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reference	LS14/2/6/1/7/4/225_poultry_Caledon
date	21 May 2025

PHS Consulting
P.O. Box 1752
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Attention: Olivia Brunings
By email: olivia@phsconsulting.co.za

Dear Ms. Brunings

Pre-Application Draft Basic Assessment Report for a Proposed Additional Poultry Rearing Facility on Remainder of Farm Grootvlei 225, Caledon (DEA&DP ref: 16/3/3/6/7/1/E4/5/1513/24)

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 proposed footprint for the additional poultry rearing facility is mapped as No Natural in the 2023 Western Cape Biodiversity Spatial Plan. There is a non-perennial river mapped directly to the south of the footprint with an in-stream dam and an associated channelled valley bottom wetland. The crop census layer on CapeFarmMapper for 2013, 2017 and 2023 maps the footprint as cultivated lands for livestock fodder.

The results from the screening tool indicate very high sensitivity for terrestrial biodiversity, medium sensitivity for animal species and low sensitivity for aquatic biodiversity and plant species.

The site sensitivity verification report indicates that no specialist studies were undertaken to address terrestrial biodiversity as there is no natural habitat remaining as described above and evident in the photos of the site and also applies to the plant species theme. While the protocols state that a compliance statement is required for verified low sensitivity, if there is evidence that a site is completely transformed, we do not consider it necessary to be verified by a specialist.

An aquatic biodiversity compliance statement was compiled to address the aquatic biodiversity theme in accordance with the protocols. It should further be noted that there is very high sensitivity mapped directly to the south associated with the features described above.

For the animal species theme, the same argument is presented as for the terrestrial biodiversity theme that the habitat is transformed and therefore no specialist studies were undertaken. One species was flagged as medium sensitivity, namely a grasshopper species. We wish to note that 4.6 of the protocols for the animal species theme states that “where SCC are found on site or have been confirmed to be likely present, a Terrestrial Animal Species Specialist Assessment must be submitted in accordance with the requirements specified for “very high” and “high” sensitivity in this protocol.”

With regards to the above, while the environmental assessment practitioner (EAP) may not have encountered any species of conservation concern (SCC) on site, in the NEMA Section 24G process for the existing poultry rearing facility undertaken in 2024, the Endangered Wildlife Trust (EWT) informed the EAP and CapeNature that there are at least three breeding pairs of Blue Crane (*Anthropoides paradiseus*) on the adjacent property to the north east (Farm 752). The proposed footprint borders on to the footprint and is relatively close to the nests according to the map provided and the species likely is encountered on the footprint. Blue Cranes are SANBI listed as near threatened on a national level and IUCN listed as vulnerable on an international level and is therefore an SCC. In accordance with the protocols an animal species assessment should be undertaken.

The aquatic biodiversity compliance statement included wetland delineation according to the standard best practice methodology. The delineated wetland is similar to the mapping of the National Wetland Map, if slightly reduced. The wetland is situated within a cultivated land which has resulted in the complete loss of wetland habitat and has also affected the soil structure. While the wetland was not visible during the site visit in the dry season the historical aerial imagery clearly depicts typical wetland/water flow characteristics.

The wetland is rated as seriously modified (E) present ecological state and low ecological importance and sensitivity. All components of the proposed development have been located outside of the 32 m buffer from the wetland and in-stream dam. As it is a compliance statement, impacts tables are not provided. A number of mitigation measures are provided, many related to water quality impacts, particularly during the operational phase.

It is noted that the proposal for the poultry raising facility is the same as for the existing facility which was subject to the NEMA Section 24G application, including that it will be a free-ranging facility and the carcasses will be disposed of at the same composting site. The concerns raised regarding the operations of the facility are equally relevant to this application as the S24G application. The responses regarding biosecurity included bird proofing of the poultry houses to ensure no access for wild birds, monitoring and testing and reporting and compliance. The

biosecurity measures should be provided to the faunal specialist. The existing composting facility on site will be used for disposal of carcasses and solid waste from the site.

A separate appendix describes the services for the facility. Stormwater management is not included in the appendix but is briefly described in the Basic Assessment Report. Confirmation must be provided that apart from the poultry houses and other structures/buildings and roads, the intervening areas will all be vegetated. A vegetated surface will attenuate run-off and absorb nutrients thereby minimizing any impact on the nearby watercourse. The Construction Phase and Operational Phase Environmental Management Programmes (EMPrs) address most of the required mitigation measures but must be comprehensive. Mitigation measures must be in place to prevent contamination from fuel for the generator.

In conclusion, CapeNature recommends that a faunal specialist study is required in accordance with the protocols. The outcomes of the aquatic biodiversity compliance statement are supported, however the EMPrs must be comprehensive.

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

Regards



Rhett Smart

For: Manager: Landscape Conservation Intelligence South