



## BASIC ASSESSMENT REPORT

(For official use only)

File Reference Number:

NEAS Number:

Date Received:


**Basic assessment report in terms of the Environmental Impact Assessment Regulations, 2014 as amended, promulgated in terms of the National Environmental Management Act, 1998(Act No. 107 of 1998), as amended.**

### Kindly note that:

1. This **basic assessment report** is a standard report that may be required by a competent authority in terms of the EIA Regulations, 2014 as amended and is meant to streamline applications. Please make sure that it is the report used by the particular competent authority for the activity that is being applied for.
2. The report must be typed within the spaces provided in the form. The size of the spaces provided is not necessarily indicative of the amount of information to be provided. The report is in the form of a table that can extend itself as each space is filled with typing.
3. Where applicable **tick** the boxes that are applicable or **black out** the boxes that are not applicable in the report.
4. An incomplete report may be returned to the applicant for revision.
5. The use of "not applicable" in the report must be done with circumspection because if it is used in respect of material information that is required by the competent authority for assessing the application, it may result in the rejection of the application as provided for in the regulations.
6. This report must be handed in at offices of the relevant competent authority as determined by each authority **unless indicated otherwise by the Department**.
7. No faxed or e-mailed reports will be accepted **unless indicated otherwise by the Department**.
8. The report must be compiled by an independent environmental assessment practitioner (EAP). The EAP must satisfy conditions 11 below.
9. Unless protected by law, all information in the report will become public information on receipt by the competent authority. Any interested and affected party should be provided with the information contained in this report on request, during any stage of the application process.
10. A competent authority may require that for specified types of activities in defined situations only parts of this report need to be completed.
- 11.1 The Environmental Assessment Practitioner (EAP) must be registered in terms of S24H Regulations with the Registration Authority EAPASA as from 8 August 2022

11.2. S24H (14) states that “only a person registered as an Environmental Assessment practitioner may perform tasks in connection with an application for an environmental authorisation contemplated in

(a) Chapter 5 of the Act read with the Environmental impact Assessment Regulations.

(b) Section 24G of the Act

(c) Chapter 5 of the National Environmental Management Waste Act 2008 (Act No 59 of 2008) read with the Environmental Impact Assessment Regulations

11.3. Tasks in regulation 14 may only be conducted by an EAP that is registered

11.4. Regulations 20 of S24H indicates the offences and penalties as indicated below:

*“20. Offences and penalties*

*(1) A person is guilty of an offence if that person-*

*(a) contravenes regulation 14 of the Regulations; or*

*(b) pretends to be a registered environmental assessment practitioner or registered candidate environmental assessment practitioner.*

*(2) A person convicted of an offence in terms of subregulation (1) is liable to the penalties contemplated in section 49B(3) of the Act.”*

*Section 49B(3) of the Act states:*

*“A person convicted of an offence in terms of section 49A(1)(h), (l), (m), (n), (o) or (p) is liable to a fine or to imprisonment for a period not exceeding one year, or to both a fine and such imprisonment.”*

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## EAP'S BACKGROUND AND DECLARATION

**Megan Hugo** - Megan started working as an Environmental Consultant in February 2015 following the completion of her Honours degree in Environmental Science at Rhodes University in Makhanda (formerly Grahamstown). Prior to this she completed a Bachelor of Science degree, also at Rhodes University, with Zoology and Environmental Science as her majors. Megan has completed accredited courses in environmental impact assessments and ISO 14001.

Megan joined Indwe Environmental Consulting in September 2017 and was made a main member of the company in April 2018. Megan is a Registered Environmental Assessment Practitioner with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (Reg. No 2019/1530). She is also registered with the South African Council for Natural Scientific Professions (Reg. No. 118810) and an active paid-up member of the International Association of Impact Assessment (IAIA) South Africa.

Megan is responsible for all company related operations and financial management as well as acquiring new projects at Indwe Environmental Consulting. Megan has gained experience in all aspects of Integrated Environmental Management (Full Scoping and Environmental Impact Assessments, Basic Assessments, Mining Permitting, Auditing, Strategic Environmental Planning), Ecological Reporting, Water Use related approvals through DWS, and General Project Management. Additionally, Megan is well versed in permitting requirements relating to ToPS, PNCO and NFA legislation. Example of fields in which Megan was the project manager and lead report writer include large public infrastructure projects (e.g. Regional Water Supply Schemes, Overhead Powerlines, National Road upgrades), private commercial and residential developments, small and large agricultural projects, mixed use developments, renewable energy projects, large scale public and private in stream and off stream storage dams and rehabilitation of coastal and terrestrial related environments.

Megan's key skills include her knowledge and experience in South African policy and legislation relating to development, particularly in the Eastern Cape province. Her 10-year presence in the industry has provided much insight and experience into project, technical and financial management. **Megan held the position of Registered EAP.**


**Michaela Manthe** - Michaela joined Indwe Environmental Consulting in February 2024 and holds the position of Junior Environmental Assessment Practitioner at the company. Michaela has completed her Honours degree in Life Sciences through UNISA in 2023. Prior to this she completed her Bachelor of Science degree in Life Sciences majoring in Zoology and Botany in 2022. Michaela is registered as a Candidate Natural Scientist with the South African Council for Natural Scientific Professions (Cand. Sci. Nat 161580) and as a Candidate EAP (Reg. No. 2022/5666) with EAPASA. Michaela is also an active paid up member of the International Association of Impact Assessment (IAIA) South Africa. To date, Michaela has assisted in environmental impact assessment processes relating to public infrastructure, retail and agricultural projects as well as acted as the Environmental Control Officer for bulk water and sewerage construction projects. In addition, she has undertaken compliance auditing on a range of operational activities within the manufacturing and mining industries. **Michaela acted as part of the project team.**

A copy of the EAP's Curriculum Vitae and professional registration is included in **Appendix G9**.

As the lead Environmental Assessment Practitioner on this project assessment, I **Megan Hugo** can confirm the following:

- 1) To the best of my knowledge, all information authored by Indwe Environmental Consulting presented in this report is factually correct. We have relied on reports and information sourced from external parties. In this regard we assume that all external information is a true reflection and is factually correct.
- 2) I can confirm that all information of relevance received in the form of comments and inputs from stakeholders and interested and affected parties has been included; and
- 3) Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties of relevance has been included.

For Indwe Environmental Consulting:



Megan Hugo  
Registered EAP: EAPASA (Reg no. 2019/1530)  
Main Member



## SECTION A: ACTIVITY INFORMATION

Has a specialist been consulted to assist with the completion of this section?

NO✓

If YES, please complete form XX for each specialist thus appointed:

Any specialist reports must be contained in Appendix D.

### 1. ACTIVITY DESCRIPTION

Describe the activity, which is being applied for, in detail

ANCA Foods (Pty) Ltd wish to increase their poultry production and thus require construction of new environmentally controlled chicken broiler house facilities. Two sites are proposed, with each site consisting of eight (8) enclosed broiler houses within a separately fenced-in operational area that includes ancillary buildings such as an office, staff eating and washing area (to meet biosecurity needs), ablution facilities (septic tank) and a water treatment plant. Stormwater infrastructure will include evaporative earth ponds, stormwater channels and dish drains. Each broiler house will be 1800 m<sup>2</sup> and have a maximum capacity of 42 000 chickens per house. The construction of the broiler houses will require the clearance of approximately 12 hectares of vacant agricultural land.

In terms of water supply, a 50 mm rising main will be utilised to reticulate water from both a borehole, as well as from an abstraction point along the Kubusi River to the broiler houses. Electric pumps will be utilised for both the borehole and Kubusi River abstraction point and will be pumped below the ground to a small water treatment plant, and then to the respective broiler house site. The water treatment plant will consist of a flocculation tank, a pH dosing tank and then chlorination going from the water storage to the broiler houses.

In terms of access to the proposed broiler house sites, existing 4 m gravel access roads will be utilised. A 5 m internal gravel access road will be formalised to allow for entry into each broiler house site operational area. Mitre drains will be installed where necessary along the internal gravel access roads. Three-phase electricity is available for the proposed development to tie into.

The proposed Oakwood Chicken Broiler Houses will occur 3.5 km south-east of Stutterheim in the Eastern Cape (Figure 1). The precise co-ordinates of two broiler sites are 32°35'34.79"S, 27°27'29.18"E; and 32°36'18.26"S, 27°28'22.40"E, respectively, within the Amahlathi Local Municipality. The proposed broiler houses will be constructed on erven 546, 547, 548, 549, 550, 551, 552, and 2235. These properties are owned by the Applicant. In terms of access to the proposed sites, existing gravel roads are available. The main watercourse in the area, the Kubusi River (perennial watercourse), acts as the cadastral boundary of the properties that the project falls on.

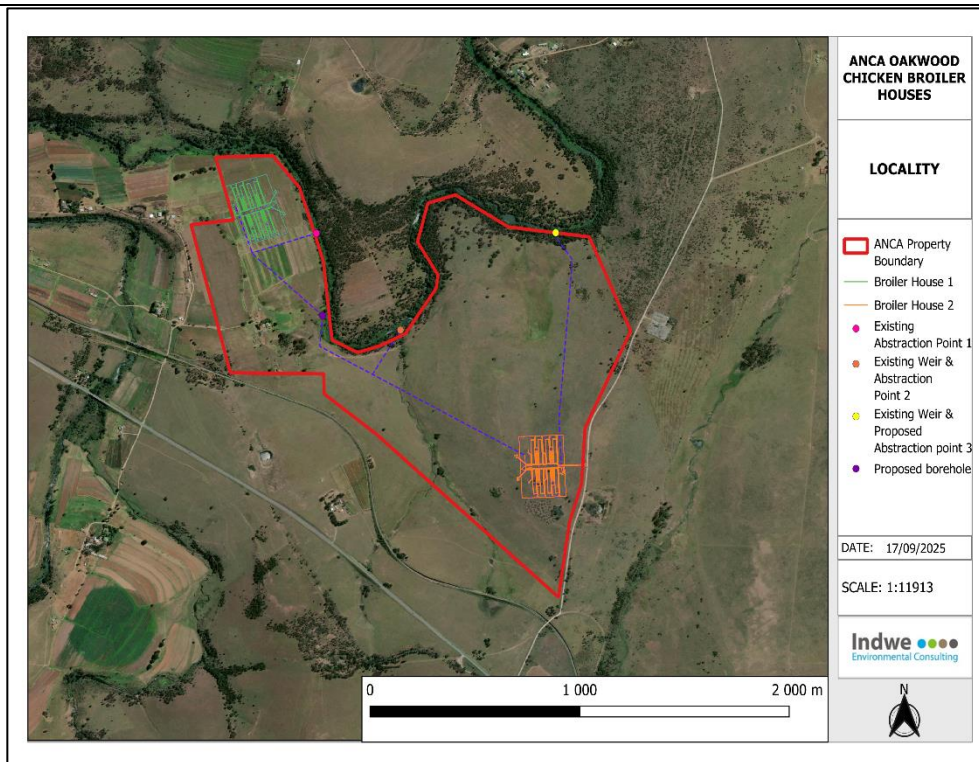


Figure 1: Aerial locality of the proposed chicken broiler houses.

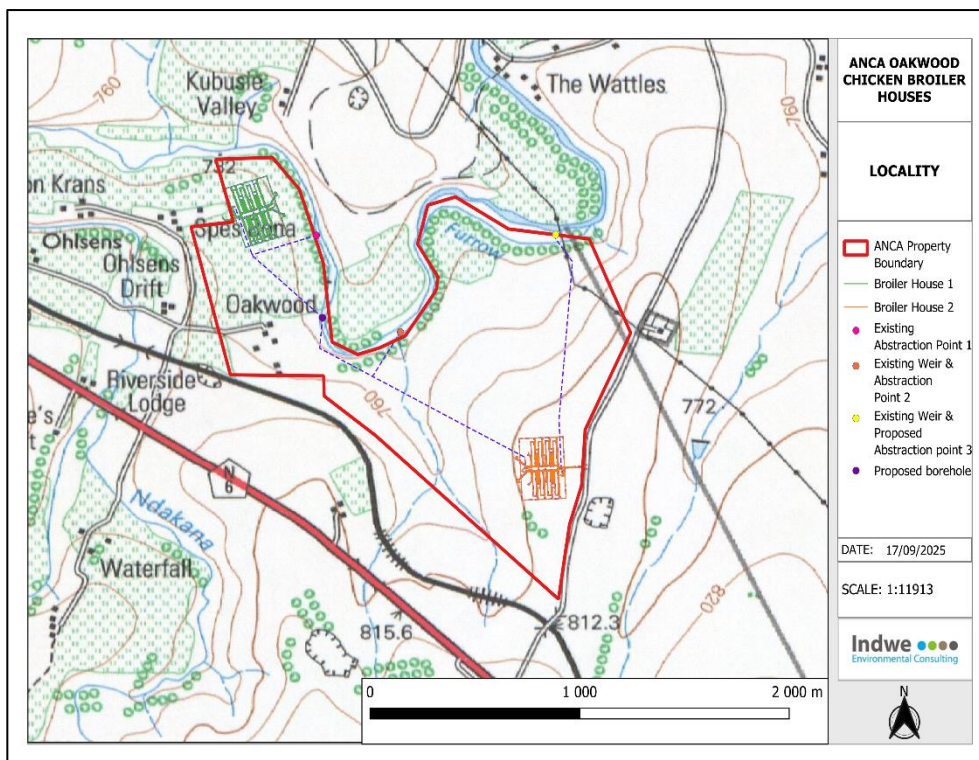


Figure 2: Topographical locality of the proposed chicken broiler houses.



Figure 3: Example of the design of the proposed chicken broiler houses.

## 2. FEASIBLE AND REASONABLE ALTERNATIVES

**“alternatives”**, in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to—

- (a) ~~the property on which or location where it is proposed to undertake the activity;~~
- (b) ~~the type of activity to be undertaken;~~
- (c) ~~the design or layout of the activity;~~
- (d) ~~the technology to be used in the activity;~~
- (e) ~~the operational aspects of the activity; and~~
- (f) the option of not implementing the activity

Describe alternatives that are considered in this application. Alternatives should include a consideration of all possible means by which the purpose and need of the proposed activity could be accomplished in the specific instance taking account of the interest of the applicant in the activity. The no-go alternative must in all cases be included in the assessment phase as the baseline against which the impacts of the other alternatives are assessed. The determination of whether site or activity (including different processes etc.) or both is appropriate needs to be informed by the specific circumstances of the activity and its environment. After receipt of this report the competent authority may also request the applicant to assess additional alternatives that could possibly accomplish the purpose and need of the proposed activity if it is clear that realistic alternatives have not been considered to a reasonable extent.

**Paragraphs 3 – 13 below should be completed for each alternative.**

### **S1:NO-GO alternative**

The No-Go alternative is applicable to the proposed development. This would involve not constructing the new chicken broiler house facilities at the proposed sites.

### 3. ACTIVITY POSITION

Indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should have at least three decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS84 spheroid in a national or local projection.

List alternative sites if applicable.

	Latitude (S):		Longitude (E):	
<b>Alternative:</b>				
Alternative S1 <sup>1</sup> (preferred or only site alternative)	32°	35'34.79"S	27°	27'29.18"E
Alternative S2 (if any)	32°	36'18.26"S	27°	28'22.40"E
Alternative S3 (if any)				

**In the case of linear activities:**

	Latitude (S):		Longitude (E):	
<b>Alternative:</b>				
Alternative S1 (preferred or only route alternative)				
• Starting point of the activity				
• Middle point of the activity				
• End point of the activity				
Alternative S2 (if any)				
• Starting point of the activity				
• Middle point of the activity				
• End point of the activity				
Alternative S3 (if any)				
• Starting point of the activity				
• Middle point of the activity				
• End point of the activity				

For route alternatives that are longer than 500m, please provide an addendum with co-ordinates taken every 250 meters along the route for each alternative alignment.

### 4. PHYSICAL SIZE OF THE ACTIVITY

Indicate the physical size of the preferred activity/technology as well as alternative activities/technologies (footprints):

<b>Alternative:</b>	<b>Size of the activity:</b>
Alternative A1 <sup>2</sup> (preferred activity alternative)	120 000 m <sup>2</sup>
Alternative A2 (if any)	

<sup>1</sup> "Alternative S.." refer to site alternatives.

<sup>2</sup> "Alternative A.." refer to activity, process, technology or other alternatives.



Alternative A3 (if any)

or, for linear activities:

**Alternative:**

Alternative A1 (preferred activity alternative)

Alternative A2 (if any)

Alternative A3 (if any)

**Length of the activity:**

Indicate the size of the alternative sites or servitudes (within which the above footprints will occur):

**Alternative:**

**Size of the site/servitude:**

Alternative A1 (preferred activity alternative)

Alternative A2 (if any)

Alternative A3 (if any)

130 000 m<sup>2</sup>

## 5. SITE ACCESS

Does ready access to the site exist?

YES✓

If NO, what is the distance over which a new access road will be built

N/A

Describe the type of access road planned:

In terms of access to the proposed broiler house sites, existing 4 m gravel access roads will be utilised. A 5 m internal gravel access road will be formalised to allow for entry into each broiler house site operational area. Mitre drains will be installed where necessary along the internal gravel access roads.

Include the position of the access road on the site plan and required map, as well as an indication of the road in relation to the site.

Refer to Appendix C.

## 6. SITE OR ROUTE PLAN

A detailed site or route plan(s) must be prepared for each alternative site or alternative activity. It must be attached as Appendix A to this document.

The site or route plans must indicate the following:

- 6.1 the scale of the plan which must be at least a scale of 1:500;
- 6.2 the property boundaries and numbers of all the properties within 50 metres of the site;
- 6.3 the current land use as well as the land use zoning of each of the properties adjoining the site or sites;
- 6.4 the exact position of each element of the application as well as any other structures on the site;
- 6.5 the position of services, including electricity supply cables (indicate above or underground), water supply pipelines, boreholes, street lights, sewage pipelines, storm water infrastructure and telecommunication infrastructure;
- 6.6 all trees and shrubs taller than 1.8 metres;
- 6.7 walls and fencing including details of the height and construction material;

- 6.8 servitudes indicating the purpose of the servitude;
- 6.9 sensitive environmental elements within 100 metres of the site or sites including (but not limited thereto):
- rivers;
  - the 1:100 year flood line (where available or where it is required by DWA);
  - ridges;
  - cultural and historical features;
  - areas with indigenous vegetation (even if it is degraded or invested with alien species);
- 6.9 for gentle slopes the 1 metre contour intervals must be indicated on the plan and whenever the slope of the site exceeds 1:10, the 500mm contours must be indicated on the plan; and
- 6.10 the positions from where photographs of the site were taken.

