

PUBLIC PARTICIPATION INFORMATION

REQUEST FOR THE ADOPTION OF A MAINTENANCE MANAGEMENT PLAN FOR THE PROPOSED REHABILITATION OF A WETLAND PORTION ON ERF 8308, GRABOUW.

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1.1. Initial I&AP List

ORGANS OF STATE		
State Department	Name of person	Contact Details
DEA&DP	D'mitri Matthews	Tel: (021) 483 8350 Email: DEADPEIAadmin@westerncape.gov.za Dmitri.Matthews@westerncape.gov.za ayasha.hamdulay@westerncape.gov.za Address:
Cape Nature	Rhett Smart	Tel:087 087 8017 / 072 835 8741 Email: rsmart@capenature.co.za; aduffell-canham@capenature.co.za Address:
BOCMA	Fabion Smith	Tel: 023 346 8000 Email: fsmith@bocma.co.za; erossouw@bocma.co.za; info@bocma.co.za; Address: Corner Mountain Mill and East Lake Roads, Worcester, 6850 Private BagX 3055, Worcester, 6850
Theewaterskloof Local Municipality	Johan Viljoen	Tel: 082 499 5724. Email: johanvi@twk.org.za Address

1.2. Revised I&AP List

ORGANS OF STATE		
State Department	Name of person	Contact Details
DEA&DP	D'mitri Matthews	Tel: (021) 483 8350 Email: DEADPEIAadmin@westerncape.gov.za; Marbe.Coetzee@westerncape.gov.za; Dmitri.Matthews@westerncape.gov.za; Address:
Cape Nature	Rhett Smart	Tel:087 087 8017 / 072 835 8741 Email: rsmart@capenature.co.za Address:
BOCMA	Vhengani Ligudu	Tel: 023 346 8000 Email: vligudu@bocma.co.za; info@bocma.co.za; vmyeza@bocma.co.za; crautenbach@bocma.co.za Address: Corner Mountain Mill and East Lake Roads, Worcester, 6850 Private BagX 3055, Worcester, 6850
Theewaterskloof Local Municipality	Johan Viljoen and Janine Joorst	Tel: 082 499 5724. Email: johanvi@twk.org.za; janinebe@twk.gov.za Address

2.1. Written Notice Provided to Commenting Authorities dated 20 June 2024



COMMENT PERIOD FOR THE ESTABLISHMENT PLAN FOR AN OFF-SITE WETLAND NORTH AND EAST OF THE ELGIN POULTRY ABATTOIR, ERF 8611, GRABOUW
DEA&DP Ref.: 16/3/1/1/E4/11/2068/14

20 June 2024

An Environmental Authorisation (EA) for the extension of the Elgin Poultry Abattoir in Grabouw Industria was granted in 2015 by the Department of Environmental Affairs and Development Planning (DEA&DP). Condition 19 of this EA requires the establishment of an off-site wetland north and east of the Elgin Poultry Abattoir, Erf 8611, Grabouw.

In compliance with Condition 19 of the EA we hereby submit the following document for comment: *The Wetland Rehabilitation and Maintenance Management Plan for the proposed rehabilitation of a wetland portion North and East of the Elgin poultry abattoir, Erf 8611, Grabouw* accompanied by the following appendices:

- Berry, M. (2024). Plant Search & Rescue Plan Wetland Rehabilitation, Elgin Free Range Chicken site, Grabouw (Appendix A)
- Grobler, D. and Belcher, T. (2014), Freshwater Assessment for Elgin Chicken Industrial Site in Grabouw Industrial Area (Appendix B)
- Environmental Authorisation (EA) for the proposed extension of the Elgin Poultry Abattoir in Grabouw Industria dated 24 February 2015 (Appendix C)
- Letter of Commitment between Elgin Free Range Chickens and Theewaterskloof Municipality for the establishment of a wetland on Erf 291 Portion 10, Grabouw dated 12 February 2015 (Appendix D)
- Finalised engineering design of the off-site wetland system compiled in conjunction with a suitably qualified freshwater specialist (Appendix E).

cell: 082 740 8046 | tel: (028) 312 1734 | fax: 086 508 3249 | paul@phsconsulting.co.za | PO Box 1752 | Hermanus 7200

PAUL SLABBERT | Managing Member | B Art Et Scien; (IAIA & AHAP)
Fynbosland 323 CC t/a PHS Consulting Reg 2005/081216/23

Project Name: Establishment of an off-site wetland North and East of the Elgin poultry abattoir, Erf 8611, Grabouw.

