



**REFERENCE:** 16/3/3/6/7/1/E4/5/1513/24  
**DATE OF ISSUE:** 21 May 2025

The Board of Directors  
Bapchix (Pty) Ltd.  
PO Box 599

**CALEDON**  
7280

**Attention: Mr. Ross Philip**

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E-mail: rossphilip@mweb.co.za

Dear Sir

**COMMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT ("BAR") IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE 2014 ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS FOR THE PROPOSED DEVELOPMENT OF CHICKEN HOUSES ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON.**

1. The electronic copy of the pre-application Draft BAR received by this Directorate on 16 April 2025 and this Directorate's acknowledgement thereof issued on 6 May 2025, refer.
2. According to the information submitted to this Directorate, it is noted that the proposal entails the following:
  - The proposed development will entail an additional poultry facility and associated infrastructure on the Remainder of Farm Grootvlei No, 225, Caledon.
  - The poultry facility will include ten chicken houses, staff housing and ablution facilities with a septic tank, an office, a loading bay, a shaving shed, a water treatment facility, a generator room, internal access routes of less than 8m wide and a biosecurity access control point.
  - Each chicken house will house 16 500 chickens, making a total of 165 000 chickens at the poultry facility.
  - The proposed development will have a development footprint of approximately 51 300m<sup>2</sup>.
  - No indigenous vegetation remains on the site.
  - No watercourses are located on or within 32m of the site.
  - The site zoned for agricultural purposes and is located outside the urban area of Caledon.

3. This Directorate has the following comments:

3.1. The Activity Description must include details of the following:

- 3.1.1 The footprint and capacity of the new septic tank system and the water treatment facility.
- 3.1.2 How much manure will be produced by the facility. The BAR states that manure will be used directly in the agricultural industry. However, it is unclear what is meant by this. Clarity is required whether manure (that will not be disposed of at the compost facility) will be collected and how often it will be collected.
- 3.1.3 Details of how many times the chicken houses will be cleaned must be provided.
- 3.1.4 It is further noted that the proposed development will include a water treatment facility. However, it is unclear whether this is intended for wastewater. No details have been provided regarding how wastewater will be disposed of.
- 3.1.5 The width, length and location of the new dirt roads.
- 3.1.6 A description of the handling and disposal of infectious mortalities.
- 3.1.7 The diameter and length of the proposed water supply line.
- 3.1.8 The transmission capacity of the proposed electricity supply line.

3.2. Since the proposed development is an expansion of the existing poultry facility, the following listed will be applicable:

Activity 40 of Listing Notice 1

*The expansion and related operation of facilities for the concentration of poultry, excluding chicks younger than 20 days, where the capacity of the facility will be increased by-*

- (i) more than 1 000 poultry where the facility is situated within an urban area; or*
- (ii) more than 5 000 poultry per facility situated outside an urban area.*

Please ensure that all subsequent documents include the correct listed activity.

3.3. Site Sensitivity Verification ("SSV")

- 3.3.1 The SSV Report indicates that the Terrestrial Biodiversity sensitivity is regarded as low. According to the Protocols, should the sensitivity be low, a compliance statement will be required. The SSV Report further indicates that no natural vegetation remains on the site and therefore no Terrestrial Compliance Statement will be required.

Please note that comment must be obtained from CapeNature regarding Biodiversity on the site.

**3.3.2 Further note that should any authority that have jurisdiction in respect of any aspect of the proposed development request that further specialist studies be conducted, and where the request is supported by this Directorate, this must take precedence.**

3.4. Impacts

3.4.1 It is noted that not all impacts associated with the proposed development have been identified and assessed.

3.4.2 Potential groundwater pollution, odour and vectors impacts have not been identified and assessed.

3.4.3 Should this not require an assessment a motivation must be included in the BAR.

3.5. Water requirements and existing water rights

3.5.1 It is noted that the water use registration certificate is issued to Zonderend Valley Farms (Pty) Ltd. However, the applicant is Bapchix (Pty) Ltd.

