

### **APPENDIX F3: COMMENTS & RESPONSE TABLE**

THE PROPOSED DEVELOPMENT OF A FREE-RANGE POULTRY BROILER FACILITY ON THE REMAINDER OF FARM NUMBER 563, 564, 565 AND THE FARM KLEINFONTEIN NUMBER 954, WORCESTER, WESTERN CAPE.

#### **ROUND 1**

**Comment period: 21 August – 22 September 2025 (Pre-application Draft BAR)**

NO	COMMENT	RESPONSE	RESPONDENT
<b>I&amp;AP: Shaun Harris (neighbour) - 21 August 2025</b>			
<b>1.1</b>	<p>I would like to lodge the following concerns:</p> <p><u>Water scarcity:</u> I have a borehole on my farm that is already in use, and it could be the case that this new development will use a lot of water and in the process reduce the water that is available for my farm.</p>	<p>A Geohydrological Assessment was undertaken by GEOSS. Please refer to Appendix G3. The study included amongst others to: <i>Determine the managed (i.e., long-term and safe) yield of the borehole as well as the quality of the groundwater; Complete an assessment of the importance of groundwater (both socio-economically and environmentally) in the area by means of a hydrocensus; and Provide recommendations and mitigation measures to minimise risk and impacts from proposed groundwater abstraction.</i></p> <p>The Basic Assessment Report (BAR) and Environmental Management Programme (Appendix H) have been updated to include ALL the recommendations made by the Geohydrological Specialist in Section 11: Groundwater Management Plan. The proposed Groundwater Management and Monitoring Plan will ensure the sustainable use of groundwater associated with the project. Furthermore, this will also be addressed as part of the Water Use Licence Application (WULA) submitted to the Breede Overberg Catchment Management Agency (BOCMA). Furthermore, the EMP (Appendix H) also addresses 'Sustainable Water Usage and Efficiency' measures to be utilised on site (Goal 5).</p>	Jenna Theron – PHS (EAP)

1.2	<p><u>Health:</u> I run a guest lodge from my property where people come to relax and get away from the noise and the air pollution of the city. As such for the health of our guests as well as the health of the people living on the farm – I am concerned of any potential noise pollution or potential air pollution that may come from the farm.</p>	<p>Noise from inside the units will be largely contained as the units are completely enclosed during night-time. Noise from agricultural activities on site is deemed acceptable in the current setting and during day-time. The proposed land use is agricultural and is compatible with the surrounding rural/ agricultural area. No significant odours will emanate from the proposed activities as the Broiler Facilities are well maintained to ensure biosecurity concerns are met. Biosecurity refers to measures taken to prevent the introduction and spread of harmful organisms (such as diseases, pests, and invasive species) to humans, animals, plants, and the environment. These measures are crucial for protecting agriculture, food safety, public health, and the environment from biological threats.</p> <p>All potential impacts on people’s health and wellbeing are anticipated to be low through the implementation of the Environmental Management Programme (EMPr) (Annexure H).</p>	Jenna Theron – PHS (EAP)
1.3	<p><u>Safety:</u> The area around the farm is quiet with few people living there. I am concerned that if a large labour force is needed for the business, it could increase the amount of people living at the farm and potentially cause an increased security risk to the neighbouring farms.</p>	<p>An additional ±40 job opportunities will result directly from the operational phase of the development. However, most of the workers will be transported to the farm daily from i.e. Villiersdorp. The existing staff accommodation will be utilised on the farm and, other than the supervisor house close to the chicken houses, no further staff accommodation is proposed on site.</p> <p>The Environmental Management Programme (EMPr) (Annexure H) addresses Security Control: Security breach &amp; Safety of Property Owners as part of the operational phase. The following ‘actions’ are to be undertaken by the Applicant:</p> <ul style="list-style-type: none"> <li>– Limit site access to authorised personnel only.</li> <li>– Use a single entry and exist point to monitor movements.</li> <li>– Limit staff movement to work related areas only. Install clear signage marking no-go areas for workers.</li> <li>– Maintain secure perimeter fencing to prevent unauthorised entry.</li> <li>– Manage traffic safety on farm access roads especially for larger trucks.</li> </ul>	Jenna Theron – PHS (EAP)

		<ul style="list-style-type: none"> <li>– Minimise unnecessary traffic movement during early mornings and late evenings.</li> <li>– Implement strict bio-security measures.</li> <li>– Implement a strict Code of Conduct for all employees and contractors (incl. noise, littering, trespassing and respect of neighbouring properties).</li> <li>– Enforce rules against playing loud music, shouting or using offensive language on site.</li> <li>– Provide adequate on-site rest areas, toilets and eating spaces so workers don't need to use roadside or neighbouring land.</li> <li>– Ensure waste bins are available and emptied regularly to prevent litter blowing onto adjacent properties.</li> </ul> <p>The Applicant is required to:</p> <ul style="list-style-type: none"> <li>– Monitoring perimeter fencing, access and traffic management.</li> <li>– Appoint a site supervisor responsible for monitoring employee conduct. Particularly near sensitive boundaries.</li> <li>– Keep a log of any complaints received and action taken.</li> </ul>	
1.4	<p><u>Visual:</u> The name of our property is Valley View and one of the advantages of the farm is that it had great views. The visual appeal of the property is good. I am concerned that building structures within sight of my households will impact our existing view negatively.</p>	<p>Views from Valley Farm will be uninterrupted to the North, South and West. The current view to the East from Valley Farm directly overlooks the existing farm werf on the subject property which is located approximately 220m from the property boundary. This includes a number of dwellings, outbuildings, and large sheds etc. The proposed Broiler Facility is located approximately 1300m to the East of the boundary of 'Valley View' Farm. Furthermore, Valley Farm is located at the same elevation as the broiler facility <math>\pm 360\text{m}</math>, however the majority of the broiler houses will be located along the lower contours (<math>\pm 350\text{-}320\text{m}</math>) falling in a northerly, north-easterly direction. Therefore, considering the existing built landscape to the east, the distance to the broiler facilities from the farm boundary and the dropped elevation of the broiler facility, the views from Valley Farm to the East will not be negatively impacted. Some of the new facilities will be hidden behind the viewshed.</p>	<p>Jenna Theron – PHS (EAP)</p>

		<p>Furthermore, through the implementation of the Environmental Management Programme (EMPr) (Appendix H):</p> <ul style="list-style-type: none"> <li>– No naked light sources should be visible from outside units, only reflected light to be visible</li> <li>– Lighting to be sufficient for safety and clarity of movement only</li> <li>– Only low voltage lights to be used.</li> <li>– Use earth tones or muted colours on buildings to reflect the local landscape.</li> <li>– Rows of indigenous and fast-growing trees will form part of the free-range areas for shade along the new structures, that will screen buildings from any visible receptors.</li> </ul>	
<b>I&amp;AP: Shaun Harris (neighbour) - 1 October 2025</b>			
<b>1.5</b>	<p>1. I was invited to visit a facility in Caledon</p> <p>2. I was met at the facility and shown around</p> <p>3. From what I could observe on that day - I found the facility very clean, tidy, well managed, without much odour, quiet and well laid out.</p> <p>From what I observed I feel more comfortable</p>	Noted.	Jenna Theron – PHS (EAP)
<b>I&amp;AP: Mashudu Mmbadi-Muligidi: Breede-Olifants Water Management Agency - 18 September 2025</b>			
<b>2</b>	<p>BOCMA reviewed the information provided and has no objection to the proposed development, subject to the following conditions:</p> <p>It is noted that the proposed activities will trigger Section 21 water uses of the National Water Act, 1998 (Act 36 of 1998). BOCMA is aware of an application with Reference Number</p>	Noted.	Jenna Theron – PHS (EAP)