Nature and Location of Activity: The proposed development involves the rehabilitation of a wetland area located to the north and east of the Elgin Poultry Abattoir, Erf 8611, in Grabouw. The site is situated north of Grabouw Industria. These activities are in compliance with the Environmental Authorization granted in 2015 for the extension of the Elgin Poultry Abattoir in Grabouw Industria. The purpose of this development is to compensate for the loss of onsite wetland functionality that will occur during phase 2 of the approved expansion.

Consultant for more information:

PHS CONSULTING

PO Box 1752, Hermanus, 7200

Fax: 086 508 3249

e-mail: paul@phsconsulting.co.za or olivia@phsconsulting.co.za

A 30-day commenting period will be provided. Commenting Authorities are hereby requested to register comments with **PHS CONSULTING** from 20 June 2024 up to and including 22 July 2024 via the above-mentioned contact details.

You are receiving communication from us for professional reasons or as Interested and Affected Party only.

The Protection of Personal Information Act (POPIA) requires that we protect your information and that we obtain your consent to communicate with you in the future.

If you wish to be removed from any data list, simply state so or we will remove your detail after a project is completed. Note we will use your personal information confidentially and professionally.

cell: 082 740 8046 | tel: (028) 312 1734 | fax: 086 508 3249 | paul@phsconsulting.co.za | PO Box 1752 |
Hermanus 7200

PAUL SLABBERT | Managing Member | B Art Et Scien; (IAIA & AHAP)
Fynbosland 323 CC t/a PHS Consulting Reg 2005/081216/23

2.2. Email notification of Commenting Authorities on the 20th of June 2024

olivia@phsconsulting.co.za

From: olivia@phsconsulting.co.za
Sent: Thursday, 20 June 2024 13:55
To: 'info@bocma.co.za'; 'Fabion Smith'; 'Elkerine Rossouw'; 'aduffell-canham@capenature.co.za'; 'Rhett Smart'; 'ayesha.hamdulay@westerncape.gov.za'; 'DEADPEIAAdmin@westerncape.gov.za'; 'Dmitri.Matthews@westerncape.gov.za'; 'johanvi@twk.org.za'
Cc: 'Paul Slabbert'
Subject: Notification of Commenting Period - EFRC Wetland Rehabilitation
Attachments: Notification of Commenting Period - EFRC Wetland Rehabilitation.pdf; Off-Site Wetland Rehabilitation and Maintenance Management Plan_Elgin Poultry Abattoir_Erf 861_Grabouw-18 June 2024.pdf

Dear Commenting Authority,

An Environmental Authorisation (EA) for the extension of the Elgin Poultry Abattoir in Grabouw Industria was granted in 2015 by the Department of Environmental Affairs and Development Planning (DEA&DP). Condition 19 of this EA requires the establishment of an off-site wetland north and east of the Elgin Poultry Abattoir, Erf 8611, Grabouw.

In compliance with Condition 19 of the EA, notice is hereby given of a 30-day Commenting Period for the Wetland Rehabilitation and Maintenance Management Plan.

Please find the notification letter as well as all relevant documentation for commenting purposes attached.

Commenting Authorities are hereby requested to register comments with PHS CONSULTING from 20 June 2024 up to and including 22 July 2024 via the above-mentioned contact details.

Please do not hesitate to contact me should you require additional information.