**See Appendix A.**

## 7. SITE PHOTOGRAPHS

Colour photographs from the centre of the site must be taken in at least the eight major compass directions with a description of each photograph. Photographs must be attached under Appendix B to this form. It must be supplemented with additional photographs of relevant features on the site, if applicable.

**Refer to Appendix B for site photographs for the proposed development.**

## 8. FACILITY ILLUSTRATION

A detailed illustration of the activity must be provided at a scale of 1:200 as Appendix C for activities that include structures. The illustrations must be to scale and must represent a realistic image of the planned activity. The illustration must give a representative view of the activity.

**See Appendix C.**

## 9. ACTIVITY MOTIVATION

### 9(A) SOCIO-ECONOMIC VALUE OF THE ACTIVITY

What is the expected capital value of the activity on completion?

R192 Million

What is the expected yearly income that will be generated by or as a result of the activity?

R180 Million

Will the activity contribute to service infrastructure?

NO✓

Is the activity a public amenity?

NO✓

How many new employment opportunities will be created in the development phase of the activity?

95

What is the expected value of the employment opportunities during the development phase?

R10 Million

What percentage of this will accrue to previously disadvantaged individuals?

45%

How many permanent new employment opportunities will be created during the operational phase of the activity?	27
What is the expected current value of the employment opportunities during the first 10 years?	R32 Million
What percentage of this will accrue to previously disadvantaged individuals?	80%

## 9(B) NEED AND DESIRABILITY OF THE ACTIVITY

Motivate and explain the need and desirability of the activity (including demand for the activity):

In terms of Amahlathi Local Municipality's Integrated Development Plan (ALM IDP 2024 – 2025), the focus is on the expansion of "Local Economic Development" for agriculture and forestry to facilitate sectoral growth. Additionally, social-spatial development focusing on development and capital investment in the settlements that make up the municipal area through careful land use management and the conservation and appropriate use of existing natural and cultural resources is of great importance for the area. "Local Economic Development" is also cited as a Key Performance Area (KPA) in ALM's IDP in which a provincial priority is rural development, land and agrarian transformation and food security.

The land use for the proposed project will remain as "agriculture" and thus aligns with the KPA goals and objectives for "Local Economic Development" in terms of development of rural land as well as food security.

Indicate any benefits that the activity will have for society in general:

- Operations of the proposed chicken broiler houses will contribute towards local and regional food security.
- Direct and indirect employment opportunities will be created during the construction and operational phase.

Indicate any benefits that the activity will have for the local communities where the activity will be located:

- Job creation for local community members during the construction and operational phase, contributing significantly towards poverty eradication and social upliftment.
- Increased food security within local communities such as Stutterheim and surrounding areas.

## 10. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

List all legislation, policies and/or guidelines of any sphere of government that are applicable to the application as contemplated in the EIA regulations, if applicable:

Title of legislation, policy or guideline:	Administering authority:	Date:
National Environmental Management Act (NEMA) No. 107 Of 1998	DFFE	1998
National Environmental Management Laws Amendment Act, 2022 (Act no 2 of 2022) <b>GG. No 48869</b>	South African Government & DFFE	2023
The Constitution of South Africa Act, 1998 (Act No. 108 of 1996)	South African Government	1996
Environmental Impact Assessment Regulations of 2014, as amended  <i>EIA Regulations promulgated under the NEMA GN No. 327; 324, 325, and 326 for listed activities that may impact on the environment.</i>	DFFE & DEDEAT	2017

National Environmental Management Biodiversity Act (10 of 2004)	DFFE & DEDEAT	2004
Conservation of Agricultural Resources Act (43 of 1983)	DRDAR	1983
National Heritage Resources Act (25 of 1999)	South African Heritage Resources Agency (SAHRA) & Eastern Cape Provincial Heritage Resource Agency (ECPHRA)	1999
Procedures for the Assessment And Minimum Criteria For Reporting On Identified Environmental Themes In Terms Of Sections 24(5)(A) And (H) And 44 Of The National Environmental Management Act, 1998, When Applying For Environmental Authorisation  <b>GN. R. 320; GG. No 43110</b>	DFFE & DEDEAT	2020
Procedures for the Assessment And Minimum Criteria For Reporting On Identified Environmental Themes In Terms Of Sections 24(5)(A) And (H) And 44 Of The National Environmental Management Act, 1998, When Applying For Environmental Authorisation  <b>GN. R. 1150; GG. No 43855</b>	DFFE & DEDEAT	2020
National Water Act (Act 36 of 1998)	DWS	1998
General Authorisation in terms of Section 39 of the National Water Act (Act 36 of 1998), Section 21 (c) and (i), as amended in 2023.	DWS	1998
Amahlathi Local Municipality Integrated Development Plan	Amahlathi Local Municipality	2024 - 2025
Amathole District Municipality Integrated Development Plan	Amathole District Municipality	2023 - 2024

## 11. WASTE, EFFLUENT, EMISSION AND NOISE MANAGEMENT

### 11(A) SOLID WASTE MANAGEMENT

Will the activity produce solid construction waste during the construction/initiation phase?

YES ✓	
~ 10 m <sup>3</sup>	

If yes, what estimated quantity will be produced per month?

How will the construction solid waste be disposed of (describe)?

The solid construction waste will likely only be that of general solid waste produced by construction employees. Earthworks will result in spoil material that will need to be removed if not eligible to be re-used for cut and fill. Spoil material will be taken to a nearby registered landfill site, or a site approved by the EAP.

During construction, builders' rubble and waste is expected to be created, this material must be taken to a suitable and registered waste disposal facility in the nearby area.

Where will the construction solid waste be disposed of (describe)?

A nearby registered waste facility will need to be located before construction commences.



Will the activity produce solid waste during its operational phase?	YES✓
If yes, what estimated quantity will be produced per month?	~ 150 m <sup>3</sup>

How will the solid waste be disposed of (describe)?

Solid waste created by the broiler houses themselves will be chicken manure. A registered and authorised private contractor will collect and remove the chicken manure off site to a registered compost facility for further treatment. The contractor will collect the chicken manure after each broiler cycle is complete (which is approximately every 48 days). Any mortalities that occur at the broiler houses will also be removed by the private contractor and taken to the compost facility for safe disposal.

In terms of solid waste, minimal general domestic waste will be generated by employees working at the facility. This general waste will feed directly into the municipal waste stream.

Where will the solid waste be disposed if it does not feed into a municipal waste stream (describe)?

As above.

If the solid waste (construction or operational phases) will not be disposed of in a registered landfill site or be taken up in a municipal waste stream, then the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

Can any part of the solid waste be classified as hazardous in terms of the relevant legislation?

If yes, inform the competent authority and request a change to an application for scoping and EIA.

Is the activity that is being applied for a solid waste handling or treatment facility?

If yes, then the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

## 11(B) LIQUID EFFLUENT

Will the activity produce effluent, other than normal sewage, that will be disposed of in a municipal sewage system?

If yes, what estimated quantity will be produced per month?

Will the activity produce any effluent that will be treated and/or disposed of on site?

If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

Will the activity produce effluent that will be treated and/or disposed of at another facility?

If yes, provide the particulars of the facility:

Facility name:

Contact person:

Postal address:

Postal code:

Telephone:

Cell:

E-mail:

Fax:

Describe the measures that will be taken to ensure the optimal reuse or recycling of waste water, if any:

N/A

### 11(C) EMISSIONS INTO THE ATMOSPHERE

Will the activity release emissions into the atmosphere?

YES✓	
	NO✓

If yes, is it controlled by any legislation of any sphere of government?

If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

If no, describe the emissions in terms of type and concentration:

During the construction phase, emissions into the atmosphere will be limited to the construction dust. Sources of emissions include those produced by heavy vehicles and machinery involved in site preparation and construction of the structures required for the broiler houses. These activities are anticipated to occur only over a short period. Mitigation measures to minimise emissions and dust generation during the construction phase are incorporated into the EMP.

During operations, the facility will make use of the municipal supply of electricity, which will evidently require more fossil fuels to be burnt to supply electricity.

Due to the nature of activities that will be occurring during the operational phase (poultry farming), nuisance odours may be generated. However, chicken manure and any mortalities will be removed on a regular basis by a private contractor. The facilities will also be properly maintained, adequate house keeping will occur and proper management and storage of waste and effluent will also occur.

### 11(D) GENERATION OF NOISE

Will the activity generate noise?

YES✓	
	NO✓

If yes, is it controlled by any legislation of any sphere of government?

If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

If no, describe the noise in terms of type and level:

The use of machinery and vehicles on site during the construction of the broiler houses will create noise disturbance to the residents of the adjacent farms, however, will cease once construction is complete. The EMPr will incorporate mitigation measures to reduce noise impacts.

During the operational phase, noise will be generated by the chickens themselves, the equipment required for the operation and maintenance of the broiler houses and transport vehicles of staff and the private contractor collecting the chicken manure.

## 12. WATER USE

Please indicate the source(s) of water that will be used for the activity by ticking the appropriate box(es)

	groundwater✓	river✓, stream, dam or lake	
--	--------------	--------------------------------	--

If water is to be extracted from groundwater, river, stream, dam, lake or any other natural feature, please indicate

the volume that will be extracted per month:

210,56 KL/day x 30 days  
= 6 316,8 KL/month

Does the activity require a water use permit from the Department of Water Affairs?

YES✓

If yes, please submit the necessary application to the Department of Water Affairs and attach proof thereof to this application if it has been submitted.

**In terms of the National Water Act (Act 36 of 1998) an application relating to Section 21 (a), (b), (c), (i) & (g) water uses will be submitted to the Department of Water and Sanitation (DWS). The water user has been linked on E-WULAAS through Megan Hugo of Indwe Environmental Consulting, and the pre-application enquiry was submitted on 13 May 2025. E-WULAAS reference number is WU43487.**

### 13. ENERGY EFFICIENCY

Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:

The construction phase will require diesel generators.

During the operational phase, electricity will be supplied by Eskom, who have confirmed that the required capacity is available. In event of loadshedding or power failures, generators are likely to be used.

Describe how alternative energy sources have been taken into account or been built into the design of the activity, if any:

During the operational phase, where possible, standard energy efficiency practices may be followed (e.g. the use of energy-saving light bulbs).

Alternative energy sources have not been considered under this application.

The Applicant may, at a future point, consider the use of solar energy.

## SECTION B: SITE/AREA/PROPERTY DESCRIPTION

### Important notes:

- For linear activities (pipelines, etc) as well as activities that cover very large sites, it may be necessary to complete this section for each part of the site that has a significantly different environment. In such cases please complete copies of Section C and indicate the area, which is covered by each copy No. on the Site Plan.

Section C Copy No. (e.g. A):

- Paragraphs 1 - 6 below must be completed for each alternative.

- Has a specialist been consulted to assist with the completion of this section?

YES ✓	
-------	--

If YES, please complete form XX for each specialist thus appointed:

All specialist reports must be contained in Appendix D.

Indwe Environmental Consulting has identified that the following important Specialist Assessments which will be required in order to assess the important environmental factors on site and how these environmental factors will be impacted by the proposed Oakwood Chicken Broiler Houses.

In terms of additional “specialist” input, the following “specialist” assessments were commissioned:

- Aquatic Biodiversity Assessment**
- Archaeological and Cultural Impact Assessment**
- Palaeontological Impact Assessment**
- Terrestrial Biodiversity Assessment including Plant and Animal Species Themes**

According to the National Web Based Screening Tool, the following sensitivities applicable to the project and the site were identified:

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme	X			
Civil Aviation Theme		X		
Defence Theme				X
Paleontology Theme	X			
Plant Species Theme			X	
Terrestrial Biodiversity Theme				X

**All remaining sensitivities not covered by the specialist studies mentioned above will be dealt with and motivated in Appendix G7- Screening Tool Deliverables.**

14. GRADIENT OF THE SITE

Indicate the general gradient of the site.

Alternative S1:

Flat✓	1:50	–
	1:20✓	

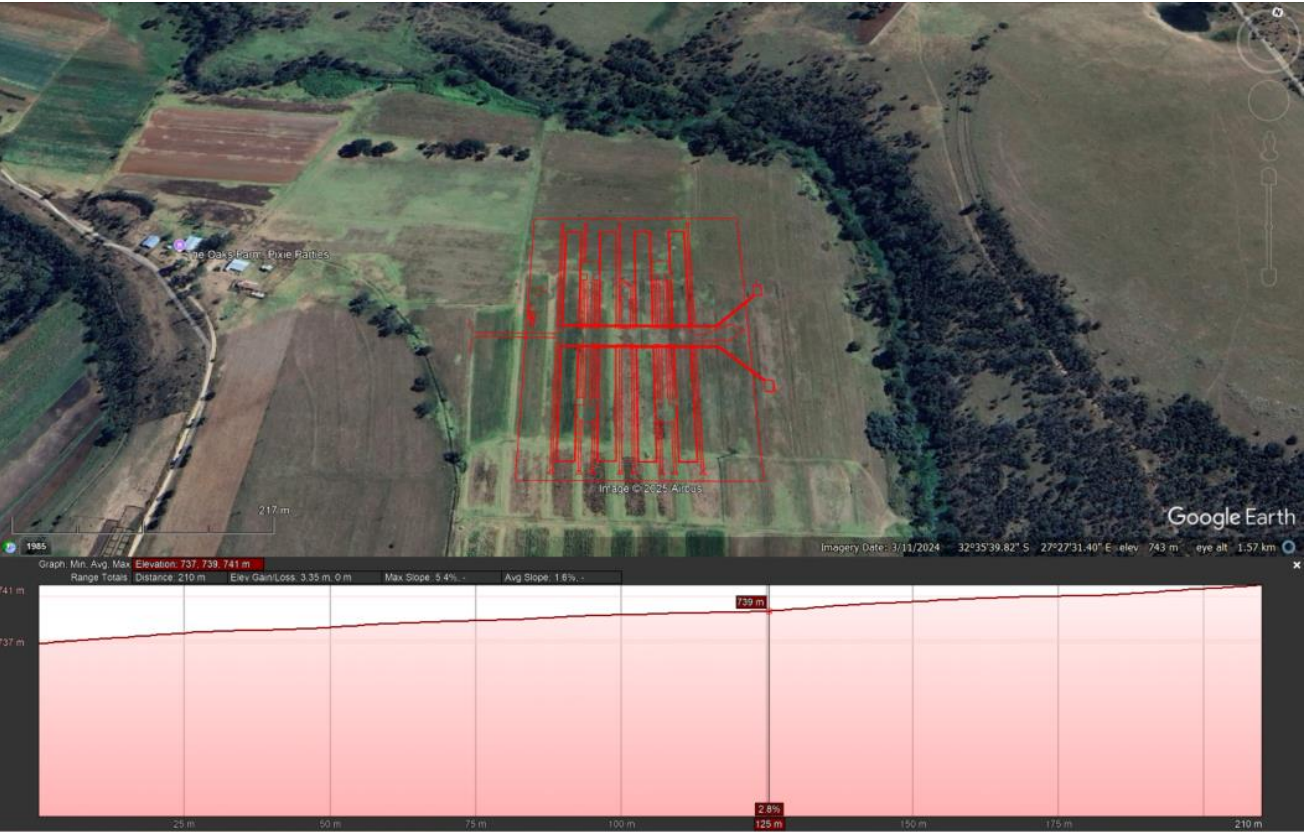
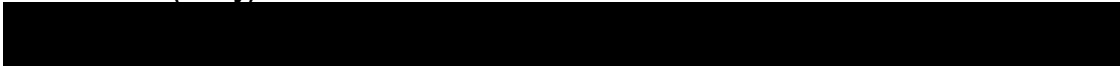


Figure 4: Elevation profile as shown through the middle of Broiler House 1.



Figure 5: Elevation profile as shown through the middle of Broiler House 2.

Alternative S2 (if any):



Alternative S3 (if any):



## 15. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site:

- 2.1 Ridgeline
- 2.2 Plateau
- 2.3 Side slope of hill/mountain
- 2.4 Closed valley
- 2.5 Open valley
- 2.6 Plain✓
- 2.7 Undulating plain / low hills
- 2.8 Dune
- 2.9 Seafront



## 16. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

Is the site(s) located on any of the following (tick the appropriate boxes)?

	Alternative S1:	Alternative S2 (if any):	Alternative S3 (if any):
Shallow water table (less than 1.5m deep)	<input type="checkbox"/>	NO✓	<input type="checkbox"/>
Dolomite, sinkhole or doline areas	<input type="checkbox"/>	NO✓	<input type="checkbox"/>
Seasonally wet soils (often close to water bodies)	YES✓	<input type="checkbox"/>	<input type="checkbox"/>
Unstable rocky slopes or steep slopes with loose soil	<input type="checkbox"/>	NO✓	<input type="checkbox"/>
Dispersive soils (soils that dissolve in water)	YES✓	<input type="checkbox"/>	<input type="checkbox"/>
Soils with high clay content (clay fraction more than 40%)	<input type="checkbox"/>	NO✓	<input type="checkbox"/>
Any other unstable soil or geological feature	<input type="checkbox"/>	NO✓	<input type="checkbox"/>
An area sensitive to erosion	<input type="checkbox"/>	NO✓	<input type="checkbox"/>

If you are unsure about any of the above or if you are concerned that any of the above aspects may be an issue of concern in the application, an appropriate specialist should be appointed to assist in the completion of this section. (Information in respect of the above will often be available as part of the project information or at the planning sections of local authorities. Where it exists, the 1:50 000 scale Regional Geotechnical Maps prepared by the Council for Geo Science may also be consulted).

### 16.1. GEOHYDROLOGICAL ASSESSMENT RESULTS:

A Geophysical Report was conducted by Water Resource Development in August 2024 to evaluate the potential of developing a sustainable groundwater source for the proposed Oakwood broiler houses.

