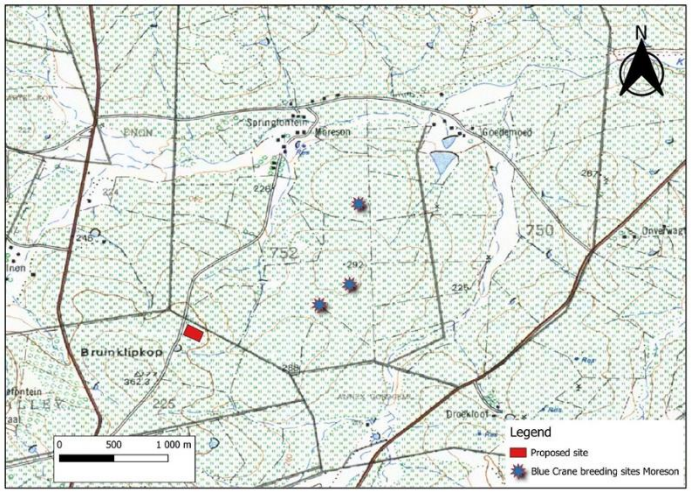
COMMENTS & RESPONSE REPORT

BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON

Opened 21 May 2025 at PHS Consulting Offices

No.	Name & Presenting Unit	COMMENT	RESPONSE
Pre-Application Draft BAR (Circulated from 16 April 2025 – 21 May 2025)			
1	Bernadette Osborne - DEADP Directorate: Development Management, Region 1	Email dated 6 May 2025: Please find attached this Directorate's correspondence regarding Remainder of Farm Grootvlei No. 225, Caledon.	Noted.
		Letter received via email dated 6 May 2025: ACKNOWLEDGEMENT OF 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 the Department's Directorate: Development Management Region 1 ("this Directorate") on 16 April 2025, refers.	Noted.
		2. This letter serves as acknowledgement of receipt of the abovementioned document.	Noted.
		3. Please note that this Directorate will consider the pre-application Draft BAR and issue a comment within the prescribed 30-day commenting period which ends on 21 May 2025.	Noted
		4. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.	This request is noted and will be complied with.
		5. Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Directorate	This comment is noted and will be complied with.

		6. This Directorate reserves the right to revise or withdraw initial comments or request further information from you based on any information received.	This comment is noted.
2	Christie Craig - Endangered Wildlife Trust	<u>Email dated 17 April 2025:</u> Please find attached comments pertaining to Blue Cranes near the facility. Will any new powerlines we constructed at the site?	<u>Email response provided 17 April 2025:</u> Thank you for the comments provided. A new underground electrical connection will be established to service the site.

		<u>Letter recived via email dated 17 April 2025:</u> Blue Cranes at Groote Valley 225 farm, Theewaterskloof Local Municipality 1. Following a site visit to Môreson 752 farm, we documented three Blue Crane Anthropoides paradiseus breeding sites as seen in Figure 1 below. Blue Cranes utilise the breeding territories for at least five months a year during the breeding season (from September to April) and can move throughout the day within the breeding territory. A flock of Blue Cranes is also known to be present on the farm throughout the winter. Blue Cranes are sensitive to disturbance during breeding, disturbance can cause them to abandon their nests temporarily (leaving them vulnerable to predation) or permanently.  **Figure 1.** Location of the three Blue Crane breeding sites and the proposed site for the infrastructure that will be built for chicken farming	1. This comment is noted. A faunal specialist study has been undertaken. The project site is found just over a kilometre away from the closest EWT identified Blue Crane breeding site. The area between the project site and the breeding sites consists of an area of intensive agriculture.

		2. The African Crane Conservation Programme of the Endangered Wildlife Trust would like to recommend that another site is selected further away from the current proposed site. This is due to possible disturbance during the breeding season and the close proximity to breeding territories. Barring this, disturbance to breeding cranes should be minimised during construction and operation of the facility. Cranes are globally Vulnerable according to the International Union for the Conservation of Nature (iucnredlist.org). Current research has shown that Blue Crane population numbers are declining in the Overberg region of the Western Cape, which is a stronghold for the species, it is vital to conserve this population.	2. This comment is noted. The proposed development site was selected based on several key factors, including its location on previously disturbed, unproductive agricultural land with no remaining natural vegetation, as well as the presence of existing access roads that minimize the need for further infrastructure development. The surrounding landscape is extensively cultivated for grain production and already experiences significant levels of human activity and disturbance. The faunal specialist study undertaken for the proposed development concluded that given the small size of the project area, the relatively large distance of the project area to the three breeding sites (> 1 km to the closest site, and almost 2 km to the furthest site), together with the likely high intensity of agricultural activities at the breeding site and in the immediate agricultural fields adjacent to the breeding sites during the summer months, it seems unlikely that the construction phase of the proposed project would impact the Blue Crane breeding. The Blue Crane breeding areas are more likely to be directly affected by practices on the farm itself where they breed. Overall, the proposed development is unlikely to generate significant negative impacts on the breeding activities of the Blue Crane. It is the specialists' opinion that the proposed development will have an overall low significance on Blue Crane.

3	George De Kok - Adjacent Landowner - Portion 1 of Farm 216, Annex Goedemoed	<u>Email dated 17 April 2025:</u> 1. I am responding to your invitation to comment on the impact Grootvlei's Chicken (Broiler) farming activities already has on the environment.	<u>Email response provided 17 April 2025:</u> 1. We will register you as an Interested and Affected Party and include the comments provided within our register. We will consider the impacts and provide appropriate responses in due course.
		2. I am absolutely apposed to further expansion of the enterprise for the following reasons.	EAP Response: 2. This comment is noted. However we do understand that the Applicant did engage with the I&AP, in order to resolve issues raised. We await further comment to confirm the resolution of issues.
		2.1. Already places a strain on underwater reserves (using borehole water for irrigation, cleaning of houses etc.)	2.1. The water required for the proposed development is available from within the existing approved water use allocations for the property. No new groundwater abstraction is required.
		2.2. No adequate housing for current labour force	2.2. Existing staff accommodation is considered adequate for current needs.
		2.3. Visual impact from Klein Swartberg Conservancy	2.3. The concern regarding potential visual impact is noted. The Klein Swartberg Conservancy is outside the 2.5 km zone of visual influence; visual impact is therefore unlikely. It's further proposed to screen the development with trees and to apply earth tone paint colours on buildings and to use charcoal roofs as impact mitigation.
		2.4. Impact of additional heavy vehicle traffic on N2- Greyton dirt road (34 ton feed delivery trucks)	2.4. The proposed facility will result in a modest increase in heavy vehicle traffic compared to current operations. District roads are higher-order rural roads that provide access between towns and farms and are primarily intended to support agricultural activities in the region. Access to the farm will be gained via District Road DR01294. This road has been recently maintained, is in a suitable condition to safely accommodate the additional vehicle loads associated with the new proposed development.

		2.5. Noise impact of moving chickens to slaughter (usually between midnight and 4 am) on same road.	2.5. It is acknowledged that vehicle movements typically take place during the early morning hours. While some noise is associated with these movements, they occur infrequently throughout the month. Operating during nighttime hours also has the benefit of avoiding peak traffic periods and general daytime activity, thereby minimising disturbance during regular working hours. Furthermore, the proposed development is situated within an agricultural landscape primarily used for grain cultivation and the area already experiences nighttime vehicle activity, during harvesting periods. Efforts will be made to minimise noise impacts, including using well-maintained vehicles, maintaining a speed limit of 20-40km/h on private onsite roads, restricting unnecessary idling, and managing loading activities efficiently. Additionally, transport routes are primarily through agricultural areas with low population density, further reducing potential disturbance to nearby residents.
		3. I would be more than willing to entertain you or someone from your company to elaborate on above claims. I am eagerly awaiting your response.	3. This comment is noted. However we do understand that the Applicant did engage with the I&AP, in order to resolve issues raised. We await further comment to confirm the resolution of issues.

4	Vanessa Stoffels - Western Cape Roads (Transport and Infrastructure Branch)	<u>Email dated 22 April 2025:</u> The message below refers to your application for the submission of a property environmental study for comment (Application No - 2025-04-0084) submitted to the Western Cape Government on 2025/04/15: Properties related to the application : • Portion 0 of Farm GROOT VALLEY 225, CALEDON Supporting documents submitted with the application : • Basic Assessment Report - (Draft-BAR-RE225-Grootvlei-Caledon-16-April-2025-1.pdf) • Site Layout Plan - (Appendix-A1-Locality-and-Topocadastral-Maps.pdf) • Site Development Plan - (Appendix-E21-Theewaterskloof-SDP-1.pdf) • Site Development Plan - (Appendix-B1-SDP.pdf) • Power of Attorney Letter - (Landowner Consent.pdf) • Title Deed - (Title Deed RE Farm Grootvlei number 225 Caledon.pdf) The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.	Noted.
		<u>Email dated 12 May 2025:</u> The message below refers to your application for the submission of a property environmental study for comment (Application No - 2025-04-0084) submitted to the Western Cape Government on 2025/04/16. Property related to the application • Portion 0 of Farm GROOT VALLEY 225, CALEDON	Noted.

		Letter received via email on 12 May 2025 dated 8 May 2025: REMAINDER OF FARM GROOT VALLEY NO.225, CALEDON: PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY COMMENTS ON DRAFT BASIC ASSESSMENT REPORT 1. Your e-mail to this Branch dated 16 April 2025 refers. 2. The subject property is located 17km south of Greyton and takes access off Minor Road 4123. 3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998. 4. This Branch will comment on the access upon receipt of the land use application.	The no-objection communication from the Western Cape Roads Transport and Infrastructure branch is noted.
5	Rulien Volschenk - Overberg District Municipality	Email dated 15 May 2025: Please find attached the ODM's comments on the proposed chicken rearing facility.	Noted.
		Letter received via email dated 15 May 2025: RE: PUBLIC PARTICIPATION PROCESS FOR A BASIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225 CALEDON. DEA&DP REF: 16/3/3/61711/E45/1513/24 1. The Overberg District Municipality's department of Environmental Management Services takes cognisance of the draft Basic Assessment Report for the proposed development of an additional poultry rearing facility on the remainder of farm 225, Grootvlei.	1. Noted.
		2. The ODM has no objection towards the application as the proposed activity aligns with the current zoning of the property and the development footprint is situated within a low sensitive area in terms of botanical and freshwater impact.	2. The no-objection comment is noted.

6	Ester Swart - IAP	<u>Email dated 16 May 2025:</u> 1. Ek is op julle webwerf en wil graag comment op een van die dokumente/sake daar gelys. Sal jy dalk vir my kan help om te verduidelik hoe lewer ek komentaar op website/dokument/saak?	<u>Email response provided 16 May 2025:</u> 1. Dankie vir die navraag. Is daar 'n spesifieke aansoek waarop jy graag kommentaar wil lewer? As jy vir my die naam van die aansoek kan gee, sal ek vir jou die e-posadres van die betrokke PHS konsultant kan deurstuur. Enige kommentaar kan dan direk aan daardie konsultant gestuur word. [Translation: Thank you for your inquiry. Is there a specific application you would like to comment on? If you can give me the name of the application, I will be able to forward you the email address of the relevant PHS consultant. Any comments can then be sent directly to that consultant.]
		<u>Email reply dated 16 May 2025:</u> 2. Ek verstaan. So ek stuur dit net per e-pos. Die grootvlei, caledon saak.	<u>Email response provided 16 May 2025:</u> 2. Dit is reg ja. Vir die Grootvlei aansoek kan jy enige kommentaar aan my stuur per e-pos. [Translation: That is correct. For the Grootvlei application, you can send me any comments by email.]
7	Jaco Swart - Springfontein Plaas	<u>Email dated 16 May 2025:</u> Hiermee wil ons net die volgende kommentare maak op die Grootvlei, Caledon aansoek. Sien Ref No. bo. [Translation: We would hereby like to make the following comments on the Grootvlei, Caledon application. See Ref No. above]	<u>Email response provided 16 May 2025:</u> Dankie vir die kommentaar ontvang. Ons registreer julle as 'n belanghebbende party. [Translation: Thank you for the comments received. We will register you as an interested party.]

		1. Kwaliteit van kwartelrivier se water- Daar is 'n kloof van die hoenderhokke wat gaan tot in die kwartelrivier. Die hoenders se afval kan loop tot in die kwartelrivier en die kwaliteit beïnvloed. [Translation: Quality of Kwartel River water - There is a valley from the chicken coops that goes into the Kwatel River. The chicken waste can run into the Kwartel River and affect the quality.]	1. The concern regarding potential contamination of the Kwartel River is noted. An aquatic specialist assessment was undertaken as part of the BAR. It considered potential water quality risks and concluded that, with the effective implementation of recommended mitigation measures, the risks to water quality are low. These mitigation measures have been incorporated into the EMPr. Key measures include designating the CVB wetland and its 28-meter buffer zone as a strict no-go area for all development activities, alongside stormwater controls to prevent contaminated runoff or wash water from entering adjacent drainage systems. The following waste and stormwater management practises have been outlined in the EMPr's and will be strictly implemented onsite: - Poultry manure will be contained within raised pens and removed at the end of each production cycle (approximately every two months). Manure will be immediately transported to the registered on-site composting facility, relevant onsite use location, or sold to users in the region. No composting or storage of manure will take place within the development footprint. As such there is no risk of waste directly entering downstream systems. - Stormwater will be excluded from poultry houses, and potentially nutrient-enriched runoff will be captured via perimeter drainage channels where settling and infiltration can occur in designated areas, thereby preventing runoff with the potential to impact downstream water quality from leaving the site. During cleaning, manure will first be dry-swept from the houses, with every effort made to remove all material before high-pressure washing. This approach will serve to minimize water use, and the small amount of residual moisture remaining after washing will be able to evaporate naturally. Collectively, these measures will reduce the generation of contaminated stormwater and prevent its release into natural watercourses, thereby safeguarding both surface and groundwater resources.

		2. Veiligheid op grond paaie- Hoe meer hoenderhokke daar is hoe meer beweging is daar op die paaie. Wat die algehele veiligheid beïnvloed. [Translation: Safety on dirt roads - The more chicken coops there are, the more movement there is on the roads. Which affects overall safety.]	2. These concerns are noted. The proposed facility will result in a modest increase in heavy vehicle traffic compared to current operations. Access to the farm will be gained via District Road DR01294. District roads are higher-order rural roads that provide access between towns and farms and are primarily intended to support agricultural activities in the region. DR01294 has been recently maintained, is in a suitable condition to safely accommodate the additional vehicle loads associated with the new proposed development. The road directly adjacent to the proposed development site is Minor Road 4123, which is currently in the process of being deproclaimed. Servitudes will be registered in favour of neighbouring landowners, thereby limiting public traffic on the route. To further enhance safety, the deproclaimed road can be widened at strategic points to allow safe passing, and warning signs will be installed at blind rises. In addition, a 20 -40 km/h speed limit will be enforced on all private onsite roads and large truck movements will mainly occur outside business hours The Western Cape Department of Infrastructure (Chief Directorate: Road Planning) has provided comment on the proposal and indicated that they have no objection to the development.
		<u>Email dated 21 May 2025:</u> Sien ook verdere komentaar op die dokument aangeheg. Ja, dit is reg oor die belanghebbende party. [Translated: See also further comments on the document attached. Yes, that is fine regarding registration as an interested party.]	Noted.

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<td>Letter received via email dated 21 May 2025:

Commenting on the development of Grootvlei No.225 Caledon as an Affected Party.

1. Introduction

The owners of Springfontein (217) have a long-standing generational heritage in Caledon and this proposed development threatens not only the sustainability of their Springfontein but also the broader rural character and ecological balance of the Overberg region.

We at Springfontein 217 would like to register as an affected party of the development at Grootvlei 225 Caledon. We have some concerns that influence us directly. Headings: Smell, Traffic, Erosion, safety and security, waste management issues and water use (contamination risks) for irrigation.</td>
<td>1. This comment is noted. Jaco Swart from Springfontein farm has been registered as an IAP for the NEMA process. we do understand that the Applicant did engage with the I&AP, in order to resolve issues raised. We await further comment to confirm the resolution of issues.

The area has a predominant agricultural character, the proposal is in line with that and the ecological aspects has been considered and studies in the EIA. Detailed comments to the concerns raised are provided below:</td>
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<td>2. Springfontein-Identified Concerns for Objections

The following Table indicates the impact of the proposed new activity as being advertised.

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<tr><th>Impact</th><th>Reason for Objection</th></tr>
<tr><td>Smell –

Orientation Relative to Prevailing Wind: The positioning of the chicken houses was aligned with the prevailing wind direction to promote the effective natural ventilation and facilitate the formation of natural visual and odour barriers.</td><td>All the main wind directions will carry the stench to the neighbouring farms and the homesteads.

The wind from the south impacts Moreson and Springfontein.

Also, when the farmers and their respective workers go past the proposed development to work on neighbouring fields.</td></tr>
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<td>2.

Smell –

This concern has been considered in the impact assessment, which concluded that the risk of significant odour impacts to surrounding farms and homesteads is low due to several factors:

- The nearest homesteads are located more than 1.6 km and 2.5 km away respectively. The proposed site is elevated and considering this and the distance any odour will be dissipated.

- Boundary landscaping including planting tree lines will be implemented to serve as an additional odour barrier.

- Manure is mainly contained within the houses and only removed once per cycle (±2 months), following strict handling practices which will minimize odour related impacts. Mortalities are removed in sealed containers.

- A strict cleaning schedule will be maintained to ensure ongoing cleanliness and to prevent the accumulation of organic waste, further minimising the potential for odour generation.

- The current operations have not recorded significant odour impacts to date.</td>
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		Safety and Security –	Apart from the obvious traffic risks, there is a significant crime risk. The safety of the farming community is of the utmost importance for those living in rural areas. With the development of this new site comes much more unnoticed traffic, and the farmers would not know if those traveling on the road leading to the new facility are for the purposes of the chicken farming operation or any other reason. Moreson and Springfontein are well-hidden farms, which contributes to the safety of the residents as there is very little unnoticed traffic or people passing through. The new development is situated on a hilltop overlooking the residents of Enon, Moreson, Springfontein and other neighbouring farms. Thus the farming community will lose their safety advantage as many staff and their guests, trucks, builders etc. will have unlimited visual access to all residents. This will also lead to more safety expenses.	**Safety and Security –** These concerns are noted. The road directly adjacent to the proposed development site is Minor Road 4123, which is currently in the process of being deproclaimed. Servitudes will be registered in favour of neighbouring landowners, thereby limiting public traffic on the route. Additionally, a security access control point can be established at the entrance to the deproclaimed road to further restrict unauthorized movement as agreed by parties involved. This matter has been discussed at a recent meeting with the applicant and adjacent landowners. The developer places great trust in his employees and has proactively invited neighbouring residents to meet the staff. It is believed that increased presence and collaboration will enhance overall safety in the area rather than diminish it.

		Waste Management Issues	Poultry farms generate large amounts of waste, which can lead to: Water pollution from runoff containing nutrients and pathogens. This runoff can contaminate local water bodies, leading to the eutrophication, which depletes oxygen in the water and harms aquatic life. Soil degradation due to excessive manure application can alter soil-ph and lead to nutrient imbalances. Thus us a substantial potential risk to the farming community adjacent to the existing chicken facilities and the proposed facility as the wastewater may find its way into the natural stream and the water sources on which the surrounding farm depend. Underground reservoirs may be impacted, highlighting the potential severity of such a risk. Irrigation out of the Kwartelrivier is also a big concern for farms that use the water eg. Springfontein.	**Waste Management Issues** The potential impacts associated with waste management and water quality impacts were assessed as part of the Basic Assessment process Detailed waste and stormwater management practises have been outlined in the EMPr's and will be strictly implemented onsite: - Poultry manure will be contained within raised pens and removed at the end of each production cycle (approximately every two months). Manure will be immediately transported to the registered on-site composting facility, to designated on-site use areas, or sold to approved users in the region. Any subsequent use within agricultural operations remains the responsibility of the end user and must comply with the relevant provisions of the NEM:WA. No composting or storage of manure will take place within the development footprint. - Stormwater will be excluded from poultry houses, and potentially nutrient-enriched runoff will be captured via perimeter drainage channels where settling and infiltration can occur in designated areas, thereby preventing runoff with the potential to impact downstream water quality from leaving the site. During cleaning, manure will first by dry-swept from the houses, with every effort made to remove all material before high-pressure washing. This approach will serve to minimize water use, and the small amount of residual moisture remaining after washing will be able to evaporate naturally. Collectively, these measures will reduce the generation of contaminated stormwater and prevent its release into natural watercourses, thereby safeguarding both surface and groundwater resources. - The applicant is an experienced respected farmer and understands soil management and avoidance of pollution. The manure is composted before application to the soils. Its organic and not chemical, soil degradation and groundwater pollution is not likely. An aquatic specialist assessment was undertaken as part of the BAR. It considered potential water quality risks and concluded that, with the effective implementation of recommended mitigation measures, the

			risks to water quality are low. These mitigation measures have been incorporated into the EMPr. Key measures include designating the CVB wetland and its 28-meter buffer zone as a strict no-go area for all development activities, alongside stormwater controls to prevent contaminated runoff or wash water from entering the wetland or adjacent drainage systems.

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<td>3. Major Concern:

Water use and Contamination Risk

- The Kwartel River, used by surrounding farm for irrigation and livestock, runs downslope from the proposed development. Runoff during heavy rains risks water pollution (e.g. S, E.coli) and eutrophication.

- Increased groundwater abstraction will deplete shared borehole sources.

<table>
<tr><th>Statement by Environmental Specialist</th><th>Comments</th></tr>
<tr><td>Water – The verified registered water use is sufficient for the proposed development activities.</td><td>All runoff water from the proposed site flows into the Kwartel River.

Neighbouring farm use this water as drinking water for sheep, as well as for irrigation and residential use. Water from the new development would negatively impact the water quality. (Salmonella risk)

This will primarily occur with heavy rain, as has happened before.

The facility’s layout directs runoff from both sides of the proposed development to the middle of the development, which was clearly done to deal with the accumulated runoff water. This is in contrast to the statement that the development was designed to deal with the stench and mitigate that with the prevailing winds.</td></tr>
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<td>3. Water use and Contamination Risk

The concern regarding potential contamination of the Kwartel River is noted. Please refer to the detailed response provided the above point.

The proposed development layout was not intentionally designed to concentrate or direct stormwater runoff to the centre of the development. Rather, the layout was developed to minimise the development footprint, support effective natural ventilation, ensure the development is sufficiently set-back from roads, property boundaries and sensitive environmental features and ensure adequate spacing between structures for biosecurity and rotational grazing purposes. Planted pasture will be established between poultry houses and landscaping will be implemented in any bare areas onsite. The vegetated nature of these areas will assist with improving infiltration and reducing surface runoff from the site.

Stormwater management measures, inclusive of a perimeter drainage channel and settling area, will be implemented to prevent any adverse environmental impacts (including during heavy rainfall events) as detailed in the above response.

