CONSERVATION INTELLIGENCE: LANDSCAPE CENTRAL

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reference SSD14/2/6/1/9/2/954etc_GenA_Chicken_Kleinfontein_Worcester
date **02 December 2025**

Jenna Theron
PHS Consulting
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By email: jt@phsconsulting.co.za / paul@phsconsulting.co.za

Dear Ms Theron

RE: The Proposed Development of a Free-Range Poultry Broiler Facility on the Remainder of Farm Number 563, 564, 565 and the Farm Kleinfontein Number 954, Worcester – Draft Basic Assessment Report
DEA&DP Ref: 16/3/3/6/7/1/B2/32/1251/25 (Previous Reference Number)
DEA&DP Ref: 16/3/3/1/B2/32/1083/25

CapeNature would like to thank you for the opportunity to comment on the Draft Basic Assessment Report (DBAR). Please note that our comments pertain primarily to impacts on biodiversity and not to the overall desirability of the project.

1. CapeNature provided comment on the Pre-Application Draft Basic Assessment Report (letter dated 25 September 2025). These comments still have reference.

2. As stated previously, according to the South African Vegetation Map (2018), the proposed development area supports Breede Shale Renosterveld (majority of the area), an Endangered Vegetation Type. There are also smaller patches of Robertson Karoo (to the East) and North Sonderend Sandstone Fynbos (to the South), both listed as Least Concern Vegetation Types. However, the area appears to be transformed through previous agricultural activities and very little natural vegetation remains, mainly along certain freshwater crossings. Furthermore, the proposed development areas are partially situated within a Terrestrial Critical Biodiversity Area (CBA 1 & CBA2: Degraded), according to the 2023 Biodiversity Spatial Plan (BSP). CBAs include areas that are usually, but not always in a natural condition that are required to meet biodiversity targets for species, ecosystems or ecological processes and ecological infrastructure. The terrestrial CBA is mapped due to the presence of the threatened vegetation type and for Watercourse protection (Western Folded Mountains). It is essential that these areas are maintained in a natural or near-natural state, with no further loss of habitat and degraded areas should ideally be rehabilitated and only low-impact, biodiversity sensitive land uses are appropriate. Furthermore, according to the 2017 BSP, the proposed development areas are partially situated within an Ecological Support Area (ESA & ESA2: Restore). ESAs play an important role in supporting the functioning of CBAs and are often vital for delivering ecosystem services. The ESA is mapped due to the presence of the threatened vegetation type, watercourse, Water source and Water Recharge area and it is essential that this area is maintained in a functional, near-natural state and underlying biodiversity objectives are not compromised. Additionally, the site is located within a Strategic Water Source Area (SWSA) for Groundwater (Southwestern Cape Ranges) and is in close proximity to the Riviersonderend Mountain Catchment Area (MCA) – which is a Protected Area.

3. According to the Freshwater Assessment, the site falls within the larger Hoeks River Catchment, specifically within Quaternary Catchment H40F, which forms part of the Breede-Gouritz Water Management Area (WMA). The landscape is generally characterized by undulating hills and valleys, predominantly used for agricultural purposes, and includes several small tributaries of the Ratel Rivier. In addition to the above, the National Wetlands Map classifies the Ratel River and its larger associated floodplain as East Coast Shale Renosterveld Floodplain wetland. These wetlands are marked as being critically endangered – both from a vegetation and wetland ecosystem perspective.

   Additionally, the site contains four primarily seasonal streams (Streams A – D), which originate in the southeastern hills and flow north-north-west, eventually converging into two tributaries before joining the Ratel River. While their upper reaches remain natural, the streams become modified to varying degrees in farmed areas due to vegetation clearance, agricultural encroachment, instream dams, and canalisation. A large portion of the Streams A and B system likely historically comprised an unchanneled valley bottom wetland. However, this area has been so extensively modified that it has lost all ecological function. Only a small remnant of the wetland remains at the confluence of the two streams. Stream A and B is located on the western side of the property (See Figure 8, Page 12) and has a Largely to Seriously Modified Present Ecological State (PES) and a Low to Moderate Ecological Importance and Sensitivity (EIS). Stream C and D is located on the eastern and southern side of the property and has a Natural to Largely Natural Present Ecological State (PES) and a High Ecological Importance and Sensitivity (EIS). Therefore, any water quality impacts and further hydrology modifications on these freshwater ecosystems (especially the more natural ones and any remaining wetland areas) should be minimised, mitigated or avoided and the aim should be to improve the PES of these streams and wetlands.

