be allowed to comment on both.	Public participation will be undertaken in line with the requirements of Regulations 39 to 44 of GN R982 of 2014 as amended.
No-go option	The option of not implementing the activity has been to the same level of detail as the other feasible and reasonable alternatives.	The option of not proceeding with the activity (no-go option) provides a reliable baseline against which to compare and evaluate feasible and reasonable alternatives.

7.4 CRITERIA FOR ASSESSMENT OF IMPACTS

Below is the assessment methodology utilized in determining the significance of the construction, operational and decommission impacts of the proposed activities, and where applicable the possible alternatives, on the biophysical and socio-economic environment. The methodology is broadly consistent to that described in Integrated Environmental Management Series.

For each impact, the significance is determined by various factors. Significance is described prior to mitigation as well as with the most effective mitigation measure(s) in place.

The mitigation described in the Environmental Management Programme (EMP) document, to be attached to the EIA, represents the full range of plausible and pragmatic measures *but does not necessarily imply that they all should or will be implemented*. The decision as to which mitigation measures to implement lies with the applicant and ultimately with the competent authority. To facilitate informed decision-making, EIAs must endeavour to come to terms with the significance of the potential environmental impacts associated with particular development activities. Despite the attempts at providing a completely objective and impartial assessment of the environmental implications of development activities, EIA processes can never completely escape the subjectivity inherent in attempting to define significance.

Recognising this, potential subjectivity in the EIA process will be addressed as follows:

- Be clear about the difficulty of being completely objective in the determination of significance;
- Develop an explicit methodology for assigning significance to impacts and outlining this methodology in detail. Having an explicit methodology not only forces the assessor to come to terms with the various facets contributing toward determination of significance, thereby avoiding arbitrary assignment, but also provides the reader of the EIA Report with a clear summary of how the assessor derived the assigned significance; and
- Wherever possible, differentiating between the likely significance of potential environmental impacts as experienced by the various affected parties.

Although these measures may not totally eliminate subjectivity, they do provide an explicit context within which to review the assessment of impacts.

Table 4: Assessment criteria for the evaluation of impacts

Criteria	Description		
Nature	A description of what causes the effect, what will be affected, and how it will be affected.		
	Type	**Score**	**Description**
Extent (E)	None (No)	1	Footprint
	Site (S)	2	On site or within 100 m of the site
	Local (L)	3	Within a 20 km radius of the centre of the site
	Regional (R)	4	Beyond a 20 km radius of the site
	National (Na)	5	Crossing provincial boundaries or on a national / land wide scale
Duration (D)	Short term (S)	1	0 – 1 years
	Short to medium (S-M)	2	2 – 5 years
	Medium term (M)	3	5 – 15 years
	Long term (L)	4	> 15 years
	Permanent(P)	5	Will not cease
Magnitude (M)	Small (S)	0	will have no effect on the environment
	Minor (Mi)	2	will not result in an impact on processes
	Low (L)	4	will cause a slight impact on processes
	Moderate (Mo)	6	processes continuing but in a modified way
	High (H)	8	processes are altered to the extent that they temporarily cease
	Very high (VH)	10	results in complete destruction of patterns and permanent cessation of processes.
Probability (P) the likelihood of the impact actually	Very improbable (VP)	1	probably will not happen
	Improbable (I)	2	some possibility, but low likelihood
	Probable (P)	3	distinct possibility

Criteria	Description		
occurring. Probability is estimated on a scale, and a score assigned	Highly probable (HP)	4	most likely
	Definite (D)	5	impact will occur regardless of any prevention measures
Significance (S)	Determined through a synthesis of the characteristics described above: **S = (E+D+M) x P** Significance can be assessed as low, medium or high		
Low: < 30 points:	The impact would not have a direct influence on the decision to develop in the area		
Medium: 30 - 60 points:	The impact could influence the decision to develop in the area unless it is effectively mitigated		
High: < 60 points:	The impact must have an influence on the decision process to develop in the area		
No significance	When no impact will occur or the impact will not affect the environment		
Status	Positive (+)		Negative (-)
The degree to which the impact can be reversed	Completely reversible (R)	90-100%	The impact can be mostly to completely reversed with the implementation of the correct mitigation and rehabilitation measures.
	Partly reversible (PR)	6-89%	The impact can be partly reversed providing that mitigation measures as stipulated in the EMP are implemented and rehabilitation measures are undertaken
	Irreversible (IR)	0-5%	The impact cannot be reversed, regardless of the mitigation or rehabilitation measures taking place
The degree to which the impact may cause irreplaceable loss of resources	Resource will not be lost (R)	1	The resource will not be lost or destroyed provided that mitigation and rehabilitation measures as stipulated in the EMP are implemented
	Resource may be partly destroyed (PR)	2	Partial loss or destruction of the resources will occur even though all management and mitigation measures as stipulated in the EMP are implemented
	Resource cannot be replaced (IR)	3	The resource cannot be replaced no matter which management or mitigation measures are implemented.
The degree to which the impact can be mitigated	Completely mitigatible (CM)	1	The impact can be completely mitigated providing that all management and mitigation measures as stipulated in the EMP are implemented
	Partly mitigatible (PM)	2	The impact cannot be completely mitigated even though all management and mitigation measures as stipulated in the EMP are

Criteria	Description		
			implemented. Implementation of these measures will provide a measure of mitigatibility
	Un-mitigatible (UM)	3	The impact cannot be mitigated no matter which management or mitigation measures are implemented.