Groundwater Abstraction:

The water required for the proposed development is available from within the existing approved water use allocations for the property. No new water abstraction is required.</td>
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		4. **Conclusion** While poultry farming is an important industry, addressing its environmental impacts through sustainable practices and responsible management is crucial. The concerns mentioned in this document is of big concern for Springfontein and the effect on us worrying.	4. This comment is noted.
8	Chris Fourie - Neighbouring Landowner	<u>Email dated 19 May 2025:</u> My name is Christoffel Hendrik Fourie, identity number . I am a trustee of Goedemoed Plaas (Farm No. 750) and a director of the operating company. I am writing as a neighbouring landowner in reference to the proposed development of a poultry rearing facility on Grootvlei Farm (Farm No. 225), Caledon, in the Western Cape. While I recognise the right of landowners to pursue agricultural development, it is equally important that neighbouring farmers have an opportunity to raise practical concerns during the planning process. I kindly request to be registered as an affected party and included in all future communication and consultatio n processes related to this proposed development. I would like to submit the following key concerns and considerations:	This comment is noted. Chris Fourie has been registered as and IAP for the NEMA process.

		1. Security, Road Access, and Local Movement The proposed facility is located near Road 4123, which, while not our main access road, falls within the road network we intend to enclose along with our primary road for security purposes. Our current access road is frequently used by the public, creating ongoing challenges in monitoring movement across our operations. With the potential introduction of external contractors and workers, we are increasingly concerned about rural crime and stock theft. We are actively working to secure our premises and ask that these concerns be considered in your planning. It is also my understanding that other possible sites for the rearing facility have been identified and should be seriously considered instead of the preferred site along Road 4123, as those alternatives may pose fewer risks and concerns for neighbouring landowners. We further believe that individuals accessing the site should be properly vetted to help maintain safety a nd trust in the local farming community.	**1. Security, Road Access and Local Movement** This concern is noted and has been duly considered. The road directly adjacent to the proposed development site is Minor Road 4123, which is currently in the process of being deproclaimed. Servitudes will be registered in favour of neighbouring landowners, thereby limiting public traffic on the route. This will limit public access to the area. Additionally, a security access control point can be established at the entrance to the deproclaimed road to further monitor and restrict unauthorized movement as agreed by the parties involved. This matter has been discussed at a recent meeting with the applicant and adjacent landowners. The applicant places great trust in his employees and has proactively invited neighbouring residents to meet the staff. It is believed that increased presence and collaboration will enhance overall safety in the area rather than diminish it. Site Alternative: While alternative site locations within the property were initially considered prior to the EIA, no practically, reasonable or feasible site alternative were identified.

		2. Environmental and Water Considerations The Kwartelrivier, which runs through our farm, is our primary source of water for livestock. While it is not used for domestic purposes, the potential for contamination due to runoff or mismanagement of poultry waste is a serious concern, with implications for livestock health, land productivity, and the environmen t. In addition, the river provides a natural habitat for several species, including the Blue Crane, South Africa 's national bird, which is classified as a vulnerable and endangered species. The preservation of this nat ural ecosystem is vital.	**2. Environmental and Water Considerations** The concern regarding potential contamination of the Kwartel River is noted. Detailed waste and stormwater management practises have been outlined in the EMPr's and will be strictly implemented onsite: - Poultry manure will be contained within raised pens and removed at the end of each production cycle (approximately every two months). Manure will be immediately transported to the registered on-site composting facility, relevant onsite use location or sold to users in the region. No composting or storage of manure will take place within the development footprint. - Stormwater will be excluded from poultry houses, and potentially nutrient-enriched runoff will be captured via perimeter drainage channels where settling and infiltration can occur in designated areas, thereby preventing runoff with the potential to impact downstream water quality from leaving the site. During cleaning, manure will first by dry-swept from the houses, with every effort made to remove all material before high-pressure washing. This approach will serve to minimize water use, and the small amount of residual moisture remaining after washing will be able to evaporate naturally. Collectively, these measures will reduce the generation of contaminated stormwater and prevent its release into natural watercourses, thereby safeguarding both surface and groundwater resources. Furthermore, an aquatic specialist assessment was undertaken as part of the BAR. It considered potential water quality risks and concluded that, with the effective implementation of recommended mitigation measures, the risks to water quality are low. These mitigation measures have been incorporated into the EMPr. Key measures include designating the CVB wetland and its 28-meter buffer zone as a strict no-go area for all development activities, alongside stormwater controls to prevent contaminated runoff or wash water from entering adjacent drainage systems.

			A faunal specialist study was also undertaken for the proposed development site. This study concluded that given the small size of the project area, the relatively large distance of the project area to the three breeding sites (> 1 km to the closest site, and almost 2 km to the furthest site), together with the likely high intensity of agricultural activities at the breeding site and in the immediate agricultural fields adjacent to the breeding sites during the summer months, it seems unlikely that the construction phase of the proposed project would impact the Blue Crane breeding. The Blue Crane breeding areas are more likely to be directly affected by practices on the farm itself where they breed. Overall, the proposed development is unlikely to generate significant negative impacts on the breeding activities of the Blue Crane. It is the specialists' opinion that the proposed development will have an overall low significance on Blue Crane.
		3. Farming Operations and Compatibility The introduction of a poultry facility nearby may affect the compatibility of certain farming practices. As part of our commitment to regenerative and sustainable agriculture, we are planning to use chicken man ure sourced from various facilities as a natural fertiliser in our grain operations. However, it is currently unclear whether this practice will still be permitted under any new biosecurity or regulatory requirements associated with the proposed poultry development. Our farm also carries out seasonal pest control activities, which include both chemical and mechanical methods. These are standard practices for responsible crop management, and we would not want them to conflict with or be restricted due to the poultry facility's operational protocols.	**4. Farming Operations and Compatibility** The proposed poultry facility is designed to support sustainable and circular agricultural practices, including the beneficial reuse of poultry manure in crop production. The proposed poultry facility will not restrict or conflict with standard agricultural practices on surrounding farms. The facility is being developed within an existing agricultural context and can coexist with ongoing farming operations in the area. The applicant has requested that neighbouring landowners notify them of planned crop spraying to allow for appropriate operational planning, thereby minimising any potential risk to poultry.
		5. Please confirm receipt of this correspondence and my registration as an affected party. I am available for any further information or engagement required.	5. This comment is noted. Chris Fourie has been registered as and IAP for the NEMA process.

9	Jan Visagie -Future Plan – Town and Regional Planning representing the owners of Farm 752 (Môreson)	<u>Email dated 19 May 2025:</u> Please find our client's objections attached to this email in terms of the application with reference number - 16/3/3/6/7/1/E4/5/1513/24 BASIC ASSESSMENT REPORT: BASIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON.	Email response provided 19 May 2025: Thank you for the comments received. You will be registered as an Interested and Affected Party for the NEMA process.
		<u>Letter recived via email dated 19 May 2025:</u> OFFICIAL OBJECTIONS AGAINST: BASIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON **1. Introduction** We act on behalf of the owners of Farm 752 (Môreson), located 30 metres north of the proposed expansion of a poultry rearing facility on Farm Grootvlei No. 225, Caledon. This document constitutes a formal objection against the Basic Assessment Report submitted by the applicant, Bapchix (Pty) Ltd. The owners of Môreson have a long-standing generational heritage in Caledon, and this proposed development threatens not only the sustainability of their farm but also the broader rural character and ecological balance of the Overberg region.	1. This comment is noted. Please note that the homestead is 2.5 km north of the proposed development site. The boundary is 30 m and the area in between the boundary and the homestead is agricultural operations.
		2. Brief Our Brief was to scrutinise the EIA documents provided on the Environmental Practitioners' website, consider our client's concerns, and comment on or object to the proposed activities as advertised.	2. Noted.

		3. **Background in terms of the application** The following descriptions for the proposed activities on the property (Remainder Farm Grootvlei No. 225, Caledon) The proposed development/expansion will be located in an area predominantly used for grain, wheat, and sheep farming. For these activities to succeed and ensure sustainability, the farmers heavily depend on the environment to provide the required safeguarding measures and influences. Concerning the above, it should be noted that bird life, bee movement, and the ability to pollinate specific cultivars are extremely important to farming operations. Farmers have little influence over these processes, except to keep the environment pristine and ensure that no negative impact would result from their and other farming operations within the area. Because of this, most farmers moved away from harmful chemicals when spraying their respective crops to get rid of pests. The activities and background for the proposal are listed below as per the statement– The proponent of Bapchix (Pty) Ltd plans to expand the existing chicken farm on Farm Grootvlei No. 225, Caledon, by constructing an additional poultry rearing facility. The proposed development property is approximately 317ha in extent and is located approximately 15 kilometres northeast of Caledon and approximately 3 kilometres north of the N2. It is accessible via a dirt road. The proposed development area is approximately 5.5 ha in extent and located in the northeastern portion of the property. The following development is proposed: 1) Ten new chicken houses with free-range grazing between houses; 2) Staff housing and ablution facilities with a septic tank system; 3) An office; 4) A loading bay; 5) A shaving shed; 6) A water treatment facility; 7) A generator room; 8) Internal access routes <8m wide; and 9) A biosecurity access control point. The new chicken houses will accommodate a maximum of 16,500 chickens per house, and each house will be approximately 1000m² in extent, with free-range pasture located between the houses. The chicken pens will be fenced off from the surrounding area for biosecurity purposes. The preferred alternative's location and layout have been developed based on existing access routes, service availability, prevailing wind directions, environmental sensitivities, and biosecurity requirements, and they have attempted to avoid environmental impacts as far as possible.	3. The background provided is noted.

		4. Grounds of Objection 4.1. Client-Identified Concerns for Objections The following Table indicates the impact of the proposed new activity as being advertised.	4.

Impact	Reason for Objection
Smell – Orientation Relative to Prevailing Wind: The positioning of the chicken houses was aligned with the prevailing wind direction to promote effective natural ventilation and facilitate the formation of natural visual and odour barriers.	All the main wind directions will carry the stench to the neighbouring farms and the homesteads. The wind directions from the southeast will impact the farm Enon, the south impacts Môreson and Springfontein, and the northwest impacts the Fourie farm. Also, when the farmers and their respective workers go past the proposed development to work on neighbouring fields. The District Road (DR01294) traverses the property, and both facilities are only 1km away from the tourist road leading to Greyton. District Road DR01279 will also be negatively impacted, and the reason is that fewer tourists make use of these roads to reduce the impact of the smell.

Smell –

This concern has been considered in the impact assessment, which concluded that the risk of significant odour impacts to surrounding farms and homesteads is low due to several factors:

- The nearest homestead is located more than 1.5 km NW and 2.5km N away, the pens are located elevated from these residences and considering distance any odour will dissipate
- Boundary landscaping will be implemented to serve as an additional odour barrier.
- Manure is mainly contained within the houses and only removed once per cycle (±2 months), following strict handling practices which will prevent odour related impacts. Mortalities are removed in sealed containers.
- A strict cleaning schedule will be maintained to ensure ongoing cleanliness and to prevent the accumulation of organic waste, further minimising the potential for odour generation.
- The existing Grootvlei chicken pen operations are strictly controlled and has not recorded odour complaints to date.

District Road DR0129 is located approximately 1km away from the proposed facility and District Road DR01279 is located approximately 2km away from the proposed facility with topographical features providing additional separation. Touritsts typically travel in enclosed vehicles, and any odour would be infrequent and limited to short periods during cleaning. Given the rural context and distance from the tourist road potential impact on passing tourists is considered very low.

			Noise The land use of the property and surrounding area is primarily agricultural in nature. The proposed development structures will be visually identical to the authorised structureson farm no. 226 which borders the proposed development site (farm no. 225) to the south. The authorised chicken houses on farm no. 226 are located immediately south of the development site's southern boundary. The proposed development is unlikely to be visually intrusive within the agricultural landscape. Noise from inside the units will be largely contained as the units are completely enclosed. Noise from agricultural activities on site is deemed acceptable in the current setting. The proposed land use is agricultural and is compatible with the surrounding rural/ agricultural area. Due to the scale and nature of the development, all potential impacts on people's health and well-being are anticipated to be low to negligible. Please refer to Appendix J for a detailed Impact and Risk Assessment.	The proposed new structure's location high up on the hill, with the wind directions taken into consideration, will not limit the noise levels. Due to the lack of trees, high scrubs, and plants around the structures, the noise levels will be carried far from this location, especially when the grain/wheat has been harvested.	**Noise -** Potential noise impacts were assessed as part of the Basic Assessment process and, with mitigation, were rated as low. The proposed site is located within a large agricultural property, with neighbouring dwellings situated at a considerable distance with the closest 1.6 km NW and the other 2.5 km N from the development. Boundary landscaping, including trees, will be established to act as a noise buffer. Staff will be instructed to minimise noise, especially after hours, and all equipment will be properly maintained. Planted pastures will be established between chicken houses and additional vegetation will be established in bare areas to help reduce noise propagation.

			Traffic Setback from roads and property boundaries: The preferred development site has been positioned in accordance with legislative requirements, ensuring appropriate setbacks from both roads and property boundaries.	Trucks and staff will regularly travel on the access road past the new development (road 4123), which is our client's primary and, in wintertime, only access to their residence. The road is so narrow that a truck will block the whole road. This makes for a hazardous situation. Not only will the trucks block the road, but the road has a steep hill just before the site from the Môreson Farm, with no line of sight until crossing the hilltop. Heading north on the road, you cannot see the oncoming traffic due to the steep hill, and with the oncoming trucks blocking the road (especially while heading in the opposite direction), it will create a hazardous situation. The movement of heavy vehicles for the use of existing grain farming operations will therefore be hindered and impact on the traffic flow during the night, especially when it is harvesting time and the lorries must get to the silos. Like other neighbouring farms, all residents and school children from Môreson Farm use the road daily.	**Traffic –** This concern is noted. The road directly adjacent to the proposed development site is Minor Road 4123, which is currently in the process of being deproclaimed. Servitudes will be registered in favour of neighbouring landowners, thereby limiting public traffic on the route. To further enhance safety, the deproclaimed road can be widened at strategic points to allow safe passing, and warning signs will be installed at blind rises. In addition, a 20-40 km/h speed limit will be enforced on all private onsite roads. The Western Cape Department of Infrastructure (Chief Directorate: Road Planning) has provided comment on the proposal and indicated that they have no objection to the development. The proposed development will result in a modest increase in heavy vehicle traffic compared to current operations. Even during harvest season, overlap with grain operations will be limited.

				Feed trucks (delivering feed to existing poultry sites) regularly get stuck and block the roads. As the farm owners (chicken farm owners) do not always have the necessary machinery, the neighbours are requested to assist in such circumstances. Trucks will turn in and out of the site and block the road access. This makes for a hazardous situation, as there have already been accidents on this specific stretch of road.	

			Negative Impact on Economy & Tourism	This purpose-built new site will be situated on a hilltop. It will block and destroy the beautiful views of Klein Swartberg Mountain that all residents of the neighbouring farms, as well as tourists travelling by the off-beaten tracks to and from Greyton, have enjoyed. The new development is also situated right next to the entrance (20/30 m) of Môreson Farm, which will surely degrade the farm entrance. Môreson and the surrounding farms have the potential for tourism income due to their beautiful views of the mountains. This potential income will not be possible if the new development occurs right before the mountain views. Job creation for the locals will not necessarily occur, as migrants are often used as labour on such farms. Proof of South African citizenship must be a prerequisite for approving such endeavours.	**Negative Impact on Economy & Tourism** <u>Visual:</u> The concern regarding potential visual impact is noted. Following the pre-application public participation process, a meeting was convened between the applicant and interested and affected landowners where this matter was discussed. It was agreed that visual screening through tree planting along the boundary would mitigate potential impacts. The land use of the property and surrounding area is primarily agricultural in nature. The proposed structures will be similar in form and scale to the authorised chicken houses on a neighbouring farm. Views from the district roads are restricted by the undulating topography of the area. While the development will be visible from the adjacent gravel access road, the visual impact can be mitigated by landscaping and visual screening by trees and the application of earth tone paint on buildings and charcoal roofs. Please refer to the Visual Statement confirming the visual impact findings. <u>Farm Entrance:</u> Two access routes via minor roads to Môreson Farm exist from the surrounding district roads, and both are relevant for general farm access. The site has been set back from roads and property boundaries in line with applicable legislative requirements, and trees can be planted to provide visual screening. <u>Tourism:</u> The proposed development is consistent with the property's current agricultural zoning, and appropriate visual mitigation measures are available and will be implemented to ensure visual integration within the existing agricultural landscape. <u>Jobs:</u> South African labour laws allow for the fair and legal employment of both local and foreign workers.

			Landscape/Visual Impact Assessment – The land use of the property and surrounding area is primarily Agricultural in nature. The proposed structures will closely resemble the authorised structures on farm no. 226 which borders the proposed development site (farm no. 225) to the south. The authorised chicken houses on farm no. 226 are located immediately south of the development site's southern boundary. The proposed development on farm no. 225 is unlikely to be visually intrusive. The primary view corridor is from the gravel road that runs immediately adjacent to the proposed site. The proposed development will be clearly visible from this internal access road, however, given that this road is a secondary access route to the neighbouring farm, the visual impact will be limited. Given the topography of the landscape, the proposed development site is not visible from any primary or secondary external roads. No Landscape/ Visual Impact Assessment will be required.	We submit that the Overberg vernacular architecture style cannot be duplicated to serve the purpose of the farm buildings adjacent to Farm 225, Caledon, except when this statement is in relation to the existing chicken farm on Farm 226. Those structures (those on Farm 226) should never have been allowed, as they already provided the precedent this application is now trying to ride for approval of no-visual impact. This will substantially negatively impact the area's visual landscape, especially because the proposed activity is located on the higher end of the hill. A site visit from the Department of Environmental Affairs officials will underline the statement made on behalf of our client.	**Landscape/Visual Impact Assessment** – A Visual Statement was completed and attached to the BAR. The concern regarding potential visual impact is noted. Following the pre-application public participation process, a meeting was convened between the applicant and interested and affected landowners where this matter was discussed. It was agreed that visual screening through tree planting along the boundary would mitigate potential impacts. The land use of the property and surrounding area is primarily agricultural in nature. Given the topography, the proposed development on Farm 225 will not be visually intrusive neither will it have a negative impact on any primary or secondary external road users. A 2.5 km zone of visual influence was identified around the site, two homestead receptors were identified 1.6 km and 2.5 km respectively. Only the 2.5 km receptors will have line of sight over a considerable distance. While the development will be visible from two district gravel access roads its sporadic and approx. 2 km out while driving in a landscape that already contains chicken pens and agricultural infrastructure and practices. Considering the visual mitigation of tree planting and earth tone paint colours and charcoal roofs, the visual impact will be low.

			Fauna and Flora- Setback from Sensitive Environmental Features: A channelled valley bottom wetland was delineated to the southeast of the proposed development site. The layout was adjusted to ensure that the development remains as far as reasonably possible from this freshwater feature, in line with environmental best practice. Biosecurity and Grazing Requirements: Adequate spacing between chicken houses was maintained to meet biosecurity standards and grazing requirements, without compromising the compact nature of the design.	It is noted that Blue Cranes nest annually close to the proposed new development. This poses a significant risk for the Blue Crane population that lives and nests in this area. High-density farming can lead to: ○ Increased disease transmission among birds, necessitating more antibiotics and chemicals. ○ Greater reliance on chemical treatments, which can harm the environment by contaminating soil and water. With this new facility, the risks of bird flu will increase by more than 30%, negatively impacting the area's birdlife.	**Fauna and Flora-** The faunal specialist study undertaken for the proposed development concluded that given the small size of the project area, the relatively large distance of the project area to the three breeding sites, together with the likely high intensity of agricultural activities at the breeding site and in the immediate agricultural fields adjacent to the breeding sites during the summer months, it seems unlikely that the construction phase of the proposed project would impact the Blue Crane breeding. The Blue Crane breeding areas are more likely to be directly affected by practices on the farm itself where they breed. Overall, the proposed development is unlikely to generate significant negative impacts on the breeding activities of the Blue Crane. It is the specialists' opinion that the proposed development will have an overall low significance on Blue Crane. Furthermore, antibiotics are only used when birds are sick. Strict biosecurity measures are in place within the existing facilities and have proven effective in limiting disease transmission. The statement that bird flu risk will increase by 30% is unsubstantiated.

			Erosion	The access road has lost gravel, and the steep hill will create more problems. Lack of maintenance, combined with the additional heavy traffic on the road, will lead to even more erosion. The proposed site is on a hilltop and will contribute to more erosion due to its location. Water will accumulate due to the hard surface and pick up speed from this high site.	**Erosion** Access to the farm will be gained via District Road DR01294. District roads are higher-order rural roads that provide access between towns and farms and are primarily intended to support agricultural activities in the region. DR01294 has been recently maintained, is in suitable condition to safely accommodate the additional vehicle loads associated with the new proposed development. The road directly adjacent to the proposed development site is Minor Road 4123, which is currently in the process of being deproclaimed. Appropriate maintenance measures—coordinated with other road users—will be implemented to ensure that all private access roads remain in good condition. Erosion control measures have been included in both the construction and operational EMPrs. An ECO or site manager will monitor the site and private access road and implement erosion mitigation where needed. At the site, grazing areas and landscaping will promote infiltration and minimise volume and velocity of runoff, and stormwater channels will manage runoff and prevent erosion.

			Safety and Security -	Apart from the obvious traffic risks, there is a significant crime risk. The safety of the farming community is of the utmost importance for those living in rural areas. With the development of this new site comes much more unnoticed traffic, and the farmers would not know if those travelling on the road leading to the new facility are for purposes of the chicken farming operation, or for any other reason. Môreson and Springfontein are well-hidden farms, contributing to the residents' safety as there is very little unnoticed traffic or people passing through. The new development is situated on a hilltop overlooking the residents of Enon, Môreson, Springfontein, and other neighbouring farms. Thus, the farming community will lose their safety advantage, as many staff and their guests, trucks, builders, etc., will have unlimited visual access to all residents. This will also lead to more safety expenses.	**Safety and Security –** These concerns are noted. The road directly adjacent to the proposed development site is Minor Road 4123, which is currently in the process of being deproclaimed. Servitudes will be registered in favour of neighbouring landowners, thereby limiting public traffic on the route. Additionally, a security access control point can be established at the entrance to the deproclaimed road to further monitor and restrict unauthorized movement as agreed by the parties involved. This matter has been discussed at a recent meeting between the applicant and adjacent landowners. The applicant places great trust in his employees and has proactively invited neighbouring residents to meet the staff. It is believed that increased presence and collaboration will enhance overall safety in the area rather than diminish it.

			Pest Controls	If the facility is approved, pest control will be limited for the area's existing wheat and grain farmers. Crop spraying via aeroplane (curtail) will be limited as the drift and noise will harm the poultry in the new development, just 30m from the field's border. This will lead to yield losses of high potential agricultural land on the neighbouring farm (Môreson). Harvesting and other farm activities create dust, which might harm poultry in the new development.	**Pest Controls** The proposed poultry facility will not restrict or conflict with standard agricultural practices on surrounding farms, including pest control measures. The facility is being developed within an existing agricultural context and can coexist with ongoing farming operations in the area. The applicant has requested that neighbouring landowners notify them of planned crop spraying to allow for appropriate operational planning, thereby minimising any potential risk to poultry.

