SITE SENSITIVITY VERIFICATION REPORT:

UNAUTHORISED CLEARING OF INDIGENOUS VEGETATION ON PORTION 22 OF KLIPFONTEIN FARM 82, VILLIERSDORP

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1. INTRODUCTION AND BACKGROUND

Unauthorised clearance of indigenous vegetation and laying of a concrete platform took place in 2023 on the farm Klipfontein 22/82 (See Figure 1 & Figure 2). Approximately 1 ha of vegetation was cleared in 2023. The cleared area is intended to be used as a truck parking area and for the storage of fruit packing pallets. The proponent, Cropmax Business Trust, intends on applying for a retrospective Environmental Authorisation (EA) to legalise the undertaken activities by means of a Section 24G application process.

The information contained in this report was ground truthed by means of a site visit that was conducted on 1 April 2025 by Josie Howard and Jenna Theron (2022/5926).

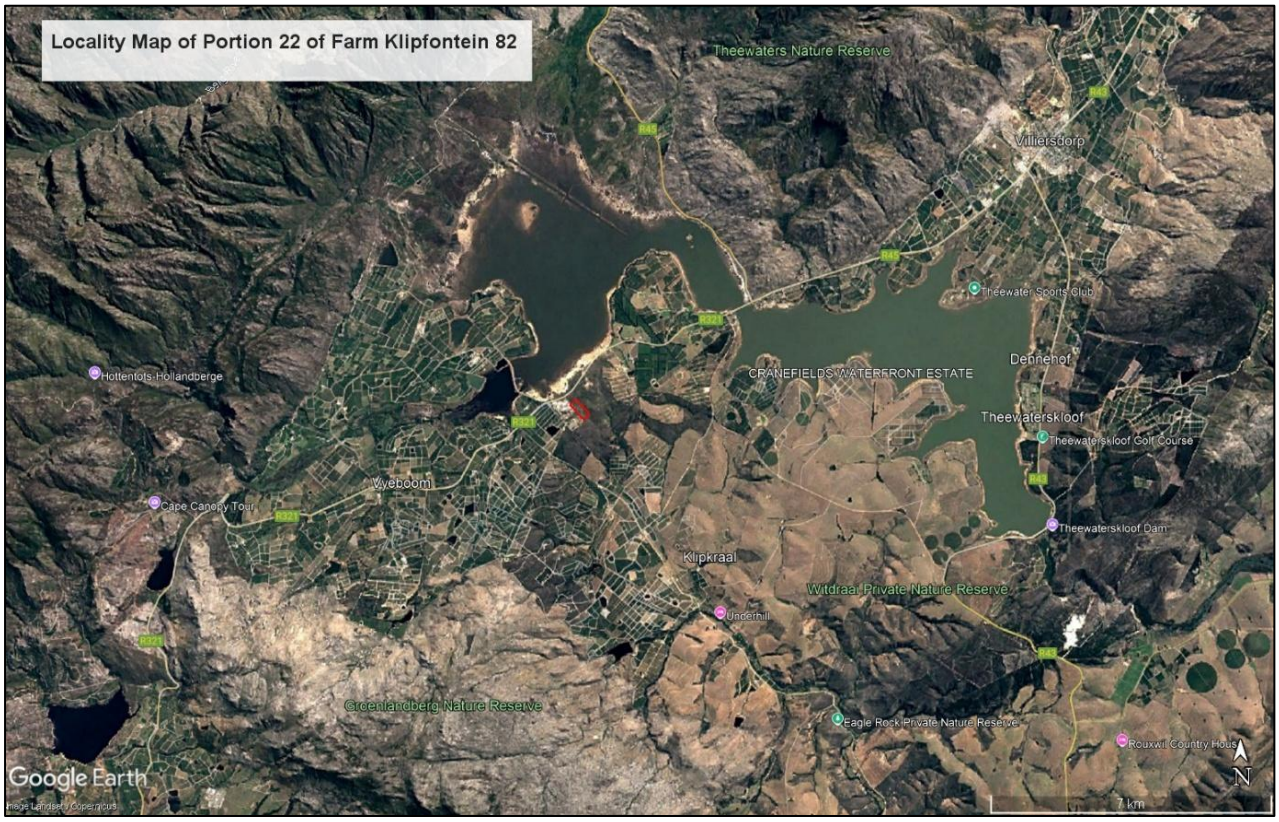


Figure 1: Locality Map (property indicated in red).