3.5.2 Confirmation is required that the applicant has existing water use rights for the proposed development.

3.5.3 Furthermore, clarity is required regarding the current water usage by the facility or activities taking place on the Remainder of Farm Grootvlei No. 225, as well as the amount of water that will be required for the proposed development.

3.6. Confirmation of services

3.6.1 Confirmation is required that Eskom have sufficient, spare, unallocated capacity to provide the proposed development with electricity.

3.6.2 It is noted that septic tanks are proposed for sewage management. However, no information has been provided regarding the final disposal of the sewage or the capacity of the relevant facility or municipality to treat it. Confirmation is required whether the relevant company or municipality has sufficient capacity to treat the sewage.

3.7. Operational Environmental Management Programme ("EMPr")

3.7.1 Page 12 of the operational EMPr states, *"Bio-security measures specific to the chicken rearing facility should be implemented at all times..."* However, no specific measures have been included in the EMPr.

3.7.2 The EMPr does not address potential odour and vector impacts.

3.7.3 The EMPr must be updated to address the above. Specific mitigation and management measures must be included in the EMPr to address the above impacts.

3.8. Confirmation from the relevant water authority must be obtained as to whether a general authorisation or water use license application in terms of the National Water Act, 1998 (Act No. 36 of 1998) is required.

3.9. It is noted that this Department's Directorate Air Quality Management has not been identified as an Interested and Affected Party. Please ensure that comment is obtained from this Directorate during your next round of public consultation.

3.10. Comments from the following authorities must be obtained and included in the BAR:

- Department of Agriculture
- Department of Water and Sanitation,
- CapeNature;
- DEADP: Waste Management;
- DEADP: Pollution and Chemicals Management; and
- Theewaterskloof Municipality.

3.11. You are reminded that a summary of the issues raised by Interested and Affected Parties ("I&APs") must be included and addressed in a comments and response report. As well as an indication of the manner in which the issues were incorporated, or the reasons for not including them.

3.12. Omission of any required information in terms of Appendices 1 and 4 of the EIA Regulations 2014, with regards to the final submission of the BAR and EMPr, respectively to the Department, may result in the application for Environmental Authorisation being refused.

3.13. Be advised that an electronically signed and dated applicant declaration is required to be submitted with the final BAR 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.

3.14. In addition to the above, please ensure that the electronically signed and dated Environmental Assessment Practitioner ("EAP") declaration is also submitted with the final BAR for decision-making.

3.15. Kindly quote the abovementioned reference number in any future correspondence in respect of the Notice of Intent.

3.16. Please note that the activity may not commence prior to an Environmental Authorisation being granted by this Directorate.

4. This Directorate reserves the right to revise initial comments and request further information based on any new or revised information received.

Yours faithfully

**Melanese**  
**Schippers**

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

Cc: (1) Mr. Paul Slabbert (PHS Consulting)  
(2) Ms. Olivia Brunings (PHS Consulting)  
(3) Mr. Johan Viljoen (Theewaterskloof Municipality)

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**REFERENCE:** 16/3/3/1/E4/5/1079/25  
**DATE OF ISSUE:** 19 November 2025

The Board of Directors  
Bapchix (Pty) Ltd.  
PO Box 599  
**CALEDON**  
7280

**Attention: Mr. Ross Philip**

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Dear Sir

**COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT ("BAR") IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE 2014 ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS FOR THE PROPOSED DEVELOPMENT OF CHICKEN HOUSES ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON.**

1. The electronic copy of the Draft BAR received by this Directorate on 20 October 2025 and this Directorate's acknowledgement thereof issued on 23 October 2025, refer.
2. According to the information submitted to this Directorate, it is noted that the proposal entails the following:
  - The proposed development will entail an additional poultry facility and associated infrastructure on the Remainder of Farm Grootvlei No, 225, Caledon.
  - The poultry facility will include ten chicken houses, staff housing and ablution facilities with a septic tank, an office, a loading bay, a shaving shed, a water treatment facility, a generator room, internal access routes of less than 8m wide and a biosecurity access control point.
  - Each chicken house will house 16 500 chickens, making a total of 165 000 chickens at the poultry facility.
  - The proposed development will have a development footprint of approximately 51 300m<sup>2</sup>.
  - No indigenous vegetation remains on the site.
  - No watercourses are located on or within 32m of the site.
  - The site zoned for agricultural purposes and is located outside the urban area of Caledon.