			Waste Management Issues	Poultry farms generate large amounts of waste, which can lead to: Water pollution from runoff containing nutrients and pathogens. This runoff can contaminate local water bodies, leading to eutrophication, which depletes oxygen in the water and harms aquatic life. Soil degradation due to excessive manure can alter soil pH and lead to nutrient imbalances. This is a substantial potential risk to the farming community adjacent to the existing chicken facilities and the proposed facility, as the wastewater may find its way into the natural stream and the water sources on which the surrounding farms depend. Underground reservoirs may be impacted, highlighting the potential severity of such a risk.	The potential impacts associated with waste management and water quality impacts were assessed as part of the Basic Assessment process Detailed waste and stormwater management practises have been outlined in the EMPr's and will be strictly implemented onsite: - Poultry manure will be contained within raised pens and removed at the end of each production cycle (approximately every two months). Manure will be immediately transported to the registered on-site composting facility, relevant onsite use locations, or sold to users in the region. Any subsequent use within agricultural operations remains the responsibility of the end user and must comply with the relevant provisions of the NEM:WA. No composting or storage of manure will take place within the development footprint. - Stormwater will be excluded from poultry houses, and potentially nutrient-enriched runoff will be captured via perimeter drainage channels where settling and infiltration can occur in designated areas, thereby preventing runoff with the potential to impact downstream water quality from leaving the site. During cleaning, manure will first by dry-swept from the houses, with every effort made to remove all material before high-pressure washing. This approach will serve to minimize water use, and the small amount of residual moisture remaining after washing will be able to evaporate naturally. Collectively, these measures will reduce the generation of contaminated stormwater and prevent its release into natural watercourses, thereby safeguarding both surface and groundwater resources. - The applicant is an experienced respected farmer and understands soil management and avoidance of pollution. Manure is organic and not chemical; with suitable management soil degradation and groundwater pollution is not likely. An aquatic specialist assessment was undertaken as part of the BAR. It considered potential water quality risks and concluded that, with the effective implementation of recommended mitigation measures, the risks to water quality are low. These mitigation measures have been incorporated into the EMPr. Key measures include designating the CVB

					wetland and its 28-meter buffer zone as a strict no-go area for all development activities, alongside stormwater controls to prevent contaminated runoff or wash water from entering the wetland or adjacent drainage systems.
			Greenhouse Gas Emissions	Poultry farming contributes to greenhouse gas emissions through: ○ Methane and nitrous oxide are released from manure, potent greenhouse gases contributing to climate change. ○ Carbon dioxide from energy used in farming operations, including heating, ventilation, and transportation. While the adjacent farmers use the dried manure as part of their compost on their fields, it is questionable if they could import additional manure that may have an adverse reaction to what they have already used in the past. This would mean a monopoly that the chicken farmer would then create artificially.	**Greenhouse Gas Emissions** This comment is noted. While the scale of the proposed facility is relatively small compared to industrial operations, measures have been incorporated to limit emissions as far as practicable. Manure will be removed regularly (approximately every two months) and either composted on-site under controlled aerobic conditions—which reduces methane generation compared to landfills—or collected by neighbouring farmers for responsible reuse. No manure will be stored outdoors within the propsoed development footprint thereby limiting uncontrolled decomposition and associated emissions. Energy use will be managed efficiently, with ventilation and heating systems selected for energy performance. Where feasible, the use of passive ventilation and natural lighting have been prioritised. <u>Manure use on adjacent farms:</u> The proposed poultry facility will not restrict or conflict with standard agricultural practices on surrounding farms. The applicant does not require surrounding farmers to use manure from onsite facilities.

			Water Usage	Poultry farming requires significant water resources, which can lead to: ○ Depletion of local water supplies, affecting both human and ecological needs. ○ Increased competition for water among agricultural and urban needs, potentially leading to conflicts over water resources.	**Water Usage** The water required for the proposed development is available from within the existing approved water use allocations for the property. No new water abstraction is required. Furthermore, water use within the facility will be minimized by dry-sweeping pens prior to washing the units. Units will be washed with high pressure hoses only once dry matter has been removed as outlined in the operation EMPr.
			Antibiotic Resistance	The use of antibiotics in poultry can contribute to: ○ Development of antibiotic-resistant bacteria, which can spread to humans and other animals, posing significant public health risks. ○ Potential health risks to humans through the food chain, as antibiotic residues can remain in meat products.	**Antibiotic Resistance –** Antibiotics are not used routinely but only when birds are sick. The facility operates under stringent biosecurity protocols, audited by the EFRC, Woolworths, and State Veterinarians. These protocols significantly reduce disease risk and help prevent the development of antibiotic resistance.
			Job Creation	As already stated, it is unclear whether this new facility will provide only job opportunities for local people. It is further unclear if any other new opportunities within the region will be created as such, and if this will only increase the potential income for the farm owner.	**Job Creation** The proposed development will create new direct and indirect job opportunities during the construction and operational phase of the development and allow for skills transfers to new employees. The proposed development will also have knock-on effect for trade in local economy in Caledon.
		4.2. Comments on the Summarised Impacts of the Proposed Development by Environmental Specialists			

			Statement by Environmental Specialist	**Comments**	Assessment of cumulative impacts has been included within the impact assessment. The Section 24G Application has been concluded. Multiple rounds of public participation were conducted as part of the Section 24G process. This included the publication of an advertisement in the *Hermanus Times* on 26 June 2024, as well as the placement of a site notice at a prominent location along the boundary of the proposed development site for the duration of the commenting period. In addition, the proposed development is currently undergoing a Basic Assessment process. A pre-application Draft Basic Assessment Report was made available for public review and comment from 16 April 2025 to 21 May 2025. As part of this process, an advertisement was published in the *Hermanus Times* on 16 April 2025, and a site notice remained in place at a visible location on the site boundary for the duration of the commenting period. Copies of the advertisements are included in Appendix F.
			An existing poultry rearing facility is located approximately 2km southwest of the new proposed development site on the same property (RE/225, Grootvlei, Caledon). The existing facility was developed between 2005 and 2011, without prior authorization. A voluntary S24G process has been initiated and is nearing finalisation.	The Impact assessment is done only in terms of one facility. The combined impact of 3 (three) such facilities should be considered, not as stand-alone facilities. Advertisements are not displayed for the proposed or the Section 24G application sites.	

			Access – Access to the property is existing. Existing internal dirt roads provide access to the proposed development site. Additional internal dirt roads (<8m wide) will however be required for access between the chicken houses.)	The report does not mention maintenance of the existing gravel road or comments from the Department of Provincial Roads regarding the District Road, which is seen as a scenic road within the Theewaterskloof Municipal Area. Access to Môreson Farm has been established along the access road to the proposed site for more than 30 years. Under South African Law, their right to use the access road has been vested. However, the impact of their traffic concerns and fears has not been appropriately addressed.	This comment is noted. Access to the farm will be gained via District Road DR01294. District roads are higher-order rural roads that provide access between towns and farms and are primarily intended to support agricultural activities in the region. DR01294 has been recently maintained, is in a suitable condition to safely accommodate the additional vehicle loads associated with the new proposed development. The road directly adjacent to the proposed development site is Minor Road 4123, which is currently in the process of being deproclaimed. The maintenance of private gravel access road(s) has been incorporated into both the construction and operational EMPrs. Appropriate maintenance measures—coordinated with other road users—will be implemented to ensure that all private access roads remain in good condition. The Western Cape Department of Infrastructure (Chief Directorate: Road Planning) has provided comment on the proposal and indicated that they have no objection to the development – please refer to comment No. 4 in this Comments and Response Report. The right of access to Môreson Farm via Minor Road 4123 is acknowledged, and the proposed development will not restrict use of this route. It is noted that the road is currently undergoing a deproclamation process, and a servitude will be registered in favour of Môreson Farm to ensure continued legal access. Traffic-related concerns have been addressed in the responses provided above.

			Electricity – Electricity supply to the proposed development will be established via extension of existing electrical infrastructure. Eskom has confirmed sufficient capacity (Refer Appendix E16). A step-up and step-down underground cable from an existing Eskom transformer will be run to the proposed development site. Electricity supply will likely be supplemented via generators.	The extension of existing lines to include the provision of electricity to the proposed location will have further determinantal visual impact on the development. With the additional provision of generators to be installed, the noise levels will further increase, disturbing the natural environment and the peace of those nearby. It is understood that the electrical line will have to be extended either over the road from one end of the farm or from Farm 226, which would require further approval in terms of NEMA.	An underground electrical connection will be established, ensuring no visual impact from new cabling. The installation falls within thresholds that do not trigger additional NEMA-listed activities. Generators will be used solely as backup during load shedding and not for regular operations.
			Sewage—A septic tank system will be installed at the proposed development site, as no wastewater treatment works are nearby.	If not run correctly, a septic tank system will pollute the underground over time, and no guarantee can be provided. Only a conservancy tank system would be acceptable for the level of wastewater that will be generated. A wastewater treatment plant can already be feasible if the combined facilities of Farms 225 and 226 are considered.	A conservancy tank system will be installed instead of a septic tank. The application has been updated accordingly.

			Mortality—Non-infectious mortalities will be disposed of via the registered on-site composting facility. The Applicant confirmed sufficient composting capacity to accommodate the expected mortalities.	This is a further alarm for the adjacent farmers, in the sense that it may, over time, negatively influence the underground water. There is a regional disposal site at Karweiderskraal, and all mortalities should be transported off-site to this facility.	This concern is noted. Composting of mortalities is a recognised and bio secure disposal method when correctly implemented. The process generates sufficient heat to deactivate most pathogens and supports safe organic breakdown. Initial composting takes place in concrete bunkers, after which material is moved to windrows on compacted ground to prevent leachate infiltration. Stormwater management measures are in place to reduce contamination risks. Additional controls include avoiding overwatering and limiting the surface area exposed to rain. On-site composting also reduces the need for offsite transport of carcasses, thereby lowering biosecurity risks.
			Manure will be managed by directing a portion to the registered on-site composting facility. The remainder will be used directly in the agricultural industry. Manure will be dry-swept and cleaned out of the chicken houses, and then high-pressure wash water will be used to clean the pens with any residual water lost through evaporation.	This will increase the stench of manure for those passing by and living within the immediate area. It is not ideal, as already stated in this objection, and therefore, no additional facility should be unabridged within the vicinity of the existing two facilities.	Odour concerns are acknowledged. Composting will occur under controlled aerobic conditions that reduce odours, and the remainder will be used in agriculture, a common and accepted practice that supports circular resource use in farming systems and is already implemented onsite and on surrounding grain farms.

			Water – The verified registered water use is sufficient for the proposed development activities.	All runoff water from the proposed site flows into the Kwartel River. Neighbouring farms use this water as drinking water for sheep, as well as for irrigation and residential use. Water from the new development would negatively impact the water quality. (Salmonella risk) This will primarily occur with heavy rain, as has happened before. The facility's layout directs runoff from both sides of the proposed development to the middle of the development, which was done to deal with the accumulated runoff water. This contrasts with the statement that the development was designed to deal with and mitigate the stench with the prevailing winds.	The concern regarding potential contamination of the Kwartel River is noted. Please refer to the detailed responses provided above. The proposed development layout was not intentionally designed to concentrate or direct stormwater runoff to the centre of the development. Rather, the layout was developed to minimise the development footprint, support effective natural ventilation ensure set-back from roads, property boundaries and sensitive environmental features and ensure adequate spacing between structures for biosecurity and rotational grazing purposes. Planted pasture will be established between poultry houses and landscaping will be implemented in any bare areas onsite. The vegetated nature of these areas will assist with improving infiltration and reducing surface runoff from the site. Stormwater control measures, including perimeter drainage channels and a designated ingress area, will be implemented to prevent contaminated runoff from entering the Kwartel River, including during heavy rainfall events.
			Domestic waste – Biodegradable materials will be composted within the onsite composting facility, plastic containers will be recycled, and the remainder will be buried in a demarcated camped off area as per the current operation. Given the size of the area in use (	The onsite composting site is not monitored regularly. All waste should be transported to the regional waste facility at Karweiderskraal for the existing facilities on Farms 225 and 226, as this current situation already concerns our clients with the sustainability of the under- and surface water they all use.	The on-site composting facility is registered in terms of the NEM:WA Norms and Standards and operates under a formal EMPr. The EMPr for the composting facility requires that daily inspections, temperature checks and cleaning of composting areas takes place. Internal audits are also to be conducted annually, and external audits by an independent EAP should occur every 24 months. These measures will ensure that the facility is actively and responsibly monitored.

		5. Summary of Objections 5.1. Environmental and Biodiversity Concerns • The proposed development site lies in an area vital to pollination networks and bird species, particularly the Blue Crane (Anthropoides paradiseus), which nests nearby. Disturbances could lead to population decline and ecosystem imbalance. • The use of antibiotics and increased poultry density will likely result in soil and water contamination, undermining adjacent organic and sustainable farming practices. Relevant Case: In Case No. 14/2/4/1-A5/14-2011 (Bot River Poultry Farm Objection), environmental approval was delayed after objections raised concerns about wetland proximity, birdlife, and unassessed. cumulative impact. The project was required to commission a complete avian impact study before further consideration.	5. 5.1. The environmental and biodiversity concerns are noted. A Faunal Specialist Assessment has been undertaken which has addressed potential impacts on bird species, including Blue Cranes as outlined above. Water quality and soil contamination risks have also been assessed, with appropriate mitigation measures included. As stated, antibiotics are only used when birds are ill, under strict supervision, and comprehensive biosecurity and waste management protocols will be implemented to prevent environmental contamination.
		5.2. Pollution – Odour, Noise, and Visual Degradation • Odour from chicken manure and ventilation is a persistent nuisance. Despite orientation claims, prevailing wind directions (SE and NW) will channel odours directly to Môreson and surrounding farms. • The visual impact on the scenic Greyton tourism corridor is substantial. The new structures are proposed on elevated land, permanently altering views of the Klein Swartberg. Relevant Case: The Elgin Poultry Development Appeal (2019) faced sustained opposition due to tourism-related visual intrusion and was ultimately required to relocate out of a view-sensitive zone.	5.3. This comment is noted. Please refer to the response provided above.

		5.4. Water Use and Contamination Risks • The Kwartel River, used by surrounding farms for irrigation and livestock, runs downslope from the proposed development. Runoff during heavy rains risks water pollution (e.g., Salmonella, E. coli) and eutrophication. • Increased groundwater abstraction will deplete shared borehole sources. Relevant Case: In Kleinmond Poultry Project EIA (2017), water rights and cumulative impacts on aquifers led to the mandated full EIA instead of a Basic Assessment due to potential public health risks.	5.4. This comment is noted. Please refer to the responses provided above.
		5.5. Road Safety and Traffic Hazards • Road 4123 is the only winter access to Môreson. Its narrow width and steep incline before the site create a blind spot where truck blockages have already caused near accidents. • Current traffic volumes during harvest season are already high. Additional feed and delivery trucks pose a safety threat to farm workers and school children.	5.5. This comment is noted. Please refer to the responses provided above.
		5.6. Safety and Security Risks • Remote farms like Môreson rely on limited access as a security measure. Increased movement from non-local staff, construction crews, and delivery vehicles introduces vulnerability to crime and trespass. • The elevated site position directs line-of-sight into private farmyards, undermining privacy and security.	5.6. This comment is noted. Please refer to the response provided above.

		5.7. Negative Economic and Tourism Impact • The Overberg region, including Caledon and Greyton, heavily relies on agri-tourism. Farm 752 and others have development potential for hospitality-based ventures that depend on open landscapes and fresh air. • The visual, olfactory, and audible degradation caused by this facility will dissuade tourists and investors. Relevant Case: In the Stanford Broiler Farm Objection (2020), community and tourism objections led to the cancellation of a proposed broiler facility near agri-tourism routes. Planners cited the incompatibility with local economic development strategies.	5.7. This comment is noted. Please refer to the response provided above.
		5.8. Lack of Meaningful Public Participation and Cumulative Impact Assessment • The application fails to assess the combined impact of three poultry facilities on the same farm, contrary to integrated planning principles under the National Environmental Management Act (NEMA). • Section 24G processes and concurrent development raise concerns about piecemeal applications to avoid complete EIA requirements.	5.8. This comment is noted. The cumulative impact has been assessed within each impact assessment table. The type of environmental assessment required—whether a Basic Assessment (BAR) or Scoping and Environmental Impact Assessment (S&EIA) —is determined by the specific listed activities triggered under the NEMA regulations. In this case, the proposed developments, individually or collectively, do not exceed the thresholds that would necessitate a full EIA. While it was initially intended to submit a combined Section 24G application for both developments, DEADP advised that separate applications must be submitted. The process being followed is in full compliance with regulatory requirements and departmental guidance and is not intended to circumvent environmental oversight.

		6. Relief Sought We hereby request: 6.1. That the current application be rejected or paused, pending a full Environmental Impact Assessment (EIA) that: o Includes cumulative impacts of all poultry developments on Farm 225. o Considers ecological, social, and economic impacts comprehensively.	6. 6.1. This comment is noted. The relevant listed activities do not trigger a full S&EIA but instead require a Basic Assessment process. This Basic Assessment comprehensively evaluates all potential impacts. The current assessment incorporates ecological, social, and economic considerations. The concerns raised by IAPs are acknowledged and have been addressed where applicable within the relevant reports and assessments. Assessment of cumulative impacts is included within each impact assessment table.
		6.2. An Avifaunal Impact Assessment should be mandated, emphasising Blue Crane and migratory species.	6.2. A faunal specialist study has been undertaken.

		6.3. Due to insufficient community engagement, the public participation process will be re-run by NEMA Regulation 41.	6.3. Public participation has been and will continue to be conducted in accordance with the EIA Regulations. This comment was received during the pre-application public participation process during which the following measures were taken: • A pre-application Draft Basic Assessment Report, including the draft EMPr and all supporting documentation, was made available for public review and comment from 16 April 2025 to 21 May 2025 via the PHS website. • A public notice (in English) was published in the Hermanus Times on 16 April 2025. • A site notice was placed in a clearly visible location at the boundary of the proposed development site. • All identified Interested and Affected Parties (IAPs) were notified of the project and the availability of the documentation for comment on 16 April 2025, either by email or registered mail, as applicable. In addition, a further 30-day public commenting period will be provided for the amended Draft BAR during the formal application phase.
		6.4. The input from the Department of Agriculture, Forestry and Fisheries (DAFF) and CapeNature regarding ecological sensitivity should be obtained.	6.4. Comment was requested from the Department of Agriculture; however no comment has been provided to date. The Department of Environmental Affairs (See Comment No 13 below) and Cape Nature (see Comment No 15 below) have provided comment.

		6.5. That any development approval be contingent upon: 6.5.1. Road upgrades at the cost of the proponent. 6.5.2. Guarantee of local employment, with proof of South African citizenship. 6.5.3. Independent monitoring of water quality and runoff controls.	6.5. This comment is noted. Safe passing can be facilitated through road widening of deproclaimed access roads at key points along the route. South African labour laws allow for the fair and legal employment of both local and foreign workers. Water Quality Monitoring: The stormwater management measures to be implemented onsite are designed to minimize runoff from the site, such that the volume and nature of water leaving the property will be negligible.
		7. Conclusion While poultry farming is an important industry, addressing its environmental impacts through sustainable practices and responsible management is crucial. Implementing strategies such as integrated pest management, reducing antibiotic use, and improving waste management can help minimise these adverse effects. The expansion of poultry farming on Farm 225 threatens the long-term viability of neighbouring farms, compromises safety, undermines rural heritage, and violates key principles of environmental justice and sustainability. We urge the competent authorities to act under Section 2 of NEMA and protect the Overberg from inappropriate, high-impact development. We remain available for public hearings or site inspections to support the concerns outlined.	7. These comments are noted. All potential impacts have been assessed in line with NEMA. with particular attention given to concerns raised by IAPs. Where practicable, these concerns have been addressed, and appropriate mitigation measures have been proposed to promote environmental and social sustainability.

		Letter recived via email dated 19 May 2025: We as permanent residence and employees on Moreson farm 752 arevery opposed and against the development of new poultry rearing facility on farm no.225 Caledon. This development will cause regular blockings of our primary road in and out of M6reson farm and we are concerned about our children's safety using this road as there will be a lot of heavy traffic and unknown (to us) people using the road. The road is steep and narrow and the additional heavy traffic that this proposed development brings will make it much more dangerous to use. Signed by: Berando Amsterdam, Hendrik Botha and, Werneth de Wee	These concerns are noted. Access to the farm will be gained via District Road DR01294. District roads are higher-order rural roads that provide access between towns and farms and are primarily intended to support agricultural activities in the region. DR01294 has been recently maintained, is in a suitable condition to safely accommodate the additional vehicle loads associated with the new proposed development. The road directly adjacent to the proposed development site is Minor Road 4123, which is currently in the process of being deproclaimed. To improve safety along this road it can be widened at strategic locations to allow for safe passing, and warning signs will be placed at blind rises once deproclaimed. A 20 -40 km/h speed limit will be enforced on private roads. Servitudes will be registered in favour of relevant neighbouring landowners, reducing overall traffic. Truck movements will mainly occur at night, outside of business hours.
10	Thomas W L du Plessis - Farm 752 Môreson	Letter recived via email dated 20 May 2025: OFFICIAL OBJECTIONS AGAINST: BASIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON 1. Introduction I a co owner of Farm 752 (Måreson), located 30 metres north of the proposed expansion of a poultry rearing facility on Farm Grootvlei No. 225, Caledon. This document constitutes a formal objection against the Basic Assessment Report submitted by the applicant, Bapchix (Pty) Ltd.	1. This comment is noted. Please note that the homestead is 2.5 km north of the proposed development site. The boundary is 30 m and the area in between the boundary and the homestead is agricultural operations.

		2. My Objections: 2.1. The proposed development of a poultry rearing facility next to the main entrance of Farm no. 752 (Moreson), Caledon and 30 meter from our border is unheard of. Imagine you put such a development next to any farm entrance in South Africa, the environmental impact would be tremendous.	2. 2.1. This comment is noted. Two access routes via minor roads to Môreson Farm exist from the surrounding district roads, and both are relevant for general farm access and both can be used as a main entrance depending on the direction one travels. The site has been set back from roads and property boundaries in line with applicable legislative requirements, and trees will be planted to provide visual screening. The Visual Statement assessed the visual impact that relates to "In summary the proposed development has a low visual exposure, a high visual absorption capacity after mitigation, a compatibility with the surrounding landscape and only a marginal visibility considering the limited receptors."
		2.2. Safety and Security Risks Remote farms like Möreson rely on limited access as a security measure. Increased movement from non-local staff, construction crews, and delivery vehicles introduces vulnerability to crime and trespass. The elevated position of the site gives direct line-of-sight into private farmyards, undermining privacy and security.	2.2. These concerns are noted. The road running past the proposed development site (Minor Road 4123) is in the process of being deproclaimed. A servitude will be registered in favour of the neighbouring landowner(s). This will limit public access to the area. Additionally, a security access control point can be established at the entrance to the deproclaimed road to further restrict monitoring and unauthorized movement as agreed by the parties involved. The developer places great trust in his employees and has proactively invited neighbouring residents to meet the staff. It is believed that increased presence and collaboration will enhance overall safety in the area rather than diminish it.
		2.3. Road Safety and Traffic Hazards Road 4123 is the only winter access to Möreson. Its narrow width and steep incline before the site create a blind spot where truck blockages have already caused near accidents. In winter the trucks loaded with chickens may get stuck on the steep incline causing a blockage. This will be disruptive for school children and farm operations.	2.3. This concern is noted. Minor road 4123 will be deproclaimed, with servitudes registered, reducing overall traffic. To improve safety, minor road 4123 can be widened at strategic locations (once deproclaimed) to allow for safe passing, and warning signs will be placed at blind rises. A 20-40 km/h speed limit will be enforced on all private roads. Truck movements will mainly occur at night, outside of business hours, and will result in modest increase in heavy vehicle traffic in relation to the existing volumes.