<p>WU44082 lodged with the Department of Water and Sanitation through the online system (E-WULAAS). The application is being processed, and all water uses related activities associated to the proposed development will be dealt with under WULA evaluation process.</p> <p><u>General Conditions:</u></p> <p>i. All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered.</p> <p>ii. No water must be taken from a water resource for any purpose without authorisation from the National Water Act, 1998 (Act 36 of 1998).</p> <p>iii. No pollution of surface water or groundwater resources may occur.</p> <p>iv. The minimising of waste must be promoted and alternative methods for waste management must be investigated.</p> <p>v. No activity may take place within the 100- year flood line or within 100 metres of any watercourse (river, spring, natural channel, a lake or dam) or within a 500 m radius from the delineated boundary (extent) of any wetland or pan without</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. A Geohydrological Assessment was undertaken by GEOSS. Please refer to Appendix G3. The Basic Assessment Report (BAR) and Environmental Management Programme (Appendix H) have been updated to include ALL the recommendations made by the Geohydrological Specialist in Section 11: Groundwater Management Plan. The proposed Groundwater Management and Monitoring Plan will ensure the sustainable use of groundwater associated with the project and prevent pollution. Pollution aspects have also been addressed in the Freshwater Impact Assessment (Appendix G2). All mitigation measures have been included in the BAR and EMPr.</p> <p>Noted. The EMPr (Appendix H) addresses Waste Management during the Construction and Operational Phase. Goal 4 of the Operational Phase addresses Waste Management specifically.</p> <p>Noted. Refer to the WULA (Appendix G4).</p>	<p>Jenna Theron – PHS (EAP)</p>
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	<p>firstly obtaining authorisation in terms of Section 21 (c) and (i) of the National Water Act,1998 (Act 36 of 1998).</p> <p>vi. Storm water management must be addressed and applied both in terms of flooding and pollution potential. No storm water runoff from any premises containing waste, or water containing waste emanating from premises may be discharged into a water resource. Polluted stormwater must be contained.</p> <p>Please be advised that no activities may commence without the appropriate approvals/authorizations where needed from the responsible authority. The onus remains with the registered property owner to confirm adherence to any relevant legislation that such activities might trigger and/or need authorisation for.</p>	<p>Noted. The EMPr (Appendix H) has been updated to include additional Stormwater Management for the Operational Phase. Please refer to Goal 7: Stormwater Management Plan.</p> <p>Noted.</p>	
<b>I&amp;AP: Leandra Knoetze: Cape Nature – 25 September 2025</b>			
<b>3.1</b>	<p>CapeNature would like to thank you for the opportunity to comment on the Pre-Application Draft Basic Assessment Report. Please note that our comments pertain primarily to impacts on biodiversity and not to the overall desirability of the project.</p> <p>1. According to the South African Vegetation Map (2018), the proposed development area supports Breede Shale Renosterveld (majority of the area), an Endangered Vegetation Type. There are also smaller patches of Robertson Karoo (to the East) and North Sonderend Sandstone Fynbos (to the South), both listed as Least Concern Vegetation Types. However, the area appears to be transformed through previous agricultural activities and very little natural vegetation remains, mainly along certain freshwater crossings.</p>	<p>Noted.</p> <p>Noted.</p>	Jenna Theron – PHS (EAP)

3.2	<p>2. The proposed development areas are partially situated within a Terrestrial Critical Biodiversity Area (CBA 1 &amp; CBA2: Degraded), according to the 2023 Biodiversity Spatial Plan (BSP). CBAs include areas that are usually, but not always in a natural condition that are required to meet biodiversity targets for species, ecosystems or ecological processes and ecological infrastructure. The terrestrial CBA is mapped due to the presence of the threatened vegetation type and for Watercourse protection (Western Folded Mountains). It is essential that these areas are maintained in a natural or near-natural state, with no further loss of habitat and degraded areas should ideally be rehabilitated and only low-impact, biodiversity sensitive land uses are appropriate. Furthermore, according to the 2017 BSP, the proposed development areas are partially situated within an Ecological Support Area (ESA &amp; ESA2: Restore). ESAs play an important role in supporting the functioning of CBAs and are often vital for delivering ecosystem services. The ESA is mapped due to the presence of the threatened vegetation type, watercourse, Water source and Water Recharge area and it is essential that this area is maintained in a functional, near-natural state and underlying biodiversity objectives are not compromised. Additionally, the site is located within a Strategic Water Source Area (SWSA) for Groundwater (Southwestern Cape Ranges) and is in close proximity to the Riviersonderend Mountain Catchment Area (MCA) – which is a Protected Area.</p>	<p>2. Noted.</p> <p>A Geohydrological Assessment was undertaken by GEOSS. Please refer to Appendix G3.</p>	<p>Jenna Theron – PHS (EAP)</p>
3.3	<p>3. According to the Freshwater Assessment, the site falls within the larger Hoeks River Catchment, specifically within Quaternary Catchment H40F, which forms part of the Breede-Gouritz Water Management Area (WMA). The landscape is generally characterized by undulating hills and valleys, predominantly used for agricultural purposes, and includes</p>	<p>3. Noted. The Freshwater Impact Assessment is included in Appendix G2.</p>	<p>Jenna Theron – PHS (EAP)</p>

	<p>several small tributaries of the Ratel Rivier. The site contains four primarily seasonal streams (Streams A – D), which originate in the southeastern hills and flow north-north-west, eventually converging into two tributaries before joining the Ratel River. While their upper reaches remain natural, the streams become modified to varying degrees in farmed areas due to vegetation clearance, agricultural encroachment, instream dams, and canalisation. Stream A and B is located on the western side of the property (See Figure 8) and has a Largely to Seriously Modified Present Ecological State (PES) and a Low to Moderate Ecological Importance and Sensitivity (EIS). Stream C and D is located on the eastern and southern side of the property and has a Natural to Largely Natural Present Ecological State (PES) and a High Ecological Importance and Sensitivity (EIS). Therefore, any water quality impacts and further hydrology modifications on these freshwater ecosystems (especially the more natural ones) should be minimised, mitigated or avoided and the aim should be to improve the PES of these streams.</p>		
<b>3.4</b>	<p>4. Water quality impacts due to the operation of the Broiler Facility, the building of the roads, installation of cables and pipelines and the Bunded Diesel Tank is our biggest concern from a Biodiversity perspective. The management of wastewater (including wash water) needs to be carefully considered to prevent any contamination of groundwater – seeing that the area is located within a SWSA for Groundwater. We recommend regular testing of the water quality and water that will be discharged from the Broiler facility – to ensure that the surrounding water resources are not affected by the construction or operation of the Facility. Furthermore, a Stormwater Management Plan should also be put in place – to address both erosion and pollution potential. Regarding the Diesel Tank, an emergency plan needs to be put in place, in case</p>	<p>4. A Geohydrological Assessment was undertaken by GEOSS. Please refer to Appendix G3. The study included, amongst others, to provide recommendations and mitigation measures to minimise risk and impacts from proposed groundwater abstraction. The Basic Assessment Report (BAR) and Environmental Management Programme (Appendix H) have been updated to include ALL the recommendations made by the Geohydrological Specialist in Section 11: Groundwater Management Plan. The proposed Groundwater Management and Monitoring Plan will ensure the sustainable use of groundwater and the prevention of groundwater pollution associated with the project. Furthermore, this will also be addressed as part of the Water Use Licence Application (WULA) submitted to the Breede Overberg Catchment Management Agency (BOCMA). Pollution aspects in terms of water quality have also been addressed in the Freshwater Impact Assessment (Appendix G2). All mitigation measures have been included in the BAR and EMPr.</p>	<p>Jenna Theron – PHS (EAP)</p>