3. This Directorate has the following comments:

- 3.1. The transmission capacity of the proposed electricity supply line must be included in the Final BAR. The start, middle, and end coordinates of the electricity line must also be provided. Please ensure that all impacts associated with the electricity line route are fully assessed and reported in the Final BAR.
- 3.2. The peak throughput capacity of the water pipeline must be included in the Final BAR, as well as confirmation of whether it will be placed within an existing road reserve. The start, middle, and end coordinates of the water pipeline must also be provided. Please ensure that all impacts associated with the water pipeline route are assessed and reported in the Final BAR.
- 3.3. It is noted that the site development plan refers to a stormwater ingress area and the EMPr indicates that perimeter drainage channels will be developed to capture nutrient rich runoff. However, no details of this have been included in the activity description. The activity description must be amended to include details of all the components of the proposed development.
- 3.4. The EMPr and the comments and response report indicate that road widening at key points for safe passing will be implemented. However, details regarding the locations and whether this will constitute any listed activities have not been provided. These details must be included in the Final BAR, and all impacts associated with the proposed road widening must be assessed and reported in the Final BAR.
- 3.5. The EMPr indicates, as a mitigation measure for manure management, that all manure must be swept back into the chicken houses each evening. Clarity is required on whether this refers to manure from the outside areas, and if so, whether this is practically feasible. Furthermore, the EMPr states that wash water must not leave the chicken houses. Clarity must be provided on how this will be managed, as no provision has been made for containing potential runoff. There is also no guarantee that all wash water will evaporate, as suggested in the BAR.
- 3.6. It was indicated that Infected mortalities will be managed and disposed of under strict guidance of the state veterinarian. If it will be taken to a hazardous waste site, written confirmation of sufficient capacity at the hazardous waste site should be obtained and included in the Final BAR.
- 3.7. The email correspondence from Eskom does not confirm whether sufficient, spare unallocated capacity is available to supply the proposed development with electricity. Written confirmation from Eskom is required to verify that adequate, spare unallocated capacity is available for the proposed development.

- 3.8. Comment from the following State Departments must be obtained and included in the Final BAR:
- Department of Agriculture: Veterinary Services;
  - Western Cape Department of Agriculture; and
  - DEADP: Air quality.
- 3.9. You are reminded that a summary of the issues raised by Interested and Affected Parties ("I&APs") must be included and addressed in a comments and response report. As well as an indication of the manner in which the issues were incorporated, or the reasons for not including them.
- 3.10. Omission of any required information in terms of Appendices 1 and 4 of the EIA Regulations 2014, with regards to the final submission of the BAR and EMPr, respectively to the Department, may result in the application for Environmental Authorisation being refused.
- 3.11. Be advised that an electronically signed and dated applicant declaration is required to be submitted with the final BAR 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.
- 3.12. In addition to the above, please ensure that the electronically signed and dated declarations of the EAP and specialists is submitted with the Final BAR for decision-making.
- 3.13. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.
- 3.14. Please note that the activity may not commence prior to an Environmental Authorisation being granted by this Directorate.
4. This Directorate reserves the right to revise initial comments and request further information based on any new or revised information received.

Yours faithfully

Melanese  
Schippers

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**pp HEAD OF COMPONENT**

**DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)**

**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Cc: (1) Mr. Paul Slabbert (PHS Consulting)  
(2) Ms. Olivia Brunings (PHS Consulting)  
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