		2.4. Water Use and Contamination Risks Runoff during heavy rains risks water pollution of the downstream Kwartel River. We pump this river water to all the fields om the farm to provide drinking water for our sheep. Contamination is a big concern for us.	2.4. The concern regarding potential contamination of the Kwartel River is noted. Detailed waste and stormwater management practises have been outlined in the EMPr's and will be strictly implemented onsite: - Poultry manure will be contained within raised pens and removed at the end of each production cycle (approximately every two months). Manure will be immediately transported to the registered on-site composting facility, relevant onsite use location or sold to users in the region. No composting or storage of manure will take place within the development footprint. - Stormwater will be excluded from poultry houses, and potentially nutrient-enriched runoff will be captured via perimeter drainage channels where settling and infiltration can occur in designated areas, thereby preventing runoff with the potential to impact downstream water quality from leaving the site. During cleaning, manure will first by dry-swept from the houses, with every effort made to remove all material before high-pressure washing. This approach will serve to minimize water use, and the small amount of residual moisture remaining after washing will be able to evaporate naturally. Collectively, these measures will reduce the generation of contaminated stormwater and prevent its release into natural watercourses, thereby safeguarding both surface and groundwater resources. An aquatic specialist assessment was undertaken as part of the BAR. It considered potential water quality risks and concluded that, with the effective implementation of recommended mitigation measures, the risks to water quality are low. These mitigation measures have been incorporated into the EMPr. Key measures include designating the CVB wetland and its 28-meter buffer zone as a strict no-go area for all development activities, alongside stormwater controls to prevent contaminated runoff or wash water from entering adjacent drainage systems.

11	Jan-Willem du Plessis - Farm 752 Môreson	<u>Email dated 20 May 2025:</u> 1. You have received our complaint from Jan Visagie (Futureplan) acting on our behalf. Tommy du Plessis (Director and owner of Môreson farm) has also sent another letter to add to our complaint. I am Jan-Willem du Plessis (co-owner and Director of Môreson farm), please register us both as affected parties.I am sure you noted it in Jan's email. thank you	<u>Email response provided 20 May 2025:</u> 1. We will register all below mentioned as interested and affected parties.
12	Herman de Kock - Neighbour (Driefontein and Leliefontein)	<u>Email dated 21 May 2025:</u> 1. It is brought to my attention that Grootvlei farm Caledon is planning to expand the chicken farming operation. I own and live on the farm Driefontein and Leliefontein adjacent to the farm Grootvlei	1. This comment is noted.
		2. These are my consurns regarding the expansion of the chicken farm at Grootvlei 2.1. The road connecting the N2 with Grootvlei is not able to safely accommodate an increase in heavy load traffic. The current junction with the N2 are not safe. The road surface is of compacted clay that becomes a slippery mess when it rains and heavy duty traffic cannot pass and blocks the roud passing Driefontein farm..	2.1. The proposed facility will result in a modest increase in heavy vehicle traffic compared to current operations. Access to the farm will be gained via District Road DR01294. District roads are higher-order rural roads that provide access between towns and farms and are primarily intended to support agricultural activities in the region. DR01294 has been recently maintained, is in a suitable condition to safely accommodate the additional vehicle loads associated with the new proposed development.
		2.2. Summer , when dry, the dust becomes a problem as the road passes through my farmyard	2.2. This comment is noted. The farmyard has been located on the road since its origins, it is a public road.
		2.3. The local skoolbus collect and deliver Children for the local school along this road and no provision is made for their safty.	2.3. This concern is noted. To improve safety, speed limit will be enforced. Truck movements will mainly occur at night, outside of business hours.
		2.4. The existing farming operation at Grootvlei have a impact on our underground water supply . Drinking water for me and the families living on my farm comes from a fountain that is fed from the same water source as the bor holes at Grootvlei	2.4. The proposed development will operate within existing, lawful water use allocations, and no additional groundwater abstraction is required. All water use will continue to be managed in accordance with applicable legislation and authorisations.
		3. Please consider the above notes when assessment af the project is done.	3. This comment is noted.

		4. Driefontein and Leliefontein farm is opposed to thurter expansion of the chicken houses at Grootvlei farm	4. This comment is noted.
13	Melanese Schippers & Bernadette Osborne – DEADP Directorate: Development Management (Region 1)	<u>Email dated 21 May 2025:</u> Find attached this Department's comment on the draft BAR for the proposed chicken houses on the Remainder of Farm Grootvlei No.225, Caledon.	Noted.
		<u>Letter recived via email dated 21 May 2025:</u> 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.	1. Noted.
		2. According to the information submitted to this Directorate, it is noted that the proposal entails the following: 2.1. The proposed development will entail an additional poultry facility and associated infrastructure on the Remainder of Farm Grootvlei No, 225, Caledon.	2. Noted. 2.1. Correct
		2.2. 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.	2.2. The initially proposed septic tank has now been changed to a conservancy tank system to address concerns raised.
		2.3. Each chicken house will house 16 500 chickens, making a total of 165 000 chickens at the poultry facility.	2.3. Correct
		2.4. The proposed development will have a development footprint of approximately 51 300m².	2.4. The proposed development footprint is approximately 5,5ha in extent.
		2.5. No indigenous vegetation remains on the site.	2.5. Correct

		2.6. No watercourses are located on or within 32m of the site.	2.6. Correct
		2.7. The site zoned for agricultural purposes and is located outside the urban area of Caledon.	2.7. Correct
		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.	3.1.1. A conservancy tank system will be installed as indicated in the SDP. The footprint of the two new conservancy tanks will be approximately $4m^2$ with capacity of approximately 4000l. each. The footprint of the water treatment facility is approximately $400m^2$ and the capacity is 100 000l.
		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.	3.1.2. Approximately $450m^3$ of manure will be generated every two months. Gain farmers used dried manure as a compost component for their fields. This practice is well-established on the proposed development site as well as the surrounding farms. Manure not utilized in the on-site composting facility or directly applied to onsite agricultural fields will be collected by pre-identified buyers at the end of each production cycle. Given the strong regional demand for manure as a composting additive, the applicant has already secured committed buyers for the quantities expected to be produced by the proposed development.
		3.1.3. Details of how many times the chicken houses will be cleaned must be provided.	3.1.3. The poultry houses will be cleaned at the end of each production cycle, that is every two months.

		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.	3.1.4. The water treatment facility is intended for the purification of incoming fresh water for use within the poultry rearing facility. This treatment involves the use of flocculation and antibacterial processes to ensure water quality suitable for the poultry operation. Disposal of wastewater: No wastewater treatment plant is proposed; however sound management will apply as follow: ▪ Domestic wastewater: A conservancy tank system will be installed to manage sewage effluent. This will be serviced by the Theewaterskloof Municipality who will empty the tanks on a regular basis and dispose of the effluent at a registered facility. ▪ Wash water: Chicken pens will be dry-swept to remove litter and solids before being washed with high-pressure hoses. Wash water use will be strictly limited, such that any residual moisture left after high pressure washing can evaporate.
		3.1.5. The width, length and location of the new dirt roads.	3.1.5. The new dirt roads proposed will be entirely within the proposed development footprint and will consist of perimeter and a central access road between the two rows of poultry houses. All roads will be approximately 4 m wide. The perimeter road will have a total length of approximately 840 m, while the central access road will extend approximately 230 m.

		3.1.6. A description of the handling and disposal of infectious mortalities.	3.1.6. Infected mortalities arising from the poultry rearing facilities will be managed and disposed of under strict guidance of the state veterinarian. Safe disposal certificates for hazardous waste removed from the facility will be kept on record for a minimum period of 5 years. The facility operates under stringent biosecurity protocols, audited by the EFRC, Woolworths, and State Veterinarians.
		3.1.7. The diameter and length of the proposed water supply line.	3.1.7. The water supply will connect to an existing 200 mm PVC pipeline via a 125 mm PVC branch. The new section of the supply line will extend approximately 1,300 m in length.
		3.1.8. The transmission capacity of the proposed electricity supply line.	3.1.8. An underground step-up/step-down cable will be installed from the existing Eskom line to the proposed development site. The on-site Eskom transformer will be upgraded from 150 kV to 200 kV to accommodate the electricity supply requirements of the new facility.
		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.	3.2. This comment is noted. All subsequent documents will 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. 3.3.1. This comment is noted. Comment was obtained from Cape Nature as included as Comment Number 15 below. With regards to the Terrestrial Biodiversity sensitivity the following was noted by Cape Nature: "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."
		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.	3.3.2. This comment is noted and will be complied with. Cape Nature requested that a Faunal Specialist Study be undertaken. This has been complied with.
		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. 3.4.1. Noted. The impact assessment has been updated.
		3.4.2. Potential groundwater pollution, odour and vectors impacts have not been identified and assessed.	3.4.2. Noted. Odour impacts were identified and assessed in the pre-application draft BAR. The impact assessment has been updated to include potential groundwater pollution and vector impacts.
		3.4.3. Should this not require an assessment a motivation must be included in the BAR.	3.4.3. Noted. Odour impacts were identified and assessed in the pre-application draft BAR. The impact assessment has been updated to include potential groundwater pollution and vector impacts.

		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. 3.5.1. This comment is noted. The registered owner of RE/225, Grootvlei, Caledon is Zonderend Valley Farms (Pty) Ltd, while the applicant for the proposed poultry rearing facility is Bapchix (Pty) Ltd. A formal consent agreement (included in the BAR as part of the applicant declaration) has been signed between Zonderend Valley Farms (landowner), and Bapchix, (applicant), authorizing the submission of this application. It is further confirmed that both entities are linked through common directorship, as Mr. Ross Phillip serves as a director of both companies. Accordingly, the applicant has the necessary rights and authorization to utilize the existing registered water under the landowner's entitlement for the proposed development.
		3.5.2. Confirmation is required that the applicant has existing water use rights for the proposed development.	3.5.2. The comment is noted. The registered owner of RE/225, Grootvlei, Caledon is Zonderend Valley Farms (Pty) Ltd, while the applicant for the proposed poultry rearing facility is Bapchix (Pty) Ltd. A formal consent agreement (included in the BAR as part of the applicant declaration) has been signed between Zonderend Valley Farms (landowner), and Bapchix, (applicant), authorizing the submission of this application. It is further confirmed that both entities are linked through common directorship, as Mr. Ross Phillip serves as a director of both companies. Accordingly, the applicant has the necessary rights and authorization to utilize the existing registered water use under the landowner's entitlement 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.	3.5.3. This comment is noted. The property has existing verified water use rights. The majority of the water allocated to the proposed development property is used for irrigation purposes. In addition, the existing poultry facility located on the property uses approximately 21843 m^3 of water per annum, a small composting facility on site uses approximately 112.3 m^3 per annum and the proposed development will require approximately 19113 m^3 of water per annum. Sufficient water is available from within the existing right for the property to support the proposed poultry facility. The balance of the water available onsite will continue to be used for irrigation purposes.
		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. 3.6.1. This comment is noted. Confirmation from Eskom has been included in Appendix E16
		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.	3.6.2. Septic tanks will no longer be used. Sewage will be managed by means of two 4000l conservancy tanks which will be serviced by Theewaterskloof Municipality as outlined in Appendix E16. Effluent will be disposed of at a registered facility.

		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. 3.7.1. Bio-security at commercial chicken rearing operations is managed through comprehensive industry Standard Operating Procedures (SOPs). The proposed facility will be subject to regular audits by Elgin Free Range Chickens, Woolworths, and, where applicable, State Veterinary Services, in accordance with ISO-based standards. As these SOPs are extensive, proprietary, and independently verified through third-party audits, they are not included in full within the EMPr. However, the EMPr has been updated to require that the proposed development comply with the audited bio-security SOPs already implemented at the existing facility on the site.
		3.7.2. The EMPr does not address potential odour and vector impacts.	3.7.2. This comment is noted. The OEMPr has been updated to 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.	3.7.3. This comment is noted. The EMPr has been updated and specific mitigation and management measures have been included where relevant to address the above mention impacts comprehensively.
		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.	3.8. The competent authority has confirmed that a general authorisation is required in terms of the National Water Act (Act No.36 of 1998) – refer Appendix M to the BAR.
		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.	3.9. This comment is noted. The Department's Directorate Air Quality Management will be included as an IAP going forward.

		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.	3.10. This comment is noted. All authorities mentioned were requested to provided comment on the draft BAR during the pre-application PPP. Comment was obtained from BOCMA, CapeNature and DEADP Pollution and Chemicals Management. Despite follow-up requests, the Department of Agriculture, DEADP Waste Management and Theewaterskloof Municipality have not provided comments to date.
		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.	3.11. This comment is noted and has been complied with. All the issues raised by IAPs have been collated in this Comments and Response report with responses provided accordingly.
		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.	3.12. This comment is noted.
		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.	3.13. This comment is noted and will be complied with.
		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.	3.14. This comment is noted and will be complied with.

		3.15. Kindly quote the abovementioned reference number in any future correspondence in respect of the Notice of Intent.	3.15. This comment is noted and will be complied with.
		3.16. Please note that the activity may not commence prior to an Environmental Authorisation being granted by this Directorate.	3.16. This comment is noted and will be complied with.
		4. This Directorate reserves the right to revise initial comments and request further information based on any new or revised information received.	4. This comment is noted.
14	Vhengani Ligudu - BOCMA	<u>Email dated 21 May 2025:</u> Please find attached.	Noted
		<u>Letter recived via email 21 May 2025:</u> RE: PUBLIC PARTICIPATION PROCESS FOR A BASIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON With reference to the above-mentioned document received by this office with DEADP reference 16/3/3/6/7/1/E4/5/1513/24 on the 16/04/2025 requesting comments.	Noted
		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.	1. This comment is noted. All relevant section and regulation of the National Water Act 1998 (Act 36 of 1998) regarding water use will be adhered to.
		2. Kindly provide an updated layout plan clearly indicating the location of all conservancy/septic tanks and associated infrastructure.	2. The location of the conservancy tanks have been included in the SDP (Appendix B1 to the draft BAR).
		3. No use of surface water and/or storage of water is permitted, unless the applicant has formally obtained a license in terms of Section 41 of the National Water Act (Act 36 of 1998) and/or formal authorisation in terms of General Authorisations issued under Section 39 (Government Notice 538 of 2016), and/or if it is authorised under Schedule 1 of the National Water Act, 1998 (Act 36 of 1998) and/or if it is an Existing Lawful Water Use in terms of the National Water Act,1998 (Act 36 of 1998).	3. This comment is noted.

		4. Where the applicant has an existing lawful registered water use, used for agricultural purposes thus far, application should be made to the Responsible Authority to amend such use proportionally per annual volume for domestic, commercial, industrial and/or agricultural, if this is applicable.	4. This comment is noted. An administrative change of sector will be undertaken for the relevant volume.
		5. No permanent structures maybe constructed within the regulated area of any watercourse (seasonal or permanent river, stream etc.), without firstly obtaining authorization in terms of Section 21 (c) and (i) of the National Water Act, 1998 (Act 36 of 1998).	5. This comment is noted. A channelled valley-bottom wetland has been identified and delineated to the southeast of the proposed facility. The development footprint falls within the regulated area of this watercourse. A Risk Assessment Matrix was undertaken and determined that the proposed activities pose a low risk to the watercourse. As such, the Section 21(c) and (i) water uses qualify for authorisation under the General Authorisation.
		6. No stormwater runoff from any premises containing waste, or water containing waste emanating from industrial activities and premises may be discharged into a water resource. Polluted storm water must be contained.	- This comment is noted. Stormwater will be excluded from poultry houses, and potentially nutrient-enriched runoff will be captured via perimeter drainage channels where settling and infiltration can occur in a designated area, thereby preventing runoff with the potential to impact downstream water quality from leaving the site. During cleaning, manure will first by dry-swept from the houses, with every effort made to remove all material before high-pressure washing. This approach will serve to minimize water use, and the small amount of residual moisture remaining after washing will be able to evaporate naturally. Collectively, these measures will reduce the generation of contaminated stormwater and prevent its release into natural watercourses, thereby safeguarding both surface and groundwater resources.
		6. All relevant sections and regulations of the National Environmental Management: Waste Act 2008 (Act 59 of 2008) regarding the disposal of solid waste must be adhered to. Solid waste may only be disposed of onto an authorized solid waste facility in terms of abovementioned legislation.	7. This comment is noted and will be adhered to.

		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.	This comment is noted.
15	Rhett Smart – Cape Nature	<u>Email dated 22 May 2025:</u> Please find attached comment from CapeNature on the Pre-Application Draft Basic Assessment Report for a Proposed Additional Poultry Rearing Facility on Remainder of Farm Grootvlei 225, Caledon.	Noted
		<u>Letter received via email dated 22 May 2025:</u> 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.	Noted.
		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.	This comment is noted. A freshwater assessment conducted for the site identified and delineated a channelled valley-bottom wetland to the southeast of the proposed development footprint.
		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.	This comment is noted.

		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.	This comment is noted.
		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.	This comment is noted. It has been noted in the SSVR that there is a high aquatic sensitivity associated with a channelled valley bottom wetland to the south/southeast of the site.
		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."	This comment is noted. A faunal specialist study has been undertaken in accordance with the protocols.

		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.	This comment is noted. A faunal specialist study has been undertaken in accordance with the protocols. The specialist study found that the project area consists of completely disturbed natural habitat, and it is considered from a faunal perspective as very low sensitivity. The flagged grasshopper SCC for the project site has a wide distributional range occurring across several different vegetation types; the heavily disturbed and completely transformed vegetation at the project site excludes this grasshopper SCC from occurring there. Considering the small size of the project area, the relatively large distance of the project area to the three breeding sites (> 1 km to the closest site, and almost 2 km to the furthest site), together with the likely high intensity of agricultural activities at the breeding site and in the immediate agricultural fields adjacent to the breeding sites during the summer months, it seems unlikely that the construction phase of the proposed project would impact the Blue Crane breeding. The Blue Crane breeding areas are more likely to be directly affected by practices on the farm itself where they breed. Overall, the proposed development is unlikely to generate significant negative impacts on the grasshopper SCC flagged, or on the breeding activities of the Blue Crane. It is the specialists' opinion that the proposed development will have an overall low significance on the insect and Blue Crane.
		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.	This comment is noted.
		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.	This comment is noted. The mitigation measures recommended in the aquatic specialist assessment have been incorporated into both the Construction and Operational Environmental Management Plans for the proposed development.

		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.	This comment is noted. The biosecurity measures currently implemented at the existing facility on the property will be fully applied to the proposed new facility to ensure consistent compliance with established protocols.
		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.	This comment is noted. Stormwater will be excluded from poultry houses, and potentially nutrient-enriched runoff will be captured via perimeter drainage channels where settling and infiltration can occur in designated areas, thereby preventing runoff with the potential to impact downstream water quality from leaving the site. These measures are detailed within the Construction and Operational Environmental Management Plans. In response to this comment, the following additional requirement will be included in the Operational EMPr to strengthen stormwater and nutrient management: *All intervening areas between buildings, poultry houses, and roads must be maintained in a stable, vegetated condition using locally appropriate grass or groundcover species. Bare or eroded areas must be rehabilitated as soon as possible to prevent stormwater runoff, sedimentation, and nutrient migration toward the wetland or any watercourse. Vegetated zones must be monitored and maintained throughout the operational life of the facility.* Mitigation measures are in place to prevent contamination from fuel, please refer to section 4.3.1 (a) of the CEMPr and section 5.9 of the OEMPr.
		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.	This comment is noted. A faunal specialist study has been conducted and the EMPr's have been updated where relevant. o
		CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.	This comment is noted.

16	Arabel McClelland & Gunther Frantz – DEADP Directorate: Pollution and Chemicals Management	<u>Email dated 22 May 2025:</u> Thank you for your email and my apologies for the delay in submission. Our unit has severe capacity constraints and I have been out of office recently. Please find attached the Directorate: Pollution and Chemicals Management comment on the abovementioned application. Should you have any queries, please do not hesitate to contact us.	Noted
		<u>Letter received via email dated 22 May 2025:</u> COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI, NO. 225, CALEDON The Directorate: Pollution and Chemicals Management (D: PCM) acknowledges receipt of the Draft Basic Assessment Report (DBAR) on 16 April 2025. Please find comment from the D: PCM as follows: 1. It is mentioned on page 3 of 53 in the DBAR that high-pressure wash water will be used to clean pens. It is further mentioned (page 38 of 53) that wash water from the units will be suitably contained and disposed of to prevent contamination of stormwater. It is unclear from the DBAR how wash water will be contained and how it will be disposed of. Please provide more details on the wash water/wastewater management from the cleaning of chicken pens.	1. This comment is noted. Wash-water is kept to a minimum by first removing dry matter from the pens, with every effort made to remove all material before high-pressure washing. This approach will serve to minimize water use, and the small amount of residual moisture remaining after washing will be able to evaporate naturally. This approach will ensure that no wash-water leaves the site or enters the stormwater system. The draft BAR and EMPr have been updated to reflect this management approach consistently throughout documentation.
		2. Further to the above, if any wash water is contained/stored in a retention pond or similar feature, such feature should be indicated on the Site Development Plan (SDP).	2. This comment is noted. No wash water is contained/stored in a retention pond or similar feature.
		3. Staff housing and ablution facilities will be connected to a septic tank system (page 13 of 53). Please provide more details about the size/capacity of the septic tank system and whether the septic tank will be able to accept the total anticipated sewage flow from housing and ablution facilities.	3. Two 4000l conservancy tanks will be used. The system will be able to accept the total anticipated sewage flow from the housing and ablution facilities.

		4. Confirmation should be provided, whether the municipality or a private service provider will be responsible for the servicing of the septic tank, when it has reached capacity.	4. The Theewaterskloof Local Municipality will service the conservancy tanks.
		Please direct any enquiries to Gunther Frantz should you require clarity on the comments provided. The Department reserves the right to revise or withdraw comments or request further information based on any information received.	This comment is noted.
In-Process Draft BAR (Circulated from 20 October 2025 – 19 November 2025)			
1	Bernadette Osborne - DEADP	<u>Email dated 23 October 2025:</u> Please find attached this Directorate's correspondence regarding Remainder of Farm Grootvlei No. 225, Caledon.	Noted.
		<u>Letter recevied via eimail dated 23 October 2025:</u> ACKNOWLEDGEMENT OF THE APPLICATION FORM AND THE DRAFT BASIC ASSESSMENT REPORT ("BAR") IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ("NEMA") AND THE 2014 ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS FOR THE PROPOSED DEVELOPMENT OF ADDITIONAL CHICKEN HOUSES ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON. 1. The electronic copy of the Application Form received by the Department's Directorate: Development Management, Region 1 ("this Directorate") on 15 October 2025, and the electronic copy of the Draft BAR received by this Directorate on 20 October 2025, refer.	1. This comment is noted.
		2. This letter serves as acknowledgement of receipt of the abovementioned documents.	2. This comment is noted.
		3. Please note that since an application has been lodged with this Directorate, the pre application file (DEA&DP Reference: 16/3/3/6/7/1/E4/5/1513/24) has been closed for administrative purposes.	3. This comment is noted.

