



REFERENCE: 19/4/4/1/BT1 (FARM GROOTVLEI NO. 225, CALEDON)

ENQUIRIES: Etienne Roux

For Attention: Ms Olivia Brunings

PHS Consulting
P.O Box 1752
HERMANUS
7200

Email: Olivia@phsconsulting.co.za

Tel: 028 312 1734
Cell: 082 740 8046

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (BAR), ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr), FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON

Dear Madam

The Directorate: Air Quality Management (hereafter 'the Directorate') has reviewed the above-mentioned documentation (hereafter 'the Report'), dated October 2025, which was received by the Directorate on 20 October 2025.

The Directorate has reviewed the documentation and has the following comments on the draft BAR and EMPr in terms of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQA):

1. Dust Management

- 1.1 Dust generated from all the activities of the facility must comply with the NEM: AQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013.
 - 1.1.1 These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health.
- 1.2 The Directorate recommends that:
 - 1.2.1 dust suppression methods be implemented through a dust monitoring programme/fugitive dust control plan.
 - 1.2.2 all dust emission mitigation measures should be implemented as per the EMPr.

2. Noise Management

- 2.1 Operational activities on site in the form of construction equipment like large vehicles and other machinery being used for construction, may cause significant noise during the construction phase.
- 2.2 Noise generated from all the proposed activities and phases must comply with the Western Cape Noise Control Regulations (P.N. 200/2013).
- 2.3 The Directorate recommends that:
 - 2.3.1 construction activities be conducted during the day-time hours, so as to avoid any night-time disturbance.
 - 2.3.2 measures to monitor, minimise and prevent noise should be implemented as per the EMPr.

3. Odour Management

- 3.1 The activities that are being conducted at the facility have a potential of generating odour emissions which may cause odour nuisance if not monitored and mitigated.
- 3.2 The applicant is reminded of Section 35 (2) of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQA), which states that "The occupier of any premises must take all reasonable steps to prevent the emission of any offensive odour caused by any activity on such premises".
- 3.3 The Directorate recommends the following in respect of odour management:
 - 3.3.1 All possible odours that may be emitted to the atmosphere from activities of the facility are recommended to be monitored and mitigated strictly as per EMPr.
 - 3.3.2 measures to monitor, minimise and prevent noise should be strictly implemented as per the EMPr.

4 General

- 4.1 Kindly be advised that the Air Quality Officer (AQO) for the Theewaterskloof Municipality (Mr. Johan Viljoen) must also be engaged regarding the proposed activity as it falls within his jurisdictional area. Mr. Viljoen can be reached on 028 214 3300 or johanvi@twk.gov.za.
- 4.2 The Department would like to draw your attention to Section 28 of the National Environmental Management Act No. 107 of 1998 (NEMA), i.e. "Duty of Care" which states that:
"Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment."
- 4.3 Please note that the above-mentioned comments/recommendations do not pre-empt the outcome of the application.
- 4.4 No information provided, views expressed and/or comments made by the DEA&DP, D: AQM should in any way be seen as an indication or confirmation:
 - 4.4.1 that additional information or documents will not be requested; or
 - 4.4.2 of the outcome of any application submitted to the authorities.

4.5 Kindly be informed that the D: AQM reserves the right to review the above-mentioned comments, should additional information come to light.

Please contact Etienne Roux (Etienne.Roux@westerncape.gov.za) should you have any further queries in this regard.

Please note that D: AQM has a dedicated email address reserved for all EIA-related correspondences, DEADP.AQM@westerncape.gov.za. Kindly use this email for any future correspondence.

Yours faithfully,

Etienne Roux

Head of Component: Air Quality Regulatory Services

REFERENCE: 19/4/4/1/BT1 (FARM GROOTVLEI NO. 225, PHILADELPHIA)

ENQUIRIES: Keagan-Leigh Adriaanse

For Attention: Ms Olivia Brunings

PHS Consulting
P.O. Box 1752
HERMANUS
7200

Email: Olivia@phsconsulting.co.za

Tel: 082 598 6500
Cell: 079 459 9881

COMMENT ON THE AMENDED DRAFT BASIC ASSESSMENT REPORT (BAR) AND ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr) FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON

Dear Madam

The Directorate: Air Quality Management (hereafter 'the Directorate') has reviewed the above-mentioned documentation (hereafter 'the Report'), dated and received by the Directorate on 01 December 2025.

The Directorate has reviewed the documentation and has the following comments on the amended draft BAR and EMPr in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (NEM: AQA):

1. Comment on the draft BAR

- 1.1. The Directorate's previous comment (dated 24 November 2025) on the draft BAR has been largely addressed and responded to.

2. Noise and Dust Management

- 2.1. The Directorate notes that the construction and operational EMPrs have included dust and noise mitigation measures.
- 2.2. The amended draft BAR indicates that there are no impacts on ambient air quality and that the NEM: AQA does not apply. However, please note that the NEM: AQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013 and the Western Cape Noise Control Regulations (P.N. 200/2013) applies and must be adhered to.
- 2.3. The Directorate recommends that the BAR to be submitted to the competent authority be amended accordingly to include reference to the aforementioned regulations.

3. Preferred Alternative

- 3.1. The amended draft BAR indicates that the Preferred Alternative (i.e. Development Layout 2) took cognisance of the prevailing wind direction. However, the predominant wind direction has not been reported on.
- 3.2. In addition, potential sensitive receptors as a result of the predominant wind direction has not been identified.
- 3.3. The Directorate recommends that further information is provided in this regard.

4. General

- 4.1. Please note that the above-mentioned comments/recommendations do not pre-empt the outcome of the application.
- 4.2. No information provided, views expressed and/or comments made by the Directorate should in any way be seen as an indication or confirmation:
 - 4.2.1. that additional information or documents will not be requested; or
 - 4.2.2. of the outcome of any application submitted to the authorities.

5. Duty of Care

- 5.1. The Directorate would like to draw your attention to Section 28 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), i.e. "Duty of Care" which states that:
"Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment."
- 5.2. Kindly be informed that the Directorate reserves the right to review the above-mentioned comments, should additional information come to light.

Please contact Keagan-Leigh Adriaanse (Keagan-Leigh.Adriaanse@westerncape.gov.za) should you have any further queries in this regard.

Please note that the Directorate has a dedicated email address reserved for all EIA-related correspondences, DEADP.AQM@westerncape.gov.za. Kindly use this email for any future correspondence.

Yours faithfully,

Etienne Roux

Head of Component: Air Quality Regulatory Services