

15 March 2019

Dear Interested and Affected Party

GNEC Ref Code: 20486

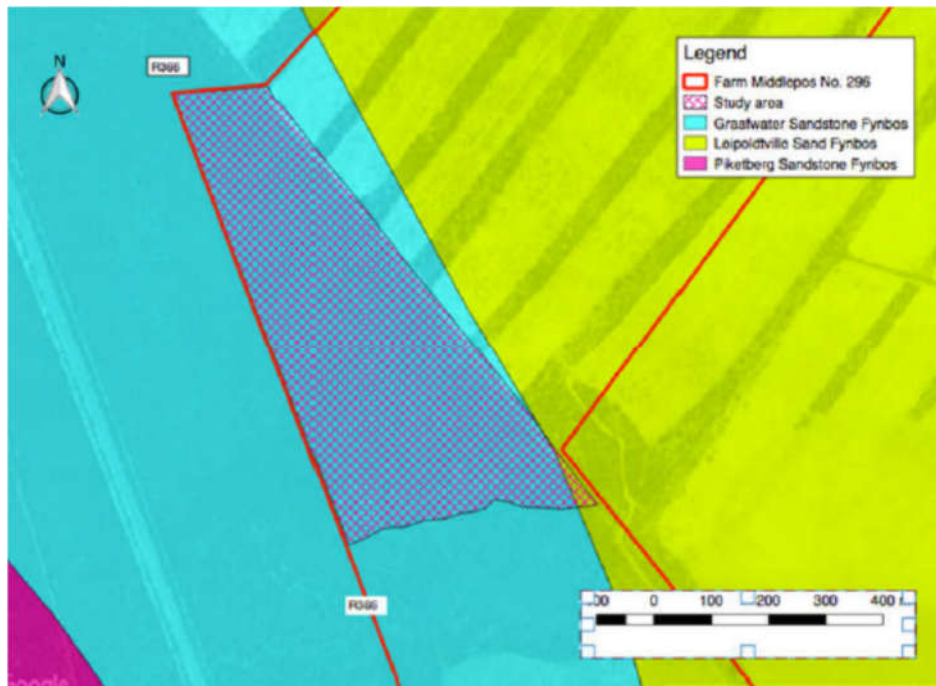
DEA&DP Ref Code: 14/1/1/E1/9/10/3/0410/17

AVAILABILITY OF THE DRAFT SECTION 24 (G) REPORT FOR THE UNLAWFUL CLEARANCE OF VEGETATION ON FARM 296 MIDDELPOS, NEAR PIKETBERG, WESTERN CAPE.

Guillaume Nel Environmental Consultants (GNEC) has been appointed by Paardekop Boerdery (Pty) Ltd to facilitate the Environmental Impact Assessment (EIA) process for the rectification of the unlawful clearance of approximately 24Ha of indigenous vegetation on Farm 296, Middelpoos near Piketberg in Western Cape Province.

A Specialist Botanical Impact Assessment has been conducted in order to further inform the Draft S24G Report. The findings of the site survey are that 24 ha of natural vegetation were cleared. Clearing by definition implies that the vegetation was uprooted and completely removed as opposed to brushcutting. In addition, the cleared area has been ploughed and cultivated initially with wheat and at present with rooibos tea.

Sampling of the intact natural vegetation to the east, south and west of the study area shows that the intact vegetation would have comprised transitional vegetation between Graafwater Sandstone Fynbos and Leipoldtville Sand Fynbos, with the latter vegetation type probably being more of a dominant unit considering the species complement. The intact and recently burnt heuwetjieveld on the south side of the drainage line is more akin to the true Graafwater Sandstone Fynbos whereas the cleared vegetation was probably more akin to Leipoldtville Sandstone Fynbos. The dominant species observed in the adjacent and intact vegetation (Figure 13) include *Leucadendron pubescens*, *Leucospermum rodolentum* (VULNERABLE), *Ehrharta calycina*, *Diospyros glabra*, *Dodonaea viscosa*, *Muraltia spinosa*, *Serruria cf. fucifolia* (ENDANGERED), *Montinia caryophyllacea*, *Passerina corymbosa*, *Phylla oleifolia* and *Willdenowia incurvata*. The cleared vegetation was probably senescent when it was cleared, judging from the 13 to 15 year-old age estimation of the unaffected vegetation. Bulbs and forbs would have also featured prominently but were probably suppressed by the dominant, partially senescent shrubs.



The 2017 *Western Cape Biodiversity Spatial Plan* (CapeNature, 2017) classifies the study area as ESA1 (Ecological Support Area 1), with the drainage line at the southern side of the study area assigned as ESA2 (Ecological Support Area 2). This should be understood within the conservation planning categories described in *The 2017 WCBSP Handbook* (Pool-Stanvliet *et al.*, 2017). Critical Biodiversity Areas (CBAs) are habitats with high biodiversity and ecological value. These include areas that are likely to be in a natural condition (CBA1) and those that are potentially degraded or represent secondary vegetation (CBA2) whereas Ecological Support Areas (ESAs) are essential for meeting biodiversity targets. They play an important role in supporting the functioning of Protected Areas or CBAs and are often vital for delivering ecosystem services. A distinction is made between ESAs that are still likely to be functional (i.e. in a natural, near-natural or moderately degraded condition; (ESA1) and Ecological Support Areas that are severely degraded, or have no natural cover remaining, and therefore require restoration (ESA2). In this instance, the ESA1 designated is confirmed to be a suitable category.

A drainage line is present on the southern boundary of the cleared area. This vegetation within this drainage line was also burnt although it was not cleared subsequently. The vegetation within and immediately surrounding this drainage line has re-established.

The DEA&DP Environmental Law Enforcement Directorate conducted a site inspection on the 9th of May 2017 and subsequently issued a Compliance Notice to the applicant Paardekop Boerdery (Pty) Ltd on the 17th of November 2017. GNEC have subsequently informed the Department of our appointment on the 6th of March 2018. All clearance activities have been completed prior to the site visit from the Department.

Environmental Assessment

The National Environmental Management Act (NEMA) (Act No. 107 of 1998) identifies the clearance of indigenous vegetation as an activity that may have had detrimental effects on the environment.

An Application for retrospective Environmental Authorization (EA) is currently being undertaken in order to authorize the following "Listed Activities" in terms of the National Environmental Management Act, 1998 ("NEMA") (Act No. 107 of 1998).

Government Notice No. R. 983 of 04 December 2014, as amended –

- Listing Notice 1 – Activity No: 27
- Listing Notice 2 – Activity No: 15

GNEC was appointed as an independent environmental consultancy by **Paardekop Boerdery (Pty) Ltd** to facilitate the environmental impact assessment and public participation process for the proposed project. A copy of the **Draft Section 24(G) Report** is made available at the Piketberg Public Library from **Friday the 15th of March until Tuesday the 16th of April 2019**. Alternatively a copy of the report is also available on the GNEC website at www.gnec.co.za. To register as an Interested and Affected Party, please complete and return the enclosed registration sheet and submit any written comments to:

GNEC

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Comment must be submitted by no later than Tuesday the 16th of April 2019.

Yours sincerely



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