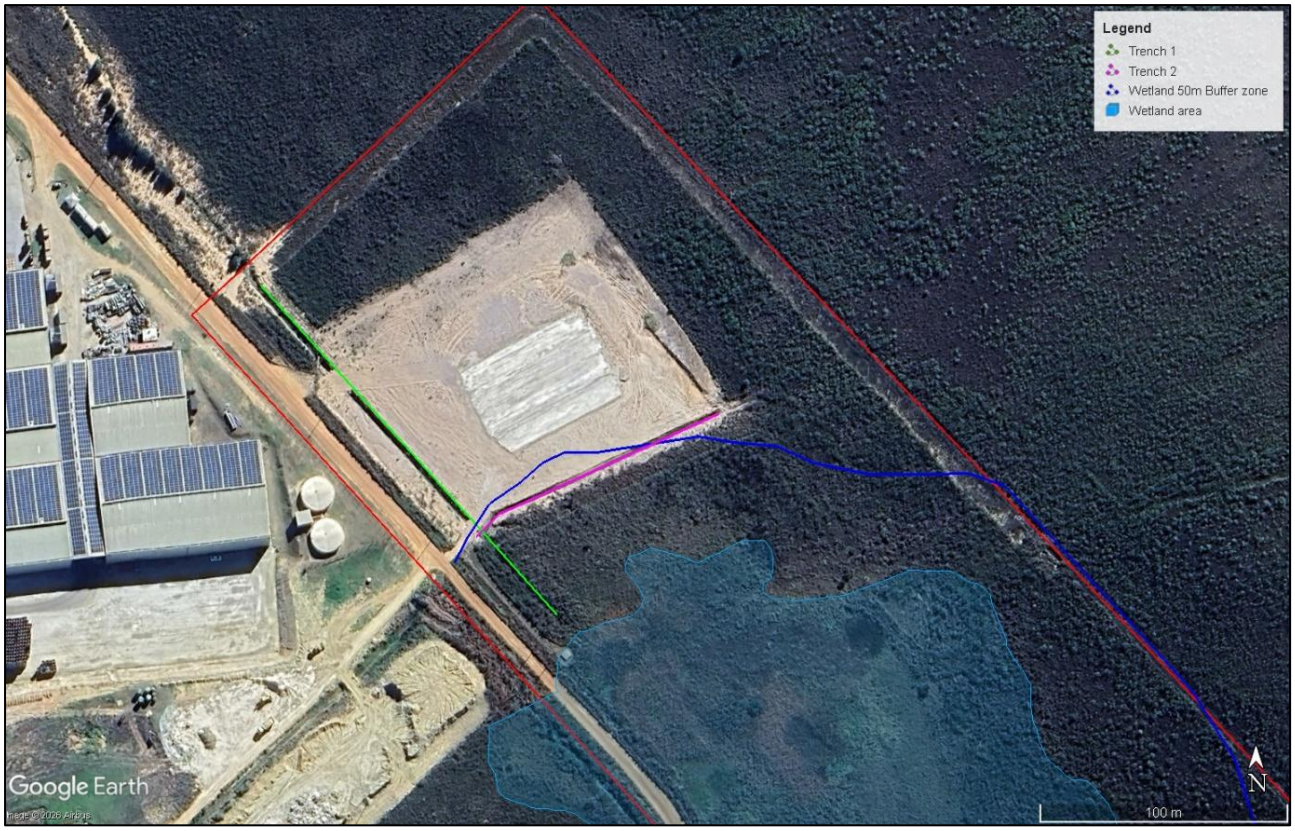


Figure 2: Site layout and location of unauthorised activities.

