

TERRESTRIAL PLANT SPECIES COMPLIANCE STATEMENT

**PROPOSED SAND AND GRAVEL MINING PERMIT ON FARM DOORNFONTEIN
RE/4/814, MALMESBURY WESTERN CAPE**



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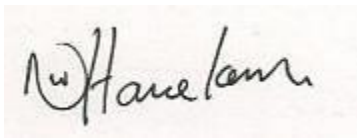
August 2026

DECLARATION OF THE SPECIALIST

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

I **Nicolaas Willem Hanekom**, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, 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 development proposal or application and that there are no circumstances that may compromise my objectivity; or
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.



Nicolaas Hanekom
Pri.Sci.Nat (Ecology) 400274/11

Signature of the EAP/ Specialist:

27 August 2026

Date:

Enviro-EAP (Pty) Ltd

Name of company (if applicable):

TABLE OF CONTENTS

DECLARATION OF THE SPECIALIST	2
1. INTRODUCTION	3
1.1. <i>Background & Competency</i>	3
1.2. <i>Conditions Relating to this Report</i>	3
1.3. <i>Terms of Reference</i>	4
2. BASELINE PROFILE DESCRIPTION OF BIODIVERSITY AND ECOSYSTEMS, INCLUDING A STATEMENT ON THE DURATION, DATE AND SEASON OF THE SITE INSPECTION AND THE RELEVANCE OF THE SEASON TO THE OUTCOME OF THE ASSESSMENT	6
3. A DESCRIPTION OF THE METHODOLOGY USED TO UNDERTAKE THE SITE SURVEY AND PREPARE THE COMPLIANCE STATEMENT, INCLUDING EQUIPMENT AND MODELLING USED WHERE RELEVANT	12
4. WHERE REQUIRED, PROPOSED IMPACT MANAGEMENT ACTIONS AND OUTCOMES OR ANY MONITORING REQUIREMENTS FOR INCLUSION IN THE EMPR .	12
5. A DESCRIPTION OF THE ASSUMPTIONS MADE AND ANY UNCERTAINTIES OR GAPS IN KNOWLEDGE OR DATA	13
6. THE MEAN DENSITY OF OBSERVATIONS/ NUMBER OF SAMPLES SITES PER UNIT AREA	14
7. ANY CONDITIONS TO WHICH THE COMPLIANCE STATEMENT IS SUBJECTED ...	20
8. REFERENCES	20
APPENDIX A SPECIALIST CV	21

1. INTRODUCTION

1.1. *Background & Competency*

Nicolaas Hanekom is a registered Professional Natural Scientist in the ecological science field with the South African Council for Natural Scientific Professions (“SACNASP”), (Ecology field) 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.

1.2. *Conditions Relating to this Report*

The findings, results, observations, conclusions and recommendations given in this report are based on the author’s best scientific and professional knowledge as well as available information and knowledge of the area.

This report may not be altered or added to without the prior written consent of the author. This restraint also refers to electronic copies of this report which are supplied as sub portion of other reports, including main reports. Similarly, any recommendations, statements, or conclusions drawn from or based on this report must specifically refer to this report. If such comments form part of a main report for this investigation, the report must be included in its entirety as an appendix or separate section to the main report.

1.3. Terms of Reference

Step 1: Site Sensitivity Verification Report

Prior to beginning the assessment, the current use of the land and the potential environmental sensitivity of the site as identified by the national web based environmental screening tool must be confirmed by undertaking an Initial Site Sensitivity Verification. The Initial Site Sensitivity Verification must be undertaken by an environmental assessment practitioner or a registered specialist with expertise in the relevant environmental theme being considered. The Initial Site Sensitivity Verification must be undertaken through the use of:

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

The outcome of the Initial Site Sensitivity Verification must be recorded in the form of a report that:

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

The site sensitivity verification report was completed by the environmental assessment practitioner and was included in the Scoping and Environmental Impact Assessment reports.

The outcome of the site sensitivity verification report concerning plant sensitivity of proposed development site and surrounds can be summarised as below:

The Department of Environmental Affairs screening report from the national web based environmental screening tool reported a “Low sensitivity for plant species theme”. Figure 1 depicts the property on which mining activities area proposed which falls within Low Plant Species Sensitivity areas (refer to figure 1 below). During the site verification inspections, it was found that all proposed mining activities are on annually cultivated agricultural land with no indigenous vegetation species recorded on the proposed mining areas, a Terrestrial Plant Compliance Statement was therefore proposed to be provided.

MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY



Where only a sensitive plant unique number or sensitive animal unique number is provided in the screening report and an assessment is required, the environmental assessment practitioner (EAP) or specialist is required to email SANBI at eiadatarequests@sanbi.org.za listing all sensitive species with their unique identifiers for which information is required. The name has been withheld as the species may be prone to illegal harvesting and must be protected. SANBI will release the actual species name after the details of the EAP or specialist have been documented.

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

Figure 1: Plant sensitivity map generated by the national web based environmental screening tool for proposed mining areas on Farm Doornfontein RE/4/814, indicating location and plant sensitivity of the proposed mining areas.

Step 2: Terrestrial Plant Species Compliance Statement

This compliance statement reports on the findings of the terrestrial plant sensitivity verification and site survey that was conducted by Nicolaas Hanekom.

The compliance statement must:

- be applicable to the study area;
- confirm that the study area is of “low” sensitivity for terrestrial plant species; and
- indicate whether or not the proposed development will have any impact on SCC.

The terrestrial plant compliance statement, must contain, as a minimum, the following information:

- contact details and relevant experience as well as the SACNASP registration number of the specialist preparing the compliance statement including a curriculum vitae; **Refer to cover page, section 1.1. and Appendix A of this report**
- A signed statement of independence by the specialist; **Refer to page 2 of this report**
- A statement on the duration, date and season of the site inspection and the relevance of the season to the outcome of the assessment; **Refer to section 2.**
- a description of the methodology used to undertake the site survey and prepare the compliance statement, including equipment and modelling used where relevant; **Refer to section 3**
- where required, proposed impact management actions and outcomes or any monitoring requirements for inclusion in the EMPr; **Refer to Section 4**
- a description of the assumptions made as well as any uncertainties or gaps in knowledge or data; and **Refer to Section 5**
- the mean density of observations/ number of samples sites per unit area; **Refer to Section 6**
- any conditions to which the compliance statement is subjected. **Refer to Sections 4 and 7**

Step 3: Reporting

A signed copy of the compliance statement must be appended to the Basic Assessment Report or Environmental Impact Assessment Report.