		4. Following the review of the information submitted to this Directorate, the following is noted: • 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 a maximum of 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 300m². • 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.	4. This comment is noted. Please note the following corrections: • Ablution facilities will be serviced by **conservancy tanks**, not septic tanks. • The proposed development will have a development footprint of approximately **5,5ha (i.e. 55 000m^2).**
		5. Please note that this Directorate will consider the Draft BAR and issue a comment within the prescribed 30-day commenting period which ends on 19 November 2025.	5. This comment is noted.
		6. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.	6. This comment is noted and will be complied with.

		7. Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Directorate. It is an offence in terms of Section 49A of the NEMA for a person to commence with a listed activity unless the Department has granted an Environmental Authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F and 49A of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department for prosecution. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.	7. This comment is noted.
		8. This Directorate reserves the right to revise or withdraw initial comments or request further information from you based on any information received.	9. This comment is noted.
		<u>Email dated 19 November 2025:</u> Attached please find the correspondence from this Directorate concerning the Remainder of Farm Grootvlei 225, Caledon.	Noted
		<u>Letter received via email dated 19 November 2025:</u> 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.	
		1.1.1. 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.	1. This comment is noted.

		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 300m². • 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.	2. This comment is noted. Please note the following corrections: • Ablution facilities will be serviced by **conservancy tanks**, not septic tanks. • The proposed development will have a development footprint of approximately **5,5ha (i.e. 55 000m^2).**

		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.	3.1. This comment is noted and will be complied with. The transmission capacity of the proposed internal electricity supply line will be 3,3 kilovolts. Given this transmission capacity, the supply line does not constitute a NEMA listed activity in its own right, it is associated infrastructure. A services plan indicating the route of the underground electricity line was provided as Appendix B3 to the Amended BAR. The start, middle and end coordinates of the electricity line have now also been included in Appendix B3 and indicated in the Final BAR. The new electrical line is proposed along the periphery of existing agricultural fields, and it will be placed underground. The proposed route does not intersect any environmental sensitivities. As such there is no anticipated biophysical impacts associated with the proposed expansion of the electricity line. The impact of the electricity supply line has been clarified in Appendix J to the 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.	3.2. This comment is noted and will be complied with. The peak throughput capacity of the 0,2m water pipeline will be 1,16l/s. Given that the water supply pipeline has an internal diameter of less than 0,36m and a peak throughput of less than 120l/s, the proposed expansion of the water pipeline does not constitute a NEMA listed activity in its own right, it is associated infrastructure. A services plan indicating the route of the underground water pipeline was provided as Appendix B3 to the draft BAR. The start, middle and end coordinates of the water pipeline have now also been included in the final BAR, together with associated coordinate maps. The water pipeline is proposed adjacent to Minor Road 4123, along the periphery of existing agricultural fields, and it will be placed underground. The proposed route does not intersect any environmental sensitivities. As such there is no anticipated biophysical impacts associated with the proposed expansion of the water pipeline. The impact of the water pipeline has been clarified in Appendix J to the 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.	3.3. This comment is noted. The activity description in the Final BAR has been amended to include the perimeter stormwater drainage channels and associated ingress area. The proposed development will incorporate drainage channels around the infrastructure to collect and direct any runoff to the designated ingress area, where infiltration can occur. It is important to note that cleaning using water will occur only after thorough dry sweeping to remove all manure, and high-pressure hoses using minimal water will be used. As a result, notable wash-water runoff is not expected, and the stormwater controls function mainly as an additional precautionary pollution-prevention measure.
		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.	3.4. This comment is noted. The existing road width varies between approximately 4m – 6.5m with minimal road reserve. The proposed widening of the existing access road at selected safe-passing points will be restricted to a total road width of no more than 8 m, with the actual widening not exceeding 4 m at any location. This is sufficient for intended use purposes and widening of this scale is below the thresholds that would trigger any NEMA-listed activities. These details have been included in the Final BAR. The precise locations of the safe-passing widening points will be confirmed in consultation with relevant role-players, including other users of the road. These widening points will be confined to Minor Road 4123, which is already an established agricultural access road bordered by existing cultivated fields. The proposed road-widening areas will not intersect any environmental sensitive areas, and as such no biophysical impacts are anticipated. The impact of the proposed widening at key points has been clarified in Appendix J to the 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.	3.5. This comment is noted. The EMPr has been amended to clarify the manure-management requirements. The reference to sweeping manure "back into the chicken houses" has been corrected to reflect that manure on the hard-stand areas where chickens move in and out of the houses must be swept up regularly to maintain overall cleanliness. This applies only to the immediate hard-stand transition areas and is considered practically feasible. With regard to wash water, the EMPr has been updated for clarity. The EMPr states that wash water must not leave the developed area. In practice, wash water will not freely exit the chicken houses because high-pressure cleaning only occurs after all manure has been fully removed through thorough dry sweeping. This process will ensure that all manure, including small residual fragments, is cleared from the houses. Water use will only be permitted after an inspection confirms that all manure has been removed. Given the limited volume used during high-pressure washing, no notable runoff is not expected under normal operating conditions. If small amounts of wash water do reach outside areas, it will infiltrate naturally into the adjacent free-range pastures. In addition, perimeter stormwater control channels around the chicken houses will capture any surplus runoff and direct it to a vegetated ingress area for settling and infiltration. These channels provide further precautionary containment should incidental wash-water ever mix with stormwater.
		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.	3.6. This comment is noted. The EMPr distinguishes between general mortalities (non-infected mortalities) and infected mortalities. The majority of mortalities are non-infected and will be managed in accordance with the standard operational procedures outlined in the EMPr. In the rare event of infected mortalities, these will be disposed of under the direct guidance of the State Veterinarian. The volumes associated with infected mortalities are small and do not pose any capacity concerns for licensed hazardous waste facilities. Should it be required Nunn 2 Waste will be able to accept and suitably dispose of hazardous waste from the facility (refer to Appendix E16 for confirmation).

		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.	3.7. This comment is noted. Eskom is the current Electrical Network Service Provider for the site. The proposed development will require approximately 60 kVA of additional electrical supply. The site is currently supplied by a 150 kVA landing at an existing 200 kVA transformer. Eskom confirmed in writing "The existing transformer and meter box is already 200kVa, therefore no work will be done in the field, but it will only be paperwork" This imply that the hardware is in place and that the additional supply is merely paperwork which implies that the extra supply capacity is available. The applicant has two feasible supply options: - **Eskom supply:** In addition to the email correspondence, Eskom provided a formal quote (refer Appendix E16 of the BAR) confirming that the existing 150 kVA supply can be upgraded to 200 kVA. A 200 kVA transformer is already installed, and the upgrade is therefore readily achievable. The only remaining step is the administrative approval process once the environmental authorisation is in place. It requires the fee to be paid. Further written confirmation has been requested from Eskom; however, responses from Eskom's public-facing channels are often delayed. The Eskom correspondence on file is logically confirming sufficient additional supply, otherwise they would have stated the opposite and not requested a payment. - **Solar generation:** The applicant also has the option to supplement the power supply via rooftop solar panels on existing infrastructure on Farm 226, Grootvlei. The required additional generation capacity is approximately 0,054 MW which will ensure sufficient spare capacity for the proposed development. The solar installation would produce less than 10 MW, cover less than 1 ha, and be mounted on existing structures; it therefore does not trigger any NEMA-listed activities. This option is immediately implementable without Environmental Authorisation if required.

			Regardless of the electricity supply option ultimately used, the proposed underground supply line route and transmission capacity will remain unchanged. The line will be placed along the periphery of existing agricultural fields and will not intersect any environmental sensitivities. Accordingly, no biophysical impacts are anticipated from the proposed electrical supply line.
		3.7. 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.	3.8. This comment is noted. The Department of Agriculture: Veterinary Services and the Western Cape Department of Agriculture were each afforded a formal opportunity to comment during both the pre-application (16 April–21 May 2025) and in-process (21 October–19 November 2025) public participation periods. DEADP: Air Quality was provided an opportunity to comment during the in-process period. No comments were received from these authorities during these timeframes. Based on DEADPs request, follow-up correspondence was issued to all three departments on 24 November 2025. DEADP's Air Quality Directorate provided comments on the same day; these are included as Appendix E13 to the BAR and have been addressed in this report. No comments have been received from the remaining two authorities to date.
		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.	3.9. This comment is noted and has been complied with. All the issues raised by IAPs have been collated in this Comments and Response report (Appendix F2 to the BAR) with responses provided accordingly
		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.	3.10. This comment is noted.

		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.	3.11. This comment is noted and will be complied with.
		3.12. In addition to the above, please ensure that the electronically signed and dated declarations of the EAP and specilaists is submitted with the Final BAR for decision making.	3.12. This comment is noted and will be complied with.
		3.13. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.	3.13. This comment is noted and will be complied with.
		3.14. Please note that the activity may not commence prior to an Environmental Authorisation being granted by this Directorate.	3.14. This comment is noted and will be complied with.
		4. This Directorate reserves the right to revise initial comments and request further information based on any new or revised information received.	4. This comment is noted.
2	Vhengani Ligudu - BOCMA	<u>Email dated 13 November 2025:</u> Please find attached comments.	Noted
		<u>Letter recevied via email dated 13 November 2025:</u> RE: PUBLIC PARTICIPATION PROCESS FOR A BASIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON With reference to the above-mentioned document received by this office with DEADP reference 16/3/3/1/E4/5/1079/25 on the 20/10/2025 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.	1. This comment is noted. All relevant sections and regulations of the National Water Act 1998 (Act 36 of 1998) regarding water use will be adhered to.
		2. This office has confirmed a General Authorisation (WU43613) in terms of Section 39 of the National Water Act, 1998, for the proposed development. The General Authorisation applies to water uses under Section 21(c) and (i), as published in Government Gazette No. 49833 dated 08 December 2023.	2. This comment is noted. A General Authorisation has been granted in terms of Section39 of the NWA for the proposed development.
		3. All relevant sections and regulations of the National Environmental Management: Waste Act 2014 (Act 26 of 2014) regarding the disposal of solid waste must be adhered.	3. This comment is noted and will be complied with.
		4. The composting facility must be routinely inspected for cracks, blockages, or signs of leakage. Any defects must be promptly repaired to maintain structural integrity and environmental compliance.	4. This comment is noted. An approved Environmental Management Plan (EMPr) is already in place for the composting facility, outlining the required monitoring and auditing measures. This EMPr will be implemented accordingly.
		5. The facility activities must be managed to avoid over-saturation and excessive moisture buildup.	5. This comment is noted and will be complied with. As outlined in the Construction and Operational EMPr, water will be used responsibly onsite to prevent over-consumption and to minimise runoff. In particular, Goal 2 in Section 4.3 of the OEMPr is to “Ensure responsible water use and management of wash water and stormwater,” and the section provides the associated objectives and mitigation measures that will be implemented throughout the operation of the proposed development. These measures will ensure that the facility is managed to avoid over-saturation and excessive moisture buildup.

		6. No stormwater runoff from any premises containing waste, or water containing waste emanating from industrial activities and premises may be discharged into a water resource. Polluted storm water must be contained.	6. This comment is noted and will be complied with. The proposed development is designed to ensure that potentially nutrient enriched stormwater is not discharged into a water resource. Washing within the chicken houses will only occur after all manure has been thoroughly removed through dry sweeping and verified by inspection. High-pressure hoses using minimal water will be employed, and any limited wash water that may reach outside areas will infiltrate into adjacent free-range pastures or evaporate naturally. Stormwater is excluded from the poultry houses, and any potentially nutrient-enriched runoff is captured via perimeter drainage channels that direct water to a designated area for settling and infiltration. These measures will prevent any contaminated water from leaving the 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.	This comment is noted.
3	Rhett Smart – Cape Nature	<u>Email dated 19 November 2025:</u> Please find attached comment from CapeNature on the Draft Basic Assessment Report for a Proposed Additional Poultry Rearing Facility on Remainder of Farm Grootvlei 225, Caledon.	Noted
		<u>Letter receved via email dated 19 November 2025:</u> 1. 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.	1. This comment is noted.

		2. CapeNature indicated in our comments on the Pre-Application Basic Assessment Report that an animal species specialist study is required in accordance with the protocols. This was due to the confirmed presence of an animal species of conservation concern within the study area, namely breeding pairs of Blue Cranes (Anthropoides paradiseus) on the neighbouring property, as confirmed by the Endangered Wildlife Trust (EWT). A faunal assessment: site sensitivity verification and compliance statement was accordingly undertaken. The site sensitivity verification indicates that although the screening tool indicates a medium sensitivity for a grasshopper species listed as vulnerable, this species is restricted to natural habitat and there is no natural habitat remaining within the development footprint. Although not explicitly stated, it is therefore interpreted that the site sensitivity is low (or less) and therefore a compliance statement was compiled.	2. This comment is noted.
		3. With regards to the potential impact on the Blue Cranes it is recommended that the cultivation of grain, fodder and oilseed crops in the surrounding areas is more likely to have an impact on the species than the proposed poultry facility and therefore there will not be any significant impact.	3. This comment is noted.
		4. Confirmation is also provided that the same biosecurity measures will be implemented for the proposed facility as the current facility and will therefore not impact on any wild bird populations.	4. This comment is noted.

		5. With regards to management of stormwater, all potentially nutrient enriched run-off will be captured in perimeter drainage channels where settling of nutrients can occur. The intervening areas will be vegetated to further attenuate run-off and capture nutrients as advised and has been included in the Environmental Management Programme.	5. This comment is noted. Please also note that the washing of the chicken pens only occurs once all manure has been thoroughly removed through dry sweeping. Washing is then conducted using high-pressure hoses that use minimal water, and under normal operating conditions, no notable runoff is expected. In the unlikely event that limited wash water does reach the outside areas, it will disperse onto the adjacent free-range pastures, where it will infiltrate into the soil. The stormwater control measures and vegetated intervening areas therefore serve primarily as an additional, precautionary pollution-prevention mechanism.
		6. In conclusion, CapeNature is satisfied that all concerns have been addressed and has not objection to the application provided mitigation measures are implemented.	6. The comment that CapeNature is satisfied that all concerns have been addressed and has no objection to the application provided that mitigation measures are implemented is noted.
		7. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.	7. This comment is noted.
4	Jan-Willem du Plessis - Farm 752 Môreson	<u>Email dated 19 November 2025:</u> I would like to comment on the PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON	
		Wetland on farm 752 Môreson; 1. The aquatic assessment was done by staff of PHS CONSULTING. Is it not against EIA regulations for the EAP consultancy doing the Basic Assessment to do specialist opinions?	1. The aquatic assessment complies with the EIA Regulations. Although PHS Consulting is the appointed EAP, the assessment was undertaken jointly by internal candidate specialist and an independent, professionally registered specialist (Ms Kimberly Perry, Delta Ecology). This ensured both technical oversight and independent review.

		2. The aquatic study fails to provide details on the site assessment and how the watercourses were identified and delineated onsite. It is indicated that "no visible wetland indicators were present during the site visit". How is that possible even though several watercourse features are acknowledge to be present on imagery (e.g. Figure 7, Figure 17 and "aerial imagery (Figure 15 & Figure 17) reveal hydrological signatures indicative of a diffuse aquatic feature. The local topography, along with desktop evidence of diffuse hydrological signatures and channelled flow support the classification of the feature as a degraded CVB wetland")?	2. Details on the site assessment and how the watercourses were identified and delineated are provided in Section 3.2 and Section 5 of the Aquatic Biodiversity Compliance Statement. As described in these sections, a combined desktop and field-based verification approach was used to identify and delineate freshwater features. The statement quoted here was with particular reference to the valley bottom wetland identified southwest of the proposed development site. Although hydrological signatures are visible in historical and recent aerial imagery, decades of intensive cultivation within the study area have removed all natural wetland vegetation and disturbed the soil structure. As a result, no visible wetland indicators were present in field during the site visit, which is consistent with a system that is seriously degraded. Accordingly, delineation was based on field verification of topographic features, position in the landscape and hydrological signatures observed in Google Earth and CD:NGI imagery (including historical imagery). This integrated method ensures that watercourses are accurately identified even in highly transformed agricultural landscapes.

		3. Therefore, please provide • Please provide coordinates of sampling sites of the field visit of 7 February 2025 - These coordinates should be for both the sampling sites to - identify watercourse presence - delineate watercourse boundary - determine the ecological status of the watercourse • descriptions at these sites and their soil form and soil hydromorphic features. If not done then how can this report be a reliable and independent professional opinion?	3. Coordinates for the areas assessed during the 7 February 2025 site visit were recorded and were used to inform the watercourse verification and delineation presented in the Aquatic Biodiversity Compliance Statement. These points correspond to the locations where field observations and soil sampling was undertaken. As described in the Aquatic Biodiversity Compliance Statement, the study area has been subject to long-term and intensive cultivation, which has significantly altered soil structure and removed natural vegetation. During the site visit, several attempts were made to obtain soil samples using a soil auger; however, the soils were extremely dry, compacted, and rocky, causing material to fall out of the auger and preventing meaningful soil profile descriptions or identification of hydromorphic features. This limitation reflects the highly transformed and degraded nature of the system, rather than an absence of assessment effort. Given these constraints, the identification and assessment of the watercourse relied on a combination of field observations (including topography and position in the landscape) and desktop evidence (hydrological signatures observed in Google Earth and CD:NGI imagery). This integrated approach is standard and appropriate in agricultural landscapes where natural indicators have been lost.

		4. Please provide evidence of studies done on the rest of this valleybottom wetland and potential impacts on it and the downstream Kwartel River in term of potential pollution impacts. Specifically please also address how poultry carcasses will be disposed of.	4. Assessments for this application focused specifically on the regulated areas triggered by the proposed development. Accordingly, the study does not include detailed ecological investigations of the full extent of the broader wetland system, as those areas fall outside the regulatory scope and defined study area (>500m from the proposed development site). The portion of the valley bottom wetland within the relevant regulatory area was delineated, assessed and evaluated for potential risks associated with the proposed activity. Although the broader downstream system was not assessed in detail, the study acknowledges that the on-site CVB wetland forms part of a system that ultimately contributes flow to the Kwartel River. The mitigation measures outlined in the Aquatic Biodiversity Compliance Statement are aimed at ensuring the protection of both the on-site wetland area and the downstream system to which it is connected. Non-infectious mortalities will be disposed of via the registered onsite composting facility, which has sufficient capacity for the anticipated volumes. Infected mortalities will be managed under the strict supervision of the State Veterinarian.
		5. Lastly: a farm dam is located in the headwaters of this valleybottom wetland close to the proposed poultry development. It is perennial (fed by the wetland) and is an magnet for various and often large numbers of waterfowl. Given that it is acknowledged that waterfowl is a vector for avian influenza is it - wise to locate this facility so close to the dam? And - how will the risk of cross-contamination be addressed?	5. The presence of the off-stream farm dam within the broader catchment of the valley-bottom wetland is noted. This dam is artificial and not fed by the wetland. Commercial poultry operations are required to implement robust, standardised biosecurity measures to minimise interaction between wild birds and domestic poultry. The proposed facility will incorporate comprehensive bird-proofing, controlled access, strict hygiene protocols, and routine monitoring to prevent cross-contamination. These measures are specifically designed to mitigate the risk of Avian Influenza transmission irrespective of the presence of waterbodies elsewhere in the catchment.
		<u>Email dated 19 November 2025:</u> I would like to comment on the PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON	

		1. It is stated in the report that the wetland is damaged and all under agricultural use but there is a fenced off protected area in the wetland.This will not be know to PHS consulting as there was no one on farm 752 to inspect this during the whole EIA proses	1. Assessments for this application focus specifically on the regulated areas triggered by the proposed development. The wetland portion within the defined study area (500m ZoR) is within cultivated agricultural fields. Features outside these regulated distances fall beyond the scope of this study and were therefore not assessed in detail.
		2. Site notice was never placed onsite but rather on the other end of the title deed.Notice is very small and unnoticeable.	2. The site notice used for this application is the standard size used for NEMA processes. In terms of the EIA Regulations, a notice must be placed at a location that is both conspicuous and accessible to the public at the boundary of the site where the proposed activity will occur. The notice was installed on the fence at the boundary of Farm RE/225 at the junction of the district road with Minor Road 4123, which provides direct access to the development site. This position complies with the regulatory requirements and ensures maximum visibility to anyone driving past or through the farm, including all users of the minor access road.

		3. Economic impact.The new development will interfere with aerial spraying as it is so close to grain fields of farm 752.It poses risk for chickens and aerial spraying will be less effective as the aerial spray equipment will have to spray from much higher positions than before the development, thus making the spray ineffective or far less effective. Structures like feed silos will cause the airplanes to spray from very high up.	3. The development is proposed within an existing agricultural landscape, and the continued use of aerial spraying on adjacent grain fields will not be restricted. The applicant has confirmed that neighbouring farmers can continue spraying as per their current operations without posing a risk to the birds. Their only request is that they are notified prior to spraying activities. No feed silos are proposed. The proposed structures will not affect the height or flight paths used for aerial spraying.
		The new development will be right infront of the Klein Swartberg when viewed from Môreson farm.This will have a severely negative impact on the farms potencial to get a tourist income as the new development will obstruct the beautiful Klein Swartberg view.	The concern regarding the view of the Klein Swartberg is noted. The proposed development is located within an existing agricultural landscape and is consistent with the property's current agricultural zoning. A visual statement and constraints analysis concluded that the development has low visual exposure, limited visibility from key viewpoints, and is compatible with the surrounding agricultural character. According to the visual analysis undertaken for the proposed development, a tree screen located between the development area and the homesteads on the northern and western borders of the development site will reduce and even eliminate any visual impact. Additional mitigation recommended within the visual analysis includes earth-tone building colours and charcoal roofs, which will further reduce visibility. Due to the undulating topography, distance from main receptors, and the presence of existing agricultural structures in the area, the visual statement and constraints analysis concludes that the development will have little potential influence on scenic resources or visual character of the area.