Regards
Olivia Brunings
BSc Conservation Ecology
Candidate Natural Scientist (154065)

PHS Consulting
Environmental, Heritage, Eco-Tourism and Land-Use
Cell: 076 849 5969
Email: olivia@phsconsulting.co.za
Website: www.phsconsulting.co.za
Company postal address: PO Box 1752, Hermanus, 7200

You are receiving communication from us for professional reasons or as Interested and Affected Party only. The Protection of Personal Information Act (POPIA) requires that we protect your information and that we obtain your consent to communicate with you in the future. If you wish to be removed from any data list, simply state so, or we will remove your detail after a project is completed. Note we will use your personal information confidentially and professionally.

3.1. Register of I&AP

Name	Presenting Unit	Date of Comments	Preferred Method of Communication
Vhengani Ligudu	BOCMA	22 July 2024	vligudu@bocma.co.za
Rhett Smart	CapeNature	26 July 2024	rsmart@capenature.co.za
D'mitri Matthews	DEADP	30 July 2024	Dmitri.Matthews@westerncape.gov.za

3.2.1. Email received from BOCMA on the 22nd of July 2024

olivia@phsconsulting.co.za

From: Vhengani Ligudu <vligudu@bocma.co.za>
Sent: Monday, 22 July 2024 16:01
To: olivia@phsconsulting.co.za
Cc: Vatiswa Myeza; Coreen Rautenbach
Subject: ERF 8611 Grabouw
Attachments: 4 10 2 g40c erf 8611 Caledon.pdf

Good day

Please see attached comments.

Kind regards

Ms Vhengani Ligudu
Designation: Water Use Officer



Tel: 023 346 8000 | Email vligudu@bocma.co.za
Corner Mountain Mill and East Lake Roads, Worcester, 6850 | Private BagX 3055, Worcester, 6850

3.2.2. Letter received from BOCMA on the 22nd of July 2024



BREED-OLIFANTS
CATCHMENT MANAGEMENT AGENCY

Cnr Mountain Mill & East Lake Road, Worcester 6850, Private Bag X3055 Worcester 6849

Enquiries: Vhengani Ligudu Tel: +27 23 346 8000 Fax: +27 23 347 2012 E-mail: vligudu@bocma.co.za

REFERENCE NO: 4/10/2/G40C/ERF 8611, GRABOUW
Date: 22/07/2024

PHS CONSULTING
P. O. Box 1752
Hermanus
7200

Attention: Olivia Brunings

RE: COMMENT PERIOD FOR THE ESTABLISHMENT PLAN FOR AN OFF-SITE WETLAND NORTH AND EAST OF THE ELGIN POULTRY ABATTOIR, ERF 8611, GRABOUW

With reference to the above-mentioned document received by this office with DEADP reference 16/3/1/1/E4/11/2068/14 on the **04/07/2024** requesting comments.

This office has reviewed the above-mentioned report and has the following comments:

1. All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered.
2. This office supports the rehabilitation plan of the offset site, however clarity must be provided regarding the following:
 - a) How will the site be protected from the impacts that will be rehabilitated to ensure it is going to be kept in the desired state?
 - b) On whose property is the offset site?

This office reserves the right to amend and revise its comments as well as to request any further information.

The onus remains on the registered property owner to confirm adherence to any relevant legislation concerning the activities that might trigger and/or need authorization.

Please do not hesitate to contact the above official should there be any queries.

Yours faithfully

Liguduwc

MR JAN VAN STADEN
CHIEF EXECUTIVE OFFICER (Acting)

3.3.1 Email received from Cape Nature on the 26th of July 2024

olivia@phsconsulting.co.za

From: Rhett Smart <rsmart@capenature.co.za>
Sent: Friday, 26 July 2024 15:03
To: olivia@phsconsulting.co.za
Cc: ls@phsconsulting.co.za; Jeanne Gouws; Alana Duffell-Canham; Vicki Hudson; fsmith@bocma.co.za
Subject: Wetland Rehabilitation & MMP: Elgin Poultry Abattoir, Erf 8611, Grabouw
Attachments: 8611_abattoir_Grabouw_20240726.pdf

Dear Olivia

Please find attached comment from CapeNature on the Off-Site Wetland Rehabilitation and Maintenance Management Plan for the Elgin Poultry Abattoir on Erf 8611, Grabouw.