2. EIA TOOLKIT REPORT RESULTS

The Site Screening report was based on the placement of the development footprint within the farm boundaries. It should therefore be noted that while certain areas may have a lower sensitivity rating than indicated overall, the DEA screening tool automatically reverts to the highest sensitivity for the block area drawn. The Screening Tool Report assigned the following sensitivity ratings to the activities:

2.1. Agriculture Theme (High Sensitivity)

The report generated for the cleared footprint indicated that the majority of the cleared footprint is classified as having a 'High' agriculture sensitivity and the remainder of the property having a Medium to High sensitivity. The reasons listed were:

- *High – 08 Moderate*
- *Medium – 07 Low-Moderate*

The site is approximately 10 ha which could be considered a small holding in South Africa and therefore already has limited capabilities. However, as the site is zoned for Agricultural purposes the site sensitivity is rated Medium-High. Furthermore, in addition to the size of the property, the site is surrounded on three sides by state-owned land and, it is our understanding, that this land is managed by Cape Nature. Furthermore, considering the location of the property within the Vyeboom farming hub and the location of the site adjacent to the IdeaFruit Packhouse, the proposed activities are considered in support of the surrounding agricultural activities. Therefore, the EAP is of the opinion that activities taking place within the project's footprint will have a Low Sensitivity rating. The project will provide a logistical space for Cropmax to park trucks and fruit crates/ pallets, both of which are used to transport fruit produced within the area.

The proposed activities are in keeping with the agricultural zoning and practices of the intended land use of the property as well as the surrounding area albeit indirectly. The proposed activity relates to the overall enhancement of the property as it is an agricultural supportive project. Considering all of the above, the EAP suggests a 'Low' sensitivity for the agriculture theme. Furthermore, as part of the Public Participation Process, I&APs will have the opportunity to comment on the 24G Report. It is our opinion that the Department of Agriculture (DoA) would be the Competent Authority to comment regarding the agricultural sensitivity of the site and the nature of the project. Comment from the DoA will be sort in order to determine the need for any further specialist input in this regard.

The overall HIGH -MEDIUM sensitivity rating in terms of this project is therefore refuted. A LOW sensitivity rating would be much more appropriate given the limitations of the site and the overall supportive agricultural nature of the project within its location. The Western Cape

Department of Agriculture will be notified of the application as a registered I&AP and will be requested to provide comment.



Figure 3: Agricultural Sensitivity. The site is located within the shaded block.

2.2. Animal Species Theme (High Sensitivity)

The footprint and the majority of the property is listed as 'High' sensitivity due to the potential presence of Aves-*Polemaetus bellicosus* (Martial eagle).

Faunal species presence can be directly related to floral and wetland habitat availability, therefore, terrestrial ecologist, Nick Helme, has been appointed to complete a botanical assessment for the site and freshwater ecologist, Jeanne Snyman from EverWater, has been appointed to complete an aquatic assessment for the site. Furthermore, the site is located adjacent to the IdeaFruit Packhouse which is operational for 12 months of the year (day and night during peak periods) and can pack up to 220 tons of fruit per day. Considering the scale (less than 1ha) and nature of the development (cleared vegetation (completed) and the construction of a platform) as well as the sites location adjacent to the busy agricultural hub of Vyeboom (specifically the neighbouring warehouses where traffic and human noise is a constant) the faunal sensitivity rating is considered LOW.

The overall HIGH sensitivity rating in terms of this particular project is therefore refuted. A LOW sensitivity rating is considered appropriate considering the nature, scale and location of the development. Furthermore, a Botanical and Freshwater Impact Assessment (Annexures A and B) will be undertaken, and Cape Nature will be included as an I&AP who will be provided with the opportunity to comment.



Figure 4: Animal Species Sensitivity. The cleared area is shown as the shaded in block.

2.3. Aquatic Biodiversity Theme (Very High Sensitivity)

A 'very high' sensitivity rating has been assigned to the cleared footprint (**See Figure 5**) due to:

- Wetlands_Seep
- SWSA (sw)_Boland

Additionally, the site sits upslope (to the south) of the Theewaterskloof Dam. Given the likely presence of aquatic constraints within the development site an aquatic specialist has been appointed to complete a specialist study.

The Aquatic Sensitivity in terms of the site was not refuted and therefore an Aquatic Impact Assessment has been undertaken by Jeanne Snyman from EverWater (Appendix A).



Figure 5: Aquatic Biodiversity Sensitivity. The site area is shown as the shaded block.