		4. Blue Cranes,I have never received the specialists that was appointed by PHS Consulting on Môreson farm where the nesting sites are registered.Not all land on Môreson farm is under very intesive agriculture,there are areas where the Blue Cranes stay.As seen in the attached photo. The Blue cranes nest in the grain fields after they have been cut and feed on harvest residue after the harvest,including the fields next to the proposed development site .Further studies need to be undertaken.Some of the comments are assumptions in my opinion. In the attached photo Blue Cranes can be seen feeding in the wetland that is downstream from the proposed development.Posing a great risk as there were over 200 on that day. 	4. Two independent qualified specialists conducted a site visit on 31 August 2025 to assess the faunal sensitivity of the project site. The commenting landowner was notified of the site visit by the applicant but indicated that they were unable to attend. The specialist confirmed that the proposed development site is located just over 1km from the closest EWT-recorded Blue Crane breeding site, and the area between the two locations consists of intensive agricultural land. The project site itself is highly transformed and does not contain habitat suitable for nesting. The findings in the report are based on a desktop and field assessment and concluded that the proposed development is unlikely to generate significant negative impacts on the breeding activities of the Blue Crane. No further studies were recommended by the specialist.
		5. Road 4123. It is stated in the comments that Road 4123 is a secondary entry to Môreson farm.This is not true,it is the primary entry road to Môreson farm 752 and sometimes the only entry road .The process of deproclaiming the road has been halted and not finished thus making it a public road still.	5. This comment is noted. Two access routes via minor roads to Môreson Farm exist from the surrounding district roads, and both are relevant for general farm access depending from which direction one travels to or from. The Basic Assessment Report has been updated accordingly While the deproclamation of Road 4123 is still in process, it has been treated as a public road for the purpose of this assessment. All applicable building line requirements have therefore been applied, and the proposed development has been set back from Road 4123 in full compliance with legislative requirements. The road's status, therefore, has no bearing on the impact assessment, as all legal requirements associated with a public road have been adhered to.

		6. It is stated in the comments that the visual effect of the development will be mitigated and that the neighbours have agreed,this is not true rather the mitigation options were proposed but the neighbours were firm that they wanted the development on another site out of view.The development will look nothing like the neighbouring farmsteads ,it it also much larger and on a hilltop contrary to surrounding farmsteads.	The comment is noted. However, the findings of the Visual Statement remain unchanged. The visual specialist confirmed that: • The proposed development is situated within an existing agricultural landscape where comparable structures occur. • The closest existing farm homesteads are located approximately 1,6km north-west and 2.5km north of the proposed development area. The view catchment corridor from these receptors, as well as the surrounding area, is limited due to the undulating nature of the topography and distance from the development. • Due to distance, surrounding topography, and proposed mitigation (including boundary tree screening and earth-tone building colours), the site has low visual exposure and a high visual absorption capacity after mitigation. Accordingly, the specialist's assessment concludes that the proposed development poses limited to no visual constraints on the broader surrounding area. Mitigation measures as recommended by the specialist will be implemented.

		7. Smell.It is stated in the comments that the houses are to far off for bad smells.Given the right strong wind smells can be carried far and as it is right next to our farm entrance, the bad odors will be smelled daily by entering and leaving the farm.Not to mention the surrounding agricultural activities.	7. As previously noted, this concern has been considered in the impact assessment, which concluded that the risk of significant odour impacts to surrounding farms and homesteads is low due to several factors: - The nearest homesteads are located more than 1.6 km and 2.5 km away respectively. The proposed site is elevated and considering this and the distance any odour will be dissipated. - Boundary landscaping including planting tree lines will be implemented to serve as an additional odour barrier. - Manure is mainly contained within the houses and only removed once per cycle (±2 months), following strict handling practices which will minimize odour related impacts. Mortalities are removed in sealed containers. - A strict cleaning schedule will be maintained to ensure ongoing cleanliness and to prevent the accumulation of organic waste, further minimising the potential for odour generation. The current operations have not recorded significant odour impacts to date.
5	George de Kok	<u>Email recevied ated 19 November 2025:</u> I would like to register an objection to the development mentioned for the following reasons. 1. Lack of sufficient water- The operation at Grootvlei is water intensive and reliant on unsustainable usage of the subterranean reservoir situated under the Klein Swartberg mountain. During periods of sustained droughts the springs on which sustainable farming practices have relied since even before the permanent settlement of European settlers, become under immense strain and during 2019 dried up. Allowing for the further exploitation of this reservoir would be hugely irresponsible. Sinking of additional boreholes to satisfy the greed of one producer at the expense of many cannot be allowed unopposed.	1. The comment regarding water availability is noted. No additional groundwater abstraction is required. The water demand for the facility falls within the existing, lawful water-use allocations for the property. The operation will therefore rely solely on the current lawful water supply and will not require new boreholes or increased abstraction from the local aquifer. As such, the development will not place additional pressure on groundwater resources, nor will it affect springs or existing agricultural water users in the area.

		2. Additional traffic on the dirt road connecting the N2 to Grootvlei cause structural damage to my house (build in 2024)	2. This comment is noted. The farmyard in reference has been located on the road since its origins; it is a public road. The proposed facility will result in a modest increase in heavy vehicle traffic compared to current operations. The road is a district road. District roads are higher-order rural roads that provide access between towns and farms and are primarily intended to support agricultural activities in the region. The road to be used for access to the farm has been recently maintained, is in a suitable condition to safely accommodate the additional vehicle loads associated with the new proposed development.
6	Etienne Roux – DEADP Air Quality Management	Email dated 24 November 2025 : Please find attached for your records. Apologies for the late submission.	Noted
		Letter received via email dated 24 November 2025: 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):	Noted
		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.	1. Dust Management 1.1. This comment is noted. Dust management measures have been incorporated into the EMPr. 1.2. This comment is noted. The potential for dust generation has been assessed as part of the impact assessment, and appropriate mitigation measures have been included in the Construction and Operational EMPrs for the proposed development. Dust suppression methods will be implemented and monitored as outlined in 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	2. Noise Management 2.1. This comment is noted. Potential construction-related noise impacts have been assessed as part of the impact assessment, and appropriate mitigation measures have been incorporated into the EMPr. These mitigation measures will be implemented and monitored in accordance with the EMPr requirements. 2.2. This comment is noted and will be adhered to. 2.3. 2.3.1. This comment is noted and has been included in the CEMPr. 2.3.2. This comment is noted. The noise related mitigation measures will be implemented and monitored as outlined in 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 odour should be strictly implemented as per the EMPr.	3. Odour Management 3.1. This comment is noted. Potential odour related impacts have been assessed as part of the impact assessment and appropriate mitigation measures have been incorporated into the EMPr. 3.2. This comment is noted. Odour management measures have been incorporated into the EMPr. 3.3. This comment is noted. All odour related mitigation measures will be implemented and monitored as outlined in 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.	4.1. This comment is noted. Mr Johan Viljoen has been notified as part of the pre-application public participation process (16 April–21 May 2025) and the in-process public participation process (21 October–19 November 2025). No comment has however been received to date.
		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.	4.2. This comment is noted. Th Duty of Care requirements in Section 28 of the National Environmental Management Act (Act 107 of 1998) is acknowledged and will be adhered to.
		4.3. Please note that the above-mentioned comments/recommendations do not pre-empt the outcome of the application.	4.4. This comment is noted.
		4.5. 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: 4.5.1. that additional information or documents will not be requested; 4.5.2. or of the outcome of any application submitted to the authorities.	4.5. This comment is noted.
		4.6. Kindly be informed that the D: AQM reserves the right to review the above-mentioned comments, should additional information come to light.	4.6. This comment is noted.
		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.	This comment is noted and will be adhered to.

7	Applications Manager – Western Cape Roads Infrastructure	The message below refers to your application for the submission of a property environmental study for comment (Application No - 2025-11-0083) submitted to the Western Cape Government on 2025/10/19: Properties related to the application : • Portion 0 of Farm GROOT VALLEY 225, CALEDON The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.	This comment is noted.
Amended Draft BAR (Circulated from 2 December 2025 – 23 January 2025)			
1	Jan Visagie -Future Plan – Town and Regional Planning representing the owners of Farm 752 (Môreson)	<u>Email dated 4 December 2025:</u> Please find our objection attached to this communication.	
		<u>Letter recevied via email dated 4 December 2025:</u> Public Participation Process for a Basic Assessment for the proposed development of an additional poultry rearing facility on the reaminder of farm grootvlei no 225, Caledon, DEA&DP Ref No. 16/3/3/1/E4/5/1079/25 1. Introduction We act on behalf of the owners of Farm 752 (Moreson), situated 30 meters north of the proposed expansion of a poultry rearing facility on Farm Grootvlei No 225, Caledon. This doment serves as a formal objection to the Basic Assessment Report submitted by die applicant, Bapchix (Pty) Ltd. The owners of Moreson have a longstanding generational heritage in Caledon, and this proposed development threatens not only the sustainablity of their farm but also the wider rural character and ecologial balance of the Overberg region.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
		2. Brief Our Brief was to scrutinise the EIA documents provided on the Environmental Practitioners' website, consider our client's concerns, and comment on or object to the proposed activities as advertised.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

		3. Background in terms of the application The following descriptions for the proposed activities on the property (Remainder Farm Grootvlei No. 225, Caledon) The proposed development/expansion will be situated in an area mainly used for grain, wheat, and sheep farming. For these activities to succeed and remain sustainable, farmers rely heavily on the environment to provide the necessary safeguards and influences. Regarding the above, it should be noted that bird life, bee activity and the ability to polluntate specific cultivars are critically important to farming practives. Farmers have limited control over these processes, aprat from maintaining a pristene environment and ensuring that no adverse effects result from their or others' farming activities in the area. Consequently, most farmers have avoided harmful chemcials when spraying their crops to control pests. The activities and background for the proposal are detailed below as per the statement – *The proponent of Bapchix (Pty) Ltd plans to expand the exsisting chicken farm on Farm Grootvlei No 225, Caledon, by constructing an additional poultry rearing facility.* *The proposed development property is approximately 317ha in extent and is located approximately 15 kilometres northeast of Caledon and approximately 3 kilometres north of the N2. It is accessible via a dirt road. The proposed development area is approximately 5.5 ha in extent and located in the northeastern portion of the property.* *The following development is proposed:* *1) Ten new chicken houses with free-range grazing between houses;* *2) Staff housing and ablution facilities with a septic tank system;* *3) An office;* *4) A loading bay;* *5) A shaving shed;* *6) A water treatment facility;* *7) A generator room;* *8) Internal access routes <8m wide; and*	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

		9) A biosecurity access control point. *The new chicken houses will accommodate a maximum of 16,500 chickens per house, and each house will be approximately 1000m² in extent, with free-range pasture located between the houses. The chicken pens will be fenced off from the surrounding area for biosecurity purposes. The preferred alternative's location and layout have been developed based on existing access routes, service availability, prevailing wind directions, environmental sensitivities, and biosecurity requirements, and they have attempted to avoid environmental impacts as far as possible.*	
		Listed NEMA Activities Applief for: Listing Notice 1 (R327) Acitivity 40: 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 1000 poultry where the facility is situatied within an urban area; or (ii) more than 5000 poultry per facility situated outside an urban area	This comment is noted. The proposed development entails the construction of an additional poultry rearing facility comprising 10 single pens each housing approximately 16500 birds in northeastern portion of the property. The development activity is new; however, it is an expansion of the existing onsite poultry operation.
		4. Ground of Objection 4.1. Client-Identified Concerns for Objections The following Table indicates the impact of the proposed new activity as being advertised.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Impact	**Reason for Objection**	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
			Smell – Orientation Relative to Prevailing Wind: The positioning of the chicken houses was aligned with the prevailing wind direction to promote the effective natural ventilation and facilitate the formation of natural visual and odour barriers.	All the main wind directions will carry the stench to the neighbouring farms and the homesteads. The wind from the southeast will affect the Enon farm, the south will affect Moreson and Springfontein and the northwest will affect the Fourie farm. Also, when the farmers and their respective workers pass by the proposed development to work on neighbouring fields. The District Road (DR01294) runs through the property, and both facilities are just 1km from the tourist route leading to Greyton. District Road DR01279 will also be negatively affected, as fewer tourists use these roads thereby reducing the smell's impact.	

			Noise The land use of the property and surrounding area is primarily agricultural in nature. The proposed development structures will be visually identical to the authorised structureson farm no. 226 which borders the proposed development site (farm no. 225) to the south. The authorised chicken houses on farm no. 226 are located immediately south of the development site's southern boundary. The proposed development is unlikely to be visually intrusive within the agricultural landscape. Noise from inside the units will be largely contained as the units are completely enclosed. Noise from agricultural activities on site is deemed acceptable in the current setting. The proposed land use is agricultural and is compatible with the surrounding rural/ agricultural area. Due to the scale and nature of the development, all potential impacts on people's health and well-being are anticipated to be low to negligible. Please refer to Appendix J for a detailed Impact and Risk Assessment.	The proposed new structure's location high up on the hill, with the wind directions taken into consideration, will not limit the noise levels. Due to the lack of trees, high scrubs, and plants around the structures, the noise levels will be carried far from this location, especially when the grain/wheat has been harvested.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Traffic Setback from roads and property boundaries: The preferred development site has been positioned in accordance with legislative requirements, ensuring appropriate setbacks from both roads and property boundaries.	Trucks and staff will regularly travel on the access road past the new development (road 4123), which is our client's primary and, in wintertime, only access to their residence. The road is so narrow that a truck will block the whole road. This makes for a dangerous situation. Not only will the trucks block the road, but there is a steep hill just before the site from the Môreson Farm, with no line of sight until crossing the hilltop. Heading north on the road, you cannot see the oncoming traffic due to the steep hill, and with the oncoming trucks blocking the road (especially while heading in the opposite direction), it will create a hazardous situation. The movement of heavy vehicles involged in current grain farming operations will therefore be restricted, affecting traffic flow during the night, especially during harvesting time and the lorries must get to the silos. Like other neighbouring farms, all residents and school children from Môreson Farm use the road daily.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

				Feed trucks delivering feed to existing poultry sites frequesntly get stuck and block the roads. Since the chicjen farm owners do not always have the necessary machinery, neighbours are requested to assist in such circumstances. Trucks will enter and exit the site, blocking road access. This creates a hazardous situatio, as there have already been accidents on this stretch of road.	

			Negative Impact on Economy & Tourism	This purpose-built new site will be situated on a hilltop. It will obstruct and spoil the stunning views of Klein Swartberg Mountain that all residents of the neighbouring farms, and tourists travelling along the less-travelled paths to and from Greyton, have enjoyed. The new development is also located very close to the entrance (20/30 m) of Môreson Farm, which will likely harm the farm's entrance. Môreson and the neighbouring farms havepotential for tourism income due to their stunning mountain views. This potential income will not be achievable if the new development takes place just before the mountain views. Job creation for the locals is unlikely, as migrants are often employed as labour on these farms. Proof of South African citizenship must be a prerequisite for approving such endeavours.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Landscape/Visual Impact Assessment – The land use of the property and surrounding area is primarily Agricultural in nature. The proposed structures will closely resemble the authorised structures on farm no. 226 which borders the proposed development site (farm no. 225) to the south. The authorised chicken houses on farm no. 226 are located immediately south of the development site's southern boundary. The proposed development on farm no. 225 is unlikely to be visually intrusive. The primary view corridor is from the gravel road that runs immediately adjacent to the proposed site. The proposed development will be clearly visible from this internal access road, however, given that this road is a secondary access route to the neighbouring farm, the visual impact will be limited. Given the topography of the landscape, the proposed development site is not visible from any primary or secondary external roads. No Landscape/ Visual Impact Assessment will be required.	We contend that the Overberg vernacular architecture style cannot be replicated to serve the purpose of the farm buildings adjacent to Farm 225, Caledon, except when this statement is in relation to the existing chicken farm on Farm 226. Those structures (those on Farm 226) should never have been permitted, as they set a precedent that this application is now attempting to exploit to secure approval on the basis of no-visual impact. This will significantly harm the area's visual landscape, particularly as the proposed actvitiy is situated on the higher part of the hill. A site visit from the Department of Environmental Affairs officials will underline the statement made on behalf of our client.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Fauna and Flora- Setback from Sensitive Environmental Features: A channelled valley bottom wetland was delineated to the southeast of the proposed development site. The layout was adjusted to ensure that the development remains as far as reasonably possible from this freshwater feature, in line with environmental best practice. Biosecurity and Grazing Requirements: Adequate spacing between chicken houses was maintained to meet biosecurity standards and grazing requirements, without compromising the compact nature of the design.	It is observed that the Blue Cranes nest each year near the proposed new development. This presents a considerable danger to the Blue Crane population that resides and nests in this region. High-density farming can lead to: o Rising disease spread among birds, leading to higher use of antibiotics and chemicals. o Greater dependance on chemical treatments, which can damage the environment by contaminating soil and water. With this new facility, the risks of bird flu will increase by more than 30%, negatively impacting the area's birdlife.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
			Erosion	The access road has lost gravel, and the steep hill will create more problems. Lack of maintenance, along with increased heavy traffic, will lead to even more erosion. The proposed site is on a hilltop and will contribute to more erosion due to its location. Water will accumulate due to the hard surface and pick up speed from this high site.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Safety and Security -	Besides the obvious traffic risks, there is a substantial risk of crime. The safety of the farming community is critically important for those living in rural areas. With the development of this new site, there will be much more unnoticed traffic, and the farmers would not know weather those travelling on the road leading to the new facility are for the chicken farming operation of for any other reason. Môreson and Springfontein are secluded farms, helping to keep residents dafe since there are very little unnoticed traffic or passers-by. The new development is located on a hilltop offering views of Enon, Môreson, Springfontein, and nearby farms. As a result, the farming community will lose their sense of security, since many staff, guests, trucks, buildingers and others will have unrestricted visual access to all residents. This will also lead to more safety expenses.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Pest Controls	If the facility is approved, pest control measures will be restricted for the existing wheat and grain farmers in the area. Crop spraying will be limited because the drift and noise could harm the poultry in the new development, just 30m from the field's border. This could cause yield on high-potential agricultural land on the neighbouring farm (Môreson). Harvesting and other farm activities generate dust, which might that may harm poultry in the new development.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Waste Management Issues	Poultry farms produce significant waste, which can result in: Water pollution caused by runoff carrying nutrients and pathogens. This runoff can contaminate local water bodies, leading to eutrophication, which depletes oxygen in the water and harms aquatic life. Soil degradation due to excessive manure can alter soil pH and lead to nutrient imbalances. This poses a significant risk to the farming community near the existing chicken facilities and the proposed site, as the wastewater could enter the natural stream and the water sources relied upon by the surrounding farms. Underground reservoirs may be affected, underscoring the potential severity of this risk.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Greenhouse Gas Emissions	Poultry farming contributes to greenhouse gas emissions through: ○ Methane and nitrous oxide are released from manure, potent greenhouse gases contributing to climate change. ○ Carbon dioxide from energy used in farming operations, including heating, ventilation, and transportation. While the adjacent farmers use the dried manure as part of their compost on their fields, it is questionable if they could import additional manure that may have an adverse reaction to what they have already used. This would mean a monopoly that the chicken farmer would then create artificially.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
			Water Usage	Poultry farming requires significant water resources, which can lead to: ○ Depletion of local water supplies, affecting both human and ecological needs. ○ Increased competition for water among agricultural and urban needs, potentially leading to conflicts over water resources.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Antibiotic Resistance	The use of antibiotics in poultry can contribute to: ○ Development of antibiotic-resistant bacteria, which can spread to humans and other animals, posing significant public health risks. ○ Potential health risks to humans through the food chain, as antibiotic residues can remain in meat products.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
			Job Creation	As already stated, it is unclear whether this new facility will provide only job opportunities for local people. It is further unclear if any other new opportunities within the region will be created as a result and weather this will only increase the farm owner's potential income.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
		4.2. Comments on the Summarised Impacts of the Proposed Development by Environmental Specialists			

			Statement by Environmental Specialist	**Comments**	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
			An existing poultry rearing facility is located approximately 2km southwest of the new proposed development site on the same property (RE/225, Grootvlei, Caledon). The existing facility was developed between 2005 and 2011, without prior authorization. A voluntary S24G process has been initiated and is nearing finalisation.	The Impact assessment is conducted for one facility. The combined impact of 3 (three) such facilities should be considered, not as stand-alone facilities. Advertisements are not displayed for the proposed or the Section 24G application sites.	
			Access – Access to the property is existing. Existing internal dirt roads provide access to the proposed development site. Additional internal dirt roads (<8m wide) will however be required for access between the chicken houses.)	The report does not mention maintenance of the existing gravel road or comments from the Department of Provincial Roads regarding the District Road, which is considered a scenic road within the Theewaterskloof Municipal Area. Access to Môreson Farm has been established along the access road to the proposed site for more than 30 years. Under South African Law, their right to use the access road has been vested. However, the impact of their traffic concerns and fears has not been appropriately addressed.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Electricity – Electricity supply to the proposed development will be established via extension of existing electrical infrastructure. Eskom has confirmed sufficient capacity (Refer Appendix E16). A step-up and step-down underground cable from an existing Eskom transformer will be run to the proposed development site. Electricity supply will likely be supplemented via generators.	The extension of existing lines to include the provision of electricity to the proposed location will have further determinantal visual impact on the development. With the additional generator installations, noise levels will rise further, disturbing the natural environment and the peace of those nearby. It is understood that the electrical line will have to be extended either over the road from one end of the farm or from Farm 226, which would require further approval in terms of NEMA.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
			Sewage—A septic tank system will be installed at the proposed development site, as no wastewater treatment works are nearby.	If it is not operated correctly, a septic tank system till contaminate the underground over time, and no guarantee can br given. A conservancy tank system is the only suitable option for the expected wastewater volume. A wastewater treatment plant can already be feasible if the combined facilities of Farm 225 and 226 are considered.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Mortality—Non-infectious mortalities will be disposed of via the registered on-site composting facility. The Applicant confirmed sufficient composting capacity to accommodate the expected mortalities.	This is a further alarm for the adjacent farmers, as it may, over time, negatively affect underground water. There is a regional disposal site at Karweiderskraal; all mortalities should be transported off-site to this facility.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
			Manure will be managed by directing a portion to the registered on-site composting facility. The remainder will be used directly in the agricultural industry. Manure will be dry-swept and cleaned out of the chicken houses, and then high-pressure wash water will be used to clean the pens with any residual water lost through evaporation.	This will increase the stench of manure for those passing by and living within the immediate area. It is not ideal, as already stated in this objection, and therefore, no additional facility should be unabridged within the vicinity of the existing two facilities.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

			Water – The verified registered water use is sufficient for the proposed development activities.	All runoff water from the proposed site flows into the Kwartel River. Neighbouring farms use this water for sheep drinking, irrigation, and residential use. Water from the new development would negatively impact the water quality (Salmonella risk). This will primarily occur with heavy rain, as has happened before. The facility's layout directs runoff from both sides of the proposed development to the middle of the development, which was done to deal with the accumulated runoff. This contrasts with the statement that the development was designed to deal with and mitigate the stench with the prevailing winds.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
			Domestic waste – Biodegradable materials will be composted within the onsite composting facility, plastic containers will be recycled, and the remainder will be buried in a demarcated camped off area as per the current operation. Given the size of the area in use (	The onsite composting site is not monitored regularly. All waste should be transported to the regional waste facility at Karweiderskraal as the current situation already concerns our clients regarding the sustainability of the under- and surface water they all use.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

