



NICK HELME BOTANICAL SURVEYS

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Pri.Sci.Nat # 400045/08

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Lornay Environmental
Hermanus
ATT: Michelle Naylor

Dear Michelle

Updated Addendum to Botanical Assessment: Romansbaai Abalone IA, Alternative 4

This addendum serves to update my Botanical Impact Assessment for this project proposal, which was dated 28 Nov 2024. The update was requested due to the inclusion of a new preferred development layout (Alternative 4, updated map shown in Figure 1), which now has a notably smaller overall development footprint (6.9ha), versus the 9.6ha proposed for Alternatives 1 & 2 (applicant's previous preferred layout).

Notable changes to the proposed layout are:

- 1) production areas (in Low and Medium sensitivity areas) have been reduced from 3.5ha to 2.0ha
- 2) seawater reservoir (in High sensitivity area) reduced from 2.0ha to 0.8ha

Table 1 is the Impact Assessment table for the new Alternative 4 construction phase. The only changes from Alternative 1 & 2 are that the latest layout reduces the botanical significance for the Phase 2 production (grow out) area from Medium negative to Low to Medium negative, and that the seawater reservoir area drops in significance from Medium to High negative to Medium negative.

The milkwood "forest" area will not be impacted by the proposed development footprint.

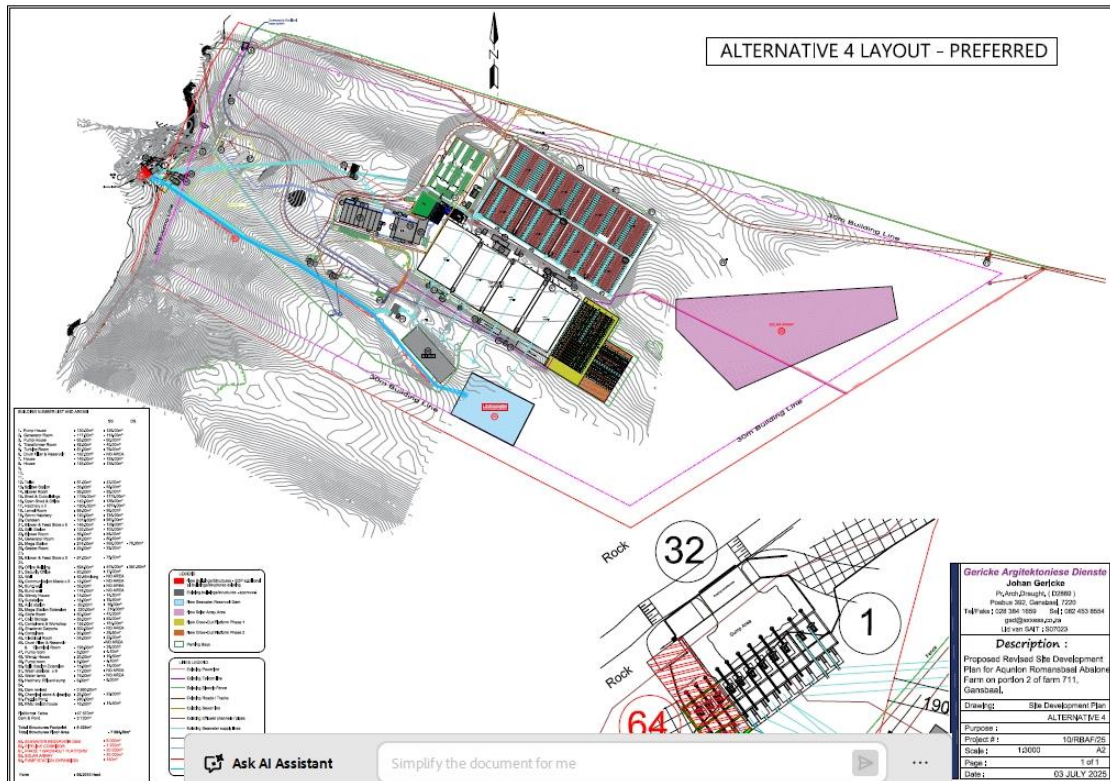


Figure 1: Copy of Alternative 4 layout.

<u>Development Area</u>	<u>Extent of impact</u>	<u>Duration of impact</u>	<u>Intensity</u>	<u>Probability of impact</u>	<u>Irreplaceable loss of biodiversity</u>	<u>Significance before mitigation</u>	<u>Significance after mitigation</u>
PV area	Local	Long term	Medium	Definite	Low to Medium	Low to Medium -ve	Low to Medium -ve
Phase 1 Area	Local & regional	Permanent	High	Definite	Low	Low -ve	Low -ve
Phase 2 Area	Local & regional	Permanent	High	Definite	Low to Medium	Low to Medium -ve	Low to Medium -ve
Dam area	Local & regional	Permanent	High	Definite	Medium	Medium -ve	Medium -ve
Pipeline	Local	Temporary	Low	Definite	Low	Low -ve	Low -ve
Pumphouse expansion	Local	Permanent	Very Low	Definite	Very Low	Very Low -ve	Very Low -ve
No Go	Local	Unknown and variable	Neutral to low negative	Unknown	Low	Neutral to Low negative	Neutral to Low negative

Table 1: Summary table for construction phase botanical impacts associated with the proposed development in each of the study areas, for Alternative 4. The primary construction phase impacts would be permanent loss of High sensitivity

vegetation (gazetted as an Endangered vegetation type), along with associated loss of the footprint subpopulations of the five recorded plant Species of Conservation Concern. Additional impacts include loss of areas mapped as CBA1 (PV site only) and ONA.

The overall reduced botanical impact (Low to Medium negative, with the seawater reservoir being Medium negative) reduces the quantum of the possible biodiversity offset that may be required. The following section is adapted and updated from my November 2024 report:

- This level of post mitigation botanical impact does potentially trigger a biodiversity offset requirement (Department of Forestry, Fisheries & the Environment. 2023), notably for the Phase 2 grow out area (Low to Medium negative impact) and the dam area (Medium negative impact) – a total footprint area of about 1.5ha (for Alternative 4). However, given that the vegetation type is relatively well conserved (100% of national target already set aside) – at least on paper – no further land additions to the conservation of Overberg Dune Strandveld are advised, especially given CapeNature's management constraints. Given that even the formally conserved areas of this vegetation type are under severe threat from alien invasive vegetation, such as in the nearby Walker Bay Nature Reserve (CapeNature). Thus it is suggested that any biodiversity offset be in the form of funding for alien invasive plant management in these already declared but poorly managed conservation areas. A biodiversity offset specialist should calculate the appropriate quantum of the contribution, and this should ideally be enough to fund alien clearing operations in at least a 15ha area (Alt 4) in perpetuity (based on approx. 1.5ha footprint of Medium and High significance, at an offset ratio of 10:1 for Endangered habitats, as per offset guidelines, Department of Forestry, Fisheries & the Environment 2023).

Yours sincerely



Nick Helme