2.4. Archaeological and Cultural Heritage Theme (Low Sensitivity)

This theme is identified and mapped as 'low' sensitivity (**See Figure 6**). A Notice of Intent to Develop (NID) was submitted to HWC and comment received confirmed that no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. Final Comment from HWC is attached as Annexure C. The Low sensitivity theme is therefore not refuted.

The Archaeological and Cultural Heritage Sensitivity in terms of the site was not refuted and a Low sensitivity is confirmed.



Figure 6: Archaeological and Cultural Heritage Sensitivity. The cleared area is indicated by the shaded block.

2.5. Civil Aviation Theme (Low Sensitivity)

An applicant intending to undertake an activity for which a specialist assessment has been identified on the screening tool as being of "low" sensitivity (Figure 7) for civil aviation, no further assessment requirements are identified. The Civil Aviation Sensitivity in terms of the site and in relation to the proposed activity is therefore considered **negligible**.

The Civil Aviation Sensitivity in terms of the site was not refuted and a Low sensitivity is confirmed.



Figure 7: Civil Aviation Sensitivity. The activity area is indicated by the coloured in block.

2.6. Defence Theme (Low Sensitivity)

A 'low' sensitivity has been assigned to the existing development footprint (**See Figure 8**). In accordance with the "Protocol for the specialist assessment and minimum report content requirements for environmental impacts on defence installations" an applicant intending to undertake an activity for which a specialist assessment has been identified on the screening tool, on a site identified as being of "low" sensitivity for defence, no further assessment requirements are identified. As no negative impacts on any defence installations are expected, this theme does not apply further to the application and is considered **negligible**.

The Defence Sensitivity in terms of the site was not refuted and a Low sensitivity is confirmed.



Figure 8: Defence Sensitivity. The location of the activity site is shown as the shaded polygon within the property.

2.7. Palaeontology Theme (Very High Sensitivity)

The cleared footprint is classified as having a 'Very High' sensitivity rating for the palaeontology theme (**See Figure 9**). A Notice of Intent to Develop (NID) was submitted to HWC and comment received confirmed that no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. Final Comment from HWC is attached as Annexure C.

The Very High sensitivity rating is therefore refuted. A LOW sensitivity rating should be given considering the nature and scale of the development as well as HWC Final Comment (Annexure C).



Figure 9: Palaeontology Sensitivity. The site area is indicated by the coloured in block within the property.

2.8. Plant Species Theme (Very High Sensitivity)

This theme is identified and mapped as 'Medium' sensitivity for the entire site except a small portion which is indicated as 'Very High' which automatically ups the sensitivity rating overall to Very High (**See Figure 10**). The triggering species was *Leucadendron elimense subsp. Vyeboomense* (Vyeboom conebrush). The property is within ±200 m of Cape Nature's Thee Waters Nature Reserve (Protected Area) and sits in the Cape Winelands Biosphere Reserve. Furthermore, the site consists of the Critically Endangered Elgin Shale Fynbos vegetation type.

The Plant Species Theme sensitivity rating in terms of the site was therefore not refuted and a Botanical Impact Assessment has been undertaken by Nick Helme (Annexure B).



Figure 10: Plant Species Sensitivity. The site area is shown as the shaded block.

2.9. Terrestrial Biodiversity Theme (Very High Sensitivity)

A 'very high' terrestrial biodiversity sensitivity has been assigned to the entire property and therefore the existing development footprint (**See Figure 11**) due to:

- *CBA: Terrestrial*
- *CBA 2: Terrestrial*
- *SWSA (sw)_Boland*
- *Critically Endangered Elgin Shale Fynbos*
- *Critically Endangered Kogelberg Sandstone Fynbos*

The development site is located within CapeNature's Cape Winelands Biosphere reserve and ±200 m south of the Thee Waters Nature Reserve a Protected Area.

The Terrestrial Biodiversity Theme sensitivity rating in terms of the site was therefore not refuted and a Botanical Impact Assessment has been undertaken by Nick Helme (Annexure B).



Figure 11: Terrestrial Biodiversity Sensitivity. The site area is indicated as the coloured in block within the property.