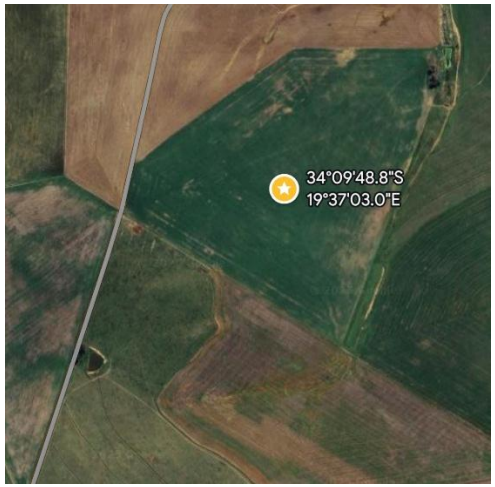
		5. Summary of Objections 5.1. Environmental and Biodiversity Concerns • The proposed development site is located in a crucial area for pollination networks and bird species, particularly the Blue Crane (Anthropoides paradiseus), which nests nearby. Disturbances could cause a decline in populations and upset the ecosystem balance. • The use of antibiotics and increased poultry density will probably cause soil and water contamination, jeapordizing nearby organic and sustaibale farming methods. Relevant Case: In Case No. 14/2/4/1-A5/14-2011 (Bot River Poultry Farm Objection), environmental approval was delayed after objections raised concerns about wetland proximity, birdlife, and unassessed. cumulative impact. The project was required to commission a complete avian impact study before further proceedings.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
		5.2. Pollution – Odour, Noise, and Visual Degradation • Odour from chicken manure and ventilation is a persistent nuisance. Despite orientation claims, prevailing wind directions (SE and NW) will channel odours directly to Môreson and neigbouring farms. • The visual impact on the scenic Greyton tourism corridor is substantial. The new structures are proposed on elevated land, permanently altering views of the Klein Swartberg. Relevant Case: The Elgin Poultry Development Appeal (2019) faced sustained opposition due to tourism-related visual intrusion and was ultimately required to relocate out of a view-sensitive zone.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

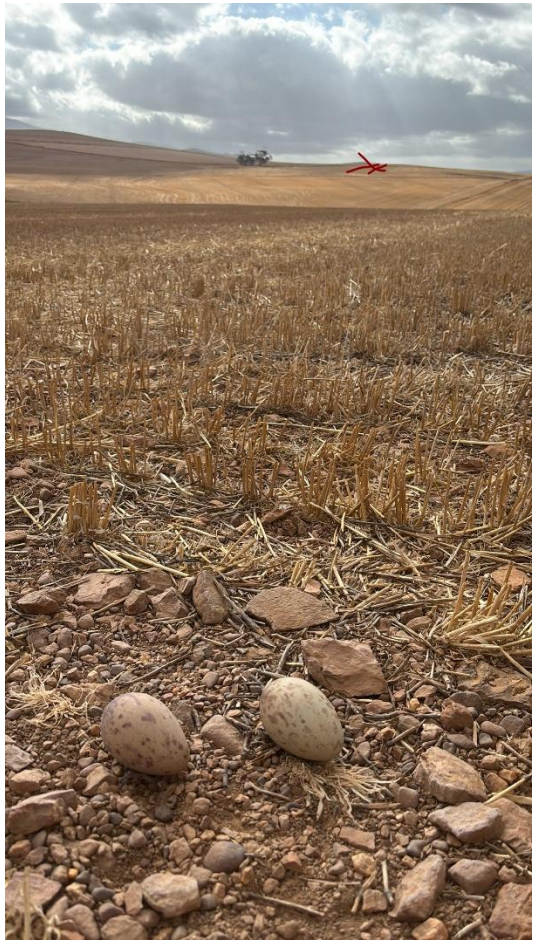
		5.3. Water Use and Contamination Risks • The Kwartel River, used by surrounding farms for irrigation and livestock, runs downslope from the proposed development. Runoff during heavy rains risks water pollution (e.g., Salmonella, E. coli) and eutrophication. • Increased groundwater abstraction will deplete shared borehole sources. Relevant Case: In Kleinmond Poultry Project EIA (2017), water rights and cumulative impacts on aquifers led to the mandated full EIA instead of a Basic Assessment due to potential public health risks.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
		5.4. Road Safety and Traffic Hazards • Road 4123 is the only winter access to Môreson. Its narrow width and steep incline before the site create a blind spot where truck blockages have already caused near accidents. • Current traffic volumes during harvest season are already high. Additional feed and delivery trucks pose a safety threat to farm workers and school children.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
		5.5. Safety and Security Risks • Remote farms like Môreson depend on restricted access as a security measure. Greater movement from non-local staff, construction crews, and delicert vechiles increases the risk of crim and tresspass. • The elevated position of the site comproses privace and security by allowing line of sight into private farmyards.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

		5.6. Negative Economic and Tourism Impact • The Overberg region, including Caledon and Greyton, heavily relies on agri-tourism. Farm 752 and others have development potential for hospitality-based ventures that depend on open landscapes and fresh air. • The visual, olfactory, and audible degradation caused by this facility will dissuade tourists and investors. Relevant Case: In the Stanford Broiler Farm Objection (2020), community and tourism objections led to the cancellation of a proposed broiler facility near agri-tourism routes. Planners cited the incompatibility with local economic development strategies.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
		5.7. Lack of Meaningful Public Participation and Cumulative Impact Assessment - The application does not evaluate the collective effect of three poultry facilitues on the same farm, contrary to integrated planning principles under the National Environmental Management Act (NEMA). - Section 24G processess concusrrent decelopment raise concerns abiyt piecemenal applications to curcumvent the comolete EIA requirements.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
		6. Relief Sought We hereby request: 6.1. That the current application be rejected or paused, pending a full Environmental Impact Assssment (EIA) that: - Includes cumulatove impacts of all poultry developments on Farm 225 - Considers ecological, social and economic impact comprehensively.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
		6.2. An Avifaunal Impact Assessment should be manded, emphasising Blue Crane and migratory sepcies.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

		6.3. Due to insufficient community engagement, the public participation process will be re-run by NEMA Regulation 41.	6.3. Public participation has been and will continue to be conducted in accordance with the EIA Regulations. The following public participation has been undertaken as part of this application: • A pre-application Draft Basic Assessment Report, including the draft EMPr and all supporting documentation, was made available for public review and comment from 16 April 2025 to 21 May 2025 via the PHS website. o A public notice (in English) was published in the Hermanus Times on 16 April 2025. o A site notice was placed in a clearly visible location at the boundary of the proposed development site. o All identified Interested and Affected Parties (IAPs) were notified of the project and the availability of the documentation for comment on 16 April 2025, either by email or registered mail, as applicable. • An in-process Draft Basic Assessment Report including the draft EMPr and all supporting documentation (updated in accordance with comments received during the previous PPP) was made available for public review and comment from 21 October 2025 to 19 November 2025 via the PHS website. o All identified Interested and Affected Parties (IAPs) were notified of the project and the availability of the documentation for comment on 20 October 2025. • An amended in-process Draft Basic Assessment Report including the draft EMPr and all supporting documentation (updated in accordance with comment received during the previous PPP) was made available for public review and comment from

			2 December 2025 – 23 January 2026 via the PHS website. o All identified Interested and Affected Parties (IAPs) were notified of the project and the availability of the documentation for comment on 1 December 2025.
		6.4. The input from the Department of Agriculture, Forestry and Fisheries (DAFF) and CapeNature regarding ecolocila sensitivity should be obtained.	Comment was requested from the Department of Agriculture; however no comment has been provided to date. The Department of Environmental Affairs (See Appendix E12) and Cape Nature (see Appendix E2) have provided comment.
		6.5. That any development approval be contingent upon: - Road upgrades at the cost of the proponent. - Guarantee of local employment, with proof of South Afican citizenship. - Independent monitoring of water quality and runoff controls.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.
		Conclusion While poultry farming is an important industry, addressing its environmental impacts through sustainable practives and responsible management is crucial. Implementing strategies such as integrated pest management, reducing antibiotic use, and impriving waste management can help minimise these adverse effects. The expansion of poultry farming on Farm 225 threetnes the long-term viability of neihbouring farms, compromises safety, undermines rural heritage and violates key principles of environmnetal justice and sustainability. We urge the competent authorities to act under Setion 2 of NEMA and protect the Overberg from inappropriate, high-impact development. We reamin avaiable for public hearings or site inspecations to support the concerns outlined.	Same comment as previously provided on the pre-application draft BAR. Please refer to the responses provided on Page 21 – Page 46 of this Comments and Response Report.

2	Jan Willem du Plessis – Moreson Farm 752	<u>Email dated 5 December 2025:</u> Please register and add this comment on the planned poultry development on Grootvlei farm 225. There is currently a Bluecrane nest 300 m away from the planned development site. This is on Moreson farm 752. See attatched photos and gps location. The faunal specialist is welcome to meet me and go visit the nest. EWT is aware of the nest. It was stated by the faunal specialist in the comments that all nesting sites are outside the 1km radius. This new nesting site is just 300 m away or less.  	<u>Specialist & EAP Response:</u> The appointed faunal specialists have reviewed the information provided by the IAP regarding the Blue Crane nest located within 300m of the proposed development site. The specialists have confirmed that the proposed poultry development does not pose a significant risk to the Blue Cranes nesting nearby. The cranes are nesting in a working agricultural area, that is harvested, and more likely to be affected by management changes in that area rather than the adjacent proposed development. The position of the cranes nests also changes each year, but they have not been recorded nesting in the project area. The findings and conclusions within the faunal sensitivity report remain valid. No additional site visit or assessments are required. Please also refer to EWT comment and Specialist response on page 131 – 135 of this Comments and Response Report as well as Appendix A to this Comments and Response Report.

		Email dated 5 December 2025: Please register with the comments that there is a new nest within 600m from the planned site. Se attatched photo of the nest with the planned development site in the background.  Email reply dated 10 December 2025: Yes 2 nests. I will recieve the specialist if they want to take a look	Email response dated 10 December 2025: Thank you for the comments provided, we take note of the two emails below. We would just like to confirm, is there a nest 300m from the proposed development site and another nest 600m from the proposed development site? Specialist & EAP Response: The appointed faunal specialists have reviewed the information provided by the IAP regarding the Blue Crane nest located within 300m and 600m from the proposed development site. The specialists have confirmed that the proposed poultry development does not pose a significant risk to the Blue Cranes nesting nearby. The cranes are nesting in a working agricultural area, that is harvested, and more likely to be affected by management changed in that area rather than the adjacent proposed development. The position of the cranes nests also changes each year, but they have not been recorded nesting in the project area. The findings and conclusions within the faunal sensitivity report remain valid. No additional site visit or assessments are required. Please also refer to EWT comment and Specialist response on page 131 – 135 of this Comments and Response Report as well as Appendix A to this Comments and Response Report.

3	Vanessa Stoffels – Western Cape Roads Infrastrucutre	<u>Email dated 17 December 2025:</u> The message below refers to your application for the submission of a property environmental study for comment (Application No - 2025-11-0083) submitted to the Western Cape Government on 2025/10/20. **<u>Property related to the application</u>** • Portion 0 of Farm GROOT VALLEY 225, CALEDON Attached find this Branch's response to your application.	Noted
		<u>Letter recevied via email dated 17 December 2025:</u> REMAINDER OF FARM GROOT VALLEY NO.225, CALEDON: PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY COMMENTS ON BASIC ASSESSMENT REPORT 1. Your e-mail to this Branch dated 20 October 2025 refers. 2. The subject property is located 17km south of Greyton and takes access off Minor Road 4123. 3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998. 4. This Branch will comment on the access upon receipt of the land use application.	The no-objection communication from the Western Cape Roads Transport and Infrastructure branch is noted.
4	Bernadette Osborne - DEADP Directorate:	<u>Email dated 18 December 2025:</u> Please find attached this Directorate's correspondence regarding Remainder of Farm Grootvlei No. 225, Caledon.	

	Development Management, Region 1	<u>Letter recevied via email dated 18 December 2025</u> ACKNOWLEDGEMENT OF THE REVISED 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 Revised Draft BAR received by this Directorate on 1 December 2025, refers. 2. This letter serves as an acknowledgement of receipt of the abovementioned document by this Directorate. 3. Please note that this Directorate will consider the Revised Draft BAR and issue a comment within the prescribed 30-day commenting period which ends on 23 January 2026. 4. Kindly quote the abovementioned reference number in any future correspondence in respect of the application. 5. Please note that the activity may not commence prior to an environmental authorisation being granted by this Directorate.	This communication is noted.
5	Bernadette Osborne - DEADP Directorate: Development Management, Region 1	<u>Email dated 21 January 2026:</u> Please find attached this Directorate's correspondence regarding Remainder of Farm Grootvlei No. 225, Caledon.	This comment is noted.
		<u>Letter recevied via email dated 21 January 2026:</u> COMMENT ON THE REVISED DRAFT BASIC ASSESSMENT REPORT ("BAR") IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ("NEMA") AND THE 2014 ENVIRONMENTAL IMPACT ASSESSMENT ("EIA:) REGULATIONS FOR THE PROPOSED DEVELOPMENT OF CHICKEN HOUSES ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON.	
		1. The electronic copy of the Revised Draft BAR received by this Directorate on 1 December 2025 and this Directorate's acknowledgement thereof issued on 18 December 2025, refer.	1. This comment is noted.

		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 conservancy tank system, 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 5.5ha. • 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.	2. This comment is noted.
		3. This Directorate has the following comments: 3.1. Written notification in terms of Regulation 19(1)(b) of the NEMA EIA Regulations, 2014 was not submitted to this Directorate. The Final BAR must therefore be submitted within 90 days from the date of receipt of the application by this Directorate, which ends on 5 February 2026.	3.1. This comment is noted. The application will be submitted by 5 February 2026.

		3.2. Wastewater and stormwater management 3.2.1. Provide the capacity and footprint of the proposed stormwater ingress area and the approximate amount of water that will be used to clean the chicken houses at the end of each production cycle. 3.2.2. It was indicated that residual water will be lost through evaporation, it is however not clear how this will be managed during the winter season when evaporation rates are low.	3.2. 3.2.1. The stormwater ingress area will have an estimated capacity of approximately ±45 m^3 and a footprint of about ±150 m^2. Cleaning of the chicken houses occurs at the end of each production cycle (approximately once every two months) and will require an estimated total of 35 m^3 of water. This water usage will be distributed over a period of one week at the conclusion of the production cycle. 3.2.2. Evaporation is not relied upon as the primary means of managing wash water. Chicken pens are thoroughly dry-cleaned prior to washing. High-pressure hoses are used, resulting in extremely small volumes of water use. Under normal operating conditions, no runoff is expected, and seasonal reductions in evaporation, including during winter, will not affect wash water management. In the unlikely event that limited wash water does reach the outside areas, it will disperse onto the adjacent free-range pastures, where it will infiltrate into the soil. The stormwater control measures and vegetated intervening areas will however serve as an additional, precautionary pollution-prevention mechanism.
		3.3. The chickens will roam freely outside the chicken houses in areas that do not have hardened surfaces. Clarity must be provided on how manure will be managed in these areas, particularly during the winter season, as improper handling may result in groundwater pollution where the groundwater table is close to the surface.	3.3. This comment is noted. Chickens preferentially defecate inside the houses where feed and water are located. Any manure on the external aprons will be swept back into the houses daily before the pop-holes are closed. Manure accumulation on the outdoor range will be rare; if observed, it will be raked up and removed to the designated composting area. During adverse weather conditions, chickens will spend more time indoors, further reducing the potential for manure deposition in external areas. As a result, the risk of groundwater contamination is considered very low.

		3.4. It is noted that an administrative process will be undertaken to change the sector use of the existing water use rights. Please confirm whether this process has started.	3.4. BOCMA has been informed of the need for a change in water use sector. No formal application process is required (or available), as this is an internal administrative update. The relevant water uses and volumes have been communicated, and the Section 21(c) and (i) water uses are already registered under a General Authorisation with the applicable use sectors captured in WARMS (refer to Appendix M of the BAR). BOCMA will update its records and billing accordingly, with confirmation only evident upon issuance of the next billing cycle.

		3.5. Comment from the following State Departments is still outstanding and must be obtained and included in the Final BAR: • Department of Agriculture: Veterinary Services; • Western Cape Department of Agriculture; and • DEADP: Air quality.	3.5. Two sets of comments have been submitted by DEADP: Air Quality. Please refer to page 89 and page 127 of this Comments and Response Report as well as Appendix E13 to the BAR. The Department of Agriculture: Veterinary Services and the Western Cape Department of Agriculture were provided with several opportunities to comment. According to our records, each of these departments were notified of the opportunity to comment on the following dates: • Pre-application phase: 16 April 2025 • In-process phase: 20 October 2025 • Final draft BAR: 1 December 2025 In addition, the Western Cape Department of Agriculture was provided with USB copies of the documentation available for public comment on 16 April 2025 and 20 October 2025 (refer to Appendix F1). Direct follow-up requests for comment were submitted to the Western Cape Department of Agriculture and the Department of Agriculture: Veterinary Services on 24 November 2025 (refer Appendix B and Appendix C of this comments and response report). A further reminder was sent to both departments on 21 January 2026, requesting that any comments be submitted by 29 January 2026 (refer to Appendix D and Appendix E of this comment and response report). On 22 January 2026, the Department of Agriculture: Veterinary Services advised that comments on this application should be obtained from Mr Cor van der Walt, who is also the designated contact person for the Western Cape Department of Agriculture. This request for comment was accordingly brought to his attention (refer to Appendix F of this comments and response report). To date, no comments have been received. Considering the various notifications, no comment suggests no issues or concerns. Should any late comments be submitted, these will be forwarded to DEADP for consideration.

		3.6. 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.	3.6. This comment is noted and has been complied with. All the issues raised by IAPs have been collated in this Comments and Response report (Appendix F2 to the BAR) with responses provided accordingly.
		3.7. 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.	3.7. This comment is noted.
		3.8. 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.	3.8. This comment is noted and will be complied with.
		3.9. 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.	3.9. This comment is noted and will be complied with.
		3.10. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.	3. 10. This comment is noted and will be complied with.
		3.11. Please note that the activity may not commence prior to an Environmental Authorisation being granted by this Directorate.	3.11. This comment is noted and will be complied with.
		3.12. This Directorate reserves the right to revise initial comments and request further information based on any new or revised information received.	3.12. This comment is noted.
6	Vhengani Ligudu - BOCMA	<u>Email dated 21 Janaury 2026:</u> Please find attached comments.	Noted.

		Letter received via email dated 21 January 2026: RE: PUBLIC PARTICIPATION PROCESS FOR A BASIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY ON THE REMAINDER OF FARM GROOTVLEI NO. 225, CALEDON With reference to the above-mentioned document received by this office on the 01/12/2025, requesting comments. This office, Breede-Olifants Catchment Management Agency (BOCMA) has reviewed the report and has the following comments:	Noted.
		1. All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered.	1. This comment is noted. All relevant sections and regulations of the National Water Act 1998 (Act 36 of 1998) regarding water use will be adhered to. A General Authorisation has been issued in terms of Section 39 of the Act for water uses as defined under Section 21(c) and (i) for the proposed development (refer Appendix M to the BAR).
		2. Kindly note that the previous comments dated 13/11/2025 remain applicable.	2. This comment is noted. Please refer to page 76-78 for responses to the previous comments dated 13/11/2025.
		3. Please be advised that undertaking any activity that triggers the National Water Act without the required authorisation constitutes an offence, and BOCMA will take legal action against the proponent in terms of Section 151 of the National Water Act, 1998 (Act 36 of 1998).	3. This comment is noted.
		This office reserves the right to revise initial comments and request further information based on any additional information that may be received. The onus remains with the registered property owner to confirm adherence to any other relevant legislation that any activities might trigger and/or need authorization. Please do not hesitate to contact the above official should there be any queries	This comment is noted.
7	Rulien Volschenk - Overberg District Municipality	Email dated 22 January 2026: Please find attached the Overberg District Municipality's comments on the proposed expansion.	Noted.

		Letter received via email dated 22 January 2026: **RE: Public Participation Process for a Basic Assessmet for the proposed development of an additional poultry rearing facility on the remainder of Farm Grootvlei No.225, Caledon.** **DEA&DP REF: 16/3/3/6/7/1/E45/1513/24** The Overberg District Municipality's department of Environmental Management Serivices takes cognisance of the draft Basic Assessment Report for the proposed development of an additional poultry rearing facility on the remainder of farm 225, Grootvlei. In reference to the comments submutted by this department on 11 May 2025, the municipality wishes to reiterate the following:	This comment is noted.
		1. The Municipality has no objection towards the proposed expansion of the poultry rearing facility.	1. This no-objection comment is noted.
		2. In addition the applicant should put measures in place to manage nuisance such as dust noise and traffic to mitigate the impacts of this development on surrounding land-users.	2. This comment is noted and will be complied with. Detailed Construction and Operational Environmental Management Plans have been outlined for the proposed development (refer Appendix H1 and Appendix H2 to the BAR) and will be implemented. These documents include several management and mitigation measures to manage nuisance such as dust, noise and traffic.
8	Application Manager – Western Cape Roads Infrastructure	Email dated 22 January 2026: The message below refers to your application for the submission of a property environmental study for comment (Application No - 2026-01-0092) submitted to the Western Cape Government on 2025/11/30: Properties related to the application : • Portion 0 of Farm GROOT VALLEY 225, CALEDON The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.	This comment is noted.

		<u>Email dated 29 January 2026:</u> The message below refers to your application for the submission of a property environmental study for comment (Application No - 2026-01-0092) submitted to the Western Cape Government on 2025/12/01. Property related to the application • Portion 0 of Farm GROOT VALLEY 225, CALEDON Attached find this Branch's response to your application.	This comment is noted.
		<u>Letter received via email dated 29 January 2026:</u> REMAINDER OF FARM GROOT VALLEY NO.225, CALEDON: PROPOSED DEVELOPMENT OF AN ADDITIONAL POULTRY REARING FACILITY: COMMENTS ON BASIC ASSESSMENT REPORT 1. Your e-mail to this Branch dated 01 December 2025 refers. 2. The subject property is located 17km south of Greyton and takes access off Minor Road 4123. 3. This Branch offers no objection to the issuing of Environmental Authorisation in terms of the National Environmental Management Act 107 of 1998. 4. This Branch will comment on the access upon receipt of the land use application.	The no-objection communication from the Western Cape Roads Transport and Infrastructure branch is noted.
9	Bianca Petersen – DEADP Directorate Air Quality Management	<u>Email dated 22 January 2026:</u> Trust this email finds you in good health. Please find attached comments for your attention.	This communication is noted.

		Letter recevied via email dated 22 January 2026: 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):	This communication is noted.
		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.	1. Comment on the draft BAR 1.1. This comment is noted.
		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.	2. Noise and Dust Management This comment is noted. 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) will be adhered to. References to these regulations have been included in the BAR in section C point 3 and in the CEMPr in point 4.8.1 and 4.3.7 and in the OMPr in point 5.4 and point 5.6.