2. BASELINE PROFILE DESCRIPTION OF BIODIVERSITY AND ECOSYSTEMS, INCLUDING A STATEMENT ON THE DURATION, DATE AND SEASON OF THE SITE INSPECTION AND THE RELEVANCE OF THE SEASON TO THE OUTCOME OF THE ASSESSMENT

The proposed property, Farm Doornfontein RE/4/814 size 200.82ha is located approximately ±7km to the south of Malmesbury, within the municipal jurisdiction of Swartland Municipality. The property can be accessed via Main Road 174 (R302) which connects to the N1. The predominant land use in the surrounding area is agriculture and includes cultivated land used for grain production and vineyards. The property is used as an agricultural unit and is developed with infrastructure such as a farmhouse or labourer cottages. The site of the proposed 5ha sand mine has significantly been impacted upon by agricultural activities. The nearest non-perennial watercourse is located approximately 230m to the west of the proposed mine. A dry-pit sand and gravel mine of 5ha is assessed in this report. The average depth of mine-able sand spread over the mine area (5ha) is ±30 cm deep and the average depth of gravel, ±50 cm. The mining operator will first remove the topsoil layer (250mm) from block 1 and stockpile it on the to be mined block 2. The mineable sand and gravel will then be

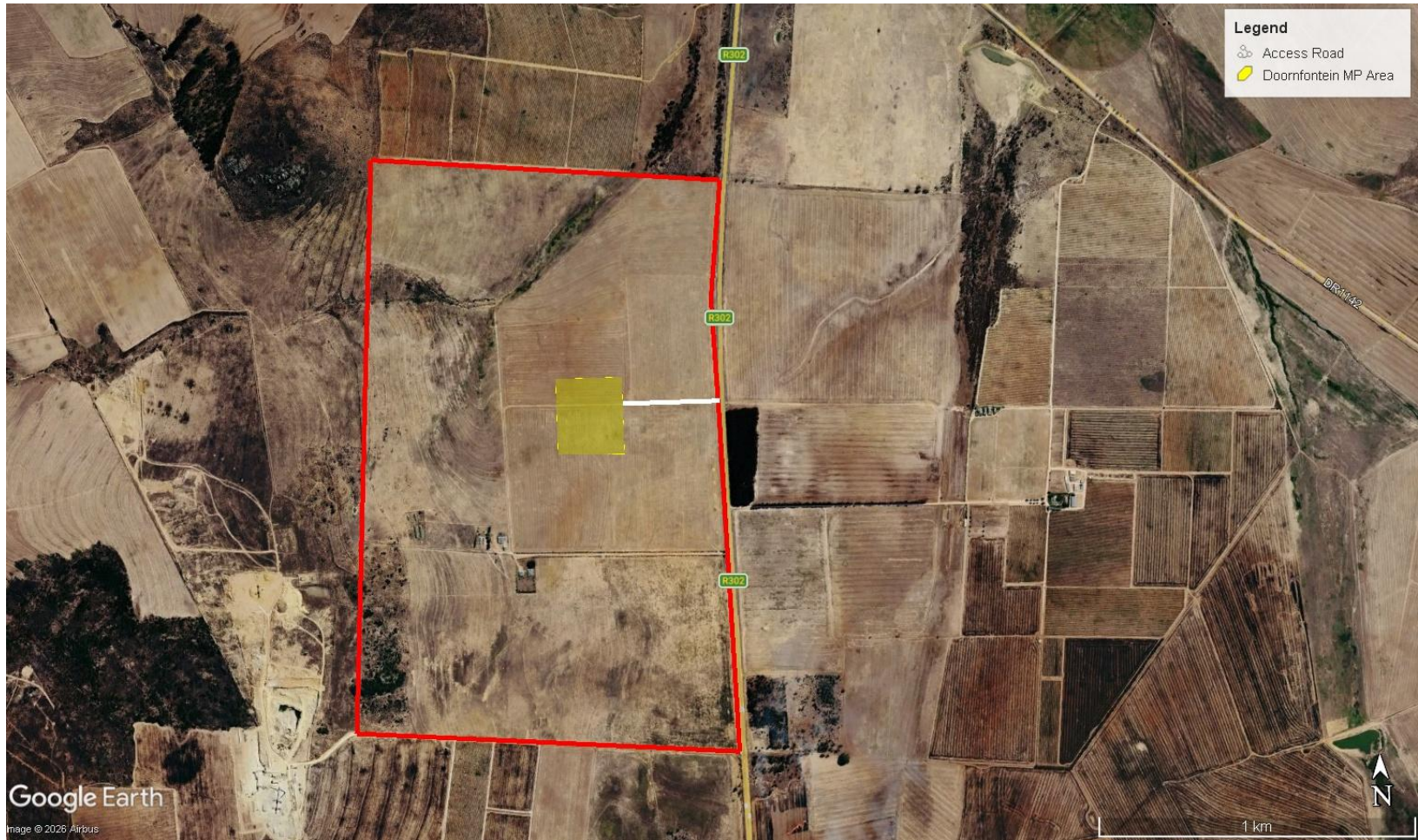
removed from block 1 by a front-end loader and loaded onto tip-trucks. When all mineable sand and gravel is removed from block 1, the stockpiled topsoil on block 2 is removed and immediately placed on block 1, leaving 500mm topsoil above the gravel / clay layer. Removal of topsoil from block 2 commences and is stockpiled on block 3, where after mining on block 3 commence. Concurrent mining and rehabilitation continue until the sand resource on the 6 mining blocks is removed. The mining process reduced the depth of the sand but, following the recommended rehabilitation measures, will leave a minimum of 500 mm of topsoil.