3. SPECIALIST STUDIES IDENTIFIED

The following Specialist Studies were identified as part of the Screening Tool Reports:

3.2. Landscape/Visual Impact Assessment

No visually intrusive structures have been constructed or are proposed as part of the development activities. The project does not involve the building of any vertical structures and the presence of trucks and packing pallets (that will come and go) would not stand out as the site is located next to the IdeaFruit Packing Shed and Vyeboom Farmer's Co-op. The site is also set back from the main road but located along a gravel road directly adjacent to the IdeaFruit warehouses. Impacts on landscape/visibility are ultimately deemed negligible, and no further studies will be required.

3.3. Archaeological and Cultural Heritage Impact Assessment

The Archaeological and Cultural Heritage Theme was classified as 'low' sensitivity for the entire cleared footprint. The development activities entailed the clearing of indigenous vegetation on site and the laying of a concrete platform. Given the nature of the development activities (surface level vegetation removal and laying of a concrete platform), no archaeological or cultural heritage impacts would have occurred. A Notice of Intent to Develop (NID) was submitted to HWC and comment received confirmed that no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.

4. Palaeontology Impact Assessment

Palaeontology is rock bound. Given the nature of the development activities, namely vegetation clearing and establishment of a hardened platform, the underlying geology would not have been impacted. A Notice of Intent to Develop (NID) was submitted to HWC and comment received confirmed that no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.

5. Terrestrial Biodiversity Impact Assessment

The development activities comprised the removal of indigenous vegetation, the critically endangered Elgin Shale Fynbos, and therefore the disturbance of associated ecosystems. Terrestrial Ecologist, Nick Helme, has been appointed to conduct a Botanical Impact Assessment (Annexure B).

6. Aquatic Biodiversity Impact Assessment

The screening tool duly assigned a 'very high' sensitivity rating to the cleared footprint for the aquatic theme. An aquatic ecologist, Jeanne Snyman from EverWater, has been appointed to conduct a specialist assessment (Annexure A).

8. Socio-Economic Assessment

The site falls within the Theewaterskloof Municipality's Rural Development Area where agriculture is the dominant economic activity and source of job creation. No potential negative socio-economic impacts are anticipated to result from the vegetation clearance and use of the area for agricultural supportive practices. On the contrary, the project will increase operational efficiency of produce transported and thus provide a degree of socio-economic benefits for the region in terms of its contribution to the local agricultural industry.

Due to the scale and nature of the project a socio-economic impact assessment is not required. The socio-economic impacts will be assessed further in the 24G Report. No negative socio-economic impacts are envisioned at this stage. Lastly, as part of the Public Participation Process I&APs will have the right to comment on the 24G Report, raising any concerns they might have in this regard.

9. Plant Species Assessment

The screening tool assigned a 'Very High' sensitivity rating to the cleared footprint. Given the nature of the development activity undertaken, Terrestrial Ecologist, Nick Helme, has been appointed to conduct a Botanical Impact Assessment (Annexure B).

10. Animal Species Assessment

Faunal species presence can be directly related to floral and wetland habitat availability, therefore, terrestrial ecologist, Nick Helme, has been appointed to complete a botanical assessment for the site and freshwater ecologist, Jeanne Snyman from EverWater, has been appointed to complete an aquatic assessment for the site. Furthermore, the site is located adjacent to the IdeaFruit Packhouse which is operational for 12 months of the year (day and night during peak periods) and can pack up to 220 tons of fruit per day. Considering the scale (less than 1ha) and nature of the development (cleared vegetation (completed) and the construction of a platform) as well as the sites location adjacent to the busy agricultural hub of Vyeboom (specifically the neighbouring warehouses where traffic and human noise is a constant) the faunal sensitivity rating is considered LOW. A Faunal Impact Assessment will not be undertaken.

Conclusion

The following Specialist Assessments were undertaken (as per above) and are included herewith:

- Aquatic Impact Assessment (Appendix A).
- Botanical Impact Assessment (addressing plant species) (Appendix B).
- Final Comment from HWC, addressing all Heritage related aspects, is included as Appendix C.

Appendix

Appendix A – Section 24G application, Appendix H2.

Appendix B - Section 24G application, Appendix H1.

Appendix C - Section 24G application, Appendix F.