Regards

Rhett

Rhett Smart
Land Use Scientist | South Landscape



tel +27 87 087 8017 | fax +27 86 529 4900 | cell +27 72 835 8741
email rsmart@capenature.co.za | postal 16 17th Avenue, Voelklip, Hermanus, 7200
physical 16 17th Avenue, Voelklip, Hermanus, 7200
www.capenature.co.za

3.3.2. Letter received from Cape Nature on the 26th of July 2024



CONSERVATION INTELLIGENCE

postal 16 17th Avenue, Voëlklip, Hermanus, 7200
physical 16 17th Avenue, Voëlklip, Hermanus, 7200
website www.capenature.co.za
enquiries Rhett Smart
telephone 087 087 8017
email rsmart@capenature.co.za
reference LS14/2/6/1/7/4/8611_abattoir_Grabouw
date 26 July 2024

PHS Consulting
P.O. Box 1752
Hermanus
7200

Attention: Olivia Brunings
By email: olivia@phsconsulting.co.za

Dear Ms. Brunings

Off-Site Wetland Rehabilitation and Maintenance Management Plan for the Elgin Poultry Abattoir on Erf 8611, Grabouw (DEA&DP ref: I6/3/3/6/7/1/E4/1/1/1046/23)

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

The Wetland Rehabilitation and Maintenance Management Plan has been compiled to meet Condition 19 of the environmental authorisation in 2015 for the expansion of the abattoir. The condition relates to the establishment of an off-site wetland as a remedy for the loss of the wetlands on the poultry abattoir property and the manage the stormwater flow from the site and surrounding catchment. An agreement was signed between the applicant and the Theewaterskloof Municipality in this regard, and requires that wetland engineering design diagrams, a maintenance management plan and a wetland habitat revegetation plan are compiled. The report and appendices include the requirements in terms of Condition 19 and the letter of commitment between the two parties.

The condition does not refer to a wetland offset, however the result will be aligned to the outcomes for a wetland offset, both in terms of the impacts incurred and the proposed remedy. We will therefore not review the report in term of the Wetland Offset Best Practice Guideline, however it is highly likely that the proposed mitigation would meet the requirements of the guideline, including the results from the wetland offset calculator (Macfarlane 2016).

In general, the proposed actions included within the rehabilitation and maintenance management plan are supported whereby the end result will potentially be an improvement in the ecological function and ecosystem services of the freshwater features, in particular with regards to water quality which is the aspect of greatest concern. However, as the plan is termed a maintenance management plan (MMP), it is assumed that this is an MMP in terms of the Environmental Impact Assessment (EIA) Regulations and therefore there should be

The Western Cape Nature Conservation Board trading as CapeNature

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack

explicit reference to the activities which allow for exclusion from environmental authorisation if undertaken in terms of an adopted MMP. In this regard, Listing Notice 1 Activity 19 and Listing Notice 3 Activity 12 would be relevant. Although the footprint is highly degraded to transformed, it will meet the definition of indigenous vegetation according to our interpretation. The proposed activities in Section 3 should be linked to the listed activities as applicable. The MMP has included maintenance activities which will be undertaken into perpetuity, aligned to the purpose of an MMP.

With regards to specific actions in the MMP we wish to note the following:

- Activity 1: Recommend that the solid waste inspections and manual clean-ups are conducted monthly rather than quarterly.
- Activity 1: Recommend that clearing of litter from the inlet and outlet should be conducted either monthly, or if quarterly, then also after every high rainfall event.
- Activity 2&3: It must be ensured that the machinery used for skimming of the lawn grasses and excavation of the wetland does not have any leaks and ensure that there are no spillages of hydrocarbons or other contaminants into the wetland.
- Activity 4: Appendix A should not only be referenced for the plant list but also the methodology for revegetation of the wetland. Appendix A does not make reference to a temporary nursery for holding of the plants prior to planting out as there will be a time lag in between. The location of the temporary nursery will also need to be indicated.
- Activity 5: Water quality monitoring is strongly supported as this is one of the key concerns that the wetland rehabilitation aims to address. However, we recommend that water quality monitoring should commence before rehabilitation in order to establish a baseline against which to measure the success of water quality improvement as a result of the establishment of the wetland. We further recommend that *Escherichia coli* should be included in the list of variables to be measured.