The geology of the area generally comprises mudstones and sandstones of the Karoo sequence that have been intruded by dolerite dykes and sheets.

The Beaufort Group (BG) is the geologically dominant unit in the district. This Group (BG) forms part of the Karoo Supergroup. Dolerite intrusions form massive sheets, dykes and ring-shaped intrusions in this Group (BG). The Group (BG) is divided into two subgroups namely the Tarkastad and Adelaide Subgroups. These Subgroups has been divided into formations. The following formations are present in the study area, Katberg sandstones and dolerite intrusions.

- Katberg Formation
- Balfour Formation



The Katberg Formation is sandstone-rich and is 500 to 1000 m thick. The sandstone is well lithified and varies in composition from fine grained, argillaceous variety to a medium-coarse grained, arenaceous type, horizontally laminated, cross-bedded or massive and on average, comprises approximately 90% of the total thickness. The positive relief features in the landscape are normally composed of dolerite or sandstone. With regards to the Oakwood farm, this is competent sandstone.



Figure 6: Geological Map of the study area (Water Resource Development, 2024).

## 17. GROUNDCOVER

Indicate the types of groundcover present on the site:

4.2 Natural veld – scattered aliens ✓

4.7 Cultivated land ✓

The location of all identified rare or endangered species or other elements should be accurately indicated on the site plan(s).

	Natural veld with scattered aliens <sup>E</sup> ✓	
	Cultivated land✓	

If any of the boxes marked with an “E” is ticked, please consult an appropriate specialist to assist in the completion of this section if the environmental assessment practitioner doesn’t have the necessary expertise.

## 18. ENVIRONMENTAL THEMES

The national web-based Environmental Screening tool allows for the generating of a Screening Report referred to in Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended, whereby a Screening Report is required to accompany any application for Environmental Authorisation. The National Environmental Screening Tool indicates the following for each sector of the development, which has relevance to this section.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme	X			
Civil Aviation Theme		X		
Defence Theme				X
Paleontology Theme	X			
Plant Species Theme			X	
Terrestrial Biodiversity Theme				X

### 18.1. TERRESTRIAL BIODIVERSITY

A Terrestrial Biodiversity Compliance Statement inclusive of the Plant and Animal Species Theme was compiled by Jamie Pote (2025) which assesses the plant and animal species sensitivity as well as the terrestrial biodiversity for the proposed Oakwood chicken broiler house sites. The specialist report investigates the various terrestrial themes and the impacts the proposed project would have on these features. The following sections cover the topics discussed in the report.

#### 18.1.1. Vegetation of Southern Africa

The National Vegetation Map (Figure 7) indicated for the site is Amatole Montane Grassland, having a Least Concern status, as per National Biodiversity Assessment Red Listed Ecosystems (2022). Land cover and remnant vegetation data reflects the site is situated in areas designated as being natural (Broiler House 2) and Transformed/Cultivated (Broiler House 1).

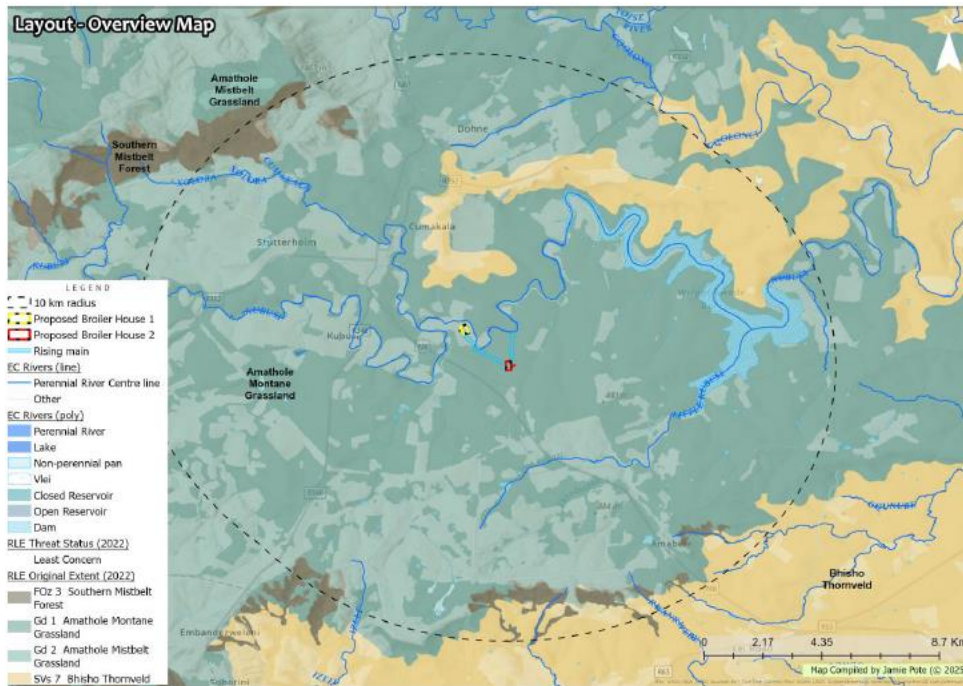


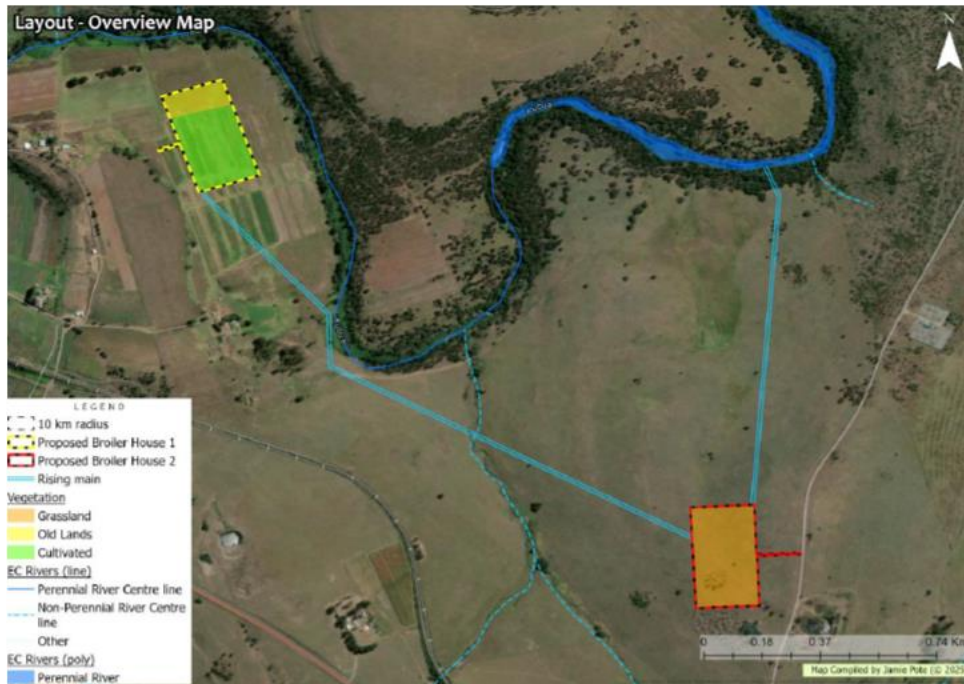
Figure 7: National Biodiversity Assessment Vegetation Type and Conservation Status Map (Pote, 2025).

### 18.1.2. Biodiversity Description

The proposed Broiler House 1 site is situated entirely within cultivated lands (pastures), with no natural vegetation remaining (Figure 8). The proposed Broiler house 2 is located within typical Montane Grassland having a mix of grasses (*Cynodon dactylon*, *Eragrostis chloromelas*, *Eragrostis curvula*, *Themeda triandra*, *Tristachya leucothrix*, *Andropogon appendiculatus*, *Brachiaria serrata*, *Heteropogon contortus* & *Sporobolus africanus*) and herbaceous elements (*Gerbera piloselloides*, *Helichrysum nudifolium*, *Helichrysum rugulosum*, *Lobelia erinus*, *Selago densiflora*, *S. retrorsus*, *Hypoxis argentea*, *Oxalis smithiana*, *Chrysocoma ciliata*, *Felicia filifolia*, *Felicia muricata*, *Commelina africana*, *Helichrysum odoratissimum* & *Senecio pterophorus*) but tending towards a higher proportion of herbaceous species (*Helichrysum* spp.). There is evidence of elevated historical and current grazing at the Broiler House 2 site, with a notable dominance of unpalatable herbs and grasses compared to surrounding areas where grass is more dominant.

The rising main section from the Kubusi River to Broiler House 2 traverses from a densely invaded riparian band along the river into near natural Grassland to Broiler House 2. The riparian habitat associated with the river is narrow and generally characterised by extensive *Acacia* and *Eucalyptus* tree infestation, with some indigenous elements typical of riparian vegetation present including *Cyperus sexangularis*, *Agrimonia sp* and *Cyperus textilis*. The rising main section from Broiler House 2 to Broiler House 1 traverses mostly near natural Grassland with a minor watercourse more or less midway to Broiler House 1 and cultivated areas surrounding Broiler House 1, as well as seep (generally characterised by secondary grassland species such as *Sporobolus africanus*, *Eragrostis plana* and *Cymbopogon sp*, with *Imperata cylindrica*, *Fimbristylis dichotoma* and *Sporobolus pyramidalis* also noted as well as *Fuirena pubescens* and *Fimbristylis dichotoma*, with *Cyperus denudatus*, *Imperata cylindrica* and other wetland-dependent plant species present in areas having permanent wetness, and wetland areas (characterised by *Fuirena pubescens*, *Fimbristylis complanata*, *Fimbristylis dichotoma*, *Schoenoplectus sp*, *Cyperus denudatus*, *Kyllinga cf melanosperma* and *Ischaemum fasciculatum*) and in proximity to the Kubusi River towards the Broiler House 1 end. The terrestrial biodiversity impacts associated with the rising main will be temporary and the excavation scar will likely return to a functional vegetated state within two years of completion, providing topsoil is removed separately and re-instated after construction. The impact to terrestrial biodiversity aspects associated with the riparian vegetation will also likely be temporary and negligible.

The construction of the chicken houses is unlikely to have any significant impact on indigenous vegetation and ecological processes as it will largely be within the transformed (Broiler House 1) and somewhat degraded grassland (Broiler House 2), as well as the limited footprint area of the proposed activity, where each site will only require a 5.5 Ha footprint.



**Figure 8: Vegetation of proposed Broiler House sites (Pote, 2025).**

### **18.1.3. Present Ecological State**

- Broiler House 1 is within a completely transformed cultivated area, with vegetation comprised predominantly of non-indigenous pasture species such as rye grass, kikuyu grass, as well as some pioneer ruderal weed elements.
- Broiler House 2 is situated within near natural but degraded Montane Grassland, with degradation being low to moderate.
- Alien invasion is low for both sites, but Broiler House site 1 does have a lot of ruderal weeds and there are some small Black Wattle clumps and occasional individuals in the vicinity of Broiler House 2.
- Dense alien tree invasion (Wattle & Eucalyptus) is present along the edges of the Kubusi River where the rising main will traverse.
- Erosion is currently low, but risk is moderate to high due to both sites being on a slope with relatively erodable soils.

### **18.1.4. Flora & Fauna**

No endemic and range restricted species were recorded to be present. Several species are known from the surrounding area, but unlikely to be affected by the proposed activity.

#### **18.1.4.1. Red Listed, Endemic and Protected Flora**

The site falls within the general distribution range of several endemic flora species and other species with a highly localised distribution, some of which are Critically Endangered, Endangered, Vulnerable or Rare. Some of these species are also only from a single or a few populations. As per Table 1, no Endangered or Critically Endangered flora species that are flagged for the site were confirmed to be present nor are known to be present in the affected area.



**Table 1: Flora Species of Special Concern (Pote, 2025)**

SCIENTIFIC NAME	STATUS <sup>a</sup>	COMMENT/PRESENCE
<i>Asclepias cooperi</i>	NEST (M), Rare	EOO 4000 km <sup>2</sup> , recorded from only four collections. This species is naturally rare, occurring as single individuals distributed sparsely over its range. Idutywa to Stutterheim. Does occur in the broader area but not recorded on site.
Sensitive species 1045	NEST (M), Rare	Katberg and Amathole Mountains and King William's Town to Komga. Damp margins of exposed dolerite rock sheets. Suitable habitat not present and not recorded.
Sensitive species 1248	NEST (M), Vulnerable	Under severe pressure from medicinal plant harvesting over the majority of its range in South Africa. Provincial authorities estimate a minimum decline of 30% nationally. This decline has taken place over the past 30 years. This species is widespread in southern and eastern Africa and occurs in South Africa, Mozambique, Zimbabwe, Zambia, Angola, Uganda and Tanzania. In South Africa, this species' range
SCIENTIFIC NAME	STATUS <sup>a</sup>	COMMENT/PRESENCE
Sensitive species 451	NEST (M), Rare	stretches from the Eastern Cape, KwaZulu-Natal, Mpumalanga, Gauteng and Limpopo. Not recorded on site. A widespread, but rare and localized species, known from only a few small subpopulations, but not suspected to be declining. Underberg, Tsehlanyana Valley (Lesotho), Hogsback, Dohne Peak and Port St Johns. Not recorded on site and outside of expected range or preferred habitat.
Sensitive species 535	NEST (M), Endangered	A population reduction of at least 50% over the last three generations (60 years) is estimated due to persistent and consistent destructive harvesting of wild individuals of this species for the medicinal plant trade, and some loss of suitable habitat to timber plantations and crop cultivation. Amathole Mountains in the Eastern Cape, extending north-eastwards to southern KwaZulu-Natal and along the eastern border of Lesotho. Primarily in the Amathole mountains to the west of the site but not recorded on site.
Sensitive species 554	NEST (M), Vulnerable	EOO 11 300 km <sup>2</sup> , known from fewer than ten locations. There have been observed declines at three of the known subpopulations as a result of rooting and predation by invasive pigs. Stutterheim to Engcobo and Umtata. Does occur in the broader area but not recorded on site.
<i>Syringodea flanaganii</i>	NEST (M), Vulnerable	A relatively widespread but rarely recorded species. It has an extent of occurrence (EOO) of 25 059 km <sup>2</sup> and is known from fewer than 10 locations and declining due to ongoing habitat loss and degradation. It is threatened by ongoing habitat loss to urban expansion around Port Elizabeth, where it was last recorded in 1933, and is now possibly locally extinct. Recent field observations from the Stutterheim-Cathcart area indicate that the species is threatened by habitat degradation due to overgrazing. Does occur in the broader area but not recorded on site.

No Flora Species of Conservation Concern were recorded at either Broiler House. PNCO (Provincial Nature Conservation Ordinance) permits are also not likely to be required as no species protected by the Ordinance were recorded within the footprints of the Broiler Houses or associated infrastructure.

#### 18.1.4.2. Red Listed and Protected Fauna

As per Table 2, no Endangered or Critically Endangered fauna species were found to be present nor are known to be present in close proximity to the affected area or are likely to be directly affected by the proposed activity and no faunal species of conservation concern was recorded on the site. Since the project footprint is relatively small, is situated within a disturbed area, any disturbance or displacement associated with increased activity or habitat destruction as a direct result of the activity is unlikely to pose a significant negative impact to any faunal species. No fauna PNCO permits are anticipated to be required.

**Table 2: Fauna Species of Special Concern (SCC) (Pote, 2025).**

SCIENTIFIC NAME	COMMON NAME	STATUS <sup>4</sup>	COMMENT/PRESENCE
<b>Mammals</b>			
<i>Chrysospalax trevelyani</i>	Giant golden mole	NEST (M), Endangered	Although recorded from 17 localities in the Eastern Cape, this species is now possibly locally extinct at many sites and appears to survive only in larger patches of indigenous Afromontane Forest on the eastern slopes of the Amathole mountains. Although the historical extent of occurrence is >20,000 km <sup>2</sup> , it has very specific habitat requirements and its total area of occupancy is estimated to be 272 km <sup>2</sup> and is severely fragmented (even if historical records are included as many of these were from small and isolated indigenous forest patches). The species does not occur in commercial forestry plantations which abut, or have replaced, many of the remaining patches of
<b>SCIENTIFIC NAME COMMON NAME STATUS<sup>4</sup> COMMENT/PRESENCE</b>			
<i>Ourebia ourebi ourebi</i>	Oribi	NEST (M), Endangered	natural habitat. Suitable preferred habitat (Afromontane Forest) is not present. This charismatic subspecies is patchily distributed in grasslands in the eastern half of the country, requiring both short grass for food and long grass for food and shelter. Based on available protected area data and survey returns from private landowners across the country, there are a minimum estimated total of 1,859 to 2,169 mature individuals (assuming a 60 to 70% mature population structure). The minimum estimate of the total number of mature individuals is likely an underestimate, due to unreturned surveys, but not significantly. While suitable habitat is potentially present, the species would not be expected to occur in the area due to proximity to urban area and illegal hunting etc. in an unprotected site. This species occurs in forested areas throughout western, central, eastern and southern Africa. Within southern Africa, it occurs in eastern Zimbabwe, parts of central Mozambique (IUCN SSC Antelope Specialist Group 2016), and along the eastern seaboard of South Africa. Although once recorded in Inhambane Province, Mozambique, in 1952, extensive deforestation and civil unrest have resulted in no recent records in the region (Skinner & Chimimba 2005). Suitable forest habitat not present and unlikely to occur in the area due to proximity to urban area and illegal hunting etc. in an unprotected site.
<i>Sensitive Species 8</i>		NEST (M), Vulnerable	
<b>Birds</b>			
<i>Balearica regulorum</i>	Grey crowned crane	NEST (H), EN (SA), EN (Intl)	The species inhabits wetlands such as marshes, pans and dams with tall emergent vegetation, riverbanks, open riverine woodland, shallowly flooded plains and temporary pools with adjacent grasslands, open savannas, croplands, pastures, fallow fields and irrigated areas. While suitable foraging habitat (grassland and pastures) is present, the surrounding area will provide adequate suitable habitat, and the scale of the project (limited footprint) is unlikely to pose any significant risk. The species breeds in wetlands, foraging primarily over reeds and lake margins. Its diet consists largely of small mammals. While suitable foraging habitat (grassland) is present, the surrounding area will provide adequate suitable habitat, and the scale of the project (limited footprint) is unlikely to pose any significant risk.
<i>Circus ranivorus</i>	African marsh harrier	NEST (H), EN (SA), LC (Intl)	While the grassland would provide suitable habitat for this species, large scale habitat loss and degradation due to agriculture, afforestation (invasive alien vegetation and timber plantations), overgrazing, urban habitat modifications as a result of growing human populations are the main threats. The surrounding area will provide adequate suitable habitat, and the scale of the project (limited footprint) is unlikely to pose any significant risk.
<i>Eupodotis senegalensis</i>	White-bellied bustard	NEST (M), VU (SA), LC (Intl)	The species inhabits grasslands, fairly dense shrubland, light woodland, farmland, crops, dried marsh and arid scrub plains and high rainfall sour grassveld, planted pastures and cereal croplands in fynbos in South Africa. It feeds on insects, small vertebrates and plant material. While suitable habitat (grassland and pastures) is present, the surrounding area will provide adequate suitable habitat, and the scale of the project (limited footprint) is unlikely to pose any significant risk.
<i>Neotis denhami</i>	Denham's Bustard	NEST (H), VU (SA), NT (Intl)	
<b>Reptiles</b>			
None of concern flagged			
<b>Amphibians</b>			

SCIENTIFIC NAME	COMMON NAME	STATUS*	COMMENT/PRESENCE
None of concern flagged			
Invertebrates			
None of concern flagged			

### 18.1.5. Terrestrial Vegetation Sensitivity Assessment

An overall vulnerability assessment of proposed Broiler Houses, incorporating key vegetation and ecological indicators was undertaken by Pote and included the following key criteria:

- relative levels of intactness in terms of overall loss of indigenous vegetation cover.
- presence, diversity, and abundance of species of special concern (weighted in favour of local endemic species).
- extent of invasion (severity and overall ecological impact), as well as the degree to which successful rehabilitation could take place.
- overall degradation incorporating above factors.
- relative importance of the vegetation communities relative to regional conservation status - indicated as vulnerability of the area because of loss.