		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. Preferred Alternative. This comment is noted. Prevailing wind direction was considered in the development layout primarily to optimise natural ventilation and airflow within the poultry houses, thereby reducing reliance on artificial heating and cooling. In the Western Cape, prevailing winds are typically south-easterly during summer and north-westerly during winter. The orientation of the poultry pens has therefore been designed to maximise natural airflow and cooling efficiency. The site is located within a rural agricultural setting with open airflow conditions and as such a detailed assessment of sensitive receptors was not required. Sensitive receptors were, however, identified as part of the visual impact assessment, with the nearest homesteads located approximately 1.6 km northwest and 2.5 km north of the site. The poultry pens are proposed at an elevated position relative to these residences, and any potential odour will dissipate over distance. Boundary landscaping will further serve as an odour buffer. Potential odour impacts were also assessed as part of the impact assessment. Free-range poultry operations are generally not associated with significant odour impacts and are subject to strict management, cleaning, and auditing requirements. The proposed facility will implement a strict waste-handling and cleaning regime, with manure largely contained within the houses and removed once per production cycle (approximately every two months). Mortalities will be removed in sealed containers. Boundary landscaping will provide an additional measure to limit any potential odour dispersion. Given the separation distances, elevation differences, and management practices, it is highly unlikely that surrounding homesteads will experience odour impacts. Existing poultry operations on the property have operated for several years without any recorded odour complaints.

		5. General 5.1. Please note that the above-mentioned comments/recommendations do not pre-empt the outcome of the application. 5.2. No information provided, views expressed and/or comments made by the Directorate should in any way be seen as an indication or confirmation: 5.2.1. that additional information or documents will not be requested; 5.2.2. or of the outcome of any application submitted to the authorities.	4.1. This comment is noted. 4.2. This comment is noted.
		6. Duty of Care 6.1. 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." 6.2. Kindly be informed that the Directorate reserves the right to review the above-mentioned comments, should additional information come to light.	5.1. This comment is noted and will be adhered to. 5.2. This comment is noted.
		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	This comment is noted.

10	Samista Rooplal – Endangered Wildlife Trust	<u>Email dated 22 January 2026:</u> Attached, please find the Endangered Wildlife Trust's comments for the Proposed Additional Poultry Rearing Facility, Caledon. I will be happy to go through the comments with you if needed. <u>Email reply dated 27 January 2026:</u> Thank you very much for the information and for clarifying. Should the EWT see fit to comment further, we will be in touch!	<u>Email response provided 23 January 2026:</u> Thank you for the comments provided. A faunal assessment has been undertaken for the proposed development, and all application documentation is available on our website at the following link: https://phsconsulting.co.za/basic-assessment-for-the-proposed-development-of-an-additional-poultry-rearing facility-on-the-remainder-of-farm-grootvlei-no-225-caledon/ Please refer to Appendix G4 (Faunal Sensitivity Report), which includes consideration of Blue Cranes. In addition, Appendix F2 (Comments and Response Report) addresses comments previously submitted by EWT and the corresponding responses (pages 2–4). During the current round of public participation, information regarding potential nesting sites approximately 300 m and 600 m from the proposed development footprint was received from an adjacent landowner and forwarded to the appointed faunal specialist. The specialist advised that the nests occur within an actively managed agricultural landscape, that nesting locations vary annually, and that Blue Cranes have not been recorded nesting within the project area itself. On this basis, it is considered that the required specialist inputs for the application have been adequately completed. Should you wish to submit further comments after reviewing the available documentation, the commenting period can be extended until close of business on 29 January 2026.

		<u>Letter received via email dated 22 Janaury 2026:</u> The Endangered Wildlife Trust (EWT) is a non-governmental, non-profit, conservation organisation, founded in 1973 and operating throughout southern Africa. The EWT conserves threatened species and ecosystems in southern Africa by implementing research and conservation action towards mitigating threats facing species diversity and supporting sustainable natural resource management. The EWT furthermore communicates the principles of sustainable living through awareness programmes to the broadest possible constituency for the benefit of the region. The EWT is driven by a team of passionate and dedicated conservationists working through 13 specialised programmes across southern and East Africa, each falling under one of our three key strategic pillars: Saving species, conserving habitats, and benefitting people.	This comment is noted.
		We have been made aware, through communication with a neighbouring landowner, of the presence of active Blue Crane (Anthropoides paradiseus) nesting sites in close proximity to the proposed development area. Based on the information provided to us, one confirmed breeding site is located within approximately 300 m of the proposed development footprint, while a second breeding pair is located between approximately 500 and 600 m from the proposed development area.	The comment is noted. A Faunal Assessment for the proposed development site was undertaken in October 2025. This assessment included a specific focus on Blue Cranes. At the time of the assessment, known breeding sites were located more than 1 km from the proposed development footprint, with the furthest site approximately 2 km away. Based on the distance to breeding sites, the small size of the project area, and the high intensity of ongoing agricultural activities within the breeding areas, the specialist concluded that construction and operation of the proposed development were unlikely to impact Blue Crane breeding success. Potential impacts on Blue Cranes were considered more likely to arise from land management practices within the agricultural fields where breeding occurs. During the final public participation period (1 December 2025 to 23 January 2026), additional information was received from the neighbouring landowner indicating the presence of nests approximately 300 m and 600 m from the proposed development footprint. This information was reviewed by the appointed faunal specialist, who confirmed that the proposed poultry development does not pose a significant risk to the nesting Blue Cranes. The nests are located within an actively managed agricultural landscape, nesting locations vary annually, and Blue Cranes have not been recorded nesting within the project area. The specialist confirmed that the

			findings and conclusions of the Faunal Sensitivity Report remain valid and that no additional site visit is required. These comments and the specialist's response are included in this Comments and Response Report on pages 116–117.
		Blue Cranes are highly sensitive to disturbance during the breeding season, and nesting failure can result from increased noise, human activity, vehicle movement, and changes in land use intensity. Construction activities associated with the proposed poultry facility, as well as ongoing operational disturbance, may therefore pose a significant risk to breeding success if not appropriately managed. Given the confirmed presence of nesting Blue Cranes, the EWT recommends the following: 1. Immediate verification by a suitably qualified avifaunal specialist to confirm the location and status of the reported nesting sites prior to any further assessment or decision-making. 2. Establishment of appropriate buffer zones around confirmed nesting sites, with no construction or high-disturbance activities permitted within these buffers during the Blue Crane breeding season. 3. Timing restrictions on construction activities to avoid the peak breeding period, should nesting be confirmed. 4. Inclusion of specific, enforceable mitigation measures within the Environmental Management Programme (EMPr) to address potential disturbance to Blue Cranes during both construction and operation. 5. Consideration of whether the proximity of confirmed breeding sites represents a fatal flaw for the proposed development layout, and whether alternative siting or design adjustments are feasible.	<u>EAP Response:</u> This comment is noted and the concerns are acknowledged. A specialist faunal assessment, including specific consideration of Blue Cranes, has been undertaken for the proposed development, and suitably qualified avifaunal specialists have conducted site visits. As the appointed specialists are best placed to assess potential impacts and required mitigation, reliance is placed on their findings and recommendations. The specialist assessment concluded that the proposed development would have an overall low impact on the Blue Cranes and no mitigation measures were recommended. The reported Blue Crane nests are located on a neighbouring property and not within the proposed development footprint. Based on specialist input, the proximity of these nesting sites does not represent a fatal flaw for the proposed development, and no alternative layout, design changes, or additional restrictions are warranted. <u>Faunal Specialist Response (please also refer to Appendix A to this Comments and Response Report):</u> Our comments and recommendations we had made in earlier emails still apply and we are not in agreement with EWT's comments that the development will constitute a greater risk than the agricultural activities on the farm that the breeding sites actually are found on. Any direct and immediate disturbance will be coming from the agricultural activities on that farm (ploughing, harvesting, etc.) and not the proposed development. Any construction or operational disturbance from the proposed poultry development will likely be marginal and low, especially during its operational phase - - i.e the project's area of influence (PAOI) should not extend to the breeding sites. I cannot find any guidelines from EWT or BirdLife SA around buffers for blue crane breeding sites, whereby a large buffer is required (or

			suggested) and all activity (ploughing, harvesting, etc.) within this buffer is prohibited. If EWT are suggesting that a buffer of at least 500 m (or larger) is required, then has the landowner implemented this buffer around the two breeding sites they have flagged on their land -- i.e. stopped all farming activity within a 500 m (plus) radius around these breeding sites? I have not heard of any such buffer areas being implemented on farms in the Overberg for blue cranes.
		The EWT is concerned that, should confirmed breeding sites not be adequately assessed and accounted for, the proposed development may result in unacceptable impacts on a species of national conservation importance.	The potential impacts of the proposed development on Blue Cranes have been assessed by suitably qualified specialists as part of the faunal assessment. The specialist study and subsequent communication concluded that the development poses a low risk to Blue Cranes.
		Please contact Bradley Gibbons bradleyg@ewt.org and Christie Craig ChristieC@ewt.org for more information. The EWT appreciates the opportunity to provide these comments and request to remain registered as an Interested and Affected Party for all further correspondence related to this application. The EWT reserves the right to revise initial comments presented here if additional information becomes available.	This comment is noted.

Public Participation to date

See proof of public participation conducted for pre-application and amended draft BAR in Appendix F1:

Pre-application Public Participation:

- A pre-application draft BAR was circulated for public comment for a period from 16 April 2025 up to and including 21 May 2025.
- An advertisement (in English) was published in the local newspaper, the Hermanus Times, dated 16 April 2025.
- A site notice was placed at a visible location at the boundary of the proposed development site.
- The pre-application Draf BAR and supporting documentation, plus the draft EMPr was available for download from the PHS website for the period from 16 April 2025 up to and including 21 May 2025.
- All identified IAPs were notified by email or registered mail as applicable on 16 April 2025 of the proposed project and the availability of the documentation for comment.
- A USB with the pre-application draft BAR was provided to the Department of Agriculture on the 16th of April 2025

In-process Public Participation:

- An amended draft BAR was circulated for public comment for a period from 20 October 2025 up to and including 19 November 2025
- The Amended Draf BAR and supporting documentation, plus the draft EMPr was available for download from the PHS website for the period from 20 October 2025 up to and including 19 November 2025.
- All identified IAPs were notified by email on 20 October 2025 of the proposed project and the availability of the documentation for comment.
- A USB with the amended draft BAR was provided to the Department of Agriculture on the 20th of October 2025

Additional 30-day Public Participation:

- An amended draft BAR was circulated for public comment for a period from 2 December 2025 up to and including 23 January 2026. In accordance with DEADP's festive-period requirements, the period from 15 December 2025 to 5 January 2026 is excluded and does not count toward the statutory commenting period; however any comments received during this time period will be accepted. Therefore, the overall commenting timeframe of 30 days is split over the festive season.
- The Amended Draft BAR and supporting documentation, plus the EMPr was available for download from the PHS website for the period from 2 December 2025 up to and including 23 January 2026.
- All identified IAPs were notified by email on 1 December 2025 of the proposed project and the availability of the documentation for comment.

Appendix A: Faunal Specialist Response to EWT Comments

Olivia Brunings

From: Jonathan Colville <jonathan.colville@gmail.com>
Sent: Tuesday, 27 January 2026 08:02
To: Olivia Brunings
Cc: Birding Africa (Callan Cohen); paul@phsconsulting.co.za
Subject: Re: FW: Notification of 30-Day Public Participation Period - Amended Basic Assessment Report: Proposed Additional Poultry Rearing Facility on Remainder of Farm Grootvlei No. 225, Caledon (DEADP Ref: 16/3/3/1/E4/5/1079/25)

Flag Status: Flagged

Dear Olivia

Our comments and recommendations we had made in earlier emails still apply and we are not in agreement with EWT's comments that the development will constitute a greater risk than the agricultural activities on the farm that the breeding sites actually are found on. Any direct and immediate disturbance will be coming from the agricultural activities on that farm (ploughing, harvesting, etc.) and not the proposed development. Any construction or operational disturbance from the proposed poultry development will likely be marginal and low, especially during its operational phase - - i.e the project's area of influence (PAOI) should not extend to the breeding sites.

I cannot find any guidelines from EWT or BirdLife SA around buffers for blue crane breeding sites, whereby a large buffer is required (or suggested) and all activity (ploughing, harvesting, etc.) within this buffer is prohibited. If EWT are suggesting that a buffer of at least 500 m (or larger) is required, then has the landowner implemented this buffer around the two breeding sites they have flagged on their land -- i.e. stopped all farming activity within a 500 m (plus) radius around these breeding sites? I have not heard of any such buffer areas being implemented on farms in the Overberg for blue cranes.

We are also happy to have a virtual meeting with EWT and they can explain their reasoning, which is not clear to us.

If needed, we can also edit our report to indicate the new breeding sites, and our opinion about this.

Best regards
Jonathan & Callan

On Fri, 23 Jan 2026 at 11:18, Olivia Brunings <olivia@phsconsulting.co.za> wrote:

> Hi Jonathan and Callan,
>
> Please see attached EWT comment on the proposed poultry development on RE/225, Grootvlei Caledon for your review.

1

Please advise whether you have any comments, clarification, or additional input to provide in response.

Kind regards

Olivia Venter (Brunings)

BSc Conservation Ecology

Candidate Natural Scientist (154065)

Candidate Environmental Assessment Practitioner (2023/6743)

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

From: Samista Rooplal <SamistaR@ewt.org>
Sent: Thursday, 22 January 2026 16:12
To: olivia@phsconsulting.co.za
Cc: Christie Craig <ChristieC@ewt.org>; Bradley Gibbons <bradleyg@ewt.org>
Subject: RE: Notification of 30-Day Public Participation Period - Amended Basic Assessment Report: Proposed Additional Poultry Rearing Facility on Remainder of Farm Grootvlei No. 225, Caledon (DEADP Ref: 16/3/3/1/E4/5/1079/25)

Dear Olivia,

Attached, please find the Endangered Wildlife Trust's comments for the Proposed Additional Poultry Rearing Facility, Caledon. I will be happy to go through the comments with you if needed.

Kind regards,

Samista Rooplal
Biodiversity and Business Officer

C 0814159285

P +27 11 372 3600

E SamistaR@ewt.org

DONATE **WEBSITE** **SUBSCRIBE**

Appendix B: Direct follow-up requests for comment submitted to the Western Cape Department of Agriculture on 24 November 2025

Olivia Brunings

From:	Olivia Brunings <olivia@phsconsulting.co.za>
Sent:	Monday, 24 November 2025 13:16
To:	'Cor.VanderWalt@westerncape.gov.za'; 'Brandon.Layman@westerncape.gov.za'
Subject:	Request for Comment as per DEADP Request: Proposed development of an additional poultry rearing facility on RE/225 Grootvlei, Caledon (DEADP Ref:16/3/3/1/E4/5/1079/25)
Attachments:	Proof of Email notificiation to State Departments - 20 October 2025.pdf; DoA Notification - April 2025.pdf; DoA USB - April 2025.pdf; USB to DoA - 20 October 2025.pdf

Good day Cor and Brandon,

I trust you are well.

As part of the Basic Assessment Report for the proposed development of an additional poultry rearing facility on the Remainder of Farm 225, Grootvlei Caledon (DEADP ref: 16/3/3/1/E4/5/1079/25), DEADP has specifically requested that we obtain comment from your Department.

According to our records, your office was notified of the opportunity to comment during:

- Pre-application phase: 16 April – 21 May 2025
- In-process phase: 21 October – 19 November 2025

Attached please find proof of notification of the commenting periods (including the provision of USB submissions at your offices).

As per DEADP's request, we kindly request confirmation on whether you have submitted any comment that we may not have received, or alternatively, whether comment will be provided on this application

Kind regards

Olivia Brunings
BSc Conservation Ecology
Candidate Natural Scientist (154065)
Candidate Environmental Assessment Practitioner (2023/6743)

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

Appendix C: Direct follow-up request for comment submitted to the Department of Agriculture: Veterinary Services on 24 November 2025

Olivia Brunings

From:	Olivia Brunings <olivia@phsconsulting.co.za>
Sent:	Monday, 24 November 2025 13:16
To:	'Gininda.Msiza@westerncape.gov.za'; 'Hilda.Combrinck@westerncape.gov.za'; 'Christi.Kloppers@westerncape.gov.za'
Subject:	Request for Comment as per DEADP Request: Proposed development of an additional poultry rearing facility on RE/225 Grootvlei, Caledon (DEADP Ref:16/3/3/1/E4/5/1079/25)
Attachments:	Proof of Email notificiation to State Departments - 20 October 2025.pdf; Proof of Email notification - 16 April.pdf

Good day Dr Gininda,

I trust you are well.

As part of the Basic Assessment Report for the proposed development of an additional poultry rearing facility on the Remainder of Farm 225, Grootvlei Caledon (DEADP ref: 16/3/3/1/E4/5/1079/25), DEADP has specifically requested that we obtain comment from your Department.

According to our records, your office was notified of the opportunity to comment during:

- Pre-application phase: 16 April – 21 May 2025
- In-process phase: 21 October – 19 November 2025

Attached please find proof of notification of the commenting periods.

As per DEADP's request, we kindly request confirmation on whether you have submitted any comment that we may not have received, or alternatively, whether comment will be provided on this application

Kind regards

Olivia Brunings
BSc Conservation Ecology
Candidate Natural Scientist (154065)
Candidate Environmental Assessment Practitioner (2023/6743)

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

Appendix D: Reminder sent to the Western Cape Department of Agriculture on 21 January 2026

Olivia Brunings

From:	Olivia Brunings <olivia@phsconsulting.co.za>
Sent:	Wednesday, 21 January 2026 14:04
To:	'Brandon.Layman@westerncape.gov.za'; 'Cor.VanderWalt@westerncape.gov.za'; 'landuse.elsenburg@elsenburg.com'
Cc:	'paul@phsconsulting.co.za'; 'Bernadette Osborne'
Subject:	RE: Notification of 30-Day Public Participation Period – Amended Basic Assessment Report: Proposed Additional Poultry Rearing Facility on Remainder of Farm Grootvlei No. 225, Caledon (DEADP Ref: 16/3/3/1/E4/5/1079/25)
Attachments:	1079.25_Grootvlei Chicken Houses_comment on Revised in-process DBAR .pdf
Importance:	High

Good afternoon Brandon and Cor,

With reference to point 3.5 in the attached letter we are required to obtain comments from your department on the above-mentioned application.

According to our records, your office was notified of the opportunity to comment on the following dates:

- 16 April 2025 and 22 April 2025: Email notification of the Pre-application draft BAR commenting period
- 20 October 2025: Email notification of the In-process draft BAR commenting period
- 1 December 2025: Email notification of the Final draft BAR commenting period

A copy of the documentation available for comment was also delivered on a USB stick to your department during the pre-application and in-process draft BAR commenting period.

Hereby a reminder that the final commenting period closes on the 23rd of January 2026. We have not received comment from you to date. For reasons as per the letter attached we can accept comments until the 29th of January 2025. However, should no communication be received from your department by COB on the 29th of January we would assume that you don't have any comment on this application.

Kind regards

Olivia Venter (Brunings)
BSc Conservation Ecology
Candidate Natural Scientist (154065)
Candidate Environmental Assessment Practitioner (2023/6743)

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

Appendix E: Reminder sent to the Department of Agriculture: Veterinary Services on 21 January 2026

Olivia Brunings

From:	Olivia Brunings <olivia@phsconsulting.co.za>
Sent:	Wednesday, 21 January 2026 14:05
To:	'Gininda.Msiza@westerncape.gov.za'; 'Hilda.Combrinck@westerncape.gov.za'; 'Christi.Kloppers@westerncape.gov.za'
Cc:	'Bernadette Osborne'; 'paul@phsconsulting.co.za'
Subject:	RE: Request for Comment as per DEADP Request: Proposed development of an additional poultry rearing facility on RE/225 Grootvlei, Caledon (DEADP Ref:16/3/3/1/E4/5/1079/25)
Attachments:	1079.25_Grootvlei Chicken Houses_comment on Revised in-process DBAR .pdf
Importance:	High

Good day Dr Gininda,

With reference to point 3.5 in the attached letter we are required to obtain comments from your department on the above-mentioned application.

According to our records, your office was notified of the opportunity to comment on the following dates:

- Pre-application phase: 16 April 2025
- In-process phase: 20 October 2025
- Follow-up request for comment: 24 November 2025
- Final draft BAR: 1 December 2025

Hereby a reminder that the final commenting period closes on the 23rd of January 2026. We have not received comment from you to date. For reasons as per the letter attached we can accept comments until the 29th of January 2026. However, should no communication be received from your department by COB on the 29th of January we would assume that you don't have any comment on this application.

Kind regards

Olivia Venter (Brunings)
BSc Conservation Ecology
Candidate Natural Scientist (154065)
Candidate Environmental Assessment Practitioner (2023/6743)

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

Appendix F: Communication received from the Department of Agriculture: Veterinary Services on 22 January 2026.

Olivia Brunings

From: Noluvuyo Magadla <Noluvuyo.Magadla@westerncape.gov.za>
Sent: Thursday, 22 January 2026 10:42
To: Christi Kloppers; Olivia Brunings
Cc: Gininda S Msiza
Subject: RE: Request for Comment as per DEADP Request: Proposed development of an additional poultry rearing facility on RE/225 Grootvlei, Caledon (DEADP Ref:16/3/3/1/E4/5/1079/25)

Dear Dr Kloppers

Dr Wolhuter has also brought this to Mr Mr. Cor van der Walt attention

Kind regards

Dr Noluvuyo Magadla
Director: Animal Health
Department of Agriculture
Western Cape Government
Private Bag X1
ELSENBURG
7607

1st Floor, Main Building, Elsenburg, Muldersvlei Road
GPS coordinates: 33.845259 S 18.834722 E

Telephone: 021-8085250
Email: noluvuyo.magadla@westerncape.gov.za
Departmental website: www.elsenburg.com
Provincial website: http://www.westerncape.gov.za/

Western Cape Government
FOR YOU

top EMPLOYER

From: Christi Kloppers <Christi.Kloppers@westerncape.gov.za>
Sent: Thursday, January 22, 2026 10:40 AM
To: Olivia Brunings <olivia@phsconsulting.co.za>
Cc: Gininda S Msiza <Gininda.Msiza@westerncape.gov.za>; Noluvuyo Magadla <Noluvuyo.Magadla@westerncape.gov.za>
Subject: RE: Request for Comment as per DEADP Request: Proposed development of an additional poultry rearing facility on RE/225 Grootvlei, Caledon (DEADP Ref:16/3/3/1/E4/5/1079/25)

Dear Olivia Venter(Brunings)

1

I am an Animal Health State Veterinarian responsible for the management and prevention of controlled animal diseases, authorised and mandated under the Animal Diseases Act. I do not have "jurisdiction" to comment on "Land Use" developments and projects.

Please contact Mr. Cor van der Walt at: Cor.VanderWalt@westerncape.gov.za or 021 – 808 5099.

Kind regards.

Christi

Dr. Christi Kloppers
State Veterinarian: Animal Health: Swellendam
Veterinary Services
Department of Agriculture
Provincial Government of the Western Cape
67 Voortrek str.
Swellendam
6740
GPS Co-ordinates Swellendam State Vet office: **-34.021276 S ; 20.441524 E**

Telephone: (021) 808-5059
Mobile phone: 083 641 5163
Email: christi.kloppers@westerncape.gov.za
Departmental Website: www.elsenburg.com
Provincial Website: www.westerncape.gov.za

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