The roles and responsibilities for the implementation of the activities will be outlined in a contract between the applicant and the Theewaterskloof Municipality which needs to be submitted to the Department of Environmental Affairs and Development Planning prior to commencement of Phase 2. CapeNature is satisfied that this will ensure the implementation of the required actions.

The letter of commitment refers to Erf 291 Portion 10, however the proposed wetland will also be located on Erf 8309. It is assumed that the municipality or the applicant are the owners of these erven, otherwise additional parties will need to form part of the agreement. In order to ensure the long-term security of the wetland rehabilitation interventions, we recommend that the wetland should either be: subdivided from the remainder of the erven and rezoned to Open Space; spot zoned to Open Space; or the entire erven should be rezoned to Open Space. As the purpose of the wetland will mainly be for restore ecological function and ecosystem services, and therefore the habitat is unlikely to be a priority for protected area expansion (i.e. only functional habitat), rezoning to open space should be sufficient as opposed for formal conservation (e.g. stewardship). Any of the four Open Space zones should be sufficient.

We further recommend that the potential contributors to the pollution of stormwater run-off that enter the wetland should be identified and appropriate action taken in terms of the relevant legislation. As indicated in the assessments, the run-off entering the property from the industrial area upstream is already highly polluted. The water quality monitoring should also be able to assist in identifying potential sources of pollution.

CapeNature recommends the adoption of the MMP with the additional recommendations listed above.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Rhett Smart
For: Manager (Landscape Conservation Intelligence)

cc. Jeanne Gouw, CapeNature
Fabion Smith, Breede Olifants Catchment Management Agency

References:

Macfarlane D., Holness S.D., von Hase A., Brownlie S., Dini J.A. & Kilian V. 2016. Wetland Offsets: A Best Practice Guideline for South Africa. Report to the Water Research Commission by South African National Biodiversity Institute and the Department of Water and Sanitation. WRC Report No. TT 660/16kInm

3.4.1 Email received from DEADP on the 30th of July 2024

olivia@phsconsulting.co.za

From: DEADP EIA Admin <DEADPEIAadmin@westerncape.gov.za>
Sent: Tuesday, 30 July 2024 10:16
To: 'Roedolf J. Steenkamp'
Cc: olivia@phsconsulting.co.za; melanydu@twk.gov.za
Subject: Re: Draft MMP comment - Erf 8611, Grabouw_1338/24
Attachments: 1338-24-DMMP_Comment-Elgin Abattoir.pdf

Flag Status: Flagged

Dear Mr R Steenkamp

Please find attached this Directorate's correspondence regarding Erf 8611, Grabouw.

Kind Regards

DEADP EIA ADMIN
Department of Environmental Affairs and Development Planning
Western Cape Government
Website: www.westerncape.gov.za/eadp



Be 110% Green. Read from the screen.

Should you not be able to contact the numbers above, please call +27 (0)21 483 4091 between 07:30 -16:00.

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If you are not the intended recipient you may not copy or deliver this message to anyone."

3.4.2. Letter received from DEADP on the 30th of July 2024



Department of Environmental Affairs and Development Planning
D'mitri Matthews
Directorate: Development Management, Region 1
Dmitri.Matthews@westerncape.gov.za | Tel: 021 483 8350

REFERENCE: 16/3/3/6/3/E4/11/1338/24
DATE: 29 July 2024

The Board of Directors
Elgin Poultry Abattoir (Pty) Ltd
P.O. Box 1176
GRABOUW
7180

Attention: Mr R Steenkamp

E-mail: roedolf@efrc.co.za

Dear Sir/Madam

COMMENT ON THE DRAFT MAINTENANCE MANAGEMENT PLAN ("MMP") IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (GN NO. 326 OF 7 APRIL 2017) FOR THE PROPOSED REHABILITATION AND MAINTENANCE OF A WETLAND PORTION NORTH AND EAST OF THE ELGIN POULTRY ABATTOIR, ERF NO. 8611, GRABOUW