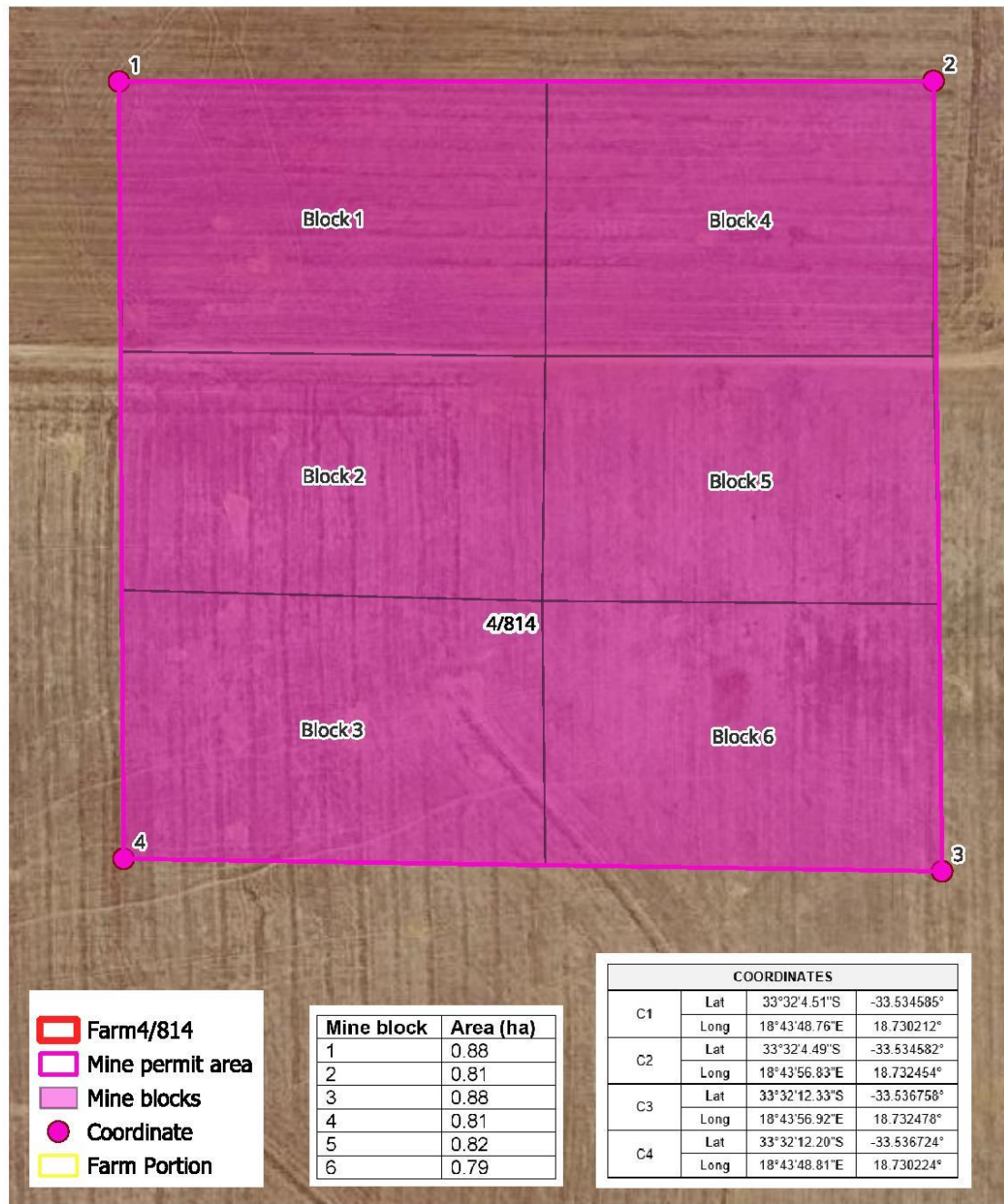
The proposed 5ha mining areas are not located on any mapped terrestrial CBA or ESA areas. Existing farm roads will remain and be used as is during the proposed mining activities and maintained as per current farming practices. The access road from the R302 to be used does not cross a terrestrial CBA or ESA area nor any indigenous vegetation areas.

The site is totally transformed, and the site and bigger area is part of a ploughed and cultivated land with no Swartland Shale Renosterveld habitat on site and cannot be restored to Swartland Shale Renosterveld.



Figure 2: Locality of Farm Doornfontein RE/4/814, Malmesbury, Western Cape.





MINE LAYOUT PLAN

Farm 4/814, Malmesbury RD

0 20 40 60 80 m



15/08/2026

P.O. Box 557, Moorreesburg, 7310, 022 4334408, 0722026587, planscape@telkomsa.net

Maps 3.1 and 3.2: Proposed 5ha mining permit area phases and access road on Farm Doornfontein RE/4/814, Malmesbury, WC