Cumulative impact: Consideration must be given to the extent of any accumulative impact that may occur due to the proposed development. Such impacts must be evaluated with an assessment of similar developments already on the environment. Such impacts will be either positive or negative, and will be graded as being of negligible, low, medium or high impact.

Degree of confidence in predictions: The specialist should state what degree of confidence (low, medium or high) is there in the predictions based on the available information and level of knowledge and expertise.

7.5 PUBLIC PARTICIPATION PROCESS

Public participation processes was undertaken as follows:

- The public and adjacent neighbours will be further advised as to the application process underway;
- Responding members of the public and neighbours (I&APs) are registered to the application data base and will be informed throughout the Scoping – EIA process;
- Registered I&APs will be appraised of the draft and final Scoping Reports and Plan of Study for EIA; and
- During the EIA phase, the draft EIA Report will be open for comment and input from registered I&APs.

The project team will evaluate any comment and input as may be forthcoming and will respond as appropriate to issues and concerns as raised by I&APs.

Should amendments to any Draft Reports be substantive, or should the Final Report contain substantive information that was not included in the Draft Report, registered I&APs will be afforded an opportunity to again comment on the Final Report before it is submitted to the competent authority as provided for by Regulation. Once all comments have been addressed, the Final EIA Report will be submitted to the competent authority for evaluation.

7.6 TERMS OF REFERENCE (TOR) FOR SPECIALIST STUDIES TO BE UNDERTAKEN IN THE EIA PHASE

The specialists will be provided with set criteria for undertaking their assessments, to allow for comparative assessment of all issues, inclusive of input as received from IA&Ps. These criteria are inclusive of the need to consider the no go option as the base line option. These criteria are defined in the EIA Regulations: Guideline and Information Document Series: Generic Terms of Reference for Environmental Assessment Practitioners: For Basic Assessment and Scoping-EIA. Specialists will

also comply with Regulation 23 of the EIA Regulations. 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 National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), when applying for Environmental Authorisation" ("the Protocols") (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020) came into effect on 9 May 2020 and will be used.

The following specialist studies are proposed to be undertaken during the EIA phase:

Specialist Report Identified	**Reason/s for the Assessment to be Conducted or Not to be Conducted (as provided by the EAP)**
Terrestrial Biodiversity and Plant Species Impact Assessment	Conducted by Dr Keet
Animal Species Assessment	To be appointed for assessment and report and detail included in draft EIR
Socio-economic impact	No separate socio-economic impact assessment will be conducted. assessment The EAP will assessed the socio-economic impacts directly into the EIR.

SECTION 8: ASSUMPTIONS AND LIMITATIONS

8.1 ASSUMPTIONS

The assumption is that the information on which the report is based (such as base line studies and project information, as well as existing information) is correct. The baseline information provided is preliminary and may need more detailed investigation, which will form part of the subsequent stages of the Scoping - EIA process. Statements or indicators of significance must be considered in the light of uncertainty regarding the extent and significance of such resources on the site.

8.2 LIMITATIONS

This report is based on currently available information and, as a result, the following limitations are implicit:

- The report is based on a project description taken from design specifications for the proposed development that have not yet been finalised, and which may undergo a number of iterations and refinements before they can be regarded as definitive;
- A project description based on the final design will be provided in the EIA Phase; and
- Descriptions of the natural and social environments are based on limited fieldwork and local knowledge as well as available literature.

More information will be provided in the EIA phase based on the outcomes of the specialist studies.

SECTION 9: CONCLUSION

The EIA phase will determine the most feasible alternatives according to the results of the specialist studies as well as the input from all I&Aps and key departments. Detail impacts will be determined accordingly and appropriate management and mitigation measures provided.

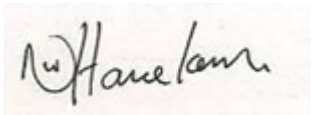
SECTION 10: REFERENCES:

Cape Farm Mapper, ver. 2.6.
Dayaram, A., Harris, L., Grobler, B. A., van der Merwe, S., Rebelo, A. G., Powrie, L. W., Vlok, J. H. J., Desmet, P., Qabaqaba, M., Hlahane, K. M., & Skowno, A. L. (2018). Vegetation Map of South Africa, Lesotho and Swaziland 2018: A description of changes since 2006. Bothalia, 49(1), a2452. https://doi.org/10.4102/ abc.v49i1.2452

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I **Nicolaas Willem Hanekom**, EAPASA Registration number **2020/1146**. as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this scoping report and any other documents/reports submitted in support of this report;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
    - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
    - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;



01/02/2026

Signature of the EAP: Date:

Enviro-EAP (Pty) Ltd

Name of company (if applicable):

DECLARATION OF THE APPLICANT

Note: Duplicate this section where there is more than one Applicant.

I……*Andre Lund*……, ID number …*720422 5251 08 2*……in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;

- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;

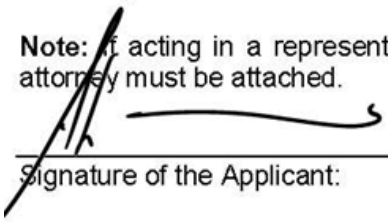
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;

    - I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;

    - I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
      - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
      - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
      - Legitimate costs in respect of specialist(s) reviews; and
      - the provision of security to ensure compliance with applicable management and mitigation measures;

- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.



02/02/2026

Signature of the Applicant: Date:

Andre Lund on behalf of Karla en Anke Trust

Name of company (if applicable):