1. The draft MMP dated June 2024, as received by the Directorate: Development Management Region 1 (herein after referred to as "this Directorate") on 20 June 2024, refers.
2. Following review of the information submitted to this Directorate notes the following:
 - An Environmental Authorisation (EA) for the extension of the Elgin Poultry Abattoir in Grabouw Industria (Figure 1) was granted on 24 February 2015.
 - The approved extension entails the expansion of existing buildings and infrastructure in two phases. Phase 2 of the project will result in the infilling and loss of two wetland portions located in the north-eastern corner of the property.
 - In order to compensate for the loss of onsite wetland functionality, the Freshwater Assessment Report compiled by BlueScience (Grobler & Belcher, 2014) recommended that a portion of the wetland area located north and east of the property should be rehabilitated.
 - The current report details the rehabilitation and long-term maintenance management actions that need to be implemented for the required mitigation to be realised, as per Condition 19.2 of the EA issued on 24 February 2024.
3. Departmental comments:
 - 3.1 This Directorate agrees with the objectives and implementation of the Wetland Rehabilitation and Maintenance Report dated June 2024, as it is based on the recommendation of the Freshwater Assessment dated 16 September 2014.
 - 3.2 The report did not indicate in terms of which listed activity (i.e. Activity 19 of Listing Notice 1) the Wetland Rehabilitation and Maintenance Report must be adopted. You are required to amend your report to include the relevant listed activity/ies.
 - 3.3 As part of the design of the off-site wetland, a berm/embankment is proposed to facilitate water retention within the wetland. Additionally, an overflow weir in the berm/embankment will allow stormwater to flow from the rehabilitated wetland area and spill at an appropriate level into the northern/northwestern channeled valley bottom wetland system associated with the Klipdrift River to the north of the site. Please amend your report to include any maintenance actions that may be associated with the berm/embankment and weir i.e. repair of structures.



www.westerncape.gov.za
Department of Environmental Affairs and Development Planning

4. Regulatory Requirements:
 - 4.1 Proof of the notifications sent to registered I&APs for the commenting purposes must be included in the final MMP.
 - 4.2 A dated photograph of erecting a site notice must be provided.
 - 4.3 Proof of placing an advertisement must be provided.
 - 4.4 Any new representations and comments received in connection with the proposal must be included in the final MMP.
 - 4.5 Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the final MMP.
 - 4.6 Please be advised that the signed and dated applicant declaration is required to be submitted with the MMP during the formal application process to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.
 - 4.7 In addition to the above, please ensure that the signed and dated EAP and specialist declarations are also submitted with the final MMP.
5. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development.
6. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.

Yours faithfully

pp

**HEAD OF COMPONENT
ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 1
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Cc to: (1) Ms. O. Brunings (PHS Consulting)
(2) Ms. M. Duthie-Surtie (Theewaterskloof Municipality)

Email: olivia@phsconsulting.co.za
Email: melanydu@twk.gov.za

3.4.3. Response letter from PHS Consulting to DEADP dated 2 August 2024



2 August 2024

Attention: Marbe Coetzee and D'mitri Matthews

Reference: 16/3/3/6/3/e4/11/1338/24

Per email: Marbe.Coetzee@westerncape.gov.za and Dmitri.Matthews@westerncape.gov.za

RESPONSE TO COMMENTS ON THE DRAFT OFF-SITE WETLAND REHABILITATION AND MAINTENANCE MANAGEMENT PLAN FOR THE ELGIN POULTRY ABATTOIR ON ERF 8611, GRABOUW

We refer to your comments dated 29 July 2024, regarding the draft Off-Site Wetland Rehabilitation and Maintenance Management Plan (MMP) for the Elgin Poultry Abattoir on Erf 8611, Grabouw. We appreciate the feedback provided and are committed to making the necessary amendments to the body of the MMP as per technical inputs.