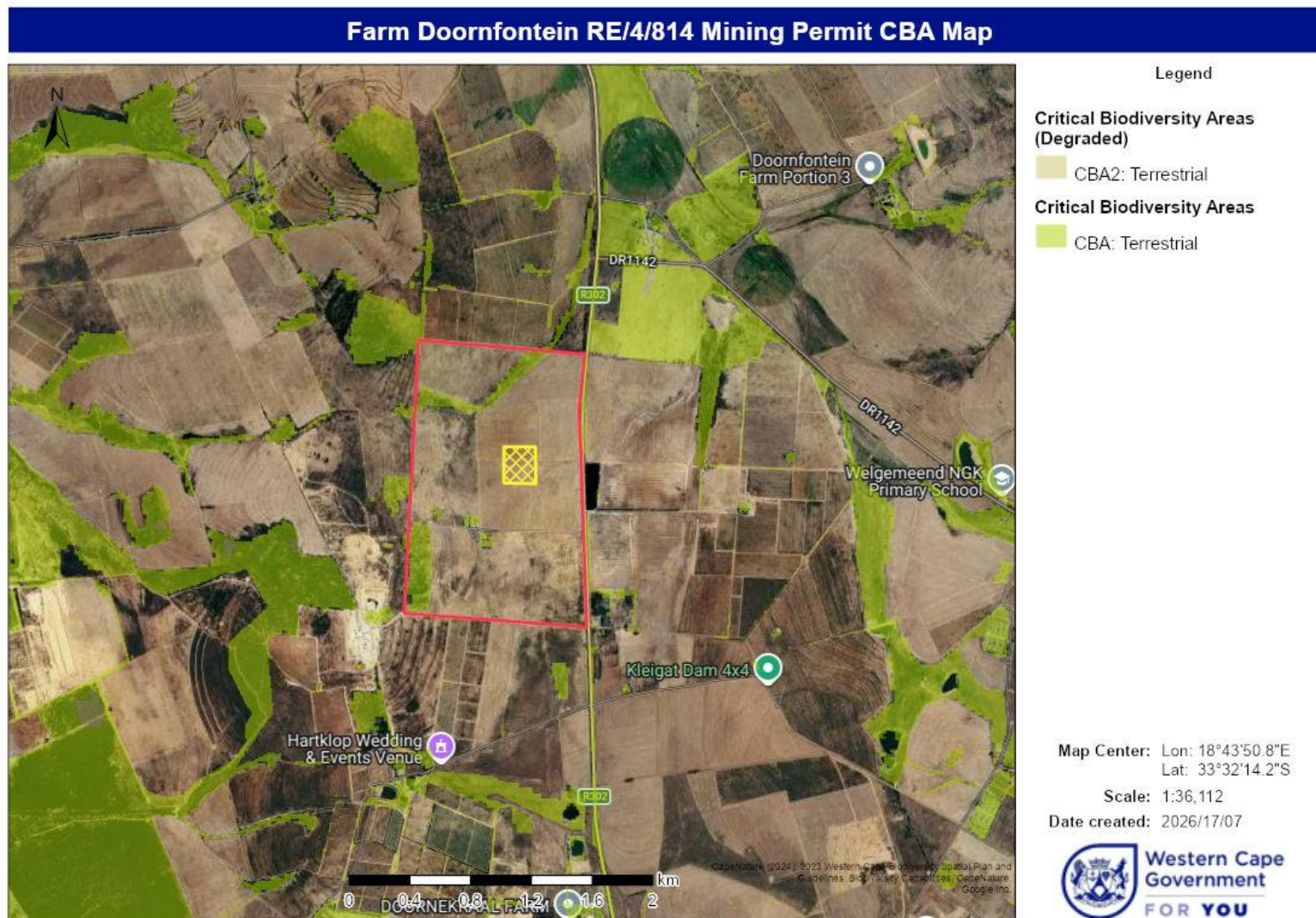


Figure 4: WCBSP 2023 CBA and ESA map in relation to the proposed mining activities areas on Farm Doornfontein RE/4/814 near Malmesbury in the Western Cape.



Photograph 1: View of mine area.



Photograph 2: View of mine area

3. A DESCRIPTION OF THE METHODOLOGY USED TO UNDERTAKE THE SITE SURVEY AND PREPARE THE COMPLIANCE STATEMENT, INCLUDING EQUIPMENT AND MODELLING USED WHERE RELEVANT

A literature review and desktop analysis were undertaken prior to the field investigation, utilizing various sources including the South African National Biodiversity Institute (SANBI) data and other relevant sources. Recent and historical aerial imagery of the site was reviewed in order to identify points for investigation during the field survey. Utilising the above information, a field investigation was undertaken whereby:

- Where present sites of geomorphological or topographic variance were identified and subjected to an evaluation of species present within transects established across the selected site.
- Where present indigenous species were identified and collated.
- Additional random sample points were selected from other similar sites (if present) surrounding the proposed impacted areas for comparative purposes.

The assessments entailed both a literature review of the region, as well as on site evaluations, during which specific primary data was collected and evaluated. In addition, the identification of key ecological features was undertaken allowing for the interpretation of the prevailing habitat form and associated processes.

All data collected in the field and during the literature review was evaluated and interpreted in order to provide an understanding of the nature of the prevailing environment at a landscape and habitat level. In addition, specific evaluation of data relating to habitat form and structure was undertaken, aiding in the identification of bio-physical anomalies within the prevailing environment. Such variance may be considered to be indicative of differing forms, which under consideration, may be of higher order ecological value in relation of the prevailing environment.

The study area was surveyed on foot, and all indigenous plant species recorded if present on the proposed development site. Indigenous plants species within the immediate surrounds were not recorded, but the overall state and coverage of the remaining indigenous vegetation remnants were noted. Various transects were conducted to cover the area. Particular attention was paid to the presence of potential flora Species of Conservation Concern on the proposed mining activities areas. Site photographs were taken.

4. WHERE REQUIRED, PROPOSED IMPACT MANAGEMENT ACTIONS AND OUTCOMES OR ANY MONITORING REQUIREMENTS FOR INCLUSION IN THE EMPR

Mining can have both direct and indirect impacts on plant species of the development sites and surrounds. Direct impacts are those that destroys indigenous plant species. Indirect impacts are those that may overtime lead to degradation or transformation of indigenous plant species habitats such as erosion and alien vegetation encroachment.

The proposed mining activities can have the following potential impacts on indigenous plant species of the site and surrounds:

- Destruction/removal of indigenous vegetation due to clearance and erosion.
- Degradation of adjacent indigenous vegetation areas due to alien vegetation

encroachment.