	<p>of a leak to ensure that the groundwater and water quality of the freshwater ecosystems are not impacted.</p>	<p>Potential surface water pollution from contaminated runoff (e.g. unit wash water) has been assessed by the Freshwater Specialist (Appendix G2). The freshwater specialist stated that: <i>“The existing plans would sufficiently address the possible water quality impacts posed by the broiler site [during the operational phase].”</i> A Low to very low negative impact on the water quality of downstream freshwater features would result from the proposed activities.</p> <p>The diesel tank is above ground and bunded at a 110% capacity, to ensure no spillage, the filling area consists of a sealed concrete hardstand and drip tray on top. All spillages will be in the drip tray or bunded area. A mop up kit will be at the tank if any diesel requires clean-up the kit can be used. Regular servicing will take place. The EMPr (Appendix H) has been updated to include GOAL 6 which addresses Emergency Procedures for the above ground Diesel Tank.</p> <p>The EMPr (Appendix H) has been updated to include additional Stormwater Management for the Operational Phase. Please refer to Goal 7: Stormwater Management Plan which also addresses potential surface water pollution from contaminated runoff.</p>	
<b>3.5</b>	<p>5. The Pre-Application Draft Basic Assessment Report (DBAR) indicates that the development footprint of the proposed development and associated infrastructure will be approximately 46 300 m<sup>2</sup>. This includes the 20 Broiler Houses, Access Roads, Ablutions, Additional Dwelling, Water Treatment Plant, two Reservoirs, Diesel Tank, Generator Room, Gate House, Spray Race, Water Pipelines and Electrical cables. Please can you indicate the footprint or size of each of the abovementioned developments or infrastructure separately, as well as indicate the exact length of the new roads, water pipelines and electric cables, additionally specifying what material would be used for the electric cables and pipelines and</p>	<p>5. All sizes given are approximate. Please note that the majority of all the activities will take place within disturbed footprints (i.e. agricultural fields, existing roads, the farmyard etc.). The size of the 20 Broiler Houses is provided in the BAR as approx. 1044m<sup>2</sup> per facility which collectively equates to ±20 880m<sup>2</sup>. In addition, as per the SDP the following is proposed:</p> <ul style="list-style-type: none"> <li>– Ablutions: ± 300m<sup>2</sup> (entrance to farm) and ± 100m<sup>2</sup> (at Broiler Facility)</li> <li>– Additional Dwelling: ± 40m<sup>2</sup></li> <li>– Water Treatment Plant: ± 30m<sup>2</sup></li> <li>– Reservoirs: Each reservoir is approximately 500m<sup>2</sup>.</li> <li>– Generator Room and bunded Diesel Tank: ± 40m<sup>2</sup></li> <li>– Guard/Gate House (± 30m<sup>2</sup>); Spray Race (± 72m<sup>2</sup>); and Refrigerator (±</li> </ul>	<p>Jenna Theron – PHS (EAP)</p>

	whether these will be located above ground or below the ground.	<p>30m<sup>2</sup>)</p> <ul style="list-style-type: none"> <li>– Water Pipelines trenched: <math>\pm 3568 \text{ m} \times 0.5\text{m} = 1784\text{m}^2</math></li> <li>– Electrical cables trenched: <math>\pm 120\text{m} \times 0.5\text{m} = 60\text{m}^2</math> (majority is overhead lines)</li> <li>– Access Roads: Approximately 4400m in length x maximum of 6m wide = 26 400m<sup>2</sup></li> </ul> <p>Total approximate footprint: 50 306 m<sup>2</sup> (excl. green above). We have also updated the figure in the BAR.</p> <p>The water pipeline consists of a PVC pipe and the electrical cable will have a copper core and isolated with PVC.</p>	
<b>I&amp;AP: Samornay Smidt: DEA&amp;DP (25 September 2025)</b>			
<b>4.1</b>	1. It is indicated that the solar panels will be attached to the roofs of the proposed chicken houses. Activity 1 of Listing Notice 1 is not triggered where the development of facilities or infrastructure is for photovoltaic installations that occur on existing infrastructure. Please confirm the applicability of this listed activity.	The total extent of the solar panels covers an area in excess of 1ha however the solar panels will be located on the roofs of the proposed chicken houses. It is assumed as the Chicken Houses are not yet “existing infrastructure” this activity will be triggered.	Jenna Theron – PHS (EAP)
<b>4.2</b>	2. Activities 4, 10 and 23 of Listing Notice 3 may be triggered by the proposed development. If applicable it must be included in the list of activities being applied for and adequately assessed and addressed.	<p>2. The BAR has been updated accordingly. Listing Notice 3:</p> <p><b>Activity 4:</b> <i>The development of a road wider than 4 metres with a reserve less than 13,5 metres.</i> (In areas containing indigenous vegetation)</p> <p><u>The road will be wider than 4 metres (max 6m) but falls largely within areas previously ploughed, cultivated and or utilised as grazing, therefore not in an area containing indigenous vegetation. It is possible that small areas particularly crossing the watercourses would contain small remnants of indigenous vegetation and therefore this activity might be triggered and as a precaution is therefore included in the BAR. Refer to <b>Figure A</b> below.</u></p>	Jenna Theron – PHS (EAP)



*watercourse, measured from the edge of a watercourse;*

(Outside urban areas:

(bb) National Protected Area Expansion Strategy Focus areas;

(dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority;

(ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans).

All the activities fall largely within areas previously ploughed, cultivated, utilised as grazing or within disturbed footprints associated with existing roads or the Farmyard area. The activities therefore largely fall outside any CBAs or ESAs (Figure B & C below). It is possible however that the 10m<sup>2</sup> threshold is exceeded through the accumulation of the small areas located within 32m of a watercourse and within the CBA overlays indicated below. This relates to the water crossings associated with the road, the trenched portion of the electrical cable and the portions of the water pipeline falling within 32m of the watercourse as well as the CBA/ ESA areas. Therefore, this activity might be triggered and as a precaution included in the BAR.