However, regarding the steps for public participation (PP) outlined in Point 4 - regulatory requirements, we would like to address the following:

1. The Environmental Authorisation (EA) for the development underwent a thorough Basic Assessment Report (BAR) process. This comprehensive process included public advertisements, site notices, consultation with stakeholders, and opportunities for appeal. The need for and the inclusion of the MMP as a condition in the application was made clear during the PP, and there were no objections raised against it by I&AP's. All Interested and Affected Parties (IAPs) were fully informed that the rehabilitation and maintenance management plan was a mandatory condition for approval.
2. Condition 19 within the EA clearly specifies who needs to be consulted regarding the MMP, namely Cape Nature, BOCMA, Theewaterskloof Municipality, and DEADP. There is no mandate for broader consultation beyond these entities. This is because the initial BAR process already encompassed extensive consultation with relevant Organs of State, neighbours and the general public, ensuring thorough engagement and input.
3. Given the extensive initial consultation and the clear directives in Condition 19, we do not believe it is necessary to advertise in the newspaper, notify neighbours, or install notice boards onsite. We propose to continue our consultation solely with Cape Nature, BOCMA, DEADP, and Theewaterskloof Municipality, as stipulated in the EA. The rehabilitation and MMP is applicable to the erf owned by the

cell: 082 740 8046 | tel: (028) 312 1734 | fax: 086 508 3249 | paul@phsconsulting.co.za | PO Box 1752 | Hermanus 7200

PAUL SLABBERT | Managing Member | B Art Et Scien: (IAIA & AHAP)
Fynbosland 323 CC t/a PHS Consulting Reg 2005/081216/23

Theewaterskloof Municipality. This approach will ensure that the MMP remains comprehensive, addressing all necessary technical and environmental requirements.

We hereby request your approval to proceed with the consultation as outlined above, limiting it to the specified entities. We believe this approach is in line with the EA requirements and will ensure the MMP is comprehensive and ecologically sound.

Thank you for your attention to this matter.

Regards,

Olivia Brunings

cell: 082 740 8046 | tel: (028) 312 1734 | fax: 086 508 3249 | paul@phsconsulting.co.za | PO Box 1752 |
Hermanus 7200

PAUL SLABBERT | Managing Member | B Art Et Scien; (IAIA & AHAP)
Fynbosland 323 CC t/a PHS Consulting Reg 2005/081216/23

3.4.4. Response received from DEADP dated 21 August 2024

olivia@phsconsulting.co.za

From: Dmitri C Matthews <Dmitri.Matthews@westerncape.gov.za>
Sent: Wednesday, 21 August 2024 09:55
To: olivia@phsconsulting.co.za; Marbe Coetzee
Cc: 'Paul Slabbert'
Subject: RE: EFRC Wetland Rehabilitation

Dear Olivia

Thank you for your email.

This Directorate agrees that since the MMP was a condition of approval, that the PPP undertaken is adequate and the draft MMP was only required to be sent to organs of state to provide comment.

This Directorate therefore awaits the submission of the final MMP for adoption.

Regards
D'mitri Matthews (Environmental Officer: Specialised Production)
Registered Environmental Assessment Practitioner: Number 2021/3377
Development Management: Region 1
Development Planning
Department of Environmental Affairs and Development Planning
Western Cape Government
1 Dorp Street, Cape Town, 8001

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Should you not be able to contact the numbers above, please call +27 (0)21 483 4091 between 06:30-15:00.

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From: olivia@phsconsulting.co.za <olivia@phsconsulting.co.za>
Sent: Tuesday, 20 August 2024 15:11
To: Dmitri C Matthews <Dmitri.Matthews@westerncape.gov.za>; Marbe Coetzee <Marbe.Coetzee@westerncape.gov.za>
Cc: 'Paul Slabbert' <paul@phsconsulting.co.za>
Subject: RE: EFRC Wetland Rehabilitation

Good day Marbe and D'mitri,

I would like to follow up on the below email sent regarding our response to your comments on the Draft Off-Site Wetland Rehabilitation and Maintenance Management Plan for the Elgin Poultry Abattoir.

We await your feedback.