#### 18.1.5.1. Intactness

Three basic classes are differentiated as follows:

- Low: > 75 % of original vegetation has been removed or lost; and/or no species of special concern present that are critically endangered, endangered, or endemic with highly localised distribution.
- Moderate: 25 - 75 % of original vegetation has been removed/lost; and or presence of species of special concern but not having high conservation status or high levels of endemism or highly localised distributions.
- High: < 25 % of original vegetation has been removed or lost; and or presence of species with a highly endemism and or high conservation status (endangered or critically endangered).

Intactness for Broiler House 1 is **Very Low**, and **Moderate to High** for Broiler House 2. Intactness for the rising main is generally **Moderate to High**, but **Low** towards the Kubusi River and around Broiler House 1 where there is dense alien invasion and cultivation.

#### 18.1.5.2. Alien Invasion

Three classes are differentiated as follows:

- Low: no or few scattered individuals.
- Moderate: individual clumps of invasives present but cover less than 50% of original area.
- High: dense, impenetrable stands of invasives present, or cover > 50 % of area with substantial loss functioning. Rehabilitation will most likely require specialised techniques over an extended period (> 5 years).

Alien invasion for both Broiler House sites and most of the rising main is **Low**, except in proximity to the Kubusi River where there is **High** alien invasion along the banks.

#### 18.1.5.3. Degradation

Overall Degradation is determined from the above alien invasion and intactness scores, according to the following matrix:

INTACTNESS	INVASION		
	LOW	MODERATE	HIGH
High	Pristine	Near Pristine	Moderately Degraded
Moderate	Near Pristine	Moderately Degraded	Severely Degraded
Low	Moderately Degraded	Severely Degraded	Transformed

Degradation for Broiler House site 1 is **High** (Transformed) and **Low** for Broiler House site 2 (Near Natural Montane Grassland). The rising main degradation is **Low** for most of the route except where it traverses in proximity to the Kubusi River and around Broiler House 1 where there is cultivation and dense alien invasion and is thus **High**.

#### 18.1.5.4. Overall Sensitivity score

Overall vulnerability (or Sensitivity) of the vegetation within the sites is calculated according to the following matrix which combines degradation and overall conservation status of the vegetation units of the site.

DEGRADATION	CONSERVATION STATUS			
	LEAST THREATENED	VULNERABLE	ENDANGERED	CRITICALLY ENDANGERED
Severely degraded/ Transformed	Very Low	Low	Moderate	Moderate - High
Moderately degraded	Low	Moderate	High	High
Ecologically Pristine or near Pristine	Moderate	Moderate - High	High	Very High (No-Go area)

#### 18.1.5.5. Habitat Sensitivity

- The entire Broiler House 1 site is **Low** Sensitivity comprised of Cultivated pastures and old lands (not cultivated in the current season).
- The entire Broiler House 2 site is designated a **Moderate** Sensitivity having near natural to degraded Montane Grassland.
- The rising main sensitivity is deemed to be **Low** for the entire route, as it will be a temporary disturbance during construction and will likely 'rehabilitate to current state within two years.
- No No-Go areas are identified in either site.

#### 18.1.6. Risks and Potential Impacts to Biodiversity

The main impacts likely to result from the proposed activity include the following:

1. Permanent or temporary loss of indigenous vegetation cover because of site clearing. Site clearing before construction will result in the blanket clearing of vegetation within the affected footprint.
2. Loss of Flora Species of Conservation Concern during pre-construction site clearing activities. Species of special concern are potentially present within the affected area, which could be destroyed during site preparation.
3. Susceptibility of some areas to erosion because of construction related disturbances. Removal of vegetation cover and soil disturbance may result in some areas being susceptible to soil erosion after completion of the activity.
4. Susceptibility of post construction disturbed areas to invasion by exotic and alien invasive species and removal of exotic and alien invasive species during construction. Post construction disturbed areas having no vegetation cover are often susceptible to invasion by weedy and alien species, which can not only become invasive but also prevent natural flora from becoming established.
5. Disturbances to ecological processes. Activity may result in disturbances to ecological processes.
6. Aquatic and Riparian processes. Diversion and increased velocity of surface water flows – Changes to the hydrological regime and increased potential for erosion. Impact of changes to water quality. Loss of riparian vegetation / aquatic habitat. Loss of species of special concern.
7. Loss of Faunal Habitat & Species of Conservation Concern: Activity will result in the loss of habitat for faunal species as well as potential direct loss of faunal species.

#### 18.1.7. Protected Areas and Protected Area Expansion Strategy priorities

The National Environmental Management Protected Areas Act (NEMPAA) (Act No. 57 of 2003) was developed to provide for the protection and conservation of ecologically viable areas representative of South Africa's biological diversity and its natural landscapes and seascapes. The nearest Protected Area to the proposed development is the Stutterheim Nature Reserve (Figure 9), which is a reserve managed by the local municipality. The reserve is approximately 4 km from the proposed development.



South Africa's protected area network currently falls far short of sustaining biodiversity and ecological processes. In this context, the goal of the National Protected Area Expansion Strategy (NPAES) is to achieve cost-effective protected area expansion for ecological sustainability and increased resilience to climate change. The NPAES highlights ways in which we can become more efficient and effective in allocating the scarce human and financial resources available for protected area expansion. It sets targets for protected area expansion, provides maps of the most important areas for protected area expansion, and makes recommendations on mechanisms for protected area expansion. The goal of the NPAES is to achieve cost-effective protected area expansion for ecological sustainability and increased resilience to climate change. It sets targets for protected area expansion, provides maps of the most important areas for protected area expansion, and makes recommendations on mechanisms for protected area expansion.

The closest NPAES Priority Focus Area near the vicinity of the proposed development occurs approximately 6 km away (Figure 10).

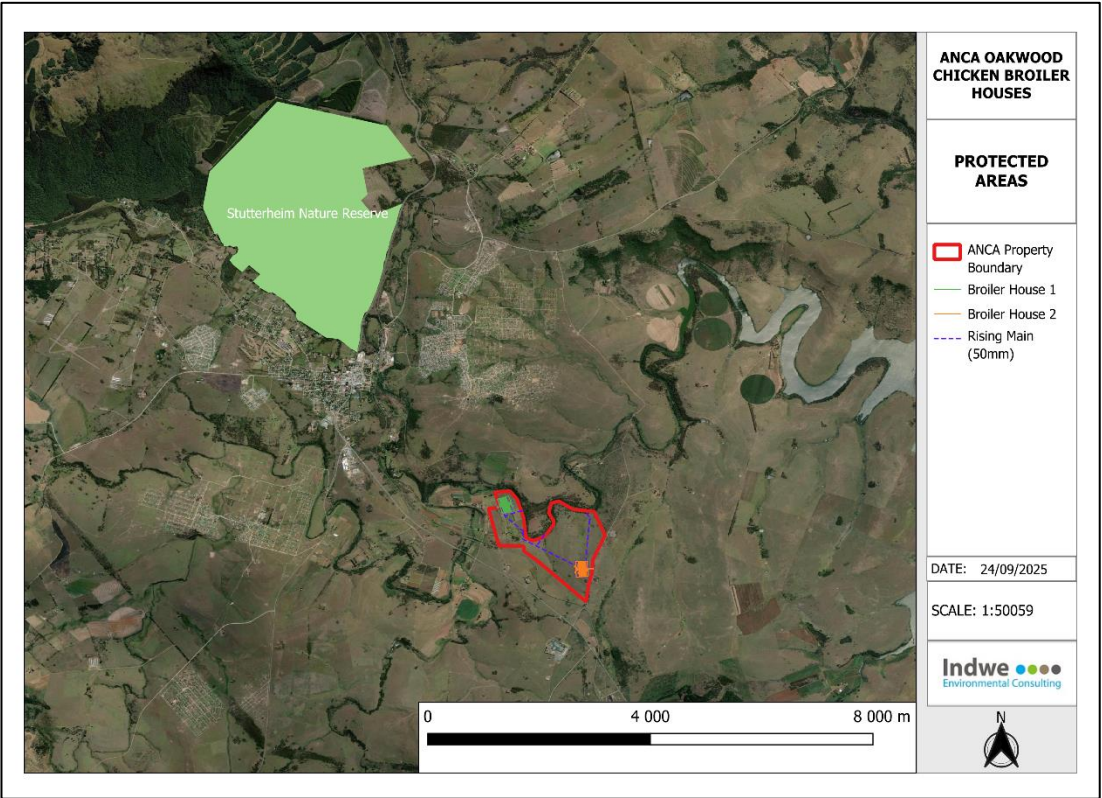
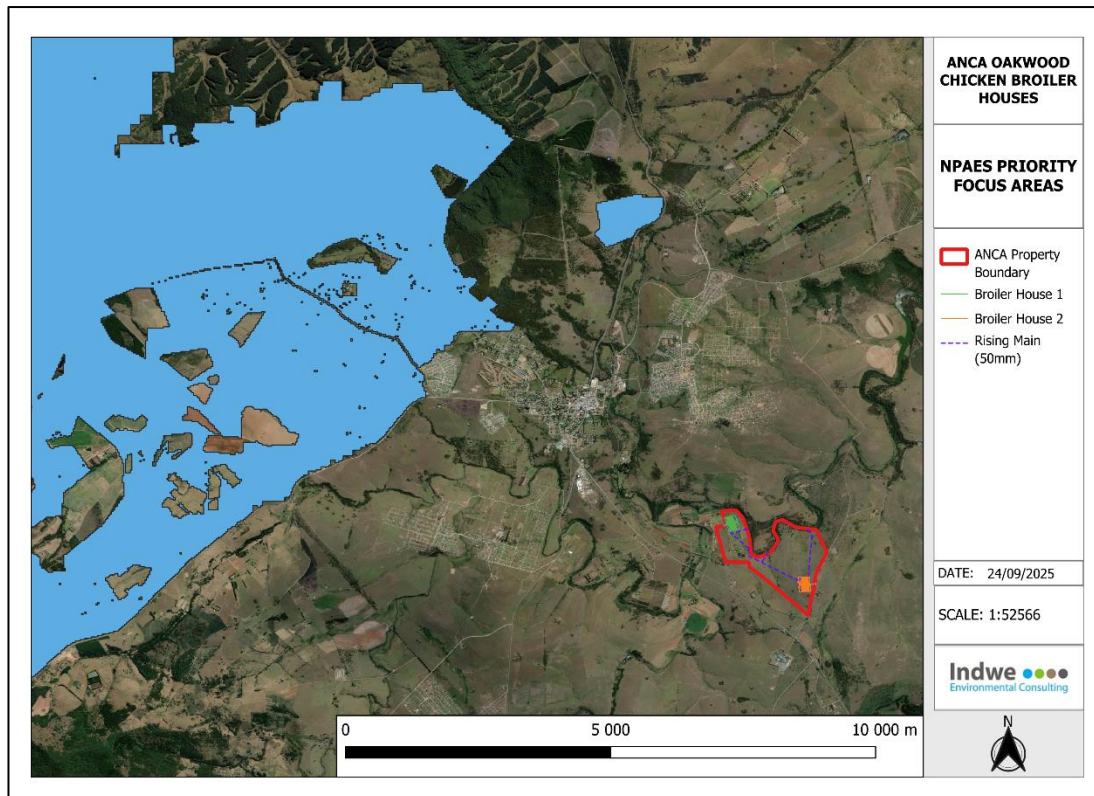


Figure 9: Protected Areas in terms of NEMPAA near the proposed development.



**Figure 10: NPAES Priority Focus Areas near the proposed development.**

#### **18.1.8. DFFE Screening Report Sensitivity Results and Verification (Terrestrial Biodiversity, Plant & Animal Species Theme)**

The site assessment by Pote (2025) was physically screened for the presence of any species flagged into the DFFE National Environmental Screening Tool (NEST), as well as other possible species or sensitivities that are not identified in the screening tool. Not all features are directly affected, but being in proximity, the risks associated with the activity will be investigated further and addressed in the report. The following is deduced from the DFFE National Environmental Screening Tool:

- The terrestrial biodiversity theme Sensitivity is LOW. The LOW terrestrial biodiversity sensitivity is thus confirmed, and a specialist sensitivity of LOW is allocated.
- Seven flora (plant) species regarded as being of conservation concern are flagged as potentially being present (MEDIUM Sensitivity) and are assessed further in the report, however none were found to be present within the affected footprints and several are unlikely to occur in the area as suitable habitat is not present and/or it is outside of the expected distribution range for those species. The MEDIUM plant species sensitivity is thus disputed, and a specialist sensitivity of LOW is allocated.
- Seven fauna (animal) species regarded as being of concern are flagged as potentially being present, including five birds and two mammals (MEDIUM/HIGH sensitivity) and are assessed further in the report. The site is unlikely to provide suitable habitat for the two mammal species and while the birds might be occasional visitors, the site would not be considered irreplaceable habitat, and the proposed Broiler Houses is unlikely to pose any risk to the specific bird species in question. The MEDIUM/HIGH fauna sensitivity is thus also disputed, and a specialist sensitivity of LOW is allocated.

#### **18.1.9. Eastern Cape Biodiversity Conservation Plan**

The Eastern Cape Biodiversity Conservation Plan was originally implemented in 2007. The Eastern Cape Biodiversity Conservation Plan (ECBCP, 2007) identified Critical Biodiversity Areas (CBAs). Critical Biodiversity Areas are terrestrial and aquatic features in the landscape that are critical for conserving biodiversity and maintaining ecosystem functioning

(Berliner & Desmet, 2007). The ECBCP analysis identified a number of CBAs in the province. CBAs are the fundamental components of Bioregional Plans.

A complete revision of the first version of the Eastern Cape Biodiversity Conservation Plan (ECBCP, 2007) was undertaken of which the Eastern Cape Biodiversity and Conservation Plan (2019) was derived. The Eastern Cape Biodiversity Conservation Plan (ECBCP, 2019) was developed in line with the principles and methods gazetted in the National Environmental Management: Biodiversity Act No 291 of 2009, "Guideline regarding the determination of Bioregions and the Preparation of and publication of Bioregional Plans". The Department of Economic Development, Environmental Affairs and Tourism issued a Provincial Notice on 19 October 2020 (PN. No. 173 of 2020) in the Provincial Gazette (No. 4460) citing "Notice of Intention to Publish and Gazette the Final Eastern Cape Biodiversity Conservation Plan (2019) for Implementation; in terms of The National Environmental Management Act". It further noted that "Listing Notice 3 (12) refers to Critical Biodiversity Areas of a Bioregional Plan. The ECBCP, 2019 is not a Bioregional Plan, but a systematic biodiversity plan, and does therefore not constitute a listed area in terms of this activity."

CBAs are described as areas selected to meet biodiversity targets for species, ecosystems and ecological processes. These include:

- Critically Endangered and Endangered Ecosystems;
- Critical linkage points (bottle-necks or pinch-points) in the corridor network; and
- All areas required to meet biodiversity targets and to ensure future persistence of species, ecosystems and special habitats.

CBAs are areas of high biodiversity value and should therefore be maintained in a natural state, with no further loss of habitat.

ESAs are areas NOT essential for meeting biodiversity targets, but are **essential** in terms of:

- Terrestrial landscape: Ensuring connectivity between CBAs, strengthening climate change resilience, and proper function of ecosystem infrastructure for delivery of ecosystem services. From a terrestrial perspective, ESAs may include riparian areas, coastal corridors, ridges, etc.
- Aquatic landscape: ESAs extend into catchments that are essential for the maintenance of CBA rivers and wetlands.

ESAs need to be maintained in a semi-natural, if not natural, state.

The objectives of ESAs are as follows:

### **Ecological Support Area 1**

Maintain ecological function within the localised and broader landscape. A functional state in this context means that the area must be maintained in a semi-natural state such that ecological function and ecosystem services are maintained.

For areas classified as ESA 1, the following objectives apply:

- These areas are not required to meet biodiversity targets, but they still perform essential roles in terms of connectivity, ecosystem service delivery and climate change resilience.
- These systems may vary in condition and maintaining function is the main objective, therefore:
  - Ecosystems still in natural, near natural state should be maintained.
  - Ecosystems that are moderately disturbed/degraded should be restored.

According to the ECBCP (2019), the development footprint falls partially within a **terrestrial ESA 1** (Figure 11) and a **freshwater ESA 1** (Figure 12).