The following impact management measures must be implemented and included in the EMP, and should they be implemented the proposed mining expansion activities should not have any significant negative impacts on any indigenous plant species on the site or surrounds:

- Alien invasive and weed vegetation monitoring and removal must be undertaken annually during mining and for at least a year after mining activities have ceased on disturbed areas or until the landowner starts with the annual cultivation activities on the affected land. This must be done by the applicant, landowner or their appointed contractor, using CapeNature approved methodology depending on the contract agreement that the applicant has with the landowner. All invasive alien species as listed by the Conservation of Agricultural Resources Act (CARA) must be removed during these surveys. Declared weeds and aliens must be removed before annual seeding.
- Remove and conserve topsoil layer and overburden material for rehabilitation after mining activities have ceased. Topsoil and overburden materials must be stored separately adjacent to the mining areas on cultivated land with effective storm water runoff and erosion prevention measures to be implemented in order to protect the materials for rehabilitation.
- Implement erosion and storm water runoff management measures as according to EMP and stormwater management plan requirements to prevent (or if prevention is not possible limit) any erosion from occurring on the mining activity areas and surrounds; and any storm water runoff from the mining areas and topsoil and overburden storage areas.
- As the excavation of the quarry advances the stored overburden material must be replaced to backfill the excavations. The backfilled area must then be contoured according to existing surrounding contours of the cultivated land to prevent erosion. After contouring has been completed the stored topsoil material must be spread over the backfilled area. Only use topsoil as derived and conserved from the proposed mining area to be rehabilitated after mining activities have ceased on the property. The topsoil must not be compacted after spreading to allow the disturbed area to be restored. The site must be monitored regularly (at least 6 monthly and after heavy rains) and all signs of erosion immediately rectified and alien vegetation removed to prevent potential siltation, erosion and alien encroachment of natural areas and drainage lines.
- No disturbance should be allowed within the remaining indigenous vegetation areas. This includes no dumping of fill, no roads, and all forms of temporary disturbance. No natural vegetation areas edges may be cleared or impacted upon by the proposed mining activities and no mining machinery may enter any indigenous vegetation areas outside of existing access roads to be used.
- The project implementation process should be subject to standard Environmental Management Programme (EMP) prescripts and conditions and only proceed under supervision of a competent and diligent Environmental Control Officer, both during the operational/excavation and rehabilitation phases.

5. A DESCRIPTION OF THE ASSUMPTIONS MADE AND ANY UNCERTAINTIES OR GAPS IN KNOWLEDGE OR DATA

The timing of the survey is regarded as optimal in terms of accurately assessing the terrestrial plant species presence on the site. An accurate idea of the priority indigenous

habitat areas and sensitive ecological features was gained by inspecting the proposed development sites and surrounds and recording distribution and/or presence of indigenous vegetation habitats (if present), and confidence in the accuracy of the findings is very high. The overall confidence in the completeness and accuracy of the terrestrial plant species findings is considered to be very good. A follow-up survey is not considered essential for decision-making.

6. THE MEAN DENSITY OF OBSERVATIONS/ NUMBER OF SAMPLES SITES PER UNIT AREA

Sensitivity Mapping and Assessment (Site Ecological Importance)¹

Where the site-specific assessment produces lower or higher SEI classification than the 'environmental sensitivity' output of the screening tool for that particular site, it is the responsibility of the specialist to provide a clear and defensible justification for the difference. SEI is considered to be a function of the biodiversity importance (BI) of the receptor (e.g. species of conservation concern, the vegetation/fauna community or habitat type present on the site and its resilience to impacts (receptor resilience [RR]) as follows:

$$SEI = BI + RR$$

BI in turn is a function of conservation importance (CI) and the functional integrity (FI) of the receptor as follows:

$$BI = CI + FI$$

Conservation importance (CI) is evaluated in accordance with recognised established internationally acceptable principles and criteria for the determination of biodiversity-related value, including the IUCN Red List of Species, Red List of Ecosystems and Key Biodiversity Areas (KBA; IUCN [2016]).

Conservation importance is defined here as:

"The importance of a site for supporting biodiversity features of conservation concern present, e.g. populations of IUCN threatened and Near Threatened species (CR, EN, VU and NT), Rare species, range-restricted species, globally significant populations of congregatory species, and areas of threatened ecosystem types, through predominantly natural processes."

These criteria are defined as follows:

IUCN threatened and Near Threatened species (CR, EN, VU and NT) are defined as either the global or national assessments of the risk of extinction as evaluated by a dedicated panel of species specialists according to the criteria of the International Union for The Conservation of Nature (www.iucnredlist.org). Where the global and national assessments differ for the same taxon, the national evaluation of status should be used in calculating SEI unless the global assessment is both more recent and of a more threatened category. It is important to note that the specialist is required to have a firm understanding of the IUCN Red List Categories and Criteria (IUCN 2012) in order to appropriately apply these for the

¹ South African National Biodiversity Institute (SANBI). 2020. Species Environmental Assessment Guideline. Guidelines for the implementation of the Fauna and Flora Species Protocols for environmental impact assessments in South Africa. South African National Biodiversity Institute, Pretoria. Version 4.1 2026.

evaluation of SEI. This criterion can be assessed using confirmed occurrences of species or the suitability of the habitat to support these species.

Rare species are those included on South Africa's National Red List as Rare or Critically Rare or Extremely Rare. These are highly restricted species that are currently not declining. However, should any development impact on a population of these species they will immediately qualify under one of the IUCN categories of threat.

Range-restricted species – the presence of terrestrial flora, vertebrate and invertebrate fauna with a global population extent of occurrence (EOO) of 10 000 km² or less.

Globally significant populations of congregatory species – a roughly estimated proportion (%) of the global population of a fauna species that congregate for breeding/feeding/hibernation/other reasons.

Significant areas of threatened vegetation types – this is a function of both the area (size) being considered in relation to the total extent of that vegetation type (i.e. proportion) and how threatened (CR, EN, VU) the vegetation types are.

Natural processes – natural unmanaged areas with low levels of ecological disturbance have largely intact natural processes such as pollination, seed dispersal and migration, and thus have greater intrinsic conservation importance than those that are modified through ecological disturbance.

While most of the features that will be included in the CI will be provided by the screening tool, it is important to note that CI is evaluated at a much finer spatial scale and based on fieldwork data collection and comprehensive desktop analyses performed by the specialist during the EA process. As a minimum requirement, CI needs to be determined for each identified habitat within the project footprint/PAOI, but best practice recommendation is that it should be determined for all habitats within the entire PAOI.

Fulfilling criteria to evaluate CI do not rely on a single specific threshold for each of the above defining characteristics but can act in combination or in isolation, providing a more robust evaluation of CI as per table below.