**Figure B: Showing the proposed activities in relation to the identified watercourses (blue lines) and CBAs/ESAs.**



**Figure C: Showing the proposed activities (zooming into the farmyard only) in relation to the identified watercourses (blue lines) and CBAs/ESAs.**

<b>4.3</b>	<p>3. The information provided with respect to the components of the development related to the watercourse related activities is limited and vague. The listed activities relate to the development of facilities and infrastructure and activities within and in proximity to the watercourses present on the site. The project description must therefore include sufficient details of the portion of the proposed development to which each of the listed activities being applied for relates. E.g. what activities will result in the infilling of the watercourses present on the site and what structures and /or infrastructure of 10 m<sup>2</sup> or 100m<sup>2</sup> or more will be developed within or within 32m of the watercourses.</p>	<p>Noted. The project description has been updated accordingly. Please note that the Engineering Drawings for the river crossings were and are also included as part of the Preferred Alternative drawings in Appendix B1b.</p>	<p>Jenna Theron – PHS (EAP)</p>
<b>4.4</b>	<p>4. In light of the fact that Activity 19 of Listing Notice 1 is triggered, it is recommended that a Maintenance Management Plan (“MMP”) forms part of a component of the EMPr. Should this Directorate agree to the MMP, future maintenance work specified within the MMP would not require Environmental</p>	<p>Please note that maintenance aspects for the proposed river crossings will be addressed and undertaken in accordance with the Operational Phase of the proposed EMPr (Appendix H). Goal 3 of the EMPr addresses maintenance aspects regarding water crossings, including:</p> <ul style="list-style-type: none"> <li>– All rehabilitated and revegetated areas within the wetland/stream</li> </ul>	<p>Jenna Theron – PHS (EAP)</p>



	<p>Authorisation prior to the undertaking of such future maintenance activities. This Directorate encourages the inclusion of a MMP for applications that involve work within watercourses. Please refer to the attached document for guidance on the MMP content requirements.</p>	<p>areas should be monitored for the 2 years (post construction), ensuring the establishment of good plant biodiversity.</p> <ul style="list-style-type: none"> <li>– No use of machinery is allowed within any wetland/stream channels for the operational phase.</li> <li>– All debris must be removed and properly disposed of.</li> <li>– No dumping of debris should be allowed in the stream/wetland areas.</li> <li>– Any wetland/ riparian or instream areas disturbed by maintenance activities to be rehabilitated and revegetated (if necessary) after maintenance works.</li> </ul> <p>A separate MMP will not be undertaken at this stage.</p>	
<b>4.5</b>	<p>5. As advised in the comment issued on the Notice of Intent (“NoI”) to submit an application, 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.</p>	<p>Noted. No additional specialist studies are required or requested to date.</p>	<p>Jenna Theron – PHS (EAP)</p>
<b>4.6</b>	<p>6. It is noted that existing boreholes will be used to supply the proposed development with the required quantity of water for operation and that a Water Use Licence Application (“WULA”) for the water use was lodged with the Department of Water and Sanitation. The required approval from the relevant authority to allow for the abstraction and use of borehole water to service the proposed development must be obtained and included in the BAR. Insufficient proof of adequate water supply to service the proposed development will be deemed, as a flaw.</p>	<p>Noted. The WULA process is running parallel to the EIA process as per the one environmental system. Please refer to the WULA included in Appendix G4 and comment from BOCMA in Point 5 above.</p>	<p>Jenna Theron – PHS (EAP)</p>
<b>4.7</b>	<p>7. Municipal confirmation regarding sufficient capacity for weekly solid waste removal and disposal services must be included in the BAR.</p>	<p>Noted. Municipal confirmation for weekly solid waste removal will be obtained and included in the Final BAR submitted to DEA&amp;DP for decision making.</p>	<p>Jenna Theron – PHS (EAP)</p>

<b>4.8</b>	<p>8. Underground collection/treatment tanks will be located at new ablution and domestic houses to manage domestic sewage. Details must be provided about the capacity and servicing of the tanks.</p> <p>If applicable, written confirmation from an appropriately qualified/registered service provider or municipal confirmation regarding sufficient capacity to service the collection/treatment tanks must be included in the BAR.</p>	<p>The underground septic tanks associated with the ablution facilities and new dwelling will have a capacity of 11m<sup>3</sup> and will not require servicing. Please refer to Annexure E16 for the type of tanks proposed. These will fall outside a 100m buffer from any watercourse/ wetland.</p>	Jenna Theron – PHS (EAP)
<b>4.9</b>	<p>9. Eskom is the electricity service provider, and it is indicated that there is insufficient capacity to service the proposed development. The electricity supply deficit will be supplemented with solar energy. Confirmation must be obtained from Eskom that sufficient, spare unallocated capacity exists for the portion of the requisite electricity supply to service the portion of the proposed development.</p>	<p>Please refer to Appendix E for a copy of the Eskom Account which states (top right): NOTIFIED MAX DEMAND = 100 KVA. Therefore, Eskom has granted the site a maximum of 100kVA, and the remainder will be supplemented with Solar Energy. The total load requirement for the farm (existing and new) is estimated to be 312kVA. Solar panels are proposed on the roofs of the chicken houses.</p>	Jenna Theron – PHS (EAP)
<b>4.10</b>	<p>10. Written confirmation from an appropriately qualified/registered service provider for the removal and safe disposal of chicken mortalities must be obtained and included in the BAR.</p>	<p>Written confirmation from a qualified/ registered service provider has been obtained for the safe disposal of chicken mortalities (Appendix E16). <i>Kandelaarsrivier Bienkies</i> (2019/542043/07), a fully certified rendering facility (S212), formally undertake to accept the mortalities arising from the new proposed Broiler Facility at Kleinfontein.</p>	Jenna Theron – PHS (EAP)
<b>4.11</b>	<p>11. The chicken manure will be loaded and taken to neighbouring farmers who will buy the manure to use on their grain producing fields. Written confirmation from a registered service provider for the removal of manure must be obtained and included in the BAR.</p>	<p>It is our understanding that chicken manure is considered organic waste and therefore not required to be handled by a registered service provider. The chicken manure will be collected directly by neighbouring farmers. A letter from neighbours who would like to utilise the chicken manure has been included in Appendix E16.</p>	Jenna Theron – PHS (EAP)
<b>4.12</b>	<p>12. Untreated wash water will be directed into surrounding pastures, which could have a potential negative groundwater</p>	<p>Potential surface water pollution from contaminated runoff (e.g. unit wash water) has been assessed by the Freshwater Specialist (Appendix G2). The</p>	Jenna Theron – PHS (EAP)