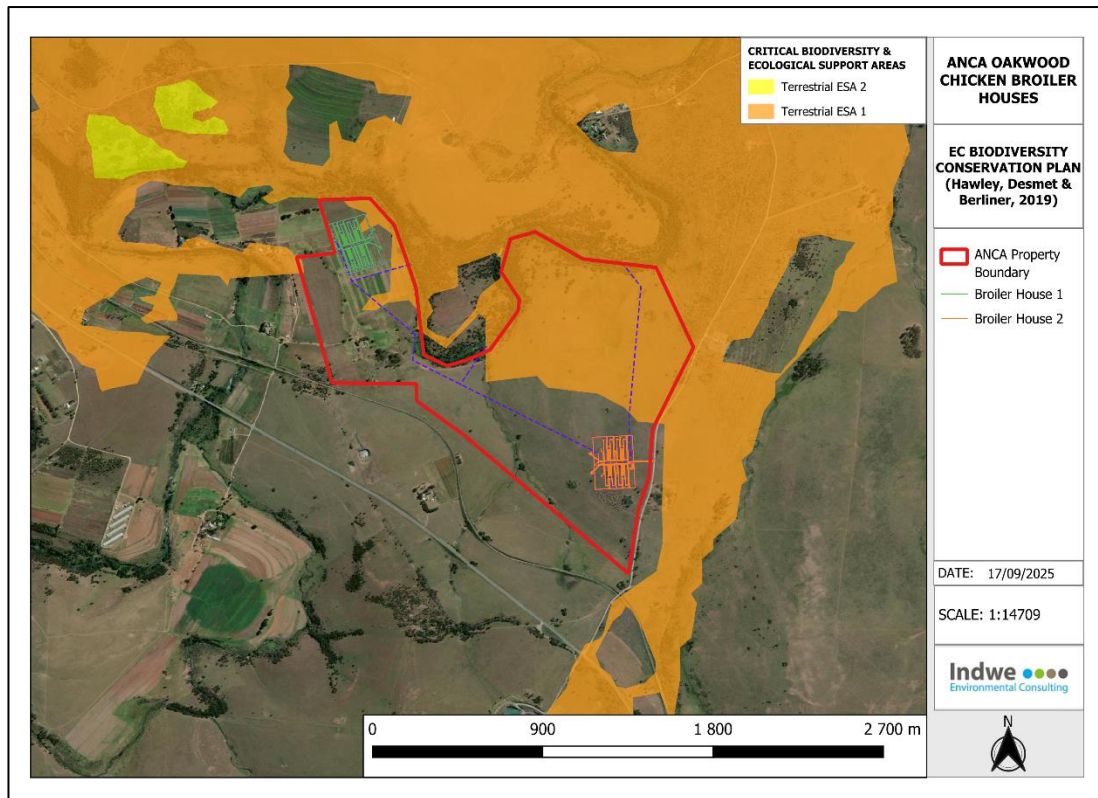


Figure 11: ECBCP (2019) - Terrestrial ESA Map relative to the proposed development area.

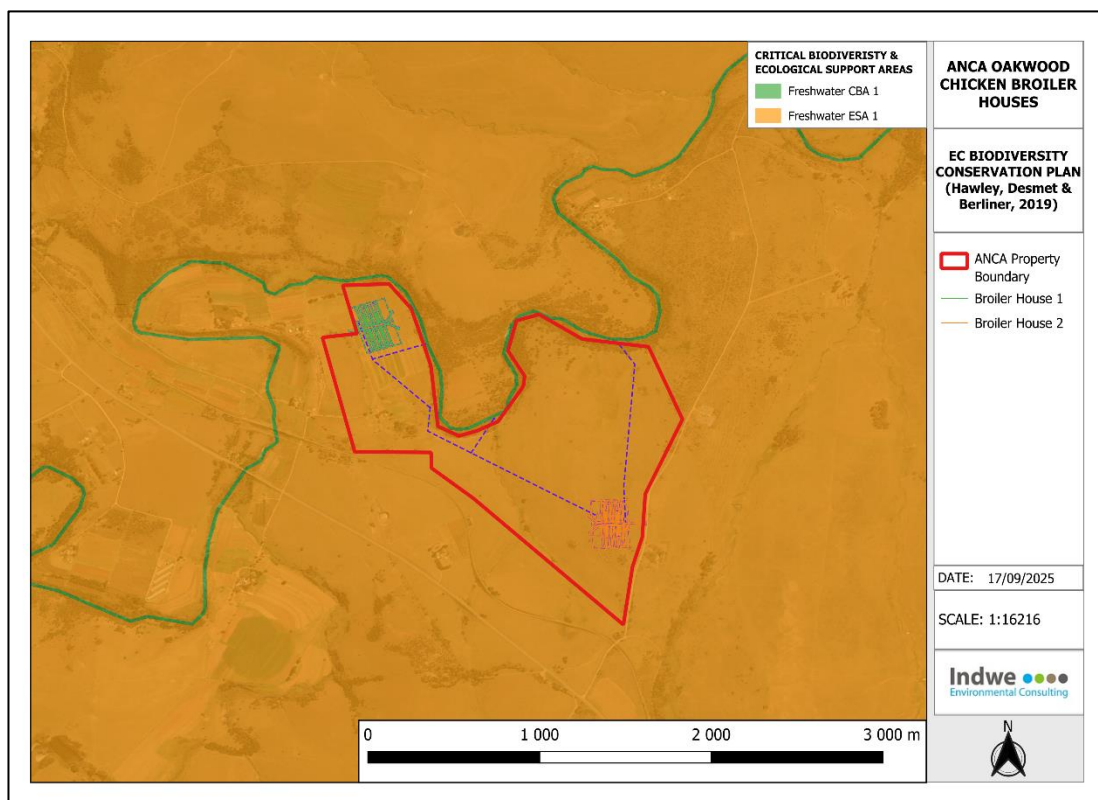


Figure 12: ECBCP (2019) - Freshwater ESA Map relative to the proposed development area.

#### 18.1.10. Summary of Terrestrial Biodiversity Assessment Findings

- The vegetation on the Broiler House 1 site is transformed, and the entire site and access road will be situated in an area having cultivated pastures and old lands.
- The vegetation on the Broiler House 2 site is comprised of Near Natural and degraded Montane Grassland, with evidence of historical overgrazing and possibly excessive fire. The site would not be deemed to have an elevated sensitivity above the norm for such habitat having a low conservation status and widespread distribution.
- The rising main section from the Kubusi River to Broiler House 2 traverses from a densely invaded riparian band along the river into near natural Grassland to Broiler House 2. The rising main section from Broiler House 2 to Broiler House 1 traverses mostly near natural Grassland with a minor watercourse more or less midway to Broiler House 1 and cultivated areas surrounding Broiler House 1, as well as seep areas and in proximity to the Kubusi River towards the Broiler House 1 end. Refer to aquatic assessment pertaining to the watercourses and seeps, being outside the scope of a terrestrial compliance statement. The terrestrial biodiversity impacts associated with the rising main will be temporary and the excavation scar will likely return to a functional vegetated state within two years of completion, providing topsoil is removed separately and re-instated after construction. The impact to terrestrial biodiversity aspects associated with the riparian vegetation will also likely be temporary and negligible.
- No Sensitive Plant or Animal species identified as per the National Environmental Screening Tool were found to be present, are likely to be present, or would be affected by the small footprint associated with Broiler Houses.
- No areas are designated CBA or ESA, or have any other Conservation designation.
- The Broiler House 1 site is designated a LOW Sensitivity due to the disturbed and transformed nature.
- The Broiler House 2 site is designated a Moderate Sensitivity, comprising Near Natural to degraded Grassland, but not having an elevated conservation status (i.e. Least Concern) and no other significant ecological sensitivities.
- No terrestrial habitat and processes associated with watercourses are directly affected by the proposed activities.
- No No-go areas are identified within either of the site footprints.
- No significant direct, indirect or cumulative impacts are anticipated before or after mitigation.

### 18.2. AQUATIC BIODIVERSITY

Steven Ellery (GroundTruth, 2025) was appointed by Indwe Environmental Consulting to conduct an Aquatic Biodiversity Assessment for the proposed chicken broiler development on the Oakwood Farm within the Amahlathi Local Municipality, south of Stutterheim. The site visit was conducted on 27 May 2025 to verify the extent of the aquatic ecosystems within the study site and to delineate the aquatic ecosystems hydrologically linked to the proposed developments and within the DWS 500 m regulated area.

#### 18.2.1. Study Site

##### 18.2.1.1. Site Sensitivity Verification

The Department of Forestry, Fisheries and the Environment (DFFE) National Environmental Screening Tool has classified the aquatic biodiversity theme of the proposed site as having “Very High” sensitivity (Figure 13). This classification is informed by the presence of mapped watercourses and aquatic ecosystem support areas (ESAs) within the development footprint (Hawley & Desmet, 2020). The “Very High” sensitivity rating was substantiated during the site visit conducted in May 2025, primarily due to the identification of two wetland features located within 500 m of the proposed development area, both of which exhibit hydrological connectivity to Broiler House 2. The Kubusi River, which borders the northern boundary of the site, while not deemed highly sensitive, is designated as a low-priority Freshwater Ecosystem Priority Area (FEPA).



**Figure 13: Aquatic biodiversity theme sensitivity map as extracted from the screening report on the DFFE screening website.**

#### **18.2.1.2. Wetland Classification**

The HGM units identified within the study site are classified as a channelled valley bottom (CVB) and hillslope seep linked to a stream channel (Ellery, 2025).

#### **18.2.1.3. River Classification**

One riverine unit was identified onsite that was delineated and assessed. This riverine unit was classified as a Lower Foothill River commencing from a weir located approximately 1.6 km upstream of Broiler House 1. The river reach was artificially defined at a weir less than 100 m downstream of where the CVB joins the Kubusi River (Ellery, 2025).

### **18.2.2. Aquatic Ecosystem Delineation**

#### **18.2.2.1. Onsite Systems**

The delineation of the aquatic ecosystems that are hydrologically linked to two proposed broiler houses identified four aquatic ecosystems namely a riverine system, two hillslope seep wetlands, and a channelled valley-bottom wetland (Figure 14).

The riverine system defines the northern boundary of the Oakwood Farm and is located in relative proximity to Broiler House 1 on the western side of the property (Figure 14). This riverine reach is part of the Kubusi River and has been artificially defined upstream by a weir across its channel. This river reach is approximately 4.9km long and is considered a suitable reach for an IHI assessment. The riverine system is defined as a lower foothills river because it is dominated by large pools with minor riffles and rapids between larger pools. The bed is dominated by sand and gravel with occasional rock outcrops which result in the formation of rapids. The riparian habitat associated with the river is generally quite narrow and is broadly characterised by extensive *Acacia mearnsii* and *Eucalyptus sp* growth along riverbanks. However, some indigenous herbaceous species such as *Cyperus sexangularis*, *Agrimonia sp* and *Cyperus textilis* were noted within the macro channel of the river. Of concern, is the extensive presence of *Pontederia crassipes* (water hyacinth) within the Kubusi River, which will likely all be washed down into the Wiggleswade Dam downstream. The riverbanks have also experienced some erosion and bank collapse was noted in a number of places along the length of the river.

The channelled valley-bottom wetland (CVB) is a small tributary of the Kubusi River and flows into the Kubusi River directly upstream of the bottom weir which defines the studies riverine reach. The CVB is situated in a narrow valley-

bottom feature and is characterised by a small and moderately sinuous channel which is fed laterally by extensive areas of seepage. The channel itself is incised in some along its length, and not incised in others and is therefore thought to be establishing an appropriate grade for its discharge. The CVB wetland is partially fed by a large valley-head seep wetland, which is hydrologically isolated from the proposed development, as well as a small tributary stream which is hydrologically isolated as well. There are a number of small *Acacia mearnsii* clumps along the length of the CVB as well as an old dam, which has been breached. Generally, the vegetation within the wetland is moderately intact. While it shows signs of overgrazing, there are some core portions of the wetland that are characterised by a healthy assemblage of wetland-dependent species, including but not limited to *Fuirena pubescens*, *Fimbristylis complanata*, *Fimbristylis dichotoma*, *Schoenoplectus* sp, *Cyperus denudatus*, *Kyllinga cf melanosperma* and *Ischaemum fasciculatum*. The areas of the wetland that have been grazed more heavily are predominantly characterised by disturbance tolerant grass species such as *Eragrostis plana*, *Sporobolus africanus*, *Cymbopogon* sp, *Digitaria eriantha* and *Miscanthus capensis*.

The first hillslope seep wetland (SEEP 1) similarly flows into the Kubusi River and is located to the north of Broiler House 2. The SEEP 1 wetland can be split into two distinct portions, the narrow and seasonal/temporary area to the south that is characterised by shallow soils and the wide seasonal/permanent area to the north. The southern portion of the SEEP 1 wetland appears to exist due to the presence of a shallow bedrock/saprolite layer, which is semi-impermeable and forces shallow groundwater to the ground surface. The saprolite layer is comprised of soft plinthite, which has a grey matrix colour (10YR 4/1 and 10YR 5/1; Munsell Color (Firm), 2013) and high chroma mottles and concretions, indicating the seasonal presence of water. This segment of the wetland is characterised by secondary grassland species such as *Sporobolus africanus*, *Eragrostis plana* and *Cymbopogon* sp, but species such as *Imperata cylindrica*, *Fimbristylis dichotoma* and *Sporobolus pyramidalis* were noted in this portion of the wetland, indicating wetland habitat. The northern segment of the SEEP wetland is lower lying and is likely characterised by a more substantial groundwater discharge point as it is characterised by permanent wetness in its centre. It is dominated by *Fuirena pubescens* and *Fimbristylis dichotoma*, with *Cyperus denudatus*, *Imperata cylindrica* and other wetland-dependent plant species present. While the wetland appeared to be in a relatively good ecological state, abundant cattle paths cross the lower wetland, and it is clearly used for winter grazing as trampling of the wetland is widespread.

The second hillslope wetland (SEEP 2) also flows into the Kubusi River and is located in a small valley between the two broiler house sites. SEEP 2 is a small wetland system that is comprised of two hillslope seep wetlands that have been lumped together for the sake of this assessment. The SEEP 2 wetland is a gently sloping wetland that is characterised by secondary grassland species with a scattered distribution of wetland plants species such as *Juncus effuses* and *Schoenoplectus* sp. These two SEEP wetlands are located close to the farm house and the fields where cattle are kept. As such, these SEEP wetlands are subjected to heavy trampling as the herds of cattle are moved to and from their enclosure.

In addition to the four aquatic ecosystems that are hydrologically linked to the proposed developments, there are several other aquatic ecosystems that are hydrologically isolated. Since all significant impacts from the proposed developments will stem from hydrological factors, it was unnecessary to delineate and evaluate these isolated ecosystems, as they will not be affected.



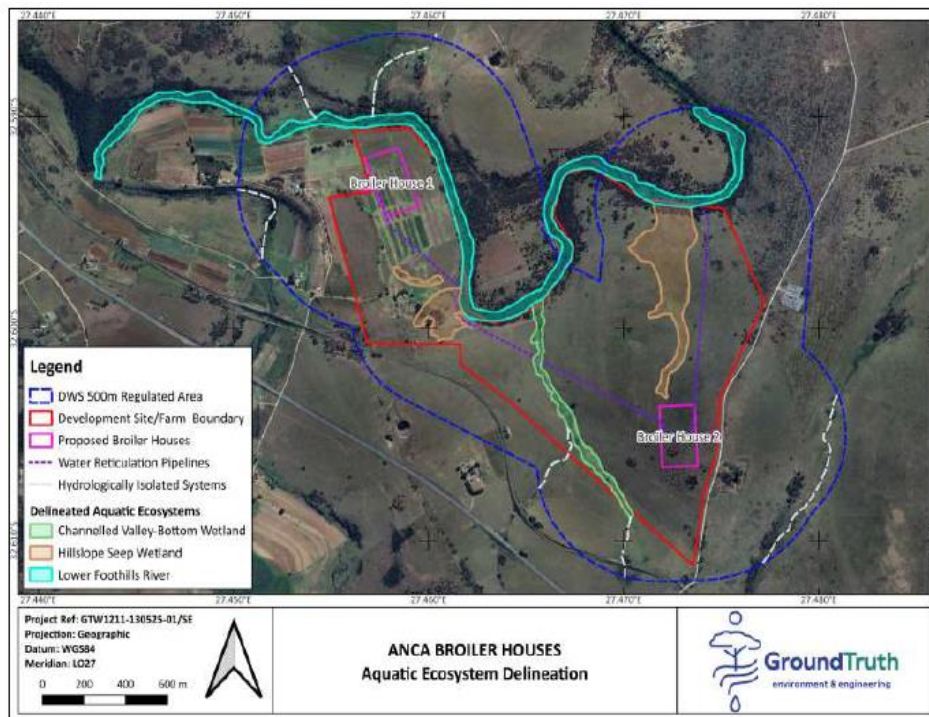


Figure 14: Aquatic ecosystems and hydrologically isolated features within 500 m of the proposed developments (Ellery, 2025).

### 18.2.3. Assessment of Aquatic Ecosystem Functioning

The general features of the aquatic ecosystems hydrologically linked to the proposed development were assessed in terms of their ecosystem functioning at a landscape level of the **current** and **post-development** scenario using a Level 2 WET-EcoServices assessment. The score for the ecosystem services represents the likely extent to which that benefit is being supplied by the aquatic ecosystems, based on the demand for said benefit, rated from 0-4, which informs the overall importance score. These are based on the following categories as presented in (Kotze et al., 2021):

- 0-0.79 Very Low;
- 0.8-1.29 Low;
- 1.3-1.69 Moderately Low;
- 1.7-2.29 Moderate;
- 2.3-2.69 Moderately High;
- 2.7-3.19 High; and
- 3.2-4.0 Very High.

#### 18.2.3.1. Riverine Ecosystem

Generally, the values recorded for the regulating and supporting services for the riverine system for the current and post-development scenarios ranged from **Very Low** to **Moderate**. The values recorded for the water quality enhancement services (i.e. phosphate, nitrate and toxicant assimilation and removal) are all **Low** in the current and post-development scenarios. A slight increase in the overall importance score of the toxicant removal ecosystem service is noted in the post-development scenario due to the increased demand for this ecosystem service with the chicken broiler houses in the landscape. The overall importance score for harvestable resources for both the current and post-development scenarios are **Moderate** due to the abundance of invasive alien trees along the banks of the riverine and riparian habitat, which would provide an abundance wood for burning and building. There are no substantial changes between the current and post-development scenarios for the riverine ecosystem.