4. Furthermore, the DBAR indicates that "Four watercourse crossings are required, two are existing crossings and two are new crossings within the proposed road alignment. Three of the structures proposed will be low waterway bridges and one will be a suspended bridge structure. Low waterway bridges are reinforced concrete structures with a driving surface (final top level) raised above ground (natural ground level) and these structures cross waterways nearly perpendicular to the natural water flow direction of the stream. Pipes will be installed at set intervals across the bridge length to allow water to freely pass through. Suspended bridges are reinforced concrete structures with a driving surface (final top level) raised above ground (natural ground level). The structure crosses the waterway at a skew angle to align with the approach roadway alignment. Where the natural runoff channel is deep and narrow a suspended bridge will span across. As there is not enough space at the suspended bridge to divert stream flow to accommodate wet works, a temporary upstream coffer dam must be constructed to temporarily divert stream water away from the wet works during construction." Please can you indicate on the map or Site Development Plan (Appendix B1a) where this coffer dam will be located and also indicate the potential impacts of this temporary coffer dam on the surrounding Freshwater ecosystems (Streams and wetland areas).

5. Water quality impacts due to the operation of the Broiler Facility, the building of the roads and stream crossings, installation of cables and pipelines and the Bunded Diesel Tank is still our biggest concern from a Biodiversity perspective for this application. The management of wastewater (including wash water) needs to be carefully considered to prevent any contamination of groundwater – seeing that the area is located within a SWSA for Groundwater.

   Previously, we stated that a Stormwater Management Plan should be put in place – to address both erosion and pollution potential. And an emergency plan needs to be put in place, regarding the Diesel Tank, in case of a leak to ensure that the groundwater and water quality of the freshwater ecosystems are not impacted. We acknowledge that the EMPr has been updated to include Goal 6 which addresses Emergency Procedures for the above ground Diesel Tank and includes additional Stormwater Management for the Operational Phase. Goal 7: Stormwater Management Plan of the EMPr was updated which also addresses potential surface water pollution from contaminated runoff. We, however, still recommend regular testing of the water quality and water that will be discharged from the Broiler facility – to ensure that the surrounding water resources are not affected by the construction or operation of the Facility.

6. We therefore agree with the proposed mitigation measures set out in the Environmental Management Programme (EMPr), Geohydrological Impact Assessment and Freshwater Impact Assessment to minimize environmental impacts and ensure that the environment is not unnecessarily damaged. These mitigation measures must be included as conditions of authorization. The mitigation measures of high importance are:

    a. The construction footprint must be demarcated prior to any development and works need to be restricted to the demarcated work area (No-go, wetlands and ecological buffer areas must be avoided). Following construction, the disturbed areas (especially along the watercourses/streams) need to be reshaped and rehabilitated with appropriate indigenous vegetation and any alien vegetation within the construction footprint should be removed. Cleared vegetative material and invasive alien vegetation must not be dumped anywhere other than an approved waste disposal site. Furthermore, clearing of riparian or wetland vegetation must be avoided where possible or kept to an absolute minimum.
    b. All reasonable measures should be taken to limit erosion and sedimentation due to the construction activities. Where erosion and/or sedimentation occurs, rectification should be carried out in accordance with details specified by the ECO and any erosion channels developed during construction must be backfilled and compacted. Construction work close to or within the Streams should be restricted to the dry, summer season.
    c. Stormwater management must be addressed both in terms of flooding and pollution potential; no stormwater runoff from any premises containing waste (especially concrete), or water containing waste emanating from activities and premises may be discharged into a water resource – polluted stormwater must be contained.
    d. The use of machinery within the watercourses should be limited as far as possible and silt traps must be installed prior to the commencement of any activities within the watercourse.

7. We recommend that an Environmental Control Officer (ECO) is appointed to ensure that all the mitigation measures of the EMPr, Freshwater Impact Assessment and Geohydrological Impact Assessment are implemented and adhered to, especially the mitigation measures pertaining to groundwater abstraction and groundwater quality deterioration, as well as trenching and stockpiling activities. Additionally, ensuring that the no-go areas (Riparian areas/Streams, associated wetlands and Indigenous Vegetation) are avoided and that the water quality impacts during construction and development of the site are kept to a minimum.