	<p>impact. How will this potential impact be addressed?</p>	<p>freshwater specialist stated that: <i>“The existing plans would sufficiently address the possible water quality impacts posed by the broiler site [during the operational phase].”</i> A Low to very low negative impact on the water quality of downstream freshwater features would result from the proposed activities.</p> <p>A Geohydrological Assessment was undertaken by GEOSS. Please refer to Appendix G3. The Basic Assessment Report (BAR) and Environmental Management Programme (Appendix H) have been updated to include ALL the recommendations made by the Geohydrological Specialist in Section 11: Groundwater Management Plan. The proposed Groundwater Management and Monitoring Plan will ensure the sustainable use of groundwater and the prevention of groundwater contamination associated with the project.</p> <p>The EMPr (Appendix H) has been updated to include additional Stormwater Management for the Operational Phase. Please refer to Goal 7: Stormwater Management Plan which also addresses potential surface water pollution from contaminated runoff.</p> <p>Manure will be dry swept and cleaned out of the chicken houses for use as organic fertiliser elsewhere. Only thereafter will high pressure hose wash pumps be used to clean the pens. Wash pumps are much more effective than a regular hosepipe for loosening and removing dirt, dust, manure, and feathers stuck to floors, walls, ceilings, and equipment. Compared to manual scrubbing or low-pressure hoses, a wash pump speeds up cleaning, ensures more consistent results and therefore uses less water. A wash pump pushes water out with strong force but in a narrower, controlled stream and can often reduce the amount of water used up to 50%. Any residual water will be washed onto the free-range pastures and trees outside the pens and lost through absorption and evaporation. The SWMP addresses any additional run-off resulting from rain events etc.</p> <p>The Kleinfontein broiler facilities stormwater management plan revolves around the construction of vegetated stormwater swales along access roads,</p>	
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		designed to accumulate any runoff in designated dry pans. Roads are shaped to push water off the surface, into a canal or stormwater swale. Swales will be vegetated and these help to trap run-off in general. These swales/canals then lead to small shallow detention ponds or more appropriately 'dry pans' considering the rate of evaporation and limited run-off. Any overflow, if applicable, will then be directed into existing agricultural contours surrounding the site. Please refer to Goal 7: Stormwater Management Plan in the EMPr (Appendix H).	
<b>4.13</b>	13. The increased traffic volume associated with the delivery and removal of chickens during the start and end of each cycle must also be included in the potential traffic impact and be adequately assessed and addressed.	In the SSVR (Appendix I2) which was accepted by DEA&DP states: <i>"The existing access to the farm will be utilised and existing internal farm roads will be utilised where possible. Existing internal roads will be upgraded where applicable (max 6m wide) and certain roads will be realigned where required for biosecurity reasons, to improve traffic flow and safety, and to improve river crossings. The proposed development will somewhat increase the current number of vehicles entering and exiting the farm. However, this is only estimated to create an additional 2.4 trips per day (approximately 2 additional vehicles will enter and exit the site every day). Given the surrounding land use and the fact that access to the development areas is direct and existing, the potential traffic impact is anticipated to be LOW. No further specialist studies will be required."</i> Furthermore, the Department of Transport and Public Works has been notified and provided with an opportunity to comment. No comment has been received to date. The BAR has been updated accordingly to address traffic impacts.	Jenna Theron – PHS (EAP)
<b>4.14</b>	14. Comment from, but not limited to the following Organs of State must be obtained: <ul style="list-style-type: none"> <li>• Department of Agriculture (including the veterinary services component)</li> <li>• Breede-Olifants Catchment Management Agency</li> <li>• CapeNature</li> <li>• Heritage Western Cape</li> </ul>	Noted. Please refer to Appendix F1 for a copy of the I&AP Register. All the applicable Organs of State listed have been included and will be provided with the opportunity to comment.	Jenna Theron – PHS (EAP)

	<ul style="list-style-type: none"> <li>• Department of Health</li> <li>• DEA&amp;DP's Waste Management, Pollution and Chemical Management and Air Quality Management Directorates</li> <li>• The relevant road authority (local and/or provincial)</li> <li>• Breede Valley Municipality</li> <li>• Cape Winelands District Municipality</li> </ul>		
<b>4.15</b>	15. A comprehensive Comments and Response Report that includes all the comments received and the responses thereto must be included in the BAR. In addition, please ensure that copies of all the comments received are attached to the BAR.	Noted. The Comments and Response Report (THIS DOCUMENT) and the comments received will be included in Appendix F.	Jenna Theron – PHS (EAP)
<b>4.16</b>	16. The Public Participation Process must comply with the requirements of Regulation 41 of the NEMA EIA Regulations, 2014, and proof of compliance with all the steps undertaken must be included in the BAR.	Noted. Proof of the PPP will be included in the Final BAR under Appendix F.	Jenna Theron – PHS (EAP)
<b>4.17</b>	17. 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 EMP, respectively to this Directorate, may result in the application for Environmental Authorisation being refused.	Noted. All the applicable information in terms of Appendices 1 & 4 of the EIA Regulations has been included in the BAR.	Jenna Theron – PHS (EAP)
<b>4.18</b>	18. Be advised that an original / electronically signed and dated applicant declaration is required to be submitted with the final BAR to this Directorate 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	Noted.	Jenna Theron – PHS (EAP)

	application.		
4.19	19. In addition to the above, please ensure that the original / electronically signed and dated Environmental Assessment Practitioner (“EAP”) declaration is also submitted with the final BAR for decision-making.	Noted.	Jenna Theron – PHS (EAP)
<b>I&amp;AP: Emily-Jane Vowels: HWC (21 August 2025)</b>			
5	In response to the s38(8) – Notification of Intent to Develop (NID) submitted to establish a Free-Range Poultry Broiler Facility on the farm Kleinfontein, Heritage Western Cape (HWC) issued a comment on 19 June 2025 under case number 25391EJV0610 that No Further Studies in terms of heritage were required for the proposal. No further action in terms of the National Heritage Resources Act is therefore required at this time. Should the project be revised to such an extent that it is no longer substantially in accordance with what was reviewed by HWC, a further NID must be submitted for assessment.	Noted. HWCs comment in Appendix E1 applies.	Jenna Theron – PHS (EAP)

<p><b>I&amp;AP: Department of Transport and Public Works</b></p> <p><b>6.1 - Vanessa Stoffels (16 September 2025)</b></p> <p><b>6.2 - Automated response was generated on submission of application from: <a href="mailto:applications@westerncaperoadsinfrastructure.org.za">applications@westerncaperoadsinfrastructure.org.za</a> (19 September 2025)</b></p>				
<b>6.1</b>	<p>We are pleased to inform you that we have implemented a new online database for application submissions. The system now requires applicants to acknowledge their status as property owners when submitting an application for a property.</p> <p>For third-party applications, applicants must acknowledge their role as third-party representatives. Additionally, the system now mandates the submission of proof of appointment, verifying that the property owner is aware and has authorised the third party to act on their behalf.</p> <p>Therefore, we kindly request the submission of the applicant's appointment letter to complete the process.</p>	<p>The Landowners Consent Form was sent via email to Vanessa on the 17<sup>th</sup> September 2025 after which the below response was received (Point 6.2).</p>		<p>Jenna Theron – PHS (EAP)</p>
<b>6.2</b>	<p>The message below refers to your application for the submission of a property environmental study for comment (Application No - 2025-09-0067) submitted to the Western Cape Government on 2025/08/19: The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.</p>	<p>Noted.</p>		<p>Jenna Theron – PHS (EAP)</p>

**Round 2**

**Comment period: 31 October – 1 December 2025 (Statutory Draft BAR)**

NO	COMMENT	RESPONSE	RESPONDENT
	<b>I&amp;AP: Mashudu Mmbadi-Muligidi: Breede-Olifants Water Management Agency – 26 November 2025</b>		
7.	<p><u>BOCMA reviewed the information provided and has no objection to the proposed development, subject to the following conditions:</u></p> <p>The proposed activities will trigger Section 21 water uses of the National Water Act, 1998 (Act 36 of 1998). BOCMA confirms that a Water Use Authorisation Application with Reference Number WU44082 was received. The application is being processed and all water use related activities associated to the proposed development will be dealt with during WULA evaluation process.</p> <p><u>General Conditions:</u></p> <p>i. All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered.</p> <p>ii. No water must be taken from a water resource for any purpose without authorisation from the National Water Act, 1998 (Act 36 of 1998).</p> <p>iii. No pollution of surface water or groundwater resources may occur.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. Refer to the WULA (Appendix G4).</p> <p>Noted. Refer to the WULA (Appendix G4).</p> <p>Noted. A Geohydrological Assessment was undertaken by GEOSS. Please refer to Appendix G3. The Basic Assessment Report (BAR) and Environmental Management Programme (Appendix H) were updated to include ALL the recommendations made by the Geohydrological Specialist in Section 11:</p>	Jenna Theron – PHS (EAP)