### 18.2.3.2. Channelled valley-bottom wetland

Similar to the riverine ecosystem, the scores for the CVB system did not differ significantly between the current and post-development scenarios. However, in the current scenario, all regulating and supporting ecosystem services are scored as being of **Very Low** importance, with all the water quality enhancement services increasing in their overall importance rating in the post development scenario due to the increased demand for water quality enhancement services. Notably, the CVB system scored **High** for the food for livestock ecosystem service, given the extent of grazeable plants within the wetland and the current use of the wetland is for grazing, thereby giving weight to the demand score for the food for livestock ecosystem service.

### 18.2.3.3. Hillslope seep wetlands

The SEEP 1 wetland has a similar trend, but given the proximity of the SEEP 1 wetland to broiler house 2, the post-development impacts on the wetland are likely to be slightly more pronounced than on the CVB and riverine systems. The current scenario for the SEEP shows that the regulating and supporting services are of **Very Low** or **Low** importance, but the sediment trapping, phosphate trapping, and toxicant assimilation all increase from **Low** to **Moderately Low** in the post-development scenario. It should be noted that this is not due to the fact that the wetland improves in condition, but rather the demand for these ecosystem services increases with the presence of the broiler houses in the immediate catchment. The food for livestock and water for human use ecosystem services are rated as being of **Moderate** importance in both the current and post-development scenarios.

The SEEP 2 wetland provides a similar suite of ecosystem services to that of SEEP 1, ranging from **Very Low** to **Moderate**. Because the SEEP 2 wetland will not be directly or indirectly affected by either of the broiler houses, but rather by the reticulation pipeline, there is negligible difference between the current and post-development scenarios.

### 18.2.4. Ecological Importance and Sensitivity

According to the DWS Manual for Rapid Ecological Determination of Inland Wetlands (Rountree et al., 2013), the current ecological importance and sensitivity (EIS) categories for the three wetland systems were derived from their ecological importance scores. All wetlands are considered to be in a **Moderate** category for both the current and post-development scenarios. The scores for both the SEEP and the CVB wetlands are derived from the fact that they receive some protection due to their location on private land which limits their use and potential degradation. All wetlands are in a **C** PES category, which also elevates their ecological importance at a landscape scale and they are characterised by a moderate level of ecological diversity which contributes to their overall ecological importance score. The only change in the post-development scenario is related to their hydro-functional importance, which increases slightly due to the increased demand for ecosystem service delivery. This does not affect their overall EIS score.

**Table 3: Ecological importance and sensitivity score for the wetland systems for the current and post-development scenarios for the CVB and SEEP wetlands (Ellery, 2025).**

Ecological Importance and Sensitivity Categories	CVB		SEEP 1		SEEP 2	
	Current	Post-dev	Current	Post-dev	Current	Post-dev
Ecological Importance and Sensitivity	2.2	2.2	2.4	2.4	2.4	2.4
Hydro-functional Importance	0.5	0.6	0.8	1.0	0.5	0.5
Direct Human Benefits	0.7	0.7	0.7	0.7	0.7	0.7
Overall Importance and Sensitivity Score	2.2	2.2	2.4	2.4	2.4	2.4
Overall Importance and Sensitivity Category	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate

### 18.2.5. Wetland Ecological Condition Assessment Results

The ecological integrity or Present Ecological State (PES) of the CVB and SEEP wetlands were assessed for the hydrology, geomorphology, vegetation and water quality components for the current and post-development scenarios (Table 4 and Table 5 respectively).

#### 18.2.5.1. Current Scenario

**Table 4: Summary of the overall ecological condition of the wetlands for the current scenario (Ellery, 2025).**

Current Scenario						
Wetland	Descriptor	Hydrology	Geomorphology	Water quality	Vegetation	Overall PES
CVB	Impact Score	2.4	1.7	0.7	4.0	2.2
	PES Category	C	B	A	D	C
SEEP 1	Impact Score	2.3	1.7	0.6	3.5	2.0
	PES Category	C	B	A	C	C
SEEP 2	Impact Score	3.2	2.4	1.5	6.0	3.3
	PES Category	C	C	B	E	C

#### 18.2.5.2. Post Development Scenario

**Table 5: Summary of the overall ecological condition of the wetlands for the post development scenario (Ellery, 2025).**

Post-development Scenario						
Wetland	Descriptor	Hydrology	Geomorphology	Water quality	Vegetation	Overall PES
CVB	Impact Score	2.4	1.7	0.9	4.0	2.3
	PES Category	C	B	A	D	C
SEEP	Impact Score	2.3	1.7	1.0	3.5	2.1
	PES Category	C	B	B	C	C
SEEP 2	Impact Score	3.2	2.4	1.5	6.0	3.3
	PES Category	C	C	B	E	C

### 18.2.6. River Health Assessment

The ecological condition of the riverine ecosystem was assessed separately to the wetland habitats (as per the following sections) given that different tools and methods are typically applied for riverine ecosystems. Benthic diatom samples were used to infer water quality impacts, with instream and riparian habitat metrics providing an indication of river habitat functioning in proximity to the site.

**Table 6: Benthic diatom results from samples collected from an upstream and a downstream site on the Kubusi River in relation to the ANCA broiler house development (Ellery, 2025).**

Site	Number of Species	Specific Pollution Sensitivity Index (SPI)	% Pollution Tolerant Valves (% PTV)	% Deformed Cells	River Health Category
Site 01 upstream	54	8.6	33.0	0.0	Poor
Site 02 downstream	43	12.4	17.6	1.0	Fair

#### 18.2.7. Resource Quality Objectives and the Recommended Ecological Category

The management objective for any watercourse is set by considering the pre-development PES and the EIS of the given watercourse. The Kubusi River and the catchments wherein the CVB and SEEP wetlands lie do not have resource quality objectives prescribed for them. Therefore, individual REC's will be set for the three aquatic ecosystems located onsite. Following the Rountree et al. 2013) method, all the systems will have to be maintained in their current PES category, considering that their EIS categories are all **Moderate**. Therefore, the CVB wetland has a REC of **C**, the SEEP wetlands have a REC of **C** and the Kubusi River has a REC of **D**.

#### 18.2.8. Buffer Determination Results

The buffer for the proposed development is split up into poor mitigation and best-case mitigation scenarios with variable buffer widths for each scenario and for each aquatic ecosystem, depending on their sensitivity and the nature of the buffer zone (Table 7). While the development **Low** risks to the downstream systems, it is recommended that appropriate mitigation activities are adopted, especially associated with stormwater and sewage management, as the downstream system has been classified as Critically Endangered.

**Table 7: Recommended buffer distance to be adopted for the wetlands present within the development footprint (Ellery, 2025).**

Aquatic Ecosystem	Mitigation Scenario	Buffer Distance per Phase	
		Construction	Operational
River	Poor mitigation scenario	15m	44m
	Best-case mitigation scenario	15m	17m
CVB	Poor mitigation scenario	15m	16m
	Best-case mitigation scenario	15m	16m
SEEP 1	Poor mitigation scenario	21m	63m
	Best-case mitigation scenario	15m	32m
SEEP 2	Poor mitigation scenario	15m	15m
	Best-case mitigation scenario	15m	15m

#### 18.2.9. DFFE Screening Report Sensitivity Results and Verification (Aquatic Biodiversity Theme)

According to the national web-based environmental screening tool report generated for the proposed development area, the proposed development is located within an area of **“Very High”** sensitivity in terms of Aquatic Biodiversity (DFFE, 2022). The **“Very High”** sensitivity designation is due to the presence of a **freshwater ESA 1** within the proposed development footprint, as identified by the Eastern Cape Biodiversity Conservation Plan (ECBCP, 2019).

During the site visit undertaken on 27 May 2025 by Ellery, the Aquatic Specialist, the “Very High” sensitivity rating was substantiated, primarily due to the identification of two wetland features located within 500 m of the proposed development area, both of which exhibit hydrological connectivity to Broiler House 2. The Kubusi River, which borders the northern boundary of the site, while not deemed highly sensitive, is designated as a low-priority Freshwater Ecosystem Priority Area (FEPA).



**Figure 15: Results from the National Web-Based Screening for the Aquatic Biodiversity Theme, indicating a Very High Sensitivity.**

### 18.3. Archaeological and Cultural Heritage

A Phase 1 Archaeological and Cultural Impact Assessment (AIA) was conducted by Ms Celeste Booth, an independent archaeologist, in July 2025.

The area proposed for Broiler House 1 is situated on previously cultivated agricultural lands. Currently the area is being used as grazing for cattle. A few exposed surface areas in the centre of the site allowed for archaeological surface visibility, mostly, the area was densely covered in grass vegetation that made archaeological visibility difficult during the survey.

The Little Kubusie River is perennial river that flows north and east of the area proposed for Broiler House 1. Rivers and watercourses are generally considered significant areas for the attraction of precolonial occupation for the provision of drinking water and food resources.

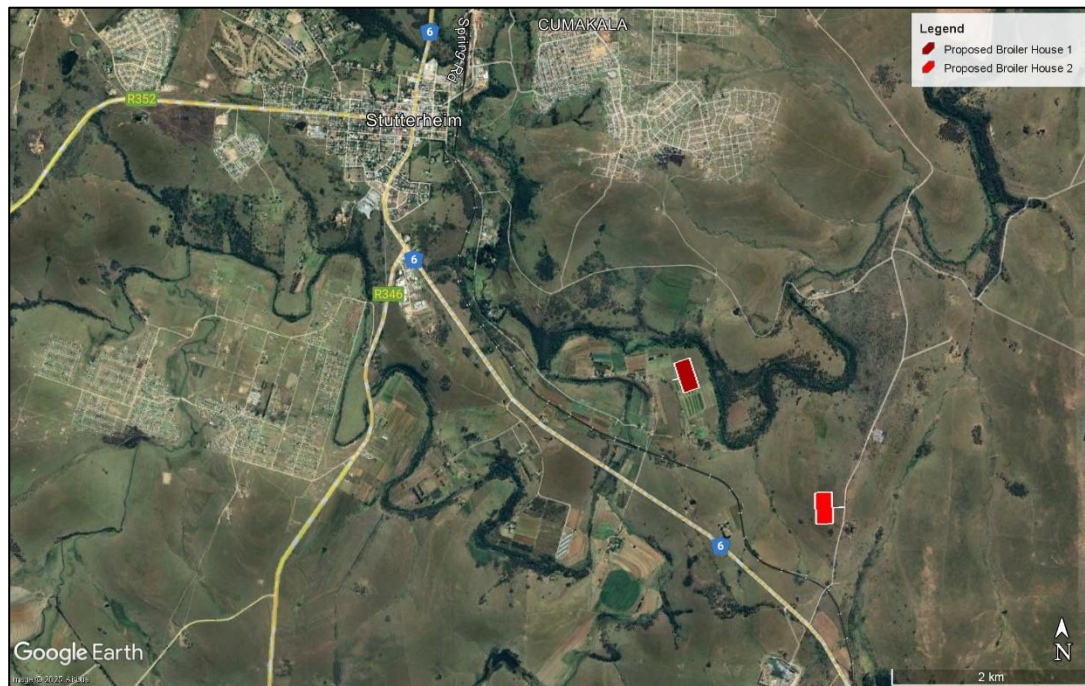
The area proposed for Broiler House 2 is situated on undisturbed land which comprises of different types of vegetation as well as alien weeds. The area was densely covered in grass and mixed vegetation that made archaeological visibility difficult during the survey. No exposed surface area occurred within the site that allowed for archaeological surface visibility.

The sites yielded no visible surface archaeological and / or other heritage remains. Very few surface disturbed areas occurred within these sites, except the internal access gravel road that accesses the sites. No visible archaeological and / or other heritage remains were identified within the internal access road.

No archaeological, cultural or heritage sites, resources or features were identified during the survey for the proposed broiler houses. The area is considered as having a *low archaeological heritage significance* as no archaeological heritage sites were identified. No living heritage sites are known to occur on the proposed development site.

It is unlikely that archaeological and / or other heritage resources will be uncovered during the course of the development of the Broiler Houses 1 and 2, however, stone artefacts may occur up to 80 cm below ground and unmarked burials up to 150

cm below ground, the construction workers and ECO for the project should be made aware of the types of archaeological materials that could be uncovered.



**Figure 16: Google Earth generated map of the location of the town of Stutterheim and the proposed Oakwood chicken broiler houses (Booth, 2025).**

The recommendations contained within Booth's (2025) AIA assessment are as follows:

- Construction managers/foremen and/or the ECO and/or anyone who may be permanently on-site during the relevant pre-construction and construction phases of the project should undergo training before the construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow when they find sites.
- A Chance Finds Protocol for archaeological and cultural heritage finds must be compiled and be readily available for the Environmental Control Officer (ECO) and/or construction manager/s and/or anyone who may be permanently on-site during the relevant pre-construction and construction phases of the project to follow the correct procedures when accidentally uncovering archaeological sites and possible unmarked burials.
- If concentrations of pre-colonial archaeological heritage material (such as below surface dense artefacts accumulations and associated material) and/or human remains (including graves and burials) are uncovered during construction, all work must cease immediately and be reported to the Eastern Cape Provincial Heritage Resources Agency (ECPHRA) (043 492 1944) and/or the archaeologist appointed to conduct the monitoring, so that systematic and professional investigation/excavation can be undertaken (subject to any permitting requirements). Phase 2 mitigation in the form of test-pitting/sampling or systematic excavations and collections of the archaeological / heritage site may then be conducted to establish the contextual status of the sites and possibly remove the archaeological deposit before development activities continue. The costs for the phase 2 mitigation will be on the onus of the developer.

An additional AIA was conducted by Booth in August 2024 for the Grassdale Layer and Hatchery facility, which is approximately 5.5 km away from the proposed development area. No archaeological, historical or other heritage material, sites or features were identified during the survey, and no living heritage sites are known to occur on the proposed development site.



### 18.3.1. DFFE Screening Report Sensitivity Results and Verification (Archaeological and Cultural Heritage Theme)

According to the National Screening Tool's Archaeological and Cultural Heritage theme, the study site is classified as having a **Very High** sensitivity.

Given the findings and the results from Booth's (2025) AIA as well as the AIA conducted at the Grassdale layer and hatchery site approximately 5.5 km away from the proposed development area, a **Low** sensitivity rating should be allocated to the proposed development site.

### 18.4. Palaeontology

A Palaeontological Impact Assessment (PIA) was compiled by Elize Butler from Banzai Environmental in August 2025.

The proposed chicken broiler project is underlain by the Bafour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup) (Figure 17). According to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS) the Paleontological Sensitivity of the Balfour Formation (Adelaide Subgroup (Beaufort Group, Karoo Supergroup) is Very High (Figure 18). The suggested location is also classified as having a **Very High** Paleontology Theme Sensitivity in the DFFE (Department of Forestry, Fisheries and the Environment) Screening Report.

A site-specific field survey of the total development footprint was conducted on foot and by motor vehicle on 19 August 2025. No fossiliferous outcrop was identified during the site investigation. Combined desktop research (National Database and published data) and field observations indicate that fossils of scientific or conservation value in the area are rare, sporadic, and unpredictable. The development footprint was rated as **Very High significance pre-mitigation and Low post-mitigation**. This contrasts with the Very High Palaeontological Sensitivity assigned by SAHRIS and the DFFE Screening Report.

The construction phase will be the only development phase impacting Paleontological Heritage and **no significant impacts are expected to impact the Operational and Decommissioning phases**. The No-Go Alternative considers the option of 'do nothing' and maintaining the status quo, will have a Neutral impact on the Paleontological Heritage of the development. The Cumulative impacts of the development are considered to be medium pre- mitigation and Low post mitigation and falls within the acceptable limits for the project. It is therefore considered that the proposed development will not lead to damaging impacts on the Paleontological resources of the area. The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of Paleontological resources. It is consequently recommended that no further Paleontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

Recommendations contained within the report are as follows:

- The ECO for this project must be informed that the Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup) has a Very High Paleontological Sensitivity.
- If fossil remains are discovered during any phase of construction, either on the surface or exposed by excavations, the Chance Find Protocol must be implemented by the ECO/site manager in charge of these developments. These discoveries ought to be protected (if possible, in situ). The ECO/site manager must report to ECPHRA (Contact details: 16 Commissioner Street, East London, EC Lungiswa Mzazi - lungiswam@ecphra.org.za / (043) 492 1942 / 081 434 3544 or Ayanda Mncwabe-Mama - ayanda.mncwabe-mama@ecsrac.gov.za / (043) 492 1370) so that a palaeontologist can carry out mitigation (collection and recording).
- Before any fossil material can be collected from the development site, the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet the minimum standards for Paleontological impact studies proposed by SAHRA (2012).

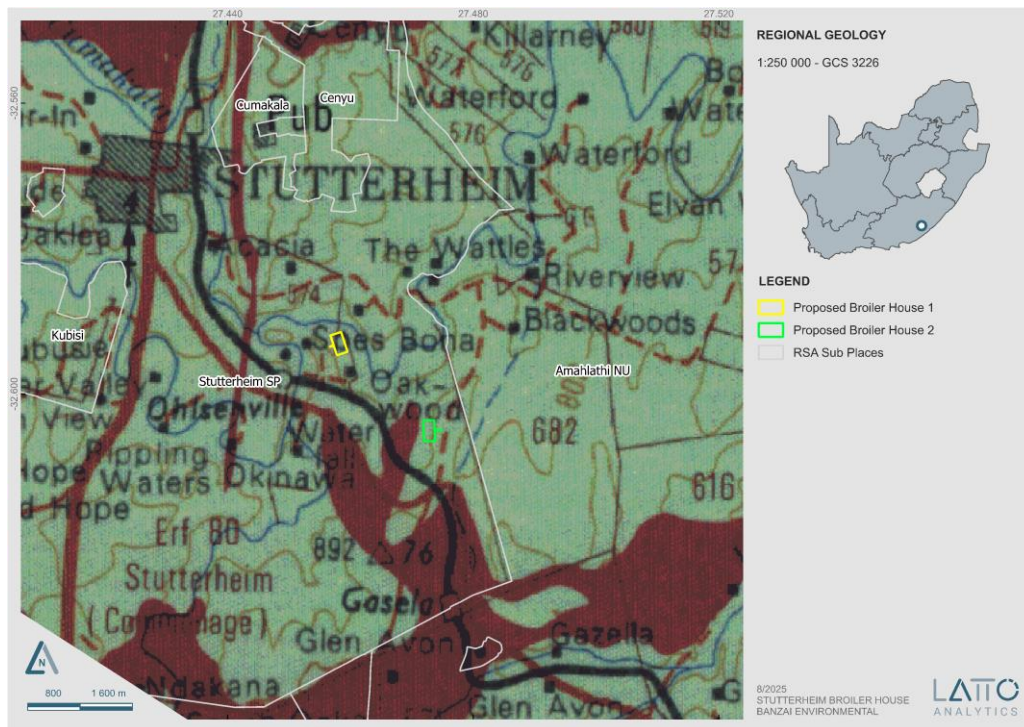


Figure 18: Extract of the 1:250 000 King William's Town 3226 (1976) Geological map (Council for Geoscience, Pretoria) indicates that the proposed development is underlain by the Balfour Formation (Pub, green) of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) (Butler, 2025).