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

Yours sincerely

Leandra Knoetze

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reference SSD14/2/6/1/9/2/954etc_GenA_Chicken_Kleinfontein_Worcester
date **25 September 2025**

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2. The proposed development areas are partially situated within a Terrestrial Critical Biodiversity Area (CBA 1 & CBA2: Degraded), according to the 2023 Biodiversity Spatial Plan (BSP). CBAs include areas that are usually, but not always in a natural condition that are required to meet biodiversity targets for species, ecosystems or ecological processes and ecological infrastructure. The terrestrial CBA is mapped due to the presence of the threatened vegetation type and for Watercourse protection (Western Folded Mountains). It is essential that these areas are maintained in a natural or near-natural state, with no further loss of habitat and degraded areas should ideally be rehabilitated and only low-impact, biodiversity sensitive land uses are appropriate. Furthermore, according to the 2017 BSP, the proposed development areas are partially situated within an Ecological Support Area (ESA & ESA2: Restore). ESAs play an important role in supporting the functioning of CBAs and are often vital for delivering ecosystem services. The ESA is mapped due to the presence of the threatened vegetation type, watercourse, Water source and Water Recharge area and it is essential that this area is maintained in a functional, near-natural state and underlying biodiversity objectives are not compromised. Additionally, the site is located within a Strategic Water Source Area (SWSA) for Groundwater (Southwestern Cape Ranges) and is in close proximity to the Riviersonderend Mountain Catchment Area (MCA) – which is a Protected Area.

3. According to the Freshwater Assessment, the site falls within the larger Hoeks River Catchment, specifically within Quaternary Catchment H40F, which forms part of the Breede-Gouritz Water Management Area (WMA). The landscape is generally characterized by undulating hills and valleys, predominantly used for agricultural purposes, and includes several small tributaries of the Ratel Rivier. The site contains four primarily seasonal streams (Streams A – D), which originate in the southeastern hills and flow north-north-west, eventually converging into two tributaries before joining the Ratel River. While their upper reaches remain natural, the streams become modified to varying degrees in farmed areas due to vegetation clearance, agricultural encroachment, instream dams, and canalisation. Stream A and B is located on the western side of the property (See Figure 8) and has a Largely to Seriously Modified Present Ecological State (PES) and a Low to Moderate Ecological Importance and Sensitivity (EIS). Stream C and D is located on the eastern and southern side of the property and has a Natural to Largely Natural Present Ecological State (PES) and a High Ecological Importance and Sensitivity (EIS). Therefore, any water quality impacts and further hydrology modifications on these freshwater ecosystems (especially the more natural ones) should be minimised, mitigated or avoided and the aim should be to improve the PES of these streams.

4. Water quality impacts due to the operation of the Broiler Facility, the building of the roads, installation of cables and pipelines and the Bunded Diesel Tank is our biggest concern from a Biodiversity perspective. The management of wastewater (including wash water) needs to be carefully considered to prevent any contamination of groundwater – seeing that the area is located within a SWSA for Groundwater. We recommend regular testing of the water quality and water that will be discharged from the Broiler facility – to ensure that the surrounding water resources are not affected by the construction or operation of the Facility. Furthermore, a Stormwater Management Plan should also be put in place – to address both erosion and pollution potential. Regarding the Diesel Tank, an emergency plan needs to be put in place, in case of a leak to ensure that the groundwater and water quality of the freshwater ecosystems are not impacted.

5. The Pre-Application Draft Basic Assessment Report (DBAR) indicates that the development footprint of the proposed development and associated infrastructure will be approximately 46 300 m2. This includes the 20 Broiler Houses, Access Roads, Ablutions, Additional Dwelling, Water Treatment Plant, two Reservoirs, Diesel Tank, Generator Room, Gate House, Spray Race, Water Pipelines and Electrical cables. Please can you indicate the footprint or size of each of the abovementioned developments or infrastructure separately, as well as indicate the exact length of the new roads, water pipelines and electric cables, additionally specifying what material would be used for the electric cables and pipelines and whether these will be located above ground or below the ground.

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

Yours sincerely

Leandra Knoetze