	<p>iv. The minimising of waste must be promoted and alternative methods for waste management must be investigated.</p> <p>v. No activity may take place within the 100- year flood line or within 100 metres of any watercourse (river, spring, natural channel, a lake or dam) or within a 500 m radius from the delineated boundary (extent) of any wetland or pan without firstly obtaining authorisation in terms of Section 21 (c) and (i) of the National Water Act,1998 (Act 36 of 1998).</p> <p>vi. Storm water management must be addressed and applied both in terms of flooding and pollution potential. No storm water runoff from any premises containing waste, or water containing waste emanating from premises may be discharged into a water resource. Polluted stormwater must be contained.</p> <p>Please be advised that no activities may commence without the appropriate approvals/authorizations where needed from the responsible authority. The onus remains with the registered property owner to confirm adherence to any relevant legislation that such activities might trigger and/or need authorisation for.</p>	<p>Groundwater Management Plan. The proposed Groundwater Management and Monitoring Plan will ensure the sustainable use of groundwater associated with the project and prevent pollution. Pollution aspects were also addressed in the Freshwater Impact Assessment (Appendix G2). All mitigation measures have been included in the BAR and EMPr.</p> <p>Noted. The EMPr (Appendix H) addresses Waste Management during the Construction and Operational Phase. Goal 4 of the Operational Phase addresses Waste Management specifically.</p> <p>Noted. Refer to the WULA (Appendix G4).</p> <p>Noted. The EMPr (Appendix H) includes Stormwater Management mitigation for the Operational Phase. Please refer to Goal 7: Stormwater Management Plan.</p> <p>Noted.</p>	
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I&AP: Leandra Knoetze: Cape Nature – 2 December 2025			
8.1	<p>CapeNature would like to thank you for the opportunity to comment on the Draft Basic Assessment Report (DBAR). Please note that our comments pertain primarily to impacts on biodiversity and not to the overall desirability of the project.</p> <p>1. CapeNature provided comment on the Pre-Application Draft Basic Assessment Report (letter dated 25 September 2025). These comments still have reference.</p> <p>2. As stated previously, according to the South African Vegetation Map (2018), the proposed development area supports Breede Shale Renosterveld (majority of the area), an Endangered Vegetation Type. There are also smaller patches of Robertson Karoo (to the East) and North Sonderend Sandstone Fynbos (to the South), both listed as Least Concern Vegetation Types. However, the area appears to be transformed through previous agricultural activities and very little natural vegetation remains, mainly along certain freshwater crossings. Furthermore, the proposed development areas are partially situated within a Terrestrial Critical Biodiversity Area (CBA 1 &amp; CBA2: Degraded), according to the 2023 Biodiversity Spatial Plan (BSP). CBAs include areas that are usually, but not always in a natural condition that are required to meet biodiversity targets for species, ecosystems or ecological processes and ecological infrastructure. The terrestrial CBA is mapped due to the presence of the threatened vegetation type and for Watercourse protection (Western Folded Mountains). It is essential that these areas are maintained in a natural or near-natural state, with no further loss of habitat and degraded areas should ideally be rehabilitated and only low-impact,</p>	<p>Noted.</p> <p>Noted. Refer to Comment 3 above.</p> <p>Noted.</p>	Jenna Theron – PHS (EAP)

	<p>biodiversity sensitive land uses are appropriate. Furthermore, according to the 2017 BSP, the proposed development areas are partially situated within an Ecological Support Area (ESA &amp; ESA2: Restore). ESAs play an important role in supporting the functioning of CBAs and are often vital for delivering ecosystem services. The ESA is mapped due to the presence of the threatened vegetation type, watercourse, Water source and Water Recharge area and it is essential that this area is maintained in a functional, near-natural state and underlying biodiversity objectives are not compromised. Additionally, the site is located within a Strategic Water Source Area (SWSA) for Groundwater (Southwestern Cape Ranges) and is in close proximity to the Riviersonderend Mountain Catchment Area (MCA) – which is a Protected Area.</p>		
<b>8.2</b>	<p>3. According to the Freshwater Assessment, the site falls within the larger Hoeks River Catchment, specifically within Quaternary Catchment H40F, which forms part of the Breede-Gouritz Water Management Area (WMA). The landscape is generally characterized by undulating hills and valleys, predominantly used for agricultural purposes, and includes several small tributaries of the Ratel Rivier. In addition to the above, the National Wetlands Map classifies the Ratel River and its larger associated floodplain as East Coast Shale Renosterveld Floodplain wetland. These wetlands are marked as being critically endangered – both from a vegetation and wetland ecosystem perspective.</p> <p>Additionally, the site contains four primarily seasonal streams (Streams A – D), which originate in the southeastern hills and flow north-north-west, eventually converging into two tributaries before joining the Ratel River. While their upper reaches remain natural, the streams become modified to varying degrees in farmed areas due to vegetation clearance,</p>	<p>Noted.</p> <p>Noted. A Freshwater Impact Assessment was undertaken and included in Appendix G2. A Geohydrological Assessment was undertaken and included in Appendix G3. All mitigations measures have been included in the EMPr (Appendix H).</p>	<p>Jenna Theron – PHS (EAP)</p>



	<p>agricultural encroachment, instream dams, and canalisation. A large portion of the Streams A and B system likely historically comprised an unchanneled valley bottom wetland. However, this area has been so extensively modified that it has lost all ecological function. Only a small remnant of the wetland remains at the confluence of the two streams. Stream A and B is located on the western side of the property (See Figure 8, Page 12) and has a Largely to Seriously Modified Present Ecological State (PES) and a Low to Moderate Ecological Importance and Sensitivity (EIS). Stream C and D is located on the eastern and southern side of the property and has a Natural to Largely Natural Present Ecological State (PES) and a High Ecological Importance and Sensitivity (EIS). Therefore, any water quality impacts and further hydrology modifications on these freshwater ecosystems (especially the more natural ones and any remaining wetland areas) should be minimised, mitigated or avoided and the aim should be to improve the PES of these streams and wetlands.</p>		
<b>8.3</b>	<p>4. Furthermore, the DBAR indicates that “Four watercourse crossings are required, two are existing crossings and two are new crossings within the proposed road alignment. Three of the structures proposed will be low waterway bridges and one will be a suspended bridge structure. Low waterway bridges are reinforced concrete structures with a driving surface (final top level) raised above ground (natural ground level) and these structures cross waterways nearly perpendicular to the natural water flow direction of the stream. Pipes will be installed at set intervals across the bridge length to allow water to freely pass through. Suspended bridges are reinforced concrete structures with a driving surface (final top level) raised above ground (natural ground level). The structure crosses the waterway at a skew angle to align with the approach roadway alignment. Where the natural runoff channel is deep and narrow a</p>	<p>The Engineer has confirmed that the existing dam above the proposed suspended bridge can be utilised (as indicated by the red star in Figure D below). Therefore, no new additional coffer facility is going to be needed. The engineering report in Appendix G5 was updated to reflect this. As stipulated by the Freshwater specialist “construction activities directly involving freshwater features should preferably be scheduled during the dry summer months—typically from December to March—when rainfall and runoff are at their lowest”. The existing upstream dam will be seen as the ‘coffer facility’ which naturally acts to divert stream water away from the wet works during construction. Considering works is proposed in summer months this would be the natural state of the existing Dam and no new intervention/ structures would be required. Therefore, there will be no additional impacts on the Freshwater Ecosystems as this Dam already captures water from the stream.</p>	<p>Jenna Theron – PHS (EAP)</p>