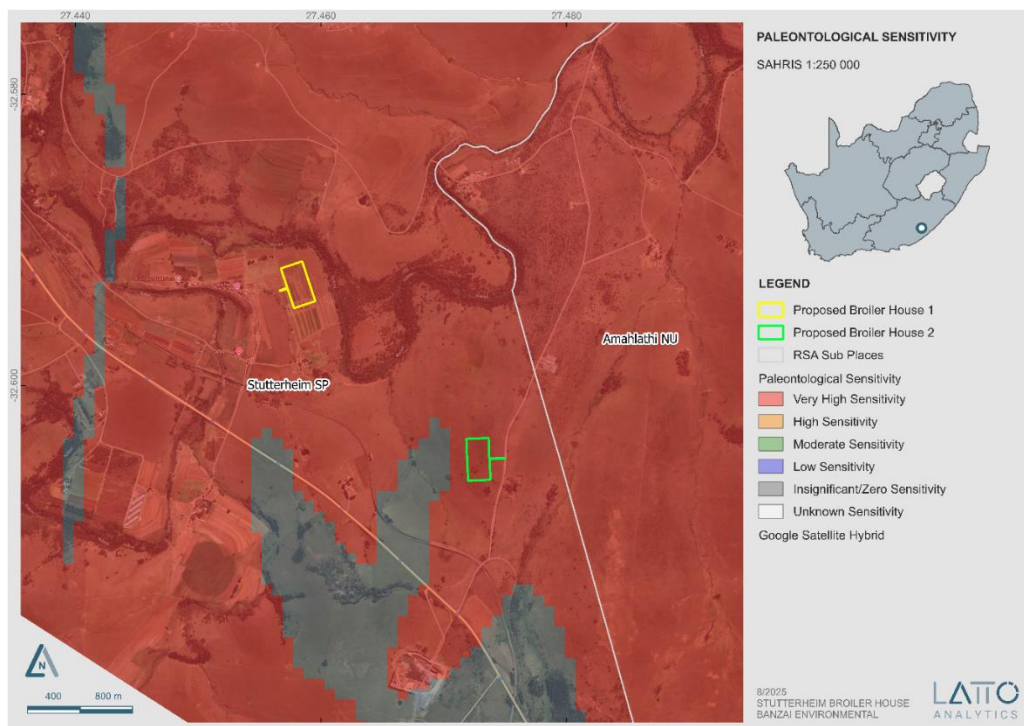


Figure 17: Extract of the SAHRIS PalaeoMap (Council for Geoscience, Pretoria) indicating the Very High (red) Palaeontological Sensitivity of the proposed study area in the Eastern Cape Province (Butler, 2025).

An additional PIA was conducted by Ryan Nel in June 2024 for the Grassdale Layer and Hatchery facility, which is approximately 5.5 km away from the proposed development area. Despite the area's **High** palaeontological sensitivity, no fossils were found during the field assessment, leading to a conclusion of **Low** palaeontological significance for the site.

#### 18.4.1. DFFE Screening Report Sensitivity Results and Verification (Palaeontology Theme)

According to the National Screening Tool's Palaeontology theme, the study site is classified as having a **Very High** sensitivity.

Given the findings and the results from Butler's (2025) PIA as well as the PIA conducted at the Grassdale layer and hatchery site approximately 5.5 km away from the proposed development area, a **Low** sensitivity rating should be allocated to the proposed development site.

### 19. LAND USE CHARACTER OF SURROUNDING AREA

Indicate land uses and/or prominent features that currently occur within a 500m radius of the site and give description of how this influences the application or may be impacted upon by the application:

#### 5.1 Natural area✓

[REDACTED]

#### 5.23 Railway line<sup>N</sup>✓

[REDACTED]

#### 5.33 Agriculture✓

#### 5.34 River, stream or wetland✓

[REDACTED]



If any of the boxes marked with an "N" are ticked, how will this impact / be impacted upon by the proposed activity.

**The railway line does not pass through the proposed development and therefore will not impact railway line traffic.**

If any of the boxes marked with an "An" are ticked, how will this impact / be impacted upon by the proposed activity.

If YES, specify and explain:

**N/A**

If YES, specify:

**N/A**

If any of the boxes marked with an "H" are ticked, how will this impact / be impacted upon by the proposed activity.

If YES, specify and explain:

**N/A**

If YES, specify:

**N/A**

## 20. CULTURAL/HISTORICAL FEATURES

Are there any signs of culturally or historically significant elements, as defined in section 2 of the National Heritage Resources Act, 1999, (Act No. 25 of 1999), including Archaeological or paleontological sites, on or close (within 20m) to the site?

YES✓	NO✓
NO✓	

If YES, explain: N/A

If uncertain, conduct a specialist investigation by a recognised specialist in the field to establish whether there is such a feature(s) present on or close to the site.

Briefly explain the findings of the specialist:

**Refer to Appendix D** for the specialist input provided by Elize Butler (Palaeontology Impact Assessment) and Celeste Booth (Archaeological and Cultural Impact Assessment).

**Paleoethology Impact Assessment Summary:**

Butler (2025) provided the following conclusion based on her desktop and site analysis of the proposed site:

- A site-specific field survey of the total development footprint was conducted on foot and by motor vehicle on 19 August 2025. No fossiliferous outcrop was identified during the site investigation.
- Combined desktop research (National Database and published data) and field observations indicate that fossils of scientific or conservation value in the area are rare, sporadic, and unpredictable.
- The development footprint was rated as Very High significance pre-mitigation and Low post-mitigation. This contrasts with the Very High Palaeontological Sensitivity assigned by SAHRIS and the DFFE Screening Report.

**Archaeological and Cultural Impact Assessment:**

Booth (2025) provided the following conclusion based on her desktop and site analysis of the proposed site.

- The overall area is considered as having a low archaeological heritage significance.
- No archaeological heritage sites, resources or features were identified during the survey for the proposed student residential development area. The area is considered as having a low archaeological heritage significance as no archaeological heritage sites were identified. There is always a possibility that human remains or other archaeological and historical material may be uncovered during the development. Such chance encounters must be reported to the Eastern Cape Provincial Heritage Resources Agency (ECPHRA) (043 492 1944) or the author of the report if exposed.
- Development may proceed as planned however the recommendations the recommendations must be considered prior to the commencement of development and be included as part of the environmental management plan for the project.

Will any building or structure older than 60 years be affected in any way?

NO✓

Is it necessary to apply for a permit in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999)?

NO✓

If yes, please submit or, make sure that the applicant or a specialist submits the necessary application to SAHRA or the relevant provincial heritage agency and attach proof thereof to this application if such application has been made.



## SECTION C: PUBLIC PARTICIPATION

### 21. ADVERTISEMENT

The person conducting a public participation process must take into account any guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of the application which is subjected to public participation by—

- (a) fixing a notice board (of a size at least 60cm by 42cm; and must display the required information in lettering and in a format as may be determined by the competent authority) at a place conspicuous to the public at the boundary or on the fence of—
  - (i) the site where the activity to which the application relates is or is to be undertaken; and
  - (ii) any alternative site mentioned in the application;
- (b) giving written notice to—
  - (i) the owner or person in control of that land if the applicant is not the owner or person in control of the land;
  - (ii) the occupiers of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;
  - (iii) owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;
  - (iv) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;
  - (v) the municipality which has jurisdiction in the area;
  - (vi) any organ of state having jurisdiction in respect of any aspect of the activity; and
  - (vii) any other party as required by the competent authority;
- (c) placing an advertisement in—
  - (i) one local newspaper; or
  - (ii) any official *Gazette* that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;
- (d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or local municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official *Gazette* referred to in subregulation 54(c)(ii); and
- (e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desiring of but unable to participate in the process due to—
  - (i) illiteracy;
  - (ii) disability; or
  - (iii) any other disadvantage.

See Appendix G.

### 22. CONTENT OF ADVERTISEMENTS AND NOTICES

A notice board, advertisement or notices must:

- (a) indicate the details of the application which is subjected to public participation; and
- (b) state—

- (i) that the application has been submitted to the competent authority in terms of these Regulations, as the case may be;
- (ii) whether basic assessment or scoping procedures are being applied to the application, in the case of an application for environmental authorisation;
- (iii) the nature and location of the activity to which the application relates;
- (iv) where further information on the application or activity can be obtained; and
- (iv) the manner in which and the person to whom representations in respect of the application may be made.

**See Appendix G.**

## **23. PLACEMENT OF ADVERTISEMENTS AND NOTICES**

Where the proposed activity may have impacts that extend beyond the municipal area where it is located, a notice must be placed in at least one provincial newspaper or national newspaper, indicating that an application will be submitted to the competent authority in terms of these regulations, the nature and location of the activity, where further information on the proposed activity can be obtained and the manner in which representations in respect of the application can be made, unless a notice has been placed in any *Gazette* that is published specifically for the purpose of providing notice to the public of applications made in terms of the EIA regulations.

Advertisements and notices must make provision for all alternatives.

**See Appendix G.**

## **24. DETERMINATION OF APPROPRIATE MEASURES**

The practitioner must ensure that the public participation is adequate and must determine whether a public meeting or any other additional measure is appropriate or not based on the particular nature of each case. Special attention should be given to the involvement of local community structures such as Ward Committees, ratepayers associations and traditional authorities where appropriate. Please note that public concerns that emerge at a later stage that should have been addressed may cause the competent authority to withdraw any authorisation it may have issued if it becomes apparent that the public participation process was inadequate.

## **25. COMMENTS AND RESPONSE REPORT**

The practitioner must record all comments and respond to each comment of the public before the application is submitted. The comments and responses must be captured in a comments and response report as prescribed in the EIA regulations and be attached to this application. The comments and response report must be attached under Appendix E.

**See Appendix E.**

## **26. AUTHORITY PARTICIPATION**

Authorities are key interested and affected parties in each application and no decision on any application will be made before the relevant local authority is provided with the opportunity to give input. The planning and the environmental sections of the local authority must be informed of the application at least 30 (thirty) calendar days before the submission of the application.

List of authorities informed:

1. Department of Economic Development, Environmental Affairs and Tourism - Amathole Region
2. Department of Water and Sanitation
3. South African Civil Aviation Authority
4. Department of Defence
5. Eastern Cape Provincial Heritage Authority

List of authorities from whom comments have been received:

1. Department of Economic Development, Environmental Affairs and Tourism - Amathole
2. Department of Water and Sanitation
3. Eastern Cape Provincial Heritage Authority

## 27. CONSULTATION WITH OTHER STAKEHOLDERS

Note that, for linear activities, or where deviation from the public participation requirements may be appropriate, the person conducting the public participation process may deviate from the requirements of that subregulation to the extent and in the manner as may be agreed to by the competent authority.

Any stakeholder that has a direct interest in the site or property, such as servitude holders and service providers, should be informed of the application at least 30 (thirty) calendar days before the submission of the application and be provided with the opportunity to comment.

Has any comment been received from stakeholders?

YES✓

If "YES", briefly describe the feedback below (also attach copies of any correspondence to and from the stakeholders to this application):

On 13 May 2025, Ms Ntombekaya Tsako from Transnet Property Management requested to be listed as an IAP following the email distribution of the BID on 8 May 2025.

## SECTION D: IMPACT ASSESSMENT

The assessment of impacts must adhere to the minimum requirements in the EIA Regulations, 2014 as amended, and should take applicable official guidelines into account. The issues raised by interested and affected parties should also be addressed in the assessment of impacts.

### 28. ISSUES RAISED BY INTERESTED AND AFFECTED PARTIES

List the main issues raised by interested and affected parties.

#### **Issues raised outside initial public participation period**

None.

#### **Issues raised during initial public participation period**

1. DEDEAT Pre-application phase:
  - Application for Environmental Authorisation will be required to obtain Environmental Authorisation for the proposed development.
2. DWS:
  - Any activity that falls within 100 of a watercourse requires water use authorisation in terms of Section 21(c) and (i) of the National Water Act.
  - The Applicant will require authorisation from DWS for any activity within a wetland or a 500m radius from the boundary of a delineated wetland
  - The river, stream and associated buffers must be treated as sensitive environment areas- caution must be exercised near the watercourses
  - Solid waste must be carefully managed as to not proliferate into the surrounding environment and watercourses
  - Sewage and wastewater management must be carefully managed as to not negatively impact the watercourses
  - Stormwater must be effectively channelled and managed
  - Erosion control must be in place
  - Hazardous chemicals must be carefully stored, and spill response measures must be in place
3. TRANSNET
  - On 13 May 2025, Ms Ntombekaya Tsako from Transnet Property Management requested to be listed as an IAP following the email distribution of the BID by Indwe on 8 May 2025.
4. ECPHRA
  - Following the distribution of the BID on 8 May 2025, ECPHRA provided an interim comment on 29 May 2025 requesting submission of the NID form, as well as a Phase 1 Heritage Impact Assessment (HIA).
  - NID form as well as the AIA Report was uploaded onto SAHRIS and submitted to ECPHRA on 28 August 2025
  - On 22 September 2025, ECPHRA acknowledged and accepted the submitted AIA (Booth, C. July 2025) but will issue a final comment once a Phase 1 PIA has been submitted, owing to the sensitivity and vastness of the proposed development footprint.



- The PIA was emailed to ECPHRA on 23 September 2025. ECPHRA is still to issue a final comment.

Response from the practitioner to the issues raised by the interested and affected parties (A full response must be given in the Comments and Response Report that must be attached to this report):

#### **Response (any) to Issue's raised during initial public participation period**

##### **1. TRANSNET**

- On 22 May 2025, Michaela Manthe (Indwe) acknowledged Ms Ntombekaya Tsako's email request to be registered as an IAP and added her to the IAP Register.

**Further responses can be seen in Appendix E and Appendix G4.**

## **29. IMPACTS THAT MAY RESULT FROM THE PLANNING AND DESIGN, CONSTRUCTION, OPERATIONAL, DECOMMISSIONING AND CLOSURE PHASES AS WELL AS PROPOSED MANAGEMENT OF IDENTIFIED IMPACTS AND PROPOSED MITIGATION MEASURES**

List the potential direct, indirect and cumulative property/activity/design/technology/operational alternative related impacts (as appropriate) that are likely to occur as a result of the planning and design phase, construction phase, operational phase, decommissioning and closure phase, including impacts relating to the choice of site/activity/technology alternatives as well as the mitigation measures that may eliminate or reduce the potential impacts listed.