Conservation importance	Fulfilling criteria
Very high	Confirmed or highly likely occurrence of CR, EN, VU or Extremely Rare or Critically Rare species that have a global EOO of < 10 km ² . Any area of natural habitat of a CR ecosystem type or large area (> 0.1% of the total ecosystem type extent) of natural habitat of EN ecosystem type. Globally significant populations of congregatory species (> 10% of global population).
High	Confirmed or highly likely occurrence of CR, EN, VU species that have a global EOO of > 10 km ² . IUCN threatened species (CR, EN, VU) must be listed under any criterion other than A, if listed as threatened only under Criterion A, include if there are less than 10 locations or <

	10 000 mature individuals remaining. Small area (> 0.01% but < 0.1% of the total ecosystem type extent) of natural habitat of EN ecosystem type or large area (> 0.1%) of natural habitat of VU ecosystem type. Presence of Rare species. Globally significant populations of congregatory species (> 1% but < 10% of global population).
Medium	Confirmed or highly likely occurrence of populations of NT species, threatened species (CR, EN, VU) listed under Criterion A only and which have more than 10 locations or more than 10 000 mature individuals. Any area of natural habitat of threatened ecosystem type with status of VU. Presence of range-restricted species. > 50% of receptor contains natural habitat with potential to support SCC.
Low	No confirmed or highly likely populations of SCC. No confirmed or highly likely populations of range-restricted species. < 50% of receptor contains natural habitat with limited potential to support SCC.
Very low	No confirmed and highly unlikely populations of SCC. No confirmed and highly unlikely populations of range-restricted species. No natural habitat remaining.

Furthermore, while CI is most likely to be assessed based on data collected during the fieldwork survey, it can also be an assessment of the suitability of the receptor to support populations conforming to the fulfilling criteria. As can be seen from the worked example below, each of these evaluations of the fulfilling criteria demand necessary justification.

Functional integrity (FI) of the receptor (e.g. the vegetation/fauna community or habitat type) is defined here as the receptors' current ability to maintain the structure and functions that define it, compared to its known or predicted state under ideal conditions. Simply stated, FI is:

'A measure of the ecological condition of the impact receptor as determined by its remaining intact and functional area, its connectivity to other natural areas and the degree of current persistent ecological impacts.'

These criteria can be defined as:

- Connectivity to other natural areas – connectivity, which can also be measured conversely as the degree of habitat fragmentation, refers to how connected habitat patches are to each other, which has a significant influence on numerous ecological process, such as migration and dispersal opportunities of biota and therefore genetic exchange between populations. Connectivity to other similar habitats becomes more important as the remaining intact and functional area of a habitat decreases, mainly because population sizes decrease and are therefore at greater risk from ecological perturbations and inbreeding effects. The degree of connectivity between habitat patches varies greatly with the dispersal ability of the taxon or taxon group (e.g. fossorial reptiles) in question.
- Degree of current persistent negative ecological impacts – persistent negative impacts

such as uncontrolled spread of alien and invasive flora effectively decreases both the remaining intact area and ecosystem functioning of a particular habitat.

- Remaining intact and functional area – the proportion of the receptor that supports natural habitat with intact ecological processes – small areas are less likely to withstand ecological degradation compared to large areas, and the latter are therefore better able to maintain structure and function allowing for intact ecological processes.

$$SEI = BI + RR$$

BI in turn is a function of conservation importance (CI) and the functional integrity (FI) of the receptor as follows:

CI = **very low**. The site is totally transformed, and the site and bigger area is part of a ploughed and cultivated land with no Swartland Shale Renosterveld habitat on site and cannot be restored to Swartland Shale Renosterveld.

FI = **very low**. No functionality left and surrounded by agricultural lands.

$$BI = CI + FI$$

Therefore, using table below, the BI was assessed to be **very low** (CI **very low** = and FI = **very low**)

Recalling that biodiversity importance (BI) is a function of conservation importance (CI) and the functional integrity (FI) of a receptor, BI can be derived from a simple matrix of CI and FI as per table below.

Biodiversity importance		Conservation importance				
		Very high	High	Medium	Low	Very low
Functional integrity	Very high	Very high	Very high	High	Medium	Low
	High	Very high	High	Medium	Medium	Low
	Medium	High	Medium	Medium	Low	Very low
	Low	Medium	Medium	Low	Low	Very low
	Very low	Medium	Low	Very low	Very low	Very low

Receptor resilience (RR) is defined here as:

'The intrinsic capacity of the receptor to resist major damage from disturbance and/or to recover to its original state with limited or no human intervention.'

The fulfilling criteria to evaluate RR are based on the estimated recovery time required to restore an appreciable portion of functionality to the receptor (refer to table below) and will require justification by the specialist. The specialist needs to bear in mind that resilience will

often be linked to a particular disturbance or impact, or even time of year, and needs to be described in relation to these factors. Receptor resilience needs to be evaluated by the specialist and justification for each evaluation must be provided in the report.

Resilience	Fulfilling criteria
Very high	Habitat that can recover rapidly (~ less than 5 years) to restore > 75% of the original species composition and functionality of the receptor functionality, or species that have a very high likelihood of remaining at a site even when a disturbance or impact is occurring, or species that have a very high likelihood of returning to a site once the disturbance or impact has been removed.
High	Habitat that can recover relatively quickly (~ 5–10 years) to restore > 75% of the original species composition and functionality of the receptor functionality, or species that have a high likelihood of remaining at a site even when a disturbance or impact is occurring, or species that have a high likelihood of returning to a site once the disturbance or impact has been removed.
Medium	Will recover slowly (~ more than 10 years) to restore > 75% of the original species composition and functionality of the receptor functionality, or species that have a moderate likelihood of remaining at a site even when a disturbance or impact is occurring, or species that have a moderate likelihood of returning to a site once the disturbance or impact has been removed.
Low	Habitat that is unlikely to be able to recover fully after a relatively long period: > 15 years required to restore ~ less than 50% of the original species composition and functionality of the receptor functionality, or species that have a low likelihood of remaining at a site even when a disturbance or impact is occurring, or species that have a low likelihood of returning to a site once the disturbance or impact has been removed.
Very low	Habitat that is unable to recover from major impacts, or species that are unlikely to remain at a site even when a disturbance or impact is occurring, or species that are unlikely to return to a site once the disturbance or impact has been removed.

The receptor resilience should be an assessment of whether the ecosystem in its current condition is resilient to disturbance and not the resilience of the original ecosystem to past disturbances unrelated to the proposed development.

The RR = **very high**. The site is totally transformed, and the site and bigger area is part of a ploughed and cultivated land with no Swartland Shale Renosterveld habitat on site and cannot be restored to Swartland Shale Renosterveld.

SEI (**very low**) = BI (**very low**) + RR (**very high**)

Site ecological importance		Biodiversity importance				
		Very high	High	Medium	Low	Very low
Receptor resilience	Very low	Very high	Very high	High	Medium	Low
	Low	Very high	Very high	High	Medium	Very low
	Medium	Very high	High	Medium	Low	Very low
	High	High	Medium	Low	Very low	Very low
	Very high	Medium	Low	Very low	Very low	Very low

Guidelines for interpreting SEI in the context of the proposed development activities.

Site ecological importance	Interpretation in relation to proposed development activities
Very high	Avoidance mitigation – no destructive development activities should be considered. Offset mitigation not acceptable/not possible (i.e. last remaining populations of species, last remaining good condition patches of ecosystems/ unique species assemblages). Destructive impacts for species/ecosystems where persistence target remains.
High	Avoidance mitigation wherever possible. Minimisation mitigation – changes to project infrastructure design to limit the amount of habitat impacted; limited development activities of low impact acceptable. Offset mitigation may be required for high impact activities.
Medium	Minimisation and restoration mitigation – development activities of medium impact acceptable followed by appropriate restoration activities.
Low	Minimisation and restoration mitigation – development activities of medium to high impact acceptable followed by appropriate restoration activities.
Very low	Minimisation mitigation – development activities of medium to high impact acceptable and restoration activities may not be required.

The PAOI mapped for this area in the screen toll report was very high. The assess Site Ecological importance is very low, which is confirmed by the fact that the area was not mapped CBA or ESA. As can be noted from the photograph and historical images, the area is ploughed and cultivated.

Standard methods of evaluation were used. A hand-held Garmin ® GPSMap 64s was used to record 'sample' waypoints and the 'sample track'. At the 'sample waypoints' specific details of the surrounding vegetation and features of habitat were recorded (if present), and photographs taken to support the general observations made on the site. Sampling was focused so as to obtain the best overall understanding of landscape and biodiversity conditions of the specific proposed mining areas, access roads and immediate surrounds.

The site visit was carried 24 June and 24 August 2026. The peak flowering time in this region is spring, which occurs from August to October. The survey was done in the optimal period. A field investigation was undertaken whereby a line transect to visit the site was conducted. This survey method is appropriate due to the transformed nature of the site and its surrounding areas. The overall confidence in the completeness and accuracy of the

terrestrial biodiversity findings at this point in time is considered to be good. A follow-up survey is not considered essential for decision-making.

7. ANY CONDITIONS TO WHICH THE COMPLIANCE STATEMENT IS SUBJECTED

It was concluded that should the proposed mitigation measures as listed under point 4 above be implemented that the overall significance of the impacts on plant sensitivity of the site and surrounds will be of overall low negative significance. All of the mitigation and monitoring measures as listed under point 4 above must be included as part of the Environmental Management Programme conditions to be adhered to before, during and after the proposed mining activities.

8. REFERENCES

Brownlie, S. 2005. Guideline for Involving Biodiversity Specialists in EIA Processes: Edition 1. CSIR Report No ENV-S-C 2005 053 C. Provincial Government of the Western Cape, Department of Environmental Affairs & Development Planning, Cape Town. 63 pp.

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Department of Water Affairs and Forestry (DWAF). 2008. Updated Manual for the Identification and Delineation of Wetlands and Riparian Areas.

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APPENDIX A SPECIALIST CV

CURRICULUM VITAE – NICOLAAS WILLEM HANEKOM

Profession: Environmental Scientist and Environmental Assessment Practitioner

Date of Birth: 01/02/1967

BIOGRAPHICAL SKETCH

Nicolaas Hanekom is a qualified Environmental Assessment Practitioner ("EAP") who holds a Masters Technologiae, Nature Conservation ("Vegetation Ecology and Biodiversity Assessment") degree from the Cape Peninsula University of Technology. Nicolaas is certified in terms of section 20(3)(a) of the Natural Scientific Professions Act, 2003 (Act 27 of 2003), as a Professional Natural Scientist (Ecological Science) Registration Number: 4008274/11. He further qualified in Environmental Management Systems ISO 14001:2004, at the Centre for Environmental Management, North-West University, as well as Environmental Management Systems ISO 14001:2004 Audit: Internal Auditors Course to ISO 19011:2003 level, from the Centre for Environmental Management, North-West University qualifying him to execute audits to ISO/SANS environmental compliance and EMS standards.

He has also completed the suite of Greener Governance courses with certificates in;

- An Overview of Environmental Management at the Local Government Level, Centre for Environmental Management, North-West University;
- Greener Governance for Local Authorities, Centre for Environmental Management, North-West University;
- Tools for Integrated Environmental Management and Governance, Centre for Environmental Management, North-West University.

He further attended and obtained a certificate on Integrated Protected Area Planning at the Centre for Environmental Development, University of Kwa Zulu Natal and a certificate in Project Management (Theory and Practical), through CS Holdings. Nicolaas has lectured in two subjects at the Cape Peninsula University of Technology. He has 26 years of environmental planning experience, working for Free State and Western Cape departments of environmental affairs, where he reviewed and commented on development (EIA) applications, in the West Coast Region.

He has, as practising EAP been responsible for many environmental impact assessments and EIA applications, waste license and atmospheric emission license applications.

He has also been involved in the implementation of several environmental management

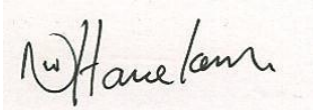
systems. He has engaged successfully with various clients as set out below.

Areas of specialisation:	• Ecosystem (terrestrial and aquatic) monitoring and assessments • Design of monitoring programmes for ecosystems (terrestrial and aquatic) • Environmental Impact Assessments • River classification and environmental water requirements • Wetlands Delineation • River and Wetlands management • Water Use Authorization Applications • Water quality management • River Health Assessments
Countries of Work Experience:	South Africa (Northern Cape, Western Cape, Free State, Mpumalanga, Gauteng)
Employment Record	• Student at Bontebok National Park (1992) • Assistant Reserve Manager at Gariep Dam Nature Reserve, Free State (1993 - 1998) • Reserve Manager, Conservation Services Manager for Western Cape Nature Conservation Board (1998 - 2006) • External Lecturer at Cape Peninsula University of Technology (2003 - 2005) • Director: Environmental Management at Cape Lowlands Environmental Services (2006 – 2010) • Director, Environmental Management and lead Environmental Impact Assessment Practitioner at Eco Impact (Pty) Ltd (2010 – to August 2019) • Director, Environmental Management and lead Environmental Impact Assessment Practitioner at Enviro-EAP (Pty) Ltd (September 2019 – to date)
Professional membership, accreditations and courses	• South African Council for Natural Scientists Professions Pri.Sci.Nat (Ecological Science) • Riparian vegetation identification and health assessment. Internal Western Cape Nature Conservation short course presented by Dr C Boucher (Stellenbosch University) in 2000. • SASS5 Aquatic Biomonitoring Training Course. 2 to 5 September 2013. Ground Truth Water and Environmental Engineering consultancy in partnership with the Department of Water Affairs. • Workshop on “Section 21(c) and (i) Water Use Training: Understanding Watercourses and Managing Impacts to their Characteristics”. 10 May 2017. Presented by Dr Wietsche Roets of the Department of Water and Sanitation (Sub-Directorate: Instream Water Use).
Summary of experience	1992: South African National Parks. Student at Bontebok National Park with management and monitoring actions related to the Breede River. 1993 -1998: Free State Nature Conservation. Ecological management and monitoring actions related to the Gariep Dam, Orange and Caledon Rivers. 1998 -2006: CapeNature. Ecological management and monitoring actions related to the Berg River Estuary, Verlorenvlei, Lamberts bay's Jackalsvlei, Wadriht Soutpanne, Oliphant's River mouth, Rocherpan Nature Reserve, etc. Review and assessment of EIA applications, inclusive of Freshwater ecology. Did some site visits with Department of Water Affairs and Forestry (Hester Lyons) to confirm the presence of aquatic ecological features during EIA water use registration

	applications. 2006 to date: Cape Lowland Environmental Services, Eco Impact Legal Consultant and Enviro-EAP. Ecological (Freshwater and aquatic) Specialist input, assessment, monitoring and reports.
Publications and assessment reports	Just to name a few. Was involved in many Ecological Assessments, monitoring and inputs in EIA applications. • Elandskloof Farm 475 Citrusdal Biodiversity Baseline Survey. August 2010. This Biodiversity Assessment Covering Terrestrial and Aquatic Aspects to Inform Decisions Regarding The Proposed Elandskloof Weir Flood Damage Project On Farm 475, In The Citrusdal Area. • Cape Solar Energy Electricity Generation Facility. Farm 187/3 & 187/13 Kenhardt. Biodiversity And Ecological Baseline Survey. January 2011. (Included Terrestrial and aquatic ecological assessments and water use authorization applications) • Prieska Photovoltaic Power Generation Project. Prieska Commonage Northern Cape. Biodiversity And Ecological Baseline Survey. July 2011. (Included Terrestrial and aquatic ecological assessments and water use authorization applications) • Witteklip Erf 123 Extension, Vredenburg. Biodiversity Baseline Survey. Updated - October 2012 (Included Terrestrial and aquatic ecological assessments and water use authorization applications) • Baseline Biodiversity Survey And Wetland Delineation for ECCA Holdings: Cape Bentonite Mine on Erf 1412 Near Heidelberg. Prepared for: Shangoni Management Services Pry (Ltd). October 2014. • Freshwater Impact Assessment Laingsburg Flood Damage Repairs & Storm Water Infrastructure. 18 February 2016. • Ecological Assessment for Swartland Municipality - Upgrades To Voortrekker/Bokomo Road And Voortrekker/Rozenburg Road Intersections and Upgrade to the Diep River Bridge, Malmesbury on A Portion Of Erf 327, Malmesbury (Road) Erf 1530, Diep River Bridge Crossing, and Erf 1528, Property South of Diep River where Road Widening and Turning Circle Will Be Constructed. March 2016. (Freshwater Ecology Inputs and Water Use Registration) • Freshwater Impact Assessment. McGregor Bridge, Robertson Bridge and Willem Nels River Maintenance Management Plan. 24 June 2016. (Freshwater Ecology assessment and input as well as Water Use Registration) • Water Use Authorization Application Risk Matrix. Orange Grove Trust Vegetation Clearing and Agricultural Development on Portion 4 of Farm Glen Heatlie No 316, Worcester. 12 June 2017. (Freshwater ecological inputs in EIA process and Water Use Registration). • Water Use Authorization Application Risk Matrix Prepared For: Witzenberg Municipality Sand Mine Farm 1 Prince Alfred Hamlet. 28 March 2017. (Freshwater ecological inputs in EIA process and Water Use Registration). • Proposed Hartmanshoop Agri Vegetation Clearing Project and Irrigation on Erf 686, Laingsburg. 12 August 2017. (Freshwater ecological inputs in Water Use Registration). • County Fair: Hocraft Abattoir And Rendering Facility Waste Water Treatment Works "CF Hocraft WWTW" Mosselbank River Second Quarter 2018 Biomonitoring Report. June 2018. (Done quarterly biomonitoring for the last three years).

CERTIFICATION

I, the undersigned, certify that to the best of my knowledge and belief, these data correctly describe my qualifications, my experience, and me.

A handwritten signature in black ink on a light-colored background. The signature appears to read 'N. Hanekom' with a stylized, cursive script.

Nicolaas Hanekom Pri Sci Nat (Ecology).
Registration number 004415