	<p>suspended bridge will span across. As there is not enough space at the suspended bridge to divert stream flow to accommodate wet works, a temporary upstream coffer dam must be constructed to temporarily divert stream water away from the wet works during construction.” Please can you indicate on the map or Site Development Plan (Appendix B1a) where this coffer dam will be located and also indicate the potential impacts of this temporary coffer dam on the surrounding Freshwater ecosystems (Streams and wetland areas).</p>	 <p><b>Figure D: The existing Dam (red star) will be utilised to act as the ‘coffer facility’ during the construction of the suspended bridge at the yellow triangle.</b></p>	
<p><b>8.4</b></p>	<p>5. Water quality impacts due to the operation of the Broiler Facility, the building of the roads and stream crossings, installation of cables and pipelines and the Bunded Diesel Tank is still our biggest concern from a Biodiversity perspective for this application. The management of wastewater (including wash water) needs to be carefully considered to prevent any contamination of groundwater – seeing that the area is located within a SWSA for Groundwater.</p> <p>Previously, we stated that a Stormwater Management Plan should be put in place – to address both erosion and pollution potential. And an emergency plan needs to be put in place, regarding the Diesel Tank, in case of a leak to ensure that the groundwater and water quality of the freshwater ecosystems</p>	<p>The EMPr (Appendix H) has been updated to include regular water quality testing of the water that will be discharged from the Broiler facility to ensure that the surrounding water resources are not affected by the construction or operation of the Facility, in addition to the specialist’s recommendations. Section 4.3.3 includes Goal 7: STORM WATER MANAGEMENT and under monitoring states that <i>“Quarterly downstream water sampling to be taken from the watercourse (s) below the proposed Broiler facility to test the water quality and ensure that no water discharge from the facility is affecting the surrounding water resources.”</i></p>	<p>Jenna Theron – PHS (EAP)</p>

	<p>are not impacted. We acknowledge that the EMPr has been updated to include Goal 6 which addresses Emergency Procedures for the above ground Diesel Tank and includes additional Stormwater Management for the Operational Phase. Goal 7: Stormwater Management Plan of the EMPr was updated which also addresses potential surface water pollution from contaminated runoff. We, however, still recommend regular testing of the water quality and water that will be discharged from the Broiler facility – to ensure that the surrounding water resources are not affected by the construction or operation of the Facility.</p>		
8.5	<p>6. We therefore agree with the proposed mitigation measures set out in the Environmental Management Programme (EMPr), Geohydrological Impact Assessment and Freshwater Impact Assessment to minimize environmental impacts and ensure that the environment is not unnecessarily damaged. These mitigation measures must be included as conditions of authorization. The mitigation measures of high importance are:</p> <p>a. The construction footprint must be demarcated prior to any development and works need to be restricted to the demarcated work area (No-go, wetlands and ecological buffer areas must be avoided). Following construction, the disturbed areas (especially along the watercourses/streams) need to be reshaped and rehabilitated with appropriate indigenous vegetation and any alien vegetation within the construction footprint should be removed. Cleared vegetative material and invasive alien vegetation must not be dumped anywhere other than an approved waste disposal site. Furthermore, clearing of riparian or wetland vegetation must be avoided where possible or kept to an absolute minimum.</p> <p>b. All reasonable measures should be taken to limit erosion and</p>	<p>Noted and Agreed.</p> <p>Page 84 of the BAR (point 2.2) states: <i>“Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation”</i> and includes all the mitigation measures identified by the specialists as well as the following conditions:</p> <ul style="list-style-type: none"> <li>• <i>The Environmental Management Programme (Appendix H) be approved and implemented (which addresses all the mitigation measures outlined in this report).</i></li> <li>• <i>An Environmental Control Officer (ECO) must be appointed to monitor compliance and implementation of the approved EMPr, mitigation measures outlined in Appendix J, and all Environmental Authorisation conditions.</i></li> <li>• <i>All requirements in terms of the National Water Act must be met.</i></li> </ul>	<p>Jenna Theron – PHS (EAP)</p>

	<p>sedimentation due to the construction activities. Where erosion and/or sedimentation occurs, rectification should be carried out in accordance with details specified by the ECO and any erosion channels developed during construction must be backfilled and compacted. Construction work close to or within the Streams should be restricted to the dry, summer season.</p> <p>c. Stormwater management must be addressed both in terms of flooding and pollution potential; no stormwater runoff from any premises containing waste (especially concrete), or water containing waste emanating from activities and premises may be discharged into a water resource – polluted stormwater must be contained.</p> <p>d. The use of machinery within the watercourses should be limited as far as possible and silt traps must be installed prior to the commencement of any activities within the watercourse.</p>		
8.6	<p>7. We recommend that an Environmental Control Officer (ECO) is appointed to ensure that all the mitigation measures of the EMPr, Freshwater Impact Assessment and Geohydrological Impact Assessment are implemented and adhered to, especially the mitigation measures pertaining to groundwater abstraction and groundwater quality deterioration, as well as trenching and stockpiling activities. Additionally, ensuring that the no-go areas (Riparian areas/Streams, associated wetlands and Indigenous Vegetation) are avoided and that the water quality impacts during construction and development of the site are kept to a minimum.</p>	<p>Noted and Agreed.</p> <p>Page 84 of the BAR (point 2.2) states: <i>“Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation”</i> and includes the following conditions (amongst others):</p> <ul style="list-style-type: none"> <li>• <i>The Environmental Management Programme (Appendix H) be approved and implemented (which addresses all the mitigation measures outlined in this report).</i></li> <li>• <i>An Environmental Control Officer (ECO) must be appointed to monitor compliance and implementation of the approved EMPr, mitigation measures outlined in Appendix J, and all Environmental Authorisation conditions.</i></li> </ul>	Jenna Theron – PHS (EAP)

<b>I&amp;AP: Samornay Smidt: DEA&amp;DP (1 December 2025)</b>			
<b>9.1</b>	1. Activity 23 of Listing Notice 3 was not included in the Application Form, DBAR and the Environmental Management Programme (“EMPr”). The relevant sections of the documents must be updated with all the relevant listed activities.	The reason Activity 23 of Listing Notice 3 was not included is that it is not considered a relevant listed activity as it refers to EXPANSION. Please note that Activity 14 of Listing Notice 3 was included as it refers to DEVELOPMENT. Both these listing notices are only triggered IF they fall within a watercourse or within 32m from the edge of a watercourse and (in the Western Cape) outside urban areas within (aa) – (hh). The only applicable reference here would be (ff) Critical Biodiversity Areas or ecosystems service areas. Please refer to the map in Appendix D showing the CBAs/ ESAs on the site in relation to the identified approx. watercourses and the proposed development. Firstly, where the activities overlap with CBAs /watercourses – these are all considered new DEVELOPMENT activities and not EXPANSION. We have however updated all applicable reports to include this activity as a precautionary measure should the Competent Authority consider any of these activities to be ‘expansion’ activities.	Jenna Theron – PHS (EAP)
<b>9.2</b>	2. A copy of the Water Use License Application (“WULA”) information is included in the BAR. Please note that proof of submission of the WULA to the Department of Water and Sanitation must also be provided in the BAR.	Noted. The WULA process is running parallel to the EIA process as per the one environmental system. Please refer to the WULA included in Appendix G4 and comment from BOCMA in Comment 5 and 7 above. The proof of the E-wulas submission is included at the end of Appendix G4.	Jenna Theron – PHS (EAP)
<b>9.3</b>	3. Further to the above, and as previously stated, the required approval from the relevant authority to allow for the abstraction and use of borehole water to service the proposed development must be obtained and included in the BAR. Insufficient proof of adequate water supply to service the proposed development will be deemed as a flaw.	Noted. The WULA process is running parallel to the EIA process as per the one environmental system. Please refer to the WULA included in Appendix G4 and comment from BOCMA in Comment 5 and 7 above. The proof of the E-wulas submission was included at the end of Appendix G4 (Appendix 4 of the WULA document). Proof of sustainable volumes from the two boreholes on site has been proven through the required DWS yield tests which is included in Appendix 2 of the WULA technical report (Appendix G4).	Jenna Theron – PHS (EAP)
<b>9.4</b>	4. Municipal confirmation regarding sufficient capacity for weekly solid waste removal and disposal services must be	Municipal confirmation regarding solid waste disposal is included in Appendix E16 of the Final BAR.	Jenna Theron – PHS (EAP)