#### **Alternative (preferred alternative)**

##### ***Direct impacts:***

*Due to impacts being a combination of Direct, Indirect and Cumulative Please see Table 10 below*

##### ***Indirect impacts:***

*Due to impacts being a combination of Direct, Indirect and Cumulative Please see Table 10 below*

##### ***Cumulative impacts:***

*Due to impacts being a combination of Direct, Indirect and Cumulative Please see Table 10 below*

**Table 8: List of potential impacts for the preferred alternative of the Proposed ANCA Oakwood Chicken Broiler Houses, within Amahlathi Local Municipality, Amathole District, Eastern Cape.**

<b>Alternative (preferred alternative)</b>	
<b>Potential Impacts that are likely to occur in PLANNING &amp; DESIGN PHASE</b>	
<b>Legislation and policy compliance (Direct):</b> During the Planning and Design Phase, failure to comply with existing policies and legal obligations could lead to the project conflicting with local, provincial and national policies, legislation etc. This could result in legal non-compliance, fines, overall project failure or undue disturbance to the natural environment	
<b>Potential Impacts that are likely to occur in CONSTRUCTION PHASE</b>	

<p><b>Development within the catchment (Direct):</b> Water contamination from the operation and washing of machinery in the catchments of the aquatic ecosystems. Impacts highlighted may be mitigated with the implementation of the mitigation measures provided by the Aquatic Specialist.</p>
<p><b>Development within the catchment (Direct):</b> Siltation in the aquatic ecosystems due to vegetation clearing and extensive earthworks that will be undertaken in the catchments of the aquatic ecosystems. These impacts may be avoided/mitigated by implementing appropriate stormwater management systems as well as the mitigation measures provided by the Aquatic Specialist.</p>
<p><b>Development within the catchment (Direct):</b> Spread of invasive alien plants into the aquatic ecosystems as a result of the disturbance during construction. The impacts highlighted may be mitigated with the implementation of the mitigation measures provided by the Aquatic Specialist.</p>
<p><b>Excavation and disturbance within an aquatic ecosystem (Direct):</b> Direct loss of wetland habitat due to excavation and installation of water reticulation pipelines. The impacts highlighted may be mitigated with the implementation of the mitigation measures provided by the Aquatic Specialist.</p>
<p><b>Archaeological and Cultural Heritage (Direct):</b> In the unlikely event that archaeological and cultural remains occur during the construction phase, they are likely to be damaged during excavation and their heritage value lost in the process. This impact may be mitigated with the implementation of the mitigation measures provided by the Archaeological and Cultural Heritage Specialist.</p>
<p><b>Palaeontology (Direct):</b> In the unlikely event that fossils and other palaeontological remains occur during the construction phase, they are likely to be damaged during excavation and their heritage value lost in the process. This impact may be mitigated with the implementation of the mitigation measures provided by the Palaeontological Specialist.</p>
<p><b>Employment Opportunities (Direct):</b> The proposed project will create temporary employment during the construction phase.</p>
<p><b>Climate Change: Contribution to Greenhouse Gasses (Direct):</b> During the construction phase, the increase in construction vehicle traffic and the use of diesel/petrol operated construction equipment will increase the GHG emissions generated as a result of construction activities (e.g. carbon dioxide, carbon monoxide, etc.). These GHGs will cumulatively contribute to the global GHG emission sources. Proper maintenance of vehicles and reducing the number of unnecessary trips that construction vehicles take will aid in mitigating this impact.</p>
<p><b>Solid waste generation (Direct):</b> Solid waste generation during construction activities i.e. builders rubble, cement, etc. and general plastic waste may proliferate into the terrestrial and aquatic environments on site. Providing proper waste disposal facilities that are emptied regularly and taken to a registered landfill is a way to mitigate this impact.</p>
<p><b>Permanent or temporary loss of indigenous vegetation cover (Direct):</b> Permanent or temporary loss of indigenous vegetation cover because of site clearing. Site clearing before construction will result in the blanket clearing of vegetation within the affected footprint. This impact may be mitigated by not clearing surrounding intact vegetation unnecessarily during the construction process.</p>
<p><b>Loss of flora species of conservation concern (Direct):</b> Loss of Flora Species of Conservation Concern during pre-construction site clearing activities. Species of special concern are potentially present within the affected area, which could be destroyed during site preparation. This impact may be mitigated by commencing a flora search and rescue before construction, however no protected species were noted on site.</p>
<p><b>Susceptibility of areas to erosion (Direct):</b> Susceptibility of some areas to erosion because of construction related disturbances. Removal of vegetation cover and soil disturbance may result in some areas being susceptible to soil erosion. Impacts highlighted may be mitigated with the implementation of the mitigation measures provided by the Terrestrial Biodiversity Specialist.</p>
<p><b>Aquatic and riparian processes (Direct):</b> Diversion and increased velocity of surface water flows – Changes to the hydrological regime and increased potential for erosion. Impact of changes to water quality. Loss of riparian vegetation / aquatic habitat. Loss of species of special concern. Impacts highlighted may be mitigated with the implementation of the mitigation measures provided by the Aquatic Specialist.</p>
<p><b>Loss of Faunal Habitat &amp; Species of Conservation Concern (Direct):</b> Activity will result in the loss of habitat for faunal species as well as potential direct loss of faunal species. Impacts highlighted may</p>

be mitigated with the implementation of the mitigation measures provided by the Terrestrial Biodiversity Specialist.

#### Potential Impacts that are likely to occur in OPERATIONAL PHASE

**Development within the catchment (Direct):** Increased flood peaks, runoff velocity and water quantity due to the increase in hardened surfaces in the catchments, thereby causing increased water inputs (flow modification). However, with the implementation of the mitigation measures provided by the Aquatic Specialist, these impacts may be significantly reduced.

**Development within the catchment (Direct):** Increased flood peaks, runoff velocity and water quantity due to the increase in hardened surfaces in the catchments, thereby causing increased water inputs (erosional and sediment flux modification). However, with the implementation of the mitigation measures provided by the Aquatic Specialist, these impacts may be significantly reduced.

**Development within the catchment (Direct):** Polluted stormwater generated from the development site (water quality modification). The impacts highlighted may be mitigated with the implementation of the mitigation measures provided by the Aquatic Specialist.

**Development within the catchment (Direct):** Operation of septic tanks in the catchment (water quality modification). The impacts highlighted may be mitigated with the implementation of the mitigation measures provided by the Aquatic Specialist.

**Operation of water reticulation pipeline in aquatic ecosystems and their catchments (Direct):** Increased hydrological inputs into aquatic ecosystems from a leaking water main (flow modification). The impacts highlighted may be mitigated with the implementation of the mitigation measures provided by the Aquatic Specialist.

**Susceptibility of post construction disturbed areas to invasion by exotic and alien invasive species (Direct):** Susceptibility of post construction disturbed areas to invasion by exotic and alien invasive species and removal of exotic and alien invasive species during construction. Post construction disturbed areas having no vegetation cover are often susceptible to invasion by weedy and alien species, which can not only become invasive but also prevent natural flora from becoming established. A suitable weed and alien invasive management strategy can be implemented after completion of construction in areas that may have been disturbed in order to mitigate this impact.

**Employment Opportunities (Direct):** The proposed project will create permanent employment for skilled and unskilled workers during the operational phase.

**Increase in food security (Direct):** Operations of the chicken broiler houses will contribute towards local and regional food security.

**Solid waste generation (Direct):** Operation of the chicken broiler houses will produce solid waste in the form of chicken manure. A way to mitigate this impact would be to hire a private contractor to remove the chicken manure on a regular basis, and to take it to a registered composting facility for safe disposal.

**Climate Change: Contribution to Greenhouse Gasses (Direct and Indirect):** Operation of the chicken broiler houses will produce solid waste in the form of chicken manure, which will contribute towards GHG emissions. Additionally, heating, lighting and ventilation of the houses which will come from fossil fuels, will also increase GHG emissions. Mitigations as contained in Appendix G7 can be applied to reduce this impact.

#### Potential Impacts that are likely to occur in DECOMMISSIONING AND CLOSURE PHASE

No discernible impacts are envisaged as it is unlikely that any aspect of the project will be decommissioned or closed now.

**Table 9: List of potential impacts for the least preferred alternative of the Proposed ANCA Oakwood Chicken Broiler Houses, within Amahlathi Local Municipality, Amathole District, Eastern Cape.**

**No-Go Alternative (least preferred alternative)**

Potential Impacts that are likely to occur <b>SHOULD THERE BE NO DEVELOPMENT</b>
<b>Loss of increased food security (Direct):</b> The no-go alternative would result in loss of increased food security locally and regionally if the proposed chicken broiler houses are not constructed.
<b>Loss of employment opportunities (Direct and Indirect):</b> The no-go alternative will result in the loss of employment opportunities during the construction and operational phase of the project.

### 30. CLIMATE CHANGE ASSESSMENT

Climate change issues must be considered as part of the EIA process. EAP must determine:

- a) The potential impact of climate change on society and the economy, whether the impact is negative or positive, considering that society needs to be at the centre of the proposed development;

**The proposed chicken broiler houses will contribute towards climate change in both the construction and operational phases. In the construction phase, vehicles and machinery will emit greenhouse gases (GHGs). During the operational phase, a by-product from the production process is chicken manure, which will contribute towards GHGs as well as the energy used for heating, lighting and ventilation of the houses, which will come from fossil fuels. However, broiler production has a distinctly smaller footprint compared to other livestock farming, therefore its impact towards climate change can be viewed as much smaller compared to other farming practices. The proposed chicken broiler houses will contribute negatively towards climate change.**

**See Appendix G7 for climate change impacts.**

- b) The potential alternatives of the proposed development, alternatives that will have less impact on climate change (environment and generation of waste included), the society and economy;

**The no-go alternative is the only alternative that has been considered. This alternative would be not constructing and operating the proposed chicken broiler houses. The impact on climate change would be slightly less as there would be no GHGs emitted by construction and operational phases.**

- c) whether, and to what extent, the proposed development will result in the release of greenhouse gas (GHG) emissions;

**During the construction phase, the increase in construction vehicle traffic and the use of diesel/petrol operated construction equipment will increase the GHG emissions generated as a result of construction activities (e.g. carbon dioxide, carbon monoxide, etc.). These GHGs will cumulatively contribute to the global GHG emission sources. GHG emissions will also be produced during the operational phase of the project, due to the energy required for heating, lighting and ventilation of the houses, which will come from fossil fuels.**

- d) whether the proposed development is necessary to achieve long term decarbonisation goals;

**This project will not contribute to achieving long term decarbonisation goals.**

- e) the impact of the development on social, economic, natural and built environment that are crucial for climate change, adaptation and resilience;

The development will have a positive impact on the social environment, as it will provide employment opportunities and increase the economic value of the area. The development will not have any direct impact on the environment's resilience to climate change.

- f) the projected impact of climate change on proposed development; and surrounding environment, and implications for the development.

It is not anticipated that climate change will have any direct impacts on the development, however, if natural disasters, such as severe flooding, become more frequent the Kubusi River may flood and potentially damage the infrastructure if the stormwater system is not equipped to handle flooding. Changes in weather patterns may impact poultry production negatively through heat stress from higher temperatures experienced.

- g) Explanation of how the impacts is likely to be exacerbated or minimised as result of climate change and what measures are likely to be implemented to accommodate and manage (adapt to) the anticipated worst scenario where applicable

**Stormwater control measures can be implemented to ensure that any seasonal floods may be controlled and damage to the infrastructure can be avoided.**

- h) whether, and to what extent, the impacts identified in (a) –(g) can be mitigated.

**Stormwater control measures can be implemented to ensure that any seasonal floods may be controlled and damage to the infrastructure can be avoided. Installation of green energy sources to generate electricity instead of feeding into the municipal system may assist in reducing GHG emissions.**

## 31. ENVIRONMENTAL IMPACT STATEMENT

Taking the assessment of potential impacts into account, please provide an environmental impact statement that summarises the impact that the proposed activity and its alternatives may have on the environment after the management and mitigation of impacts have been taken into account, with specific reference to types of impact, duration of impacts, likelihood of potential impacts actually occurring and the significance of impacts.

### Alternative A (Preferred Alternative)

**Table 10: Pre and Post Impact Significance**

	IMPACT SIGNIFICANCE											
	PRE-MITIGATION						POST MITIGATION					
	INSIGNIFICANT	VERY LOW	LOW	MEDIUM	HIGH	V. HIGH	INSIGNIFICANT	VERY LOW	LOW	MEDIUM	HIGH	V. HIGH
Planning & Design Phase	-	-	-	-	1 (-ve)	-	-	-	1 (-ve)	-	-	-
Construction Phase	-	2 (-ve)	6 (-ve)	4 (-ve) 1 (+ve)	1 (-ve)	-	-	8 (-ve)	4 (-ve)	1 (-ve)	-	-
Operational Phase	-	-	2 (-ve)	5 (-ve) 1 (+ve)	1 (-ve) 1 (+ve)	-	-	2 (-ve)	5 (-ve)	1 (-ve)	-	-
Decommissioning Phase	-	-	-	-	-	-	-	-	-	-	-	-
<b>TOTAL</b>	-	2 (-ve)	8 (-ve)	9 (-ve) 2 (+ve)	3 (-ve) 1 (+ve)	-	-	10 (-ve)	10 (-ve)	2 (-ve)	-	-



### **High Significant Impacts**

During the planning and design phase, failure of legislation and policy compliance was identified as a high negative impact of significance. This was because of the potential failure to comply with existing policies and legal obligations which could lead to the project conflicting with local, provincial and national policies, legislation etc. This could result in legal non-compliance, fines, overall project failure or undue disturbance to the natural environment.

During the construction phase, the spread of invasive alien plants into the aquatic ecosystems as a result of the disturbance was identified as a high negative impact of significance.

During the operational phase, polluted stormwater generated from the development site (water quality modification) - development within the catchment, was identified as a high negative impact of significance.

Increased food security was identified as a positive impact of high significance during the operational phase.

### **Medium Significant Impacts**

During the construction phase of the project, water contamination from the operation and washing of machinery in the catchments of the aquatic ecosystems, was identified as a negative impact of medium significance.

Siltation in the aquatic systems due to vegetation clearing and extensive earthworks that will be undertaken in the catchments of the aquatic ecosystems was a negative impact of medium significance.

A negative impact of medium significance recognised was the direct loss of wetland habitat due to excavation and installation of water reticulation pipelines.

A positive impact of medium significance noted was the increase in employment opportunities in both construction and operational phases.

During the construction phase, the increase in construction vehicle traffic and the use of diesel/petrol operated construction equipment will increase the GHG emissions generated as a result of construction activities (e.g. carbon dioxide, carbon monoxide, etc.). These GHGs will cumulatively contribute to the global GHG emission sources. This impact was noted as a negative impact of medium significance.

During the operational phase, operation of the chicken broiler houses will produce solid waste in the form of chicken manure, which will contribute towards GHG emissions. Additionally, heating, lighting and ventilation of the houses which will come from fossil fuels, will also increase GHG emissions. Therefore, this impact was identified to be that of negative, medium significance.

During the operational phase, an increase in flood peaks, runoff velocity and water quantity due to the increase in hardened surfaces in the catchments, thereby causing increased water inputs (flow modification and erosional and sediment influx modification) was identified as a negative impact of medium significance.

Additionally, polluted stormwater generated from the development site and operation of septic tanks in the catchment (water quality modification) during the operational phase was a negative, medium significance impact.

Increased hydrological inputs into aquatic ecosystems from a leaking water main (flow modification) during the operational phase was also noted as a negative impact of medium significance.

### **Low Significant Impacts**

Solid waste generation during the construction phase i.e. builder's rubble, cement, etc. and general plastic waste may proliferate into the terrestrial and aquatic environments on site. Additionally, during the operational phase, the operation of

the chicken broiler houses will produce solid waste in the form of chicken manure. These negative impacts were identified as being low significance.

During the construction phase, permanent or temporary loss of indigenous vegetation cover and loss of flora species of conservation concern were noted as negative impacts of low significance.

The susceptibility of certain areas to erosion due to construction related disturbances was identified as a negative impact of low significance.

Changes to aquatic and riparian processes and loss of faunal habitat and species of conservation concern during the construction phase were also identified as negative impacts of low significance.

During the operational phase, susceptibility of post construction disturbed areas to invasion by exotic and alien invasive species was noted as a negative impact of low significance.

### Very Low Significant Impacts

The remaining impacts of very low impact significant prior to mitigation remain at very low.

### No-go alternative (compulsory)

**Table 11: Impact Significance of Least Preferred (No-go) Alternative**

	IMPACT SIGNIFICANCE									
	PRE-MITIGATION					POST MITIGATION				
	INSIGNIFICANT	VERY LOW	LOW	MEDIUM	HIGH	INSIGNIFICANT	VERY LOW	LOW	MEDIUM	HIGH
No-Go Alternative	-	-	-		2 (-ve)	-	-	-		2 (-ve)
TOTAL	-	-	-	-	2 (-ve)	-	-	-		2 (-ve)

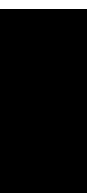
### High Significant Impacts

An impact of high, negative significance was identified for the no-go alternative, in terms of loss of increased food security locally and regionally if the proposed chicken broiler houses are not constructed.

Additionally, another a negative impact of high significance was noted, which relates to the loss of employment and skills development within the local area. Because this project would require employment from unskilled to skilled workers, it has the potential to provide employment to community members, however if this alternative is opted for, the employment opportunities would be lost.

## SECTION E. RECOMMENDATIONS OF PRACTITIONER

Is the information contained in this report and the documentation attached hereto sufficient to make a decision in respect of the activity applied for (in the view of the environmental assessment practitioner)?

YES✓	
YES✓	

Is an EMPr attached?

The EMPr must be attached as Appendix F.

If “NO”, indicate the aspects that should be assessed further as part of a Scoping and EIA process before a decision can be made (list the aspects that require further assessment):

N/A

If “YES”, please list any recommended conditions, including mitigation measures that should be considered for inclusion in any authorisation that may be granted by the competent authority in respect of the application:

Based on the information provided it is the opinion of Indwe Environmental Consulting that no significant fatal flaws have been identified for the Proposed Construction of Oakwood Chicken Broiler Houses for the Production of Poultry within Amahlathi Local Municipality, Amathole District, Eastern Cape and that the information contained within this report is sufficient to allow DEDEAT to make an informed decision.

Indwe Environmental Consulting therefore recommends that Environmental Authorisation be granted for the proposed project based on the following recommendations.

- Strict adherence to the relevant mitigation measures described above and in Appendix G7 and compliance with the attached EMPr (Appendix F) is adhered to throughout all phases of the proposed project to reduce the risk or significance of impacts to an acceptable level after mitigation measures are adhered to.
- The validity period of the environmental authorisation should be for two years in which time construction should commence.
- All necessary authorisations in the form of an EA, GA/WUL and/or other must be obtained prior to construction should they be required.
- All species requiring PNCO permits are to be obtained before construction commences.
- An ECO should be appointed for the duration of the construction period to monitor the compliance with conditions of the authorisation/permits.
- The ECO needs to conduct a pre-commencement survey for PNCO species, if necessary, that will need search and rescue after the relevant permits have been achieved.
- Stormwater should be managed using suitable structures. Silt and sedimentation should be kept to a minimum, using the above-mentioned structures by also ensuring that all structures do not create any form of erosion.
- A Chance Find Protocol must be implemented if any items of archaeological and cultural heritage or paleontological remains are discovered.
- Vegetation clearing should occur in parallel with the construction progress to minimise erosion and/or run-off. Large tracts of bare soil will either cause dust pollution or quickly erode and then cause sedimentation in the lower portions of the catchment.
- No clearing outside of the project footprint is to take place.
- In the event where erosion and sedimentation or pollution of the water resource occurs and where environmental damage is caused, the holder of the environmental authorisation must take responsibility to recover and rehabilitate the damaged ecosystems expediently.
- The construction activities must be restricted to the approved actual footprint. All material arising from the development must be prohibited from entering the aquatic habitats and associated buffer zones provided by the Aquatic Specialist.
- All construction materials including fuels and oil should be stored in demarcated areas that are contained within berms / bunds to avoid spread of any contamination into the stream adjacent to the site. Washing and cleaning of equipment should also be done in berms or bunds, to trap any cement and prevent excessive soil erosion.
- The construction of the proposed infrastructure should occur during the dry season in the months of May, June, July, August and September when rainfall is minimal to non-existent.
- All alien invasive vegetation must be removed from the site and an alien invasive management plan developed.

## SECTION F: APPENDICES

The following appendixes must be attached as appropriate:

Appendix A: Site plan(s)

Appendix B: Photographs

Appendix C: Facility illustration(s)

Appendix D: Specialist reports

Appendix E: Comments and responses report

Appendix F: Environmental Management Programme (EMPr)

Appendix G: Other information