	included in the final BAR.		
9.5	<p>5. “Eskom is the electricity service provider, and it is indicated that there is insufficient capacity to service the proposed development. The electricity supply deficit will be supplemented with solar energy. Confirmation must be obtained from Eskom that sufficient, spare unallocated capacity exists for the portion of the requisite electricity supply to service the portion of the proposed development.” The copy of the Eskom account that states the maximum allocation demand is not sufficient and written confirmation must be obtained from Eskom with specific reference to service provision to the proposed chicken broiler facility, since this is a new development and not related to the existing farm activities currently operating of the farm.</p>	<p>As stated, Eskom does not currently have sufficient, spare unallocated capacity to service the proposed development. The Eskom account is clear in that it provides a maximum allocation demand of 100KVa to the site. This is a given regardless of what activities are being undertaken on the Farm. RenEnergy was tasked for a solution that will ensure the required energy demand for the proposed Broiler Facility would be met in the absence of sufficient supply by Eskom for the project. The existing Eskom supply will therefore be supplemented with solar energy which is more sustainable. Based on the electrical equipment that would be installed inside each one of the 20 broiler houses, the broiler houses will have a total peak power requirement of around 301.5kVA, including the new infrastructure at the entrance of the farm and requirement of the existing infrastructure, the total load requirement for the farm is estimated to be 312kVA. Solar panels are proposed on the roofs of the chicken houses. At a designated area close to the delivery point of Eskom the containerised solar batteries (distribution station) will be placed, and a generator room will be built to house the backup generators. A bunded Diesel Tank (2200L) will also be located within close vicinity of the Generator Room. A low voltage (LV) underground cable will go from the existing Eskom point/transformer, via a trench, to the distribution station. A step-up transformer and 11KV overhead line will then distribute power from the distribution station to the proposed facilities.</p> <p>As agreed by DEAD&amp;DP per email (Wed 2025/12/10 12:26): <i>“Following internal discussions, we hereby confirm that we will accept the Eskom invoice (Municipal Account) in this matter.”</i></p>	Jenna Theron – PHS (EAP)
9.6	<p>6. The following is stated in response to this Directorate’s previous comment on the potential traffic impact associated with the proposed development: “The proposed development will somewhat increase the current number of vehicles entering</p>	<p>The average additional trips of <math>\pm 2.4</math> trips per day includes trips generated at the start and end of a cycle. There are 6.8 cycles in 1 year and therefore 1 cycle equates to <math>\pm 54</math> days. Therefore, if we remove the trips generated by bringing in day-old chicks at the start of the cycle (10 trips over <math>\pm 10</math> days) and</p>	Jenna Theron – PHS (EAP)



	and exiting the farm. However, this is only estimated to create an additional 2.4 trips per day (approximately 2 additional vehicles will enter and exit the site every day)". Please confirm whether this estimated number of additional trips are also applicable to the start and end of each cycle, when the chicks and chickens are delivered and collected, respectively, as specifically queried in the previous comment.	live birds being removed at the end of the cycle (29 trips over $\pm 10$ days) then the average daily trips generated would be $\pm 1.33$ trips per day. At the end of the cycle for 10 days (of the 54 days) this will increase to $\pm 4.23$ trips per day and at the start of the new cycle for 10 days (of the 54 days) this daily average would increase to $\pm 2.4$ trips per day. Traffic management and related impacts will be addressed through the implementation of the EMPr.	
<b>9.7</b>	7. It is indicated that the "maintenance aspects for the proposed river crossings will be addressed and undertaken in accordance with the Operational Phase of the proposed EMPr (Appendix H)" and that "A separate MMP will not be undertaken at this stage". Note that the approved watercourse-related activities are only for the portion of the development that are located within a watercourse. It does not include or address future maintenance that may trigger listed activities. Therefore, in light of the fact that Activity 19 of Listing Notice 1 is triggered, it is always recommended that a Maintenance Management Plan ("MMP") forms part of a component of the EMPr. Should this Directorate agree to the MMP, future maintenance work specified within the MMP would not require Environmental Authorisation prior to the undertaking of such future maintenance activities. Although it is not a legislative requirement, this Directorate always encourages the inclusion of a MMP for applications that involve work within watercourses.	Noted. A separate MMP will not be undertaken at this stage.	Jenna Theron – PHS (EAP)
<b>9.8</b>	8. Comment must be obtained from the following Organs of State, including confirmation that comments already provided have been adequately addressed: <ul style="list-style-type: none"> <li>• Department of Agriculture (including the veterinary</li> </ul>	Please refer to Appendix F1 for the list of I&APs notified and Appendix F2 for the proof of public participation. All the aforementioned Organs of State were notified and provided with an opportunity to comment. Comment received is included in Appendix F4.	Jenna Theron – PHS (EAP)

	<p>services component and not only from the veterinary services component)</p> <ul style="list-style-type: none"> <li>• Breede-Olifants Catchment Management Agency</li> <li>• CapeNature</li> <li>• Department of Health</li> <li>• DEA&amp;DP's Waste Management, Pollution and Chemical Management and Air Quality Management Directorates</li> <li>• The relevant road authority (local and/or provincial)</li> <li>• Breede Valley Municipality</li> <li>• Cape Winelands District Municipality</li> <li>• Heritage Western Cape</li> </ul>		
<b>9.9</b>	9. A comprehensive Comments and Response Report that includes all the comments received and the responses thereto must be included in the BAR. In addition, please ensure that copies of all the comments received are attached to the BAR.	Noted. Please refer to Appendix F3 for a complete <i>Comments and Response Table</i> [THIS DOCUMENT] and Appendix G4 for the comments received in Round 1 and Round 2.	Jenna Theron – PHS (EAP)
<b>9.10</b>	10. The Public Participation Process must comply with the requirements of Regulation 41 of the NEMA EIA Regulations, 2014, and proof of compliance with all the steps undertaken must be included in the BAR.	Noted and agreed. Please refer to Appendix F for the Public Participation Process undertaken to date. The proof of the PPP is included under Appendix F2.	Jenna Theron – PHS (EAP)
<b>9.11</b>	11. 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 EMP, respectively to this Directorate, may result in the application for Environmental Authorisation being refused.	Noted.	Jenna Theron – PHS (EAP)
<b>9.12</b>	12. Be advised that an original / electronically signed and dated applicant declaration is required to be submitted with the final BAR to this Directorate for decision-making. It is important to note that by signing this declaration, the applicant is confirming	Noted. Included in the Final BAR.	Jenna Theron – PHS (EAP)



	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.		
<b>9.13</b>	13. In addition to the above, please ensure that the original / electronically signed and dated Environmental Assessment Practitioner ("EAP") declaration is also submitted with the final BAR for decision-making.	Noted. Included in the Final BAR.	Jenna Theron